

RSPCA
Submission

CONSULTATION DRAFT OF THE REVISED FERAL CAT THREAT ABATEMENT PLAN

7 December 2023

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Executive Summary

Management of feral and domestic cats in Australia is an ongoing and complex challenge. Although considerable efforts have been made to protect vulnerable native species through reducing predation by feral cats and decreasing the unwanted domestic cat population, the complexity of these problems makes effective cat management very difficult. Effective cat management requires a high level of government and community support, and communication and coordination between all stakeholders; aspects which are often difficult to achieve and maintain over time.

The RSPCA is very concerned about the process and content of the revised Feral Cat Threat Abatement Plan (revised TAP). The key areas of concern relate to the labelling of domestic unowned and semi-owned cats as 'feral', the inclusion of domestic cat management, and a lack of consultation with key relevant stakeholders regarding the inclusion and aspects relating to domestic cat management in the revised TAP. These changes, which vary significantly from the 2015 Feral Cat Threat Abatement Plan, pose serious risks relating to community support, human mental health impacts, and efficacy of domestic cat management programs.

A significant hindrance to achieving effective domestic cat management is the lack of a universal understanding of different cat categories. The RSPCA considers that labelling of unowned and semi-owned domestic cats as feral and the inclusion of domestic cat management in the revised TAP will be counterproductive. The revised TAP has escalated the need to resolve this through effective key stakeholder engagement.

In relation to feral cat management, the RSPCA recognises the need for a greater focus on animal welfare - many of our recommendations relate to incorporating welfare assessments into certain proposed actions and mitigating welfare impacts.

Recommendations

Below is a list of key recommendations, the document provides further detailed recommendations regarding proposed actions against individual points.

Recommendation 1: That reference to domestic cat management is removed from the revised Feral Cat TAP.

Recommendation 2: That 'sentience' is acknowledged in relation to all relevant species in the Introduction of the revised Feral Cat TAP.

Recommendation 3: That in the future, the Feral Cat Taskforce is given an opportunity to review and provide feedback on any relevant documents associated with feral cat management which are developed or revised by DEECW prior to release for public consultation, including future revisions of this TAP.

Recommendation 4: That the National Domestic Cat Management Working Group is adequately funded to enable effective engagement of key stakeholders.

Recommendation 5: The word 'cat' is not used in the revised Feral Cat TAP but only the terms 'feral cat' as per the RSPCA recommended definition and, where appropriate, the use of domestic cat (unowned, semi-owned and owned) is used.

Recommendation 6: That the revised Feral Cat TAP defines all cats with some dependence (direct or indirect) on humans as ‘domestic’ cats. Cats who are unowned, unsocialised, have no relationship with or dependence on humans and reproduce in the wild should be defined as ‘feral’ cats.

Recommendation 7: Domestic cats, including semi-owned and unowned cats, should be excluded from the definition of feral cats in the revised Feral Cat TAP.

Recommendation 8: Within the definition of ‘domestic’ cats, cat management strategies should recognise three subcategories of domestic cats using the following definitions:

Owned – these cats are identified with and cared for by a specific person and are directly depending on humans. They are usually sociable although sociability varies.

Semi-owned – these cats are fed or provided with other care by people who do not consider they own them. They are of varying sociability with many socialised to humans and may be associated with one or more households.

Unowned – these cats are indirectly depending on humans with some having casual and temporary interactions with humans. They are of varying sociability, including some who are unsocialised to humans, and may live in groups.

Recommendation 9: That domestic cats are not included in the revised Feral Cat TAP and that a separate action plan is developed for management of domestic cats.

Recommendation 10: That the National Domestic Cat Management Working Group is charged with and adequately resourced to facilitate the development of a national action plan for domestic cat management as well as promoting and supporting the development and implementation of cat management plans by local councils.

Recommendation 11: That research is supported (separate from the revised Feral Cat TAP) to better quantify the predation impacts of domestic cats on native wildlife to help prioritise strategic management and to assist in developing adaptive management approaches.

Recommendation 12: That more balanced information regarding the true risks to the Australian human population is included in the revised Feral Cat TAP.

Recommendation 13: That research be undertaken to quantify the nature and incidence of clinical cases of toxoplasmosis in Australians.

Introduction

The RSPCA greatly appreciates the opportunity to provide comments on the revised Feral Cat Threat Abatement Plan (the revised TAP). This is a joint submission with input from RSPCA Australia, RSPCA ACT, RSPCA Victoria, RSPCA Queensland, RSPCA SA and RSPCA Tasmania.

Threat abatement plans are very important documents to help achieve consistency and high standards across jurisdictions, landscapes, and stakeholders. However, the RSPCA has serious concerns regarding several aspects of this revised TAP. In particular, we are concerned about;

- i) the restriction of cat definitions to either 'feral' or 'pet' cat and
- ii) the inclusion of domestic cat management in this document.

The RSPCA advocates that cat categories are outlined as either 'feral' or 'domestic (owned, semi-owned, unowned)'. A serious consequence of labelling unowned and semi-owned cats as 'feral' in jurisdictions where feral cats are declared a pest species under legislation, prohibits rehoming of these cats.

Where the term 'domestic cat' is used in this submission it refers to 'unowned, semi-owned and owned cats'. Where the term 'feral cat' is used in this submission, it refers to cats who are unowned, unsocialised, have no relationship with or dependence on humans and reproduce in the wild.

The RSPCA strongly urges that any reference to 'domestic cat' management is removed from this revised TAP and is provided in a separate document on the basis that management strategies for these two separate groups differ significantly in terms of key stakeholders, community aspects and on the ground control methods. Details regarding these and other concerns are outlined in this submission.

Although feral cats have not been described in a derogatory way in the revised TAP, language used in association with feral cat management, including promoting the TAP, should not demonise cats. Labelling them as 'killing machines' and 'declaring war on cats' can encourage targeted cruelty of all cats, which is of great concern to the RSPCA. Furthermore, this has been recognised by Dubois et al (2017) as being ineffective and counterproductive in terms of wild animal management programs. Labelling is likely to alienate cat owners and carers who need to be engaged through behaviour change processes for domestic cat management to be successful. Vilifying cats also shifts the focus from the key objective from what should be the focus (to protect and conserve vulnerable native species) to instead promoting the killing of as many cats as possible, which is neither ethical, nor scientifically justified.

NOTE: Please remove references to the RSPCA in the revised TAP as these relate to domestic cat management and we advocate that domestic cat management is removed from the TAP.

Specific comments – Sections 1-7

1. Summary

On page 4, the revised TAP refers to the [Threatened Species Action Plan 2022-2032](#) (Commonwealth of Australia 2022) and in particular the following targets:

- Target 8. Feral cats and foxes are managed across all important habitats for susceptible priority species using best practice methods; and
- Target 9. Feral cats and foxes are managed in all priority places where they are a key threat to condition, using best practice methods for the location.

It is difficult to estimate the impact that domestic cats in the semi-owned and unowned sub-populations have on native wildlife and habitats and there is no direct evidence that domestic cats in urban areas have caused the decline of any threatened species in Australia. The inclusion of domestic cats in the revised TAP does not seem to align with the above targets. The revised TAP would be best served by focusing on feral cat management particularly in arid/semi-arid areas as well as other habitats in remote areas of recognised importance/priority. Domestic cat management requires a tailored approach involving different stakeholders compared to feral cat management. This is not to say that domestic cat impacts on native animals and their management should be ignored but rather separated from the revised TAP.

Furthermore, including unowned and semi-owned cats as feral is inconsistent with Objective 2 of the revised TAP, as little consideration has been given to contemporary research on these populations and this definition restriction is likely to reduce community trust and support, rather than enhance it.

Recommendation 1: That reference to domestic cat management is removed from the revised Feral Cat TAP.

2. Introduction

The RSPCA is concerned that sentience is not acknowledged in the revised TAP. This acknowledgement is essential to demonstrate that the Australian Government is committed and sincere in ensuring that cats in Australia are treated with respect and compassion with due consideration to their welfare.

Recommendation 2: That ‘sentience’ is acknowledged in relation to all relevant species in the Introduction of the revised Feral Cat TAP.

2.1 Pre-consultation with Feral Cat Taskforce and Indigenous land managers

The RSPCA does not agree with the statement made under 2.1 that the National Feral Cat Taskforce (the Taskforce), (of which RSPCA Australia is a member), was adequately consulted on the revised TAP. The Taskforce was only notified about the revised draft and consultation period on the day it was released (7th September). The Taskforce, which comprises members who combined, have a comprehensive and broad knowledge and understanding of feral cat biology, impacts and management, did not have an opportunity to provide comments on the revised TAP prior to release. We believe that this was a missed opportunity to leverage the expertise of the group. A brief comment on progress of the review of the 2015 TAP was provided at Taskforce meetings but exact details of the content including the significant change in definitions and actions were not provided. To discover that there was a strong focus on domestic cat management and the inclusion of semi-owned and unowned cats as feral cats without prior consultation with the Taskforce was extremely disappointing. Undertaking consultation with the Taskforce would have strengthened the evidence-base for the revised TAP.

The consultation process with Indigenous groups is mentioned several times and appears to be in-depth, which is to be commended but, unfortunately, this level of prior consultation did not occur with the Taskforce.

The RSPCA understands that on more than one occasion, some members of the Taskforce have expressed concern at Taskforce meetings regarding the potential consideration of domestic cat management in the revised TAP, the scale of which was unknown at the time. The Taskforce was not given an opportunity to discuss the inclusion of Objective 9 (which aims to reduce density of free-roaming cats around areas of human habitation and infrastructure) in the revised TAP.

It is also noted that the National Domestic Cat Management Working Group (NDCMWG) did not have an opportunity to review and provide comment on the revised TAP prior to release for consultation. It is understood that the NDCMWG has only met three times and does not have funding to continue its work. It is essential that funding for this working group is provided to enable national dialogue regarding domestic cat management, especially in light of the prominence it is delegated within the revised TAP.

Recommendation 3: That in the future, the Feral Cat Taskforce is given an opportunity to review and provide feedback on any relevant documents associated with feral cat management which are developed or revised by DEECW prior to release for public consultation, including future revisions of this TAP.

Recommendation 4: That the National Domestic Cat Management Working Group is adequately funded to enable effective engagement of key stakeholders.

2.3 The review of the 2015 threat abatement plan

The revised TAP differs substantially from the 2015 TAP with serious implications including but not limited to:

- Cat definition confined to ‘feral’ and ‘pet’ (see details under Definitions)
- Whole section on domestic cat management dilutes the focus on feral cats in remote areas
- The use of the word ‘cat’ throughout the document is confusing and instead should be clear to specify feral cats.

Recommendation 5: The word ‘cat’ is not used in the revised Feral Cat TAP but only the terms ‘feral cat’ as per the RSPCA recommended definition and, where appropriate, the use of domestic cat (unowned, semi-owned and owned) is used.

3. Cat definitions, ecology, distribution, and abundance

3.1 Cat definitions

Cat management strategies aimed at influencing human behaviour must recognise the ownership status of cats as well as their level of socialisation to, dependence on and relationship with humans.

The most important definitional delineation is between feral and domestic cats as this has profound consequences for the treatment and fate of individual cats. We note that, the term ‘feral’ is often used incorrectly to describe stray urban cats who may be owned (roaming free/lost), semi-owned or unowned cats and/or cats who may display fearful or confrontational behaviour (which any cat, even a socialised owned cat, may display when under stress). The use of the term ‘feral’ in this way is confusing and counterproductive.

Unowned cats found in and around human habitations, may depend opportunistically on some resources indirectly and unintentionally from humans, and have no identifiable owner, although they may have been previously owned or become lost (Aguiler & Farnworth, 2012; Finkler & Terkel, 2012; Alberthsen et al 2013). It is also likely that a proportion of unowned cats were originally unwanted kittens of owned or semi-owned cats (Casey et al 2009; Marston & Bennett, 2009). Semi-owned cats are under the direct and intentional care of humans, but their carers do not consider themselves to be their owner (Toukhsati et al 2012). Rescue groups have achieved success in rehoming unowned and semi-owned cats on an individual case basis or through community-based initiatives. The RSPCA acknowledges that unowned and semi-owned cats both add to cat overpopulation and predation of wildlife.

Domestic cats, including semi-owned and unowned cats, should be excluded from the definition of feral cats because they require different management approaches. The effectiveness of domestic cat management is largely dependent on implementing consistent collaborative programs, implementing appropriate legal requirements, and engaging with and supporting cat care givers (Zito et al 2016; Zito et al 2018; Ma et al 2023). This will achieve greater consistency in implementing management programs, legislation, research, and evaluation activities as well as engendering community support (Deak et al 2019). Work by McLeod et al (2017) has helped to further our understanding of the importance of examining communication processes with cat owners. Additional research done by McLeod et al (2019) using the COM behaviour model to assess capability, opportunity and motivation demonstrates the importance of this in relation to

understanding cat owner and carers' current behaviour and likelihood of adopting new behaviours. This type of work assists policy makers and program developers to design more effective and targeted approaches to domestic cat management. The study by Ma et al (2023) also highlights the importance of understanding the demographics, motivation, and behaviours of cat semi-owners.

The success of urban and peri-urban cat management is dependent on social licence. Strong relationships have been identified between care givers and unowned and semi-owned cats (Crawford et al 2023, Neal & Wolf 2023, Scotney et al 2023, Zito et al 2015). A care-centred (or assistive-centred) approach to managing these populations of cats has been recommended to not only improve cat management outcomes but also to reduce negative psychological impacts on care givers and improve welfare of both the cats and people involved, consistent with a One Welfare¹ approach. Care-centred approaches include support to sterilise cats and where possible assist adoption.

Another important reason to achieve a universal understanding of cat categories is to accurately assess prevalence and impacts of true feral cats versus unowned or semi-owned domestic cats who may reside in peri-urban areas but still have some dependence on humans.

By labelling unowned and semi-owned cats as feral as done in the revised TAP, in those jurisdictions which have declared feral cats as pests, negates the possibility of these cats being rehomed. This will inevitably result in trap and kill programs being conducted. There is evidence that these types of programs are not effective where low-level culling is undertaken (Lazenby et al 2015). Isolated and indiscriminate efforts are effectively low-level culling and, as currently practiced, are unlikely to result in any significant long-term improvement for issues of concern, such as wildlife predation, spread of disease, public health, or cat welfare. Computer-based modelling has consistently predicted failure of lethal control methods to eliminate cat populations unless high removal rates are achieved consistently and for long periods; these conditions are unrealistic in urban areas (Andersen et al. 2004; Foley et al. 2005; Budke and Slater 2009; Schmidt et al. 2009; McCarthy et al. 2013). One simulation model estimated that over 82% of cats in a population of 200 cats would need to be removed to result in elimination of the population over 4,000 days (McCarthy et al. 2013). Most, 'unowned' cats are provided with care by someone, often multiple people (Ma et al 2023). These caregivers often have strong relationships with the cats they care for (Crawford et al 2023, Scotney et al 2023, Zito et al 2015; Neal & Wolf, 2023) and are strongly opposed to lethal or inhumane approaches to management. Furthermore, the significant mental health impacts affecting those involved in killing large numbers of cats are devastating (Scotney et al 2015; Scotney 2016).

Another consequence of labelling unowned and semi-owned cats as feral and, therefore, as 'pests' is the demonisation of cats as killing machines, leading to a lack of consideration for their welfare and, in the most extreme cases, deliberate inhumane treatment. There have been numerous reports of domestic cats in residential areas being shot or killed, with some cases over recent years involving the use of a bow and arrow. In at least one case, the accused claimed that the cat was feral and therefore, their actions were justified. He was given a six month suspended jail sentence for what the magistrate described as actions which were unnecessary, extreme and inhumane (Barker, 2017).

The RSPCA strongly recommends that the definitions outlined in the [2018 RSPCA Identifying Best Practice Management Report](#) be adopted in the revised TAP. These definitions are based on the

¹ One Welfare' is the concept that animal welfare depends on and influences human welfare and environmental sustainability (Pinillos et al 2016)

human-cat relationship which influences strategies for managing cats in urban environments. A feral cat does not have human contact (living and reproducing in the wild) and is not dependent on humans for food or other resources – this term and definition has been used by government, conservation groups, researchers, and animal advocates. Unowned and semi-owned cats are not feral cats by definition and should not be subject to the management strategies proposed for feral cats. The RSPCA also submits that stakeholder engagement regarding unowned and semi-owned domestic cats is likely to yield better outcomes in relation to domestic cat management.

Domestic cats (including semi-owned and unowned cats) should be excluded from the legal definition of feral cats. This will achieve greater consistency in implementing management programs, legislation, research, and evaluation activities as well as engendering community support. The definitions used in the revised TAP have shifted significantly from the 2015 TAP where three categories are described – feral, stray, and domestic. The use of the term ‘human-associated feral cats’ under Objective 9 (page 73) contradicts the definition of a feral cat living and reproducing in the wild. The 2015 TAP also notes “*stray cats* are those found in and around cities, towns and rural properties; they may depend on some resources provided by humans but are not owned”. This is a critical point as unlike feral cats, there is a human factor which must be considered in terms of management strategies. Also, these significant definition changes do not acknowledge the research that has been undertaken in relation to the management of unowned and semi-owned domestic cats since 2015. The following cat category definitions are extracted from the [RSPCA Identifying Best Practice Domestic Cat Management in Australia Report](#).

Feral cats Cats who are unowned, unsocialised, have no relationship with or dependence on humans and reproduce in the wild should be defined as feral cats.

Domestic cats

Owned – these cats are identified with and cared for by a specific person and are directly depending on humans. They are usually sociable although sociability varies.

Semi-owned – these cats are fed or provided with other care by people who do not consider they own them. They are of varying sociability with many socialised to humans and may be associated with one or more households.

Unowned – these cats are indirectly depending on humans with some having casual and temporary interactions with humans. They are of varying sociability, including some who are unsocialised to humans, and may live in groups.

Recommendation 6: That the revised Feral Cat TAP defines all cats with some dependence (direct or indirect) on humans as ‘domestic’ cats. Cats who are unowned, unsocialised, have no relationship with or dependence on humans and reproduce in the wild should be defined as ‘feral’ cats.

Recommendation 7: Domestic cats, including semi-owned and unowned cats, should be excluded from the definition of feral cats in the revised Feral Cat TAP.

Recommendation 8: Within the definition of ‘domestic’ cats, cat management strategies should recognise three subcategories of domestic cats using the following definitions:

Owned – these cats are identified with and cared for by a specific person and are directly depending on humans. They are usually sociable although sociability varies.

Semi-owned – these cats are fed or provided with other care by people who do not consider they own them. They are of varying sociability with many socialised to humans and may be associated with one or more households.

Unowned – these cats are indirectly depending on humans with some having casual and temporary interactions with humans. They are of varying sociability, including some who are unsocialised to humans, and may live in groups.

Recommendation 9: That domestic cats are not included in the revised Feral Cat TAP and that a separate action plan is developed for management of domestic cats.

Although not explicit, the revised TAP highlights the importance of the need for a national domestic cat action plan to help achieve best practice management, undertake collaborative work, and agree on key metrics for monitoring and program evaluation. The National Domestic Cat Management Working Group is well placed to facilitate this important work, provided they are appropriately funded and supported. In addition, appropriate development, and implementation of domestic cat management plans by local councils could help implement key components of a national action plan. We submit that it is desirable to harmonise local council policies across jurisdictions, where possible, acknowledging that in some areas, special and specific policies will be required to address local issues.

Recommendation 10: That the National Domestic Cat Management Working Group is charged with and adequately resourced to facilitate the development of a national action plan for domestic cat management as well as promoting and supporting the development and implementation of cat management plans by local councils.

4. Cat impacts

4.1 Predation

There is substantial evidence gathered over many years regarding the negative impacts caused by feral cats as outlined in the consultation Background Paper.

However, the RSPCA questions the claims relating to the numbers of native animals reported to be preyed on by domestic cats as the literature is equivocal. Comprehensive field studies need to be undertaken rather than relying on extrapolated desk top figures to be consistent with applying evidence-based information to quantify predation by domestic cats. There is an urgent need to investigate the role of all categories of domestic cats in different locations and circumstances including areas in close proximity to native bushland as well as industrial areas.

Hunting and killing is a very strong natural instinct, even for owned cats who are fed daily (Barratt, 1997; Lilith et al 2006; Hutchins, 2013; Loss et al 2013; Kitts-Morgan, 2015; MacDonald et al 2015;

Woinarski et al 2017). Studies show that the majority of domestic cats do hunt when given the opportunity, although individual cats vary significantly in their predilection for hunting and their prey preference (Woinarski et al 2017; Bruce et al 2019; Moseby et al 2015; Dickman & Newsome 2015; Eyles & Mulvaney 2014).

The impact of domestic cats on biodiversity also depends greatly on their location. In highly urbanised settings, there is evidence that introduced species are more commonly hunted than native species. A Canberra survey of cat owners found that 75% of owned cats hunted, with 64% of prey being rodents, 14% native birds, 10% introduced birds and a few reptiles and frogs (Barratt, 1997). Indeed, cat predation on introduced black rats was shown to have a positive effect on tree-nesting birds in remnant bushland in metropolitan Sydney (Matthews et al 1999). Other studies have also found that cats will selectively predate sick and old rather than healthy birds (Baker et al 2008; Moller & Erritzoe 2000). A further study by Franklin et al 2021 revealed that over 85% of animals preyed by pet dogs and cats were introduced species including rats, mice, and rabbits and that although many domestic pets caught native animals, the total number was low and mainly comprised of skinks and lizards.

In comparison, domestic cats living in a NSW National Park, preyed mainly on native mammals (49%), then introduced mammals (26%), followed by native birds (19%) and reptiles (6%) (Meek 1998). Irrespective of whether domestic cats kill native or introduced animals, prey animals will suffer and die as a result of the hunting and killing process. Minimising these impacts and protecting wildlife at the local level is one justification for the containment of domestic cats (Jessop, 2004). However, there is no direct evidence that domestic cats in urban areas have caused the decline of any threatened species in Australia. It is well understood that in these areas, land clearing and development and other human activities pose a much greater threat to the survival of vulnerable native species than do domestic cats (Grayson et al 2007; Lilith et al 2010; Cogger et al 2017).

Recommendation 11: That research is supported (separate from the revised Feral Cat TAP) to better quantify the predation impacts of domestic cats on native wildlife to help prioritise strategic management and to assist in developing adaptive management approaches.

4.3 Disease

This section highlights potential disease risks but does not mention that the vast majority of the Australian human population will not experience diseases directly from cats and that there are simple actions that can be taken to prevent infection. Omitting this information is misleading and can result in owners surrendering, abandoning or giving away their cats unnecessarily and people persecuting cats without justification. Although there is no dispute in terms of cats being the definitive host of toxoplasmosis, direct contact with cats has not been identified as a risk factor for infection. The main risk factors are reported as ingestion of contaminated meat, food, water or soil (Aguirre et al 2019; Djurković-Djaković et al 2019). In particular, pregnant women and immunocompromised people should be advised to avoid cleaning litter trays but if this is not possible, risks can be minimised by maintaining good hygiene using appropriate protective equipment, removing faeces from the tray at least daily, placing the waste in an airtight bag, and disposing of the waste appropriately.

The consultation Background Paper refers to a study which has extrapolated figures (including those from other countries (Legge et al 2020)). With regard to toxoplasmosis, there is a need for more specific data from Australian health records and studies to help validate these reported figures and to gain a more accurate understanding of the true prevalence and impacts of this pathogen.

Recommendation 12: That more balanced information regarding the true risks to the Australian human population is included in the revised Feral Cat TAP.

Recommendation 13: That research be undertaken to quantify the nature and incidence of clinical cases of toxoplasmosis in Australians.

4.4 Public amenity

The consultation Background Paper refers to the Nou et al 2021 report but it is disappointing and concerning that feral/stray cats were combined rather than attempting to segregate these categories based on human interactions/dependency. As previously highlighted in this submission, achieving a universal understanding of appropriate definitions is critical to ongoing discussions, research, policy, and legislation relating to cat management.

5. Cat management

5.1 Public support

This section should include reference to studies examining important factors relating to the management of unowned and semi-owned cats as this is a key determinant of public support (Zito et al 2016; Zito et al 2018; Ma et al 2023).

However, given that the RSPCA has recommended that domestic cat management be provided in a separate document, it would not be relevant to reference these studies here but would be appropriate in a national domestic cat management action plan.

6. Guiding principles

These are supported but the RSPCA would urge that in the future, in alignment with Principle 1 that key stakeholder groups are provided an opportunity to comment on any revised or new TAPs prior to release for public consultation. Furthermore, given the increased focus on domestic cats, it would have been very beneficial to have consulted key stakeholders involved in domestic cat management including cat rescue groups/shelters, animal welfare organisations, local government animal management officers, social scientists, researchers, and others prior to release of the public consultation draft. This issue could be partly addressed by funding the National Domestic Cat Management Working Group and including this group in consultation on further updates of the TAP.

Specific comments – Sections 8-16

Comments on Actions

Section/objective/action	Comments
Objective 1 Action 1.1 Enhance harmonisation across government legislation that identifies feral cats as a pest, requires feral cats to be controlled, and identifies control techniques that may be used, based on evidence of efficacy and risks.	The RSPCA does not support unowned and semi-owned domestic cats being considered as feral cats and, therefore, declared as a pest species. We believe the management of these populations must be considered and conducted differently to feral populations in remote areas, as the populations are fundamentally different. There are also concerns that increasing bylaws will lead to inconsistency between local government areas. To avoid this, the preferred approach would be to implement evidence based mandatory requirements through state/territory-based legislation but still allow some flexibility for individual local government authorities where required.
Recommendation 14: Unowned and semi-owned cats are not subjected to feral cat control measures. Recommendation 15: Consideration be given to promoting state/territory-based cat management legislation rather than local government bylaws to help achieve consistency. Recommendation 16: Research be supported to understand migration between feral and domestic cat populations, and potential unintended consequences of changes to cat management legislation. Recommendation 17: Add ‘humaneness’ to efficacy to this action statement.	
1.2 Enhance consistency across state and territory legislation for companion animals, including mandating the principles of responsible pet ownership, and enabling local governments to more easily set additional bylaws that designate suburbs as cat-free.	Enabling local governments to designate suburbs as cat-free should be explored with caution, as there is insufficient evidence to support this approach given there is biased reporting of positive impacts and a lack of reporting of negative consequences of this approach. The benefits of taking this approach compared to mandatory cat containment are unclear. There is potential that inappropriate decisions may be made which discriminate against cat owners and encourage vilification of cats. Declaring cat-free suburbs should require in-depth assessment of key aspects that demonstrate this to be justified and effective. It is noted that the consultation Background Paper does not contain any references which provide

	evidence as to the effectiveness and possible negative consequences of this approach, including cats being surrendered or released and/or cats still being cared for despite mandatory exclusion. In addition, the declaration of cat-free suburbs will discriminate against cat owners. Before declaring cat-free suburbs, consideration could perhaps be given to creating cat-free buffers adjacent to ecologically sensitive areas rather than declaring whole suburbs as cat-free, especially where these bans would cover a substantial area.
Recommendation 18: Cat-free suburbs should not be mandated without first conducting research to determine the effectiveness, potential unintended consequences affecting cats, wildlife, and people and exploring possible alternatives.	
1.3 Local governments improve regulatory and policy settings to reduce pet cat impacts [see also objective 9 for management actions]: • Where there are gaps in state/territory legislation, by introducing bylaws to require responsible pet cat ownership (registration, identification, desexing, household caps, containment). • By applying conditions of cat prohibition in suburbs near areas with high biodiversity value.	Mandating multiple requirements simultaneously may create obstacles and challenges in supporting and achieving greater responsible cat ownership. Careful consideration must be given to the potential unintended consequences of placing additional restrictions on cat ownership. In particular, requirements to register and contain cats, and limits on the number of cats per household create an important barrier to semi-owners taking on ownership of the cats they care for (Ma et al 2023). There is ongoing debate and lack of evidence regarding the effectiveness, as well as the capacity, of local governments to enforce mandatory requirements and more research is required in this area. In particular, there does not appear to be any studies undertaken to evaluate mandating household limits on cat numbers. It is understood that some jurisdictions do permit additional cats upon application. Related to this is the question of whether the owner has the capacity to provide appropriate care to all residing cats. Strict household limits on the number of cats permitted may lead to increased pressure on shelters and rescue groups by denying adoptions to suitable owners. Furthermore, any legislative changes in cat management must be approached holistically with adequate resources provided to all relevant stakeholders. This may include construction, maintenance, staffing, and veterinary and other expenses associated with effective implementation of domestic cat management plans.

Recommendation 19: The RSPCA encourages studies be conducted to evaluate the effectiveness of mandating laws at a local government level. Such legislation should include clearly defined objectives as well as comparative studies which evaluate the implementation of alternative approaches, including community support and education.

Recommendation 20: Identify sources of funding to assist local councils and other relevant organisations to implement effective domestic cat management plans.

1.5 Continue to disallow importation of new domestic cat hybrids

This action is supported.

Objective 2
2.10 Consider bounty systems with payment systems that are structured to encourage cat hunting in designated areas.

Where feasible, control programs should include monitoring for cat density/activity and outcomes for native species.

The RSPCA opposes the use of bounty systems as there is adequate evidence to show these are ineffective, encourage inhumane treatment of target species and are open to fraud (Proulx & Rodtka 2015; Wilson, 2008; Fairbridge 2020; Pestsmart 2011). Bounties are not consistent with control programs monitoring impacts rather than kill target numbers.

Humane control programs should not be undertaken unless impact evaluation in terms of clearly defined goals relating to native species conservation are monitored, reported, and assessed.

Recommendation 21: Bounty systems are not introduced.

2.11 Maintain, enhance, and update as required Codes of Practice (CoPs) and Standard Operating Procedures (SoPs), coordinated across jurisdictions, assessed using the humaneness index, and presented in a variety of formats to maximise accessibility to diverse stakeholder groups.

In addition to this, advice should be given to use the most humane method based on the relative humaneness matrix, where possible. There is also a need to include a SOP related to the use of 1080 baiting and other methods which are being used.

Recommendation 22: Further work is undertaken to complete the relative humaneness matrix and prepare SOPs to include 1080 baiting, Felixer grooming traps, exclusion fencing and shooting trapped cats.

Recommendation 23: The revised Feral Cat TAP promote the use of the most relatively humane methods where possible, based on the relative humaneness matrix.

2.15 Engage and communicate with the broader public.

- Disseminate information on cat management issues and biodiversity outcomes of cat management via regular and social media, with content and format tailored for different stakeholder groups.

In relation to feral cats, information on biodiversity outcomes and animal welfare considerations rather than a focus on just killing cats should be disseminated, especially for school education programs as well as mentioning the impact of human interventions such as habitat loss, pollution on biodiversity.

• Make available information on the multiple benefits of habitat, pest animal, and dingo management (for regions where the benefits are known), in accessible formats, to diverse land manager groups. • Develop engaging materials illustrating the impacts of cats on Australian fauna, and management options, as teaching resource packs for use in school education programs. • Undertake research to understand whether the engagement is changing attitudes and behaviours.	In relation to domestic cats, there is considerable evidence which shows that communications based on native animal impacts is not the most effective way to engage key stakeholders like cat owners and carers. Rather, better outcomes can be achieved when responsible cat ownership is encouraged by communicating the associated benefits including better welfare, health, and safety for cats. This approach is also more likely to increase uptake of voluntary cat containment (McLeod et al 2017a; McLeod et al 2017b).
Recommendation 24: Documents which refer to domestic cat management should include links to relevant campaigns (e.g. Safe Cats Safe Wildlife, Keeping Your Cat Safe and Happy at Home, and Keeping Cats Safe at Home) which actively promote responsible cat ownership and welfare friendly containment.	
2.16 Maintain and increase broad public support for improved cat management for conservation, cat welfare, human health, and livestock production outcomes. • Understand the level of public acceptance for different control options for feral cats in natural environments (including poison-baiting, shooting, etc), and what might change those views. • Understand the complexities in how Indigenous communities may view feral cats, and their place in Country, and as pets, and how best to discuss cat management.	It is noted that the Royal Society for the Prevention of Cruelty to Animals is listed as being responsible for this action. This is not appropriate given that the RSPCA; - was not consulted about this involvement, - does not agree with the definitions used in the revised TAP, - has serious concerns relating to some killing methods, especially the use of 1080 (including the push for national registration of Eradicat®) and leghold traps. We agree that facilitating discussions with Indigenous communities to gain a better understanding on how to achieve effective cat management is essential as well as consulting all other relevant stakeholders.
Recommendation 25: Royal Society for the Prevention of Cruelty to Animals is removed from Action 2.16 in the revised TAP. Recommendation 26: Instead of aiming to increase public support for existing relatively inhumane cat management approaches, conduct effective stakeholder consultation (with ALL stakeholders) to develop cat management approaches that meet community expectations.	
Obj 4: Control methods	In terms of performance criteria, it would be helpful to assess overall humaneness of feral cat management by tracking where possible, trends in use of methods with different relative humaneness rankings.

	With the push for national registration of 1080, and the likelihood of increased uptake of the use of 1080 following this, the overall humaneness of feral cat management will decline. To help maintain social licence for ongoing feral cat management, it is essential to show continuous improvement in overall humaneness. The RSPCA encourages consideration of reducing future reliance of the use of 1080, especially as a more humane alternative toxin (para-aminopropiophenone - PAPP) is available, although it is acknowledged that consideration must be given to risks to non-target species (e.g. goannas). There is an urgent need to improve the usability (reduce risks) & affordability with the use of PAPP. The main purpose for developing PAPP was to replace 1080 on the basis that 1080 is not considered to be humane. The routine use of leghold traps also raises concerns due to risk of non-target species capture, localised leg injury, and associated negative mental impacts experienced by trapped animals (lossa et al 2007; Marks et al 2004). Surtees et al (2019) provide advice on minimising negative welfare outcomes associated with the use of leg hold traps. Leg hold traps should only be used where cage traps have been used and failed based on relevant assessment criteria. A mechanism should be put in place to ensure that the use of leghold traps is justified and strictly monitored. On page 43, the revised TAP mentions the use of trained dogs to bail feral cats. The use of trained detection dogs to locate feral cats can be an effective tool. However, using dogs to bail feral cats can pose serious welfare risks to both the dog and cat including injuries arising from the dog chasing the cat, direct physical contact between the feral cat and dog, fear and stress to cats, and injuries associated with discharging a firearm in close proximity to the dog.
Recommendation 27: Identify a mechanism to help track trends in overall humaneness of feral cat management. Recommendation 28: Steps are taken to reduce the reliance on and commence a phase out of the broadscale use of 1080 to kill feral cats.	

Recommendation 29: The use of leg-hold traps is not promoted as a routine tool and are only used as a last resort with strict guidelines and monitoring criteria.

Recommendation 30: Where leghold traps are already being used, monitoring must be undertaken to quantify the nature and incidence of negative physical and mental impacts experienced by trapped target and non-target animals (e.g. use of camera traps) with the view to refine their use to minimise negative welfare outcomes.

Recommendation 31: The revised Feral Cat TAP does not refer to trained dogs being used to bail feral cats.

4.3 Complete field trials of, and refinements to, Felixer grooming traps; then register Felixer grooming traps for use nationally.

Although Felixer grooming traps currently deploy 1080 gel, original work undertaken by Read et al (2014) using PAPP gel resulted in 14 out of 16 feral cats consuming the toxin with 50% succumbing and without obvious signs of pain. It is understood that PAPP does pose some challenges relating to the formulation being suitable to be sprayed through the Felixer trap nozzles.

It is also recognised that there are potential risks associated with the use of Felixer traps in peri-urban areas due to the possible presence of roaming domestic cats in some areas.

Recommendation 32: Undertake further evaluation of the use of PAPP in Felixer traps.

Recommendation 33: Felixer traps are not used in peri-urban areas due to the possible presence of roaming domestic cats in some areas.

4.4 Explore options for field euthanasia for live-trapped cats that are not based on shooting or lethal injection, to make it possible for land managers (Indigenous and non-Indigenous) to humanely kill captured cats.

It is essential to avoid pain and stress associated with the humane killing of trapped cats. There are also specific sites where shooting for example will not be feasible (such as mine sites). There has been some interest in the potential to use carbon monoxide in a closed system, based on the Dencofume® system which is registered for fumigating fox dens. Carbon monoxide gassing is considered as a conditionally acceptable method on the basis that specific and exact conditions must be complied with to achieve a humane death and where handling and restraint of trapped cats is done appropriately.

This action excludes work to improving humaneness of Indigenous hunting methods. Identification of the most humane techniques is encouraged and may include research to develop tools or methods suitable for use in remote Indigenous communities. An example of working with Indigenous communities to achieve better welfare outcomes from hunting practices is evidenced in the study

	undertaken by Flint et al 2017 which engaged the Indigenous community to achieve improvements in humaneness of turtle hunting methods.
Recommendation 34: This action be amended to specifically mention exploring the feasibility of an enclosed carbon monoxide system for humanely killing trapped cats as an example. Recommendation 35: This action to specify work to be undertaken to help improve humaneness of Indigenous hunting methods.	
4.5 Collaborate with a recreational shooting group to trial the value of sustained shooting programs to reduce cat density and generate biodiversity outcomes: • The trials should include monitoring for cat density/activity and outcomes for native species [as per objective 2]. • The information should be used to develop guidelines to support other shooting groups to design and implement effective cat control, coupled with appropriate monitoring.	The use of sport shooters raises many concerns including efficacy in achieving program objectives as well as animal welfare considerations. This action does not mention animal welfare.
Recommendation 36: This action be amended to specify animal welfare requirements including that: • shooters undergo shooting competency assessment and • that field audits are conducted to ensure compliance with the SOP - CAT 001 Ground Shooting Feral Cats. Recommendation 37: This action be amended to specify that appropriate monitoring includes assessing outcomes relating to conservation and protection of vulnerable native species.	
4.6 Continue to explore the potential of new attractants to draw cats to control or monitoring points: • 'Mata Hari Judas' technique (using female cats with induced oestrus to attract remaining cats in closed populations).	There are concerns relating to this technique in terms of identifying and resolving welfare impacts on female cats being used for the Mata Hari Judas (MHJ) technique. Murray et al (2020) reported adverse effects displayed by treated females including aggression, abnormal urination, excessive genital grooming and allogrooming. This study indicates that there are significant welfare risks using this method which require further investigation and resolution before this technique should be pursued. Rather than using the MHJ technique, alternative options should be explored including the potential use of synthetic pheromones.
Recommendation 38: This action be amended to include welfare assessment and mitigation of risks to Judas female cats.	

4.7 Carry out trials to establish whether guardian dogs can effectively repel cats and benefit native species.	There are concerns relating to this technique in terms of identifying and resolving potential dog predatory behaviour on native species and welfare impacts affecting guardian dogs and feral cats.
Recommendation 39: This action to be amended to include welfare assessment and mitigation of risks to the guardian dogs and feral cats as well as predatory risks to native species.	
4.8 Disease: develop a risk assessment framework using diseases as part of multiple control options in specific circumstances, such as island eradications.	There are serious concerns relating to associated welfare impacts with the use of disease-causing organisms.
Recommendation 40: The use of disease-causing agents is removed from the revised Feral Cat TAP. However, if this action remains, it should be amended to state the risk assessment must include animal welfare impacts with the acknowledgement that specific disease-causing organisms may be rejected on animal welfare grounds.	
4.9 Immunocontraception: Continue research to develop approaches with improved efficacy over sustained periods, and feasible spreading mechanisms.	Although immunocontraception offers the potential for a more humane alternative, welfare risks must be assessed (e.g. if a vector is considered, this must be innocuous).
Recommendation 41: This action to state welfare assessment will be performed in addition to efficacy and spreading mechanisms.	
4.10 Synthetic biology: Develop a detailed plan for progressing the use of gene drives to control cat populations, structured into stages with clear decision points and risk assessments undertaken before progressing to the next stage.	Although potential welfare benefits are acknowledged, caution is urged in relation to potential welfare risks associated with this method.
Recommendation 42: This action to be amended to include welfare assessment as part of risk assessment.	
Objective 9 Rationale Reducing the impacts of cats living with and around humans requires a different suite of actions, compared with managing feral cats in natural environments. Most importantly, options for managing cats living with or around people are strongly influenced by human attitudes and behaviours, which may vary from place to place.	As stated previously, the use of the term ‘human-associated feral cats’ is not supported. Any cat with a relationship/dependence with humans should not be referred to as a ‘feral’ cat. The RSPCA believes that labelling these cats as feral is not conducive to achieving strong community support for management programs, which is key to their success. The RSPCA acknowledges that free roaming domestic cats require a different management approach to feral cats and that consideration of the human element is integral to reducing negative impacts of these cats. We also note that the independent review commissioned by Office of Local Government NSW recommended subsidising cat desexing state-wide

	at \$2 million per year, with the expectation of decreasing council cat-related nuisance complaints by 50-60% and reducing shelter cat intake by 30% after year 1 and reducing impacts on threatened species (OLG 2022).
Recommendation 43: That further consideration be given to state and federal governments' support for holistic cat management practices including desexing initiatives.	
9.1 Local governments improve <i>feral</i> cat management: • Improving waste management, so feral cat populations are not supported by access to refuse and introduced rodents. • Disseminating information to local residents about the One Health benefits of reducing feral cat populations for improving outcomes for people and livestock production as well as wildlife. • Implementing feral cat control (e.g. via trapping, shooting where feasible) with local government staff; and where feasible, by lending traps to community members. Continue to discourage TNR.	The RSPCA advocates that community support and action is encouraged and facilitated by local government to reduce numbers of free roaming domestic cats through targeted subsidised desexing schemes to encourage ownership of unowned and semi-owned cats (Zito et al 2016; Zito et al 2018; Ma et al 2023). For example, RSPCA NSW and RSPCA Queensland work closely with a number of councils to promote and/or undertake subsidised desexing. It is imperative that accurate information is provided to the community on human health risks, particularly in relation to toxoplasmosis, where partial or incomplete understanding is likely to lead to increased risks to people (as they don't understand the various routes of infection) and create unnecessary fear and persecution of cats. This has been mentioned previously. Encouraging trapping by the community poses many welfare risks including inappropriate placement of traps, not checking checks sufficiently frequently, not checking for ownership status and inhumane methods of disposing of cats. Encouraging the public to trap free-roaming cats is also likely to contribute to vilification of and deliberate cruelty towards cats. Where trapping is undertaken, trapped cats should be handed into local authorities to check for a microchip and to take appropriate further action. Consistent with our recommendation that unowned and semi-owned domestic cats should not be included under the definition of 'feral cat' and that domestic cat management should not be included in the revised TAP, we do not believe any specific comment on TNR is required in the Feral Cat TAP if this is intended to refer to management of unowned and semi-owned domestic cats. Recommendations in the TAP should be based on scientific evidence. The management of unowned and semi-owned cats continues to be explored in

	research, including approaches which might be considered a permutation of TNR. It is important that new scientific evidence is reviewed on an ongoing basis to determine the most effective way to manage unowned and semi-owned cats and that recommendations are made on that basis. This should be a matter for the National Domestic Cat Management Working Group.
Recommendation 44: This action to include ‘to undertake humane trapping through education and oversight by local government where traps are loaned to community members. Recommendation 45: Further research is needed to evaluate options for management of unowned and semi-owned cats which are humane and effective including targeted desexing and adoption.	
9.2 Local governments improve <i>pet</i> cat management. • Develop incentive programs for registration, identification and desexing packages, especially in areas of socioeconomic disadvantage. • Contract vets to travel to rural and remote areas and communities (i.e. areas lacking vet services) to carry out free or heavily subsidised desexing programs. • Work with local communities to build support for expanding areas requiring 24/7 cat containment. This is likely to include collaborations with local vets and RSPCA to disseminate information on caring for indoor and contained cats. • Establish cat-free suburbs near areas of high biodiversity value; this is most tractable in new housing developments. • Disseminate information on the conservation, livestock, human health and amenity problems from high roaming cat density, and the benefits of responsible cat ownership, to remote Indigenous communities by the most appropriate messengers. • Design and implement a monitoring program that can report on the efficacy of cat management by local governments.	Contracting vets to travel to remote areas and communities is a very important initiative. It is essential to include hay shed/farm cats in any desexing program as these cats pose a risk of contributing to feral cat populations and are often overlooked. For new housing developments, it is essential that prior to any clearing or site works commencing that a comprehensive environmental study is undertaken and where vulnerable native species are found, that local planning authorities either refuse the application or require developers to undertake actions to mitigate negative impacts on native fauna and flora. Some local governments are already implementing such policies. The RSPCA encourages owners to keep cats contained in environments that meet their physical and mental needs. However, given the current lack of evidence on the outcomes associated with 24/7 mandatory companion cat containment and many complex potential negative consequences which may arise, the RSPCA does not currently support the introduction of mandatory 24/7 cat containment legislation. Support for the introduction of mandatory 24/7 cat containment would need to be based on evidence that it can achieve the stated objectives for cats, wildlife, and the broader community, and that the potential negative consequences can be eliminated or effectively mitigated. The RSPCA supports and encourages such research. If mandatory 24/7 cat containment is introduced, effective monitoring is needed that will provide

	evidence of outcomes (positive and negative) and inform a better understanding of potential negative consequences and strategies to eliminate or effectively mitigate these. The ACT, where mandatory cat containment has been implemented, could act as a feasible pilot case, if appropriate monitoring and reporting is undertaken. Cat containment should only be one element of a holistic cat management program that effectively and humanely addresses all domestic cat populations in the area including owned, semi-owned, and unowned cats. Please see the RSPCA's Position Paper on Cat Containment for more information. The RSPCA is very active in promoting welfare friendly and safe cat containment through the following programs: Cat Safety - Keeping Your Cat Safe And Happy At Home - RSPCA Home Safe Cat Safe Wildlife Keeping Cats Safe at Home RSPCA NSW Local government authorities are the lead agency in relation to domestic cat management, but program effectiveness relies upon effective communication and collaboration with the community and key stakeholder groups including cat rescue/welfare groups, veterinarians etc. The RSPCA supports the establishment of agreed measures to monitor and report on the efficacy of domestic cat management by local authorities. Significant benefits could be achieved through local councils developing appropriate domestic cat management plans which could incorporate metrics for monitoring and evaluating domestic cat management activities. Ideally these should align with a national domestic cat action plan.
Recommendation 46: This action to specifically mention 'farm' cats. Recommendation 47: This action includes reference that impact of land development on vulnerable native species has been appropriately assessed. Recommendation 48: This action should include supporting local councils to develop and implement harmonised domestic cat management plans.	
9.3 Improve the evidence base on the biodiversity impacts of feral cats living near human habitation and infrastructure	The RSPCA supports obtaining robust information relating to the impacts of unowned and semi-owned domestic cats including those associated with biodiversity, disease transmission and contribution

	to populations of feral cats living in proximity to residential areas.
9.4 Maintain and increase broad public support for improved cat management near human habitation and infrastructure, for conservation, cat welfare, human health, and livestock production outcomes. • Identify potential drivers of attitudinal and behavioural change that would support better pet management. • Understand reasons for increasing cat ownership in Indigenous communities, and barriers to reversing that trend. • Understand the level of public acceptance for different control options for feral cats living around human habitation and infrastructure (e.g. Trap-Neuter-Release).	The RSPCA supports studies on attitudinal and behavioural change that would help improve domestic cat management. Good work in this area has already been undertaken relating to cat semi-owners and to cat containment (Ma et al 2023; Ma & McLeod 2023). There is poor public support for lethal control of unowned and semi-owned domestic cats. For example, there is increasing pressure on councils to reduce euthanasia of healthy and treatable cats in pounds (Scotney et al 2023). Studies have shown the relationships people have with cats who reside in proximity to people. It is essential to understand the importance and nature of these relationships particularly in regard to the implications of different control options for both people and cats.
Recommendation 49: Research to investigate community views and values relating to different options for managing unowned and semi-owned cats must include assessment of the implications of these for both people and cats.	
9.7 Work with human health services, to determine the incidence of disease from cat-borne pathogens in people living in a range of settings, including in people living in remote communities and island communities. • Include communities living in areas that are cat-free versus communities with high densities of cats. Investigate the best options for reducing the disease burden. • Investigate options for reducing the disease burden.	The RSPCA supports studies to quantify the risks and actual rather than hypothetical impacts on human health of cat borne diseases in Australia. In addition to examining communities, it may be useful to analyse hospital records and include cohorts of people who work with cats, e.g. shelter workers, vets etc.

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