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Australian Pet Welfare Foundation Submission **Draft Threat Abatement Plan for Predation by Feral Cats 2023-2028**

This document serves as a summary of the key points and should be read in conjunction with the Australian Pet Welfare Foundation's (APWF) response to the Department of Climate Change, Energy, the Environment and Water's (DCEEW) consultation survey.

About us

The APWF is a research and advocacy not-for-profit organisation focused on investigating effective and humane strategies aligned with a One Welfare approach to manage urban dogs and cats. Adopting a One Welfare mindset means balancing and optimising the well-being of animals, people and their environment. You can read more about us and our vision on our website: <https://petwelfare.org.au/>.

Our views

We recognise that the Threat Abatement Plan for Predation by Feral Cats (TAP) is crucial in safeguarding Australia's endangered native species and wildlife. As an organisation deeply invested in the welfare of pets throughout Australia, we also share a deep appreciation for the diverse and precious native wildlife within Australia. While we acknowledge the pivotal role of government in safeguarding our native wildlife, we hold several significant concerns about the current approach taken in the draft TAP.

We are committed to promoting humane and effective cat management and responsible cat-caring behaviours. We believe it is crucial to recognise that feral cats are just one of many factors that contribute to native species endangerment and emphasise the need for a balanced, holistic and humane approach to their management if native species whose long-term viability is threatened by cat predation.

Urban cat management in Australia over the last 40 years has been based on trapping cats that are a source of complaints and killing those that are not reclaimed or adopted. Recent research documents that, despite killing approximately 33% of cats and kittens entering shelters and pounds annually, the number of impounded cats received by local governments is not decreasing (Chua 2023, The ICE, 2022). This method of urban cat management has not only proven ineffective, but it exposes many veterinarians and other support staff to serious mental health outcomes associated with killing large numbers of predominantly healthy and treatable cats and kittens.

We would welcome the opportunity to meet with DCCEEW to further discuss our views and assist in the further development of a well-considered and evidence-based TAP.

1. Cat Definitions

The current recommendation for classification of cats as either Feral or Pet lacks depth and practicality and disregards nationally and internationally recognised distinctions between feral and domestic cats, including semi-owned and unowned (often called stray cats). Cats should be categorised based on how and where they live, and it is recommended that two groups of cats be recognised as Feral and Domestic, as recommended in the RSPCA's Best Practice Domestic Cat Management (2018). It is imperative that these definitions be revised in the TAP to ensure effective policy responses and management approaches which can be delivered efficiently.

We note that, under the *Environment Protection and Biodiversity Conservation Act 1999*, a threat abatement plan must be addressed towards the relevant key threatening process, in this case, predation by **feral cats**. Appropriate and evidence-based definitions of cats is foundational to ensure the TAP is focussed appropriately.

Recommendation 1: The TAP definitions should be updated to align with the following definitions, which are based in evidence-based research:

- **Domestic cats** have some dependence on people (direct or indirect) and live in the vicinity of where people live or frequent, which includes around farm buildings and mining sites, and are subcategorised as owned, semi-owned and unowned. Domestic cats may be:
 - **owned**, live in a domestic household, are usually named, have a form of identification and depend on humans for their food.
 - **semi-owned**, are directly dependent on humans and are intentionally fed by people who do not consider they own them. These cats are more abundant in disadvantaged areas and where food resources are available. They are sometimes called stray cats. Recent research documented strong emotional bonds of semi-owners with the cats they care for, and almost identical to the bonds reported by cat owners with their pet cats (Scotney 2023, Neal 2023, Ma 2023, Crawford 2023).
 - **unowned**, are indirectly dependent on humans and receive food from people unintentionally, such as via food waste bins. They are more abundant in areas where food resources are available. These cats are of varying sociability and are sometimes called stray cats.
- **Feral cats** have no relationship with or dependence on humans (neither direct nor indirect), survive by hunting or scavenging for food, and live and reproduce in the wild (e.g., forests, woodlands, grasslands, deserts). Feral cats do not live in the vicinity of where people live, and they do not receive food from humans intentionally (direct feeding) or unintentionally (e.g. via food waste bins). Feral cats are not found or trapped in the vicinity of where people live or frequent and are not the subject of nuisance complaints relating to behaviour around humans.

Importantly, behaviour towards humans is an invalid test of whether a cat is feral or domestic. Sociability and adoptability cannot be judged in a highly stressful environment, such as in a trap cage, and frightened pet cats may display more aggressive behaviours towards humans than truly feral cats (Slater 2013, Jacobsen 2022). A minimum of 3 to 5 days, and up to 14 days or longer, are required for many pet cats to habituate to a new environment and for accurate assessment of sociability.

Recommendation 2: Consistent with the scope of the TAP being required to be aimed at predation by **feral cats**, we recommend removal of references to 'human-associated' and 'urban' feral cats and that the TAP be confined to actions that specifically focus on feral cats, defined as above with reference to evidence-based research.

2. Management of domestic cats

Our concern lies in the ramifications of mislabelling of semi-owned and unowned domestic cats as feral cats, subjecting them to being declared a pest in relevant jurisdictions, and restricting their management to lethal methods because they cannot legally be rehomed.

The National Domestic Cat Working Group (NDCWG) focuses on balanced management solutions that consider the needs of wildlife, cat, and human populations throughout Australia. Involvement of the NDCWG is crucial for holistic and humane domestic cat management based on a One Welfare approach that aims to optimise the well-being of animals, people and the environment.

Recommendation 3: The Feral Cat TAP focuses solely on feral cats, defined as cats with no dependence on people (direct or indirect) and do not live in the vicinity of where people live or frequent.

Recommendation 4: Engage the National Domestic Cat Working Group to develop a humane and effective Domestic Cat Management Plan based on contemporary research and consultation with recognised experts in domestic cat management, which can appropriately supplement the objectives of the TAP.

Recommendation 5: Sufficient funding be provided for the Chair and supporting staff of the National Domestic Cat Working Group to conduct regular meetings to develop a Domestic Cat Management Plan.

3. Language

We consider that the TAP uses unnecessarily divisive language. The use of such language risks exacerbating societal divisions regarding the management of cat populations. This may have negative impacts not only on the broader public but especially on younger generations. We are also concerned that the excessive emphasis on lethal control methods risks further demonising cats, including pet cats, potentially leading to instances of animal cruelty.



Recommendation 6: Shift the narrative and implement dialogue that focuses on providing information that assists with improving cat caring behaviours via desexing, microchipping, and preventive health care and highlights the benefits of cat containment using social science-based messaging to facilitate behaviour change.

4. Non-lethal methods of cat management

As a priority, where possible, non-lethal methods of managing feral cats that improve the survival of native species of conservation concern should be implemented. These include improving fire management and supporting native species to be more resilient to cat predation through habitat restoration. Fenced predator-proof areas to protect the most vulnerable native species are supported because the need for ongoing predator control is minimised.

Where lethal management is the only option, more humane toxins than 1080 should be used, for example, paraminopropiophenone (PAPP) in Felixers spray traps and baits.

We also have welfare concerns about the competency of sports shooters and the risk of leaving maimed cats alive in the field. We do not support bounties because there is a high risk that pet cats will become an easy target to collect a bounty, and reviews of past bounty schemes from Australia and around the world show that they are an ineffective form of pest animal control and do not deliver long-term solutions. (Wilson, 2007; Proulx & Rodtka, 2015).

Recommendation 7: Non-lethal methods such as habitat restoration and preventive fire management should be used as much as possible to improve the survival of threatened and endangered species.

Recommendation 8: Bounties for cats should not be implemented, and sport shooters should only be employed if specifically trained and certified in humane cat culling and only in areas where there is reasonable expectation of a measurable benefit to species of wildlife concern.

5. Evidence-based strategies to protect native wildlife of conservation concern.

It is critical that actions for cat management for both feral and domestic cats are evidence-based and result in the protection of wildlife of concern, given that the proposed strategies will result in greater numbers of healthy cats being killed. It is essential that outcomes of control measures are monitored by documenting that species whose long-term viability is threatened by cats are stabilising or increasing in number and are not measured by the number of baits deployed or cats killed.

We suggest that the draft TAP reflects a lack of consultation with expert scientists in contemporary urban cat management. The proposed actions in the plan regarding cat curfews, caps on cat ownership, mandated desexing and restricting ownership of cats in local government areas demonstrate a lack of understanding of the cause of the free-roaming cat problem in our cities and towns based on current Australian research. For example, mandating desexing for owned cats fails to recognise that it is not lack of motivation but cost which is the greatest barrier to desexing. Household income is the strongest predictor of whether a cat is desexed (Chu2007), and Australian studies have failed to show any benefit in locations where desexing is mandated (Alberthsen 2016, Chua 2023). Therefore, the proposed solutions are highly flawed, will be costly to enforce and will be ineffective at protecting wildlife populations of concern (Barratt 1998, Grayson 2007, Lilith 2010, Maclagan 2018). They will, however, increase the exposure of veterinarians and shelter/pound staff to killing healthy and treatable cats and kittens and the associated risk of mental health damage, which increases the risk of substance abuse, depression and posttraumatic stress (Baran, Reeve, Rohlf, Scotney etc). Research in urban areas to determine locations of species of conservation concern to facilitate microtargeted management of cats based on contemporary Australian research of effective strategies should be funded.

Recommendation 9: Strategies for cat management are evidence-based and especially where lethal, that wildlife whose long-term viability is threatened by cats are monitored to ensure there is evidence of a beneficial impact of cat management on wildlife populations.

6. Targeted desexing

We acknowledge and support the draft TAP proposal to “develop incentive programs for registration, identification and desexing packages, especially in areas of socioeconomic disadvantage”. This is critically important to address the number of free-roaming domestic cats because more than 50% of cats entering shelters and pounds in Australia were born in the last six months (Albertson2016, Kerr 2018), and recent



modelling from the UK found that owned cats are the biggest contributor to stray cat populations (McDonald 2023).

It is noted that the draft TAP states that the intention is to “continue to discourage TNR”, but this fails to acknowledge that Australian research shows that TNR, when done strategically and sustainably, can have the desired impact to stabilise and reduce populations over time (Swarbrick 2018, Tan 2017). TNR involves trapping, desexing, and returning semi-owned or unowned cats to their original location. Caretakers typically provide food and shelter and monitor the cats. When foster or permanent homes are available, young kittens and friendly adults are removed and placed for adoption.

It is recognised that in the draft TAP, desexing of cats in indigenous communities is recommended to be supported and expanded. This is aligned with recommendations in the AMRRIC-supported review (Kennedy 2020), which concluded that TNR is part of the best practice for the humane and ethical management of cat populations in these communities. It is disingenuous that TNR is being promoted in indigenous communities (and termed desexing) while not supported in other urban communities, which generally are more remote from native species of conservation concern.

Recommendation 10: Support for desexing of owned, semi-owned and unowned domestic cats be supported, and that reference to discouraging TNR be removed from the draft TAP.

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