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**6 August 2024**

The Australian Pet Welfare Foundation (APWF) is a research and advocacy not-for-profit organisation 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 optimizing 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>.

APWF's research is aimed at improving the welfare of dogs and cats and the people who care for them, which includes eliminating euthanasia of healthy and treatable animals in shelters and pounds. We share the outcomes of this research with the community, staff in shelters and pounds, state and local governments, and veterinarians to create positive change for animal welfare and the legislation that governs this.

Under the guidance of Dr. Jacquie Rand, Emeritus Professor of Companion Animal Health at The University of Queensland and a registered specialist in small animal internal medicine, APWF has significantly contributed to shelter research. Over the past 16 years, Dr. Rand has led numerous studies, including collaborations with the RSPCA, the Animal Welfare League, and various local government bodies. Her tenure at UQ included teaching Urban Animal Management, and she has co-authored 23 peer-reviewed articles focused on this subject, particularly addressing the management of semi-owned and unowned cats.

This submission is in response to the Cats in Clarence, Tasmania consultation for the new Cat Policy.

### **Definitions of cats**

Cats should be categorized based on how and where they live. All Australian jurisdictions should define all cats with some dependence on people (direct or indirect) living in the vicinity of where people live, as domestic cats. Cats that have no relationship with or dependence on humans, that live and reproduce in the wild (i.e. do not live where people live) should be defined as feral cats (in accordance with RSPCA Australia, Commonwealth government definitions).

Domestic cats should be excluded from the legal definition of feral cats. Behaviour is an invalid test of whether a cat is feral or domestic and should never be used to label a cat feral. Cats should be categorized based on how and where they live This will enable the implementation of effective domestic cat management strategies, supported by the community. Research shows that pet cats can react with more aggressive behaviours to humans than feral cats when highly stressed. Domestic cats require an average of five days to five weeks in a non-stressful environment before adoptability can be assessed (with a range from a minimum of 3 days to five weeks or longer to assess adoptability) (Rochlitz 1998, Kessler 1997, Ellis 2014, DiGangi 2022, Jacobsen 2022, Slater 2013 and Kerr 2018).



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## **Domestic cats**

Cat management strategies should recognise three subcategories of domestic cats including:

- **Owned cats** – these cats are identified with and cared for by a specific person and are directly dependent on humans. They are usually sociable, although sociability varies. These cats are also called pet cats.
- **Semi-owned cats** – these cats are directly dependent on humans and are intentionally fed by people who do not consider they own them. These cats are of varying sociability and are sometimes called stray cats.
- **Unowned cats** – these cats are indirectly dependent on humans and receive food from people unintentionally, such as via food waste bins. These cats are of varying sociability and are sometimes called stray cats.
- **Feral 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 completely unsocialised to humans and have none of their needs fulfilled by humans. Feral cats are not found or trapped in the vicinity of where people live, are not the subject of nuisance complaints and do not enter Australian council pounds or animal shelters.

## **Mandatory Containment**

The APWF strongly recommends keeping cats contained indoors at night, and during the day, if possible, on their owners' property in a comfortable environment that meets their physical and mental needs. However, the APWF is against mandated cat containment (night curfews and 24/7) because it results in increased cat-related complaints, impoundments, and euthanasia, as well as higher costs and enforcement difficulties for local governments. Additionally, mandated cat containment fails to reduce the overall number of wandering cats in the short and long term, both in Australia and internationally, and is a barrier to solving the free-roaming cat problem.

For cat containment to be successful, clear measurable goals need to be first identified such as reduced wandering and nuisance cats and/or reduced risk of wildlife predation. For successful implementation it is critical to recognize the source of the problem, geographic locations where the issues are greatest, and barriers in these areas for residents to successfully contain their cats. For example, free-roaming domestic cats and cat-related complaints are greatest in disadvantaged areas. In these areas, many free-



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roaming cats are semi-owned cats or unidentified-owned cats with disadvantaged owners. Mandated containment will not achieve the hoped for goals, because firstly, most free-roaming cats in these areas are unidentified. Secondly, many disadvantaged residents simply have no ability to comply, and therefore mandated containment becomes a social justice issue. In areas where free-roaming cats are most numerous and problematic, many residents live in low-cost rental properties that have inadequate fencing for cat containment, and may have no screens on windows and doors or air-conditioning. Containment fencing is often in the range of \$700 to \$2000 or more and is simply not affordable for community members to comply with cat containment mandates. Unfortunately, no subsidy is available to encourage their purchase, and cheaper options, such as PVC pipe installations, may require specific skills that some individuals do not possess. Additionally, many community members live in apartment blocks without access to a yard, leaving them with only communal spaces where they cannot put an enclosure. This is particularly common in social housing, where residents may not have flyscreens on windows and, therefore, cannot physically contain their cats, and fencing is inadequate to fit even inexpensive PVC tubing.

Promoting simple low or minimum-cost solutions such as bedtime feeding is likely to get more compliance, especially effective night-time compliance. Night-time containment is effective at protecting vulnerable wildlife, because it is a time when cats and threatened and endangered species most susceptible to cat predation (nocturnal mammals such as squirrel gliders and phascogales) are most likely to interact. Bedtime feeding of cats is recommended as a highly effective way to assist cat owners at minimal to no additional cost to keep owned pet cats safely inside at night and prevent potential wildlife predation and nuisance behaviours such as fighting. This involves feeding cats inside at bedtime and ensuring all doors and windows are shut for the night, providing many owners with a way to safely confine their cat in the house/dwelling overnight. Bed-time feeding should be widely promoted to raise awareness among cat owners to increase cat containment at night, however, containment should not be made mandatory. This is because containment may not be achievable, for example for owners with no air-conditioning and inadequate screening on windows and doors, and no suitable secure area. In addition, mandating containment leads to increased costs and enforcement difficulties for local governments and other unintended negative consequences including severe mental health impacts on community residents and staff associated with euthanising healthy cats and kittens. Mandated cat containment also prevents the resolution of the problem of wandering cats by creating a significant obstacle for cat semi-owners to take full ownership of the stray cats they are feeding.

Mandating cat confinement creates a false hope within the community that the problems will be fixed once implemented and enforced. However, enforcement cannot occur when there is no owner for a cat, and effective enforcement requires an owner to be issued



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with the infringement or notice. In the relatively few cases where an owner or semi-owner is identified, they often have no ability to comply. Infringements issued by the council noncompliance can further financially burden cat owners without achieving containment. It is noted that in an article from Pulse Tasmania on 15 July 2024, the Mayor of Clarence Council, stated “the council is looking to make cat ownership “a positive experience for all” as they begin consultations that could lead to the introduction of tougher rules, similar to those for dogs.” It is easy to prove ownership of a dog, as it is generally in a backyard or behind a fence or gate, proof of ownership for cats is very difficult when a cats could be on another property to where it resides, or even in a different street. Dogs and cats are in no way similar when it comes to proof of ownership, for enforcement purposes. The same article also stated, “On the mainland, the Indigo Shire Council in Victoria last year implemented a 24/7 cat curfew after receiving 900 submissions indicating strong support for the restrictions.” Surprisingly, city of Clarence would compare themselves geographically to the Indigo Shire in Victoria, which is classified as a rural area.

Mandating cat containment is seen as a popular solution to the free-roaming cat and nuisance problem. However, this is because the community does not understand the cause of the problem (low socioeconomic, semi-owned and unidentified owned cats), nor do they understand the adverse impacts of such a program on staff mental health and job satisfaction, nuisance complaints and costs to councils and welfare agencies. They also do not understand that evidence from Victoria demonstrates they are not effective, while microtargeted desexing programs are successful at reducing the problem.

The expansion of local cat confinement laws will not solve the issue of semi-owned and stray domestic cats, as has been shown in previous instances such as Yarra Ranges Council and Casey Council (Victoria) (APWF 2023). Furthermore, some councils have produced reports stating that curfews are unenforceable (Hobsons Bay Council, Hume City Council). In the City of Yarra Ranges (Victoria), in the 3rd year after mandating 24/7 cat containment, cat-related complaints increased by 143%. Yarra Ranges Council acknowledged that the significant increase in cat complaints was likely the result of the introduction of a 24-hour cat curfew in 2014. In addition, impoundments increased by 68%, and euthanasia increased by 18% (human population only increased by 2%) (Yarra Ranges 2021). In the City of Casey (Victoria), 20 years after introducing mandated 24/7 cat containment, the number of cats impounded was still 296% higher than baseline (from 264 cats in 1998 to 1,047 cats in 2019/20), more than double the rate of the human population increase. In 2000, Casey received 349 cat nuisance and related complaints which had increased to 376 complaints in 2020/2021 (Casey Council 2001 & 2021a, b) (APWF 2023). Therefore, mandated containment is not effective over 3 years or 20 years in reducing complaints associated with free-roaming cats, cat impoundments and therefore costs to councils. This failure reflects the impracticality for owners of semi-owned or stray cats to contain cats, and the financial and logistical barriers faced by cat residents in disadvantaged



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urban environments including in social housing. Therefore, it is important to consider alternative solutions that are both effective and feasible for all community members.

**Recommendation-**

- **We recommend a more nuanced approach that includes supporting the construction of affordable and simple cat enclosures and exploring subsidies for those in need and promoting bedtime feeding where feasible.**
- **Look at proactive programs to support cat confinement within the community, rather than implementing further laws that will fail.**

**Microchipping, Desexing, and Visible Identification (Collar and Tag)**

Responsible cat owners generally comply with registration requirements, desexing and microchipping, but individuals who feed or care for stray cats often lack the resources to do so. While microchipping is essential for identifying and tracking down owners, the effectiveness is diminished if owners do not keep their contact details up-to-date. Although microchipping and desexing are mandated for cats over four months old, these measures do not address the existing populations of stray domestic cats that continue to reproduce unchecked. In line with RSPCA recommendations, for cat safety should wear a collar with a breakaway clip, which will reduce the chance of a cat getting stuck or injured. A further recommendation is they advise against using non-stretch material collars with buckles and collars that will lose elasticity over time. Bells on collars will initially reduce the number of birds and small mammals caught, though clever cats soon adapt their stalking behaviour to minimise the noise warning (RSPCA 2022) It is assumed if an owner can be identified, the owner would be directed to rectify the noncompliance or receive an infringement, which may not result in compliance but may result in further costs for the council to try and retrieve the financial total through a court process. This still does not result in compliance.

While responsible cat owners comply with these requirements, the reality is that if every cat owner or carer adhered to them, we wouldn't be facing the current issues. With only 7% of cats being reclaimed from pounds in Australia (Chua, 2023) and a growing overpopulation problem, existing programs are ineffective regardless of the mandates imposed. To address this, we must shift our approach from reactive complaint management to proactive cat programs in partnership with the community and local cat welfare shelters. This strategy will help keep cats out of shelters and pounds, thereby increasing their capacity to care for cats in need and reducing costs, intake, and euthanasia totals for both councils and not-for-profit organizations.

**Recommendation-**

- **Implement free and low-cost microchipping targeted to communities contributing to high stray intake into the pound or shelter is effective. These are usually**



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**underserved communities. Combine these events with “check a chip” so pet owners can update their contact details for their pet on the microchip database.**

- **Provide free engraved ID tags and collars, so all pets have visual identification and therefore neighbours can return pets directly to owners without impounding and the subsequent risk that they will not be reclaimed because of prohibitive fines.**
- **Adopt a process for wandering at large or trapped cats, so any cat wearing visible ID, the owner is contacted directly and returned to the person, bypassing the pound.**

### **Limit on the Number of Cats per Household (addressing cat hoarding)**

It is essential to recognize that a local law limiting the number of cats per property differs significantly from a cat hoarding situation. A study in Victoria, involving 22 cases, describes animal hoarding as the accumulation of a large number of animals beyond the owner's capacity to provide adequate care (Ockenden 2014). This extreme form of hoarding is challenging to resolve, often linked to underlying issues such as depression, anxiety, and mental illness, with traumatic life events like the loss of a family member triggering the behavior. Resolving these cases requires substantial resources from various agencies and often results in the removal of cats, which then impacts council or welfare shelters' capacities. Without specific behavioural change interventions, there is a nearly 100 percent chance of reoffending. Addressing these situations necessitates more than just Animal Management Officers (AMOs); it requires the involvement of social services, including social workers and other support services.

Limiting the number of cats on a property is a matter of local law, as is the permit system associated with the private keeping of cats. Under the Cat Management Act 2009, obtaining a multiple cat permit requires an application to the Department of Natural Resources and Environment for assessment. However, these permits should be managed directly by the city of Clarence AMOs, which specializes in domestic animal management and is most likely to receive any cat-related complaints and resolve further issues if any.

### **Recommendation-**

- **Multi-cat household application assessments and permits become the responsibility of the council's domestic animal management specialists.**
- **Partnerships are developed and maintained for behavioral change interventions for cat hoarding-specific properties and appropriate processes are documented for ongoing management of these properties.**

### **Declaration of Cat-Prohibited Areas to Protect Wildlife (in conservation areas, reserves and sensitive wildlife areas)**

While we acknowledge the importance of designating cat-prohibited areas to protect and conserve sensitive wildlife, it is crucial to prioritize the analysis and management of



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regions with the highest cat intake and complaints. These problem areas should be the primary focus to curb the unnecessary breeding of cats, which leads to overflow and abandonment in these high-priority zones. Implementing effective and proactive cat control programs in urban and peri-urban areas, can significantly reduce the need for establishing cat-prohibited areas.

### **Recommendation-**

- **Implement proactive free or subsidised cat desexing programs, including free microchipping and identification tags, in the most problematic areas will reduce the need for declaring these priority areas.**

### **Localised Cat Control Strategies (tailored to specific issues)**

The APWF advocates for the expansion of innovative desexing initiatives, such as that undertaken in the city of Banyule (Cotterell 2024). These programs need clear measurable objectives for each year over 3 to 5 years. These programs must be targeted to suburbs of high pound/shelter intake or cat-related calls, and microtargeted within these areas to locations where cats and kittens are most at risk of being impounded or surrendered from. These initiatives also need to be of sufficient intensity. If only targeted to problem suburbs, then approximately 30 cats/1000 residents per year need to be desexed but if intense microtargeting is also applied in these suburbs, then similar decreases in impoundments and euthanasia can be achieved with desexing 10 cats/1000 residents annually. It is critical that budgeting and resources, particularly animal management officers (AMOs) time, guide the size of the areas to be targeted. Insufficient intensity and/or targeting will mean objectives will not be achieved.

Community Cat Programs (CCPs) are dependent on strong local partnerships. Enhancing relationships with local veterinarians and welfare agencies can facilitate the expansion of low-cost or free desexing services, which are particularly crucial for residents who cannot afford or access veterinary clinics. These programs should be adaptive to the specific needs and constraints of the communities they serve. A limiting factor for roll-out of these programs across Victoria is access to sufficient veterinary capacity for the required volume of desexing. Therefore, high-volume clinics need to be supported that include pre-pubertal desexing. Animal welfare agencies also need encouragement, and potentially funding, to prioritise development of high-volume desexing clinics that are open to the public. Effective cat management transcends the capabilities of any single agency or organisation—it is a community-centric challenge that requires collaborative efforts among all stakeholders. The highest cat impoundments per 1000 residents are often in regional areas which are also low socioeconomic (Chua 2023, Alberthson 2016). It is essential that affordable desexing services are available in regional communities with limited access to veterinary care. This may include mobile clinics for towns with no veterinary clinic in the



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area, and would also service farming communities. Alternatively, transporting multiple cats in a suitable van to a regional veterinary clinic for desexing is safe for up to two hours of travel, and commonly practised in more remote areas of USA not serviced by a local veterinary clinic. Desexing and transport services could be augmented by fostering robust partnerships among stakeholders, including local veterinary practices. It is crucial to address the economic barriers to cat desexing, especially for low-income earners.

We recommend the investment in affordable desexing programs, which should include targeted grants aimed at assisting vulnerable people. Such initiatives are essential for broadening access to desexing services, thereby reducing the numbers of unwanted cats. For measurable outcomes to be achieved, it is absolutely essential that cat desexing initiatives be microtargeted to locations where cat-related calls or impounded cats are emanating from. Positive, assistive engagement of AMOs with disadvantaged individuals in the community with entire cats is critical for maximizing the effectiveness of these programs. The Banyule model (Cotterell 2024) exemplifies successful microtargeted desexing practices that have meaningfully reduced intake and euthanasia rates by engaging with disadvantaged communities and individuals. High-volume desexing clinics located in areas of most need, will need to be subsidised until they are established and are cost neutral. However, many cat carers in disadvantaged suburbs, particularly those caring for multiple cats, will not be able to pay the veterinary costs even at these high-volume clinics, if clinic prices cover all costs. Therefore, subsidies will be still needed for these cats to be desexed for free or at very low costs. AMOs are interacting with this demographic, and therefore grants to councils to enable cats in these situations to be desexed would be highly effective. It is likely a proportion of these people will also need assistance with transporting their cats to the surgery, which would be better use of AMOs time than transporting them for impounding.

While programs aimed at encouraging desexing are a positive step, subsidized desexing programs that are not targeted to those most in need may have little to no measurable effect (Frank 2007). These programs may only provide a cheaper option for those who were already planning on getting their cats desexed. It is critically important that programs are microtargeted to locations of need, and do not have barriers or conditions, such as requiring a pension or government-issued card. Vouchers for subsidised desexing at local veterinary clinics may not provide access to affordable desexing services. Unfortunately, many people in disadvantaged areas still cannot afford cat desexing due to the shortage of veterinarians and the increased cost of veterinary services. Based on RSPCA NSW experience (Bolger 2019, Ma 2023), only half the residents who had cats desexed in a targeted and microtargeted program had benefits cards.





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### **Recommendation-**

- **Implement an effective proactive approach to help people with the desexing and microchipping of their semi-owned cat, and supporting them to take full ownership. This is achieved through Community Cat Programs, i.e., high-intensity free desexing programs targeted at areas of high impoundments and cat-related complaints. By significantly reducing the number of unwanted kittens born, these programs, not mandated curfews, are the key solution to reducing the problem of wandering cats and the associated issues such as nuisance complaints, costs to local governments, and potential wildlife predation (APWF 2023).**
- **City of Clarence encourages State government to set up a grant program, or subsidies through council or Department of Natural Resource and Environment, for cat owners wanting to purchase enclosures for their cats.**
- **City of Clarence develop partnerships and funding with manufacturers of cat enclosures, allowing discounts/ subsidies for community members who want to contain their cats by purchasing enclosures.**

### **Feral and Domestic Cat Management**

Cats trapped by residents or council trapping programs have no science-based guidelines on which to assess these cats “wild” or “uncontrollable”, only informal assessment processes. All cats that present to council pounds and animal welfare shelters have the potential to exhibit anti-social behaviours if stressed, making it impossible to determine the difference between a stray, semi-owned, owned or feral cat (Slater 2010).

A common assessment for a cat in a trap is if the cat displays behaviour of trying to climb the walls of the trap cage or displays aggression (rather than being still and quiet), then the cat may be deemed uncontrollable and may be euthanised immediately. Uncontrolled or anti-social behaviour may also be attributed to the conditions within the facilities they are housed. Other contributing factors may be the type of facility, the temperature within the facility, noise levels, and where they are housed, making it impossible for anyone to accurately assess a cat’s sociability merely on sight (Slater 2010). Sociability and adaptability 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).

Cats require an average of five days to five weeks in a non-stressful environment before adoptability can be assessed (with a range from a minimum of 3 days to five weeks or longer to assess adoptability) (Rochlitz 1998, Kessler 1997, Ellis 2014, DiGangi 2022, Jacobsen 2022, Slater 2013 and Kerr 2018). When cats are in a trap cage or recently admitted to a shelter or pound and exhibit behaviours such as hissing, growling or striking,



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this represents a normal fear response to an unfamiliar environment. This does not mean the cat is a feral cat, an unsocialised cat or unsuitable for adoption (Overall 2013). Importantly, behaviour towards humans is an invalid test of whether a cat is feral or domestic, and this should be made on where and how cats live. Feral cats do not live around where people live or frequent and therefore are not the source of complaints from the public about nuisance behaviours. Cats should be assessed as domestic or feral based on where and how they live. If the cat is trapped in response to a complaint about nuisance behaviours, it is a domestic cat, regardless of its behaviour to humans.

Outcome decisions based on behavioural characteristics must be deferred to allow the cat sufficient time to habituate to the unfamiliar environment (e.g., shelter or pound), given the likelihood that these cats will experience high levels of fear in a trap cage or unfamiliar environment, and that different behaviours will be observed after habituation has occurred. It is not scientifically possible for a veterinarian, animal behaviourist or any other person, regardless of their experience or training, to immediately assess the behavioural characteristics, suitability for adoption, or socialisation level of a cat in a trap cage or on entry to a shelter/pound or other facility, with any accuracy. This is because based on veterinary behavioural science, it is only possible to make accurate behaviour assessments after the cat has habituated to the unfamiliar environment, and this requires a time period and the provision of an appropriately calm and comfortable environment for the cat. Habituation time can vary between individual cats. Scientific studies show that the average time for cats to habituate to a shelter-like environment is five days to five weeks (Rochlitz 1998, Kessler 1997, Ellis 2014, DiGangi 2022, Jacobsen 2022, Slater 2013, Kerr 2018).

Cats should be given the opportunity for multiple behaviour assessments over time. Cats that are still showing fearful behaviours such as hissing, growling or striking after being given reasonable habituation time should be moved out of the shelter/pound facility environment to a more suitable environment such as foster care and given more time to habituate. Barn/working/factory cats are other options that should be considered for these cats. If it is impossible to determine the difference between the different definitions of cats (feral, stray and owned) based on behaviour, it poses the question of how many cats are incorrectly identified by their behaviour and euthanised immediately or soon after admission? When RSPCA Qld changed its assessment from 24 hours to 72 hours, the number of cats classified as feral and euthanized decreased from 1178 to 132 per year (Kerr 2018). In association with increased time for assessment of behaviour and increased use of behaviour modification programs and foster care, cats euthanized for behavioural reasons decreased by 85%, including a marked decrease in the number of cats euthanised because the cat was deemed feral.



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We understand there are responsibilities of government agencies and local councils to implement programs for the management of cats, depending on the landowner and whether the cats to be managed are feral or domestic. However, these management programs differ greatly depending on the location and classification of cats, from traditional trap, impound, and euthanize or rehome, to programs using baiting and shooting. Feral cats are wild, unowned, and unsocialized felines that survive by hunting or scavenging for food. They do not have any contact with humans and are not dependent on them for food or shelter. Since feral cats do not live in areas frequented by humans, they are not the subject of complaints or found in areas where humans are present. As a result, they are not trapped or disturbed by humans. This information is based on the Threat Abatement Plan for Predation by Feral Cats, published by the Commonwealth of Australia in 2015.

It is important to recognize that cats in indigenous communities, around farm buildings, mining sites and other more remote areas where there are humans, should be classed as domestic cats. Effective management can only be achieved when the value to humans either through companionship and/or as working cats, is considered. For example, in a current study being conducted by APWF of free desexing offered for cats on dairy farms, all farmers stated that cats are considered important working animals because they effectively eliminate costs associated with damage caused by rodents, particularly to dairy wiring, and they reduce food safety issues associated with rodents. Farmers stated that cats are the preferred method of rodent control and were preferred over rodent poison because of factors such as cost, baiting's impact on wildlife, and its threat to pets and children. Of note, they mentioned that baits are tax deductible but currently cats are not.

All farmers viewed the cats as working animals and stated they are a necessity on the farm, with one farmer stating that his cats did more work than his working dogs (which are tax deductible). Following desexing of the cats, farmers perceived an improvement in the cats' impact on wildlife with comments stating that they see less (if any) wildlife being killed by the cats after desexing. Following desexing they also noted an improvement in the cats' health and behaviour with Improved body condition, less fighting, more friendly, less wondering, less defecation. Most farmers have some sort of bond with some of the cats and these cats have names, they talk to them, they pet them. Therefore, based on this information, it is recommended that animal welfare agencies lobby the Australian Tax office to include cats on farms as working cats and costs of desexing, microchipping, health care, including vaccination, be tax deductible.

**Recommendation-**

- **Using non-lethal methods of managing feral cats that improve the survival of native species of conservation concern should be implemented as a priority and in preference to lethal methods.**



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- **Develop guidelines based on recommendations by veterinary behaviorists and scientific literature for the assessment of cats entering shelters and pounds, especially those impounded through council trapping processes.**

If the APWF can assist with any further information, please do not hesitate to contact me at [info@petwelfare.org.au](mailto:info@petwelfare.org.au)

Best wishes,

*Jacquie*

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