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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 (DCCEEW) consultation survey on the Draft Threat Abatement Plan for Predation by Feral Cats (TAP).

### **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 wellbeing 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 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 Australia's diverse and precious native wildlife.

We believe it is fundamental to recognise that feral cats are just one of many factors that contribute to native species endangerment. In this regard we applaud the inclusion of objectives and actions in the TAP which seek to establish alignment between strategies to mitigate the various risks which exist in this context. We further emphasise the need for a balanced, holistic, and humane approach to cat management.

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 TAP. 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**

We reject the revised classification of cats provided by section 3.1 of the TAP. In this regard, we note that there is no commentary which justifies the change to the classification which was provided for in section 1.2.1 of the 2015 Threat Abatement Plan for Predation by Feral Cats (2015 TAP). It is disappointing that DCCEEW did not consult with experts in domestic cat management in the formulation of this revised definition. A justification, which sets out the views of experts, for any change as fundamental as definitions should be included in the TAP.

The TAP's 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). Appropriate and evidence-based definitions of cats is foundational to ensure the TAP is focussed appropriately. It is imperative that these definitions be revised in the TAP to ensure effective policy responses and management approaches which can be delivered efficiently.

*Recommendation 1:* Cats should be categorised based on how and where they live. Accordingly, we recommend that cats should instead be recognised as *feral* or *domestic*, consistent with the RSPCA's Best Practice Domestic Cat Management (2018). We suggest this approach is also consistent with the 2015 TAP, which classified cats as *feral*, *stray*, or *domestic*. In this regard, stray cats (which may be semi-owned or unowned), which live in and around where humans live or frequent should not be considered feral cats. Further, this approach is based in contemporary evidence and 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, mining sites and in indigenous communities, 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, rubbish dumps). 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; frightened pet cats may display more aggressive behaviours towards humans than truly feral cats (Slater 2013; Jacobson 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.

## 2. Management of domestic cats

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**.

*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.

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 are not legally able to 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 wellbeing of animals, people, and the environment.

*Recommendation 3:* We recommend that, to complement the TAP, the Government ensures that sufficient funding and support is guaranteed for the NDCWG to facilitate a coordinated approach to domestic cat management across all jurisdictions. This should include the development of a Domestic Cat Management Plan, based on contemporary research and consultation with recognised experts in domestic cat management, to complement the objectives of the TAP.

### **3. Language**

We consider that the TAP uses unnecessarily divisive language, which may risk the ability of the TAP to mobilise stakeholder engagement and action during implementation. The use of such language also risks exacerbating societal divisions regarding 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 demonizing cats, including pet cats, potentially leading to instances of animal cruelty.

*Recommendation 4:* Shift the narrative and implement dialogue that focuses on providing information that assists with improving cat caring behaviours via desexing, microchipping, 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**

*Recommendation 5:* Non-lethal methods of managing feral cats that improve survival of native species of conservation concern should be implemented as a priority, and in preference to lethal methods.

We agree with the TAP's proposition that 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. In this regard, we note that although 1080 is widely used in Australia, it is either banned or use severely restricted in many other countries due to the risks it poses to humans and non-target species.

*Recommendation 6:* Bounties for cats should not be implemented. We do not support bounties because there is a high risk that pet cats will become an easy target to collect a bounty, and that 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:* Sport shooters should only be engaged for feral cat control if specifically trained and certified in humane cat culling. We also note our welfare concerns about the risk of leaving maimed cats alive in the field.

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

*Recommendation 8:* Strategies for cat management must be based in contemporary evidence and research. Where lethal strategies are engaged, performance should be measured by reference to the benefits to wildlife whose long-term viability is threatened by cats (such as assessing whether the population of target native species is stabilising or increasing), rather than number of cats killed or baits deployed.

In this regard, we suggest that the draft TAP reflects 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 demonstrates 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 (Chu 2007), 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 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 2009; Reeve 2005; Rohlf 2005; Scotney 2015; Scotney 2023). Research in urban areas to determine locations of native species whose long-term viability is threatened by cats to facilitate microtargeted management of cats based on contemporary Australian research of effective strategies should be funded.

## **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 6 months (Albertson 2016; Kerr 2018), and recent modelling from the UK found that owned cats are the biggest contributor to stray cat populations (McDonald 2023).

However, we reject the TAP’s intention is to “continue to discourage TNR”. This position 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).

*Recommendation 9:* The TAP be amended to remove the discouragement of TNR. Rather, the Government should consider funding further research into the benefits of TNR in the Australian context, both in relation benefits to domestic cat management and to native wildlife.

TNR involves trapping, desexing and then 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 best practice for 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.



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