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PO Box 609

Terrey Hills NSW 2084

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25 May 2016

**Re: Submission on draft report – Review of pest animal management**

While this review includes a number of considered pest animals, my submission will deal exclusively with the draft report recommendations from the **feral cat management** - pest animal management review.

I have particular concerns in regards to the following recommendations:

- **Declare feral cats as a pest by including them in a pest animal regulation under the Biosecurity Act 2015**
- **Prioritise within the NSW Invasive Species Plan the management of feral cats in areas of high biodiversity value**
- **Support continued research into the scale, efficiency, cost-effectiveness, sustainability and risk of cat control methods**

While I welcome further research and study into the management of feral cats, I fear the outcomes will likely be biased, largely driven by the pest control industry or others with financial or political goals to be gained through a pre-determined outcome, through influential but well hidden placements on advisory panels and stakeholder groups.

It's also extremely important to outline what the panel considers the difference between a stray and a feral cat. And also to consider if any difference is considered between a bush feral cat and a city feral cat. And if not, can we expect to see recreational shooters in our city streets with their guns blazing shooting away at any cats they see? Or perhaps do we need to fear poison baiting to be left around areas in Sydney where feral cat colonies are known to reside, any of which could be eaten by pet cats or dogs, or even children? These are concerns I hold, and would like to see clarified. While this may sound overly paranoid, it wasn't that long ago when the N.S.W. Government under Premier Barry O'Farrell did a deal with the NSW Shooters M.P.'s to allow recreational shooting in our National Parks. So I don't feel that I can take anything for granted.

I hold particular concerns given this review falls into the climate of the well publicised Federal Governments "war on cats", where the Federal Environment Minister Greg Hunt has pledged significant funding for community groups to eradicate feral cats. While this may sound benign, and even reasonable, the reality is very different. For example, who are these community groups? Many of them will be recreational shooters who take great personal pleasure in the killing and torture of cats. Federal Government funding will give such groups and individuals legitimacy in the eyes of the community, making the killing of cats seem a noble cause.

My main issue in relation to Greg Hunt's war on feral cats is predominantly that the exercise will not achieve its outcomes, and will only cause suffering to the millions of individual cats killed as a result. If I truly had any belief at all that a mass cull of feral cats would genuinely help to protect and save vulnerable, native wildlife, while I wouldn't like it, I would agree that is a necessary evil. However, the fact is that we've been killing feral cats in very high numbers for many, many years, yet we're not seeing a decline in the feral cat numbers. So I don't understand why the Environment Minister thinks that by simply ramping up the killing that the outcome will be any different, as the Department hasn't provided any evidence to show it will achieve the outcomes, and I'm sure they are relying on the public to take it as a simple premise at face value to assume that killing more feral cats will result in less feral cats that will therefore result in protecting native species. Sadly it's not that simple. All that is happening are the feral cats simply breed back to the same numbers very quickly, as cats are prolific breeders who start breeding very young. In addition, many experts have argued that the cats who are killed through such programs are generally the weaker, slower cats of whom many wouldn't have survived long on their own anyway, and who are less likely to breed as a result.

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I do however support the following recommendations for amendments to the *Companion Animals Act 1998*:

- **The compulsory desexing of all cats by the age of four months of not exempted**
- **Requiring all owners of sexually entire cats older than four months to be registered as a breeder**
- **All sexually entire cats to be registered annually**

Given the failures of compulsory desexing in the A.C.T. due the difficulties of enforcement, to ensure it's successful in N.S.W. it's vital to make sure that processes are built in so that we don't fail where they did. One of my recommendations would be to tie compulsory desexing into the existing N.S.W. Companion Animal Register, with automated reminder letters, emails and/or sms's to anyone whose cat is on the Register but not recorded as desexed. I also recommend developing a "Confirmation of Desexing" form, similar to the existing "Permanent Identification" (ie: microchip) form, for vets to complete and submit to council once they've desexed the cat, so council can then upload this information to the Register. However, as a rescue group I can assure you that many of the Change of Owner forms we submit to council are never processed. So if an expansion of the existing system to include compulsory desexing is to be considered, then the existing system needs some review and upgrades.

In order to try to capture many of the cats who will never make it onto the Companion Animals Register, I recommend reviewing the role of classifieds (such as Gumtree, etc) where companion animals are sold or given away, to see if regulations could be enacted that would give control to the government over any animals advertised on these forums.

While I strongly support compulsory desexing, there are a number of other factors to consider and address as part of the implementation.

The first such factor is the fact that many Australians can't afford full price desexing, particularly those in regional Australia where desexing costs can be up to five times higher than in the city. I've heard of vets charging \$800 to desex a single female cat in remote parts of N.S.W. And they can, because they're the

only vet for hundreds of kilometres. While I understand that it may not be possible for the government to tell Veterinary practices how much they can charge, it is certainly an area that needs to be considered before rolling out compulsory desexing. Of course, there are also many people living in Sydney, particularly the unemployed, who also can't afford the cost of desexing. While there are some charity funded subsidised desexing programs in Sydney, they are insufficient to cover the needs of the public. Problems range from the cat owner not having access to a car to get their cat to the vet, to there not being a vet in their area who participates in a subsidised desexing program, to the cat owner not being able to read or speak English so isn't able to access these programs as they currently exist.

My recommendations are to invest funding into providing further subsidised desexing programs, including interpreter services for non-English speakers.

Another problem we regularly face is cat owners wanting help with desexing their cat when the owner is disabled and isolated without family support, so they need us to find someone to take their cat to the vet for them (and back again later that day) as they are unable to do so. But as a completely volunteer rescue group without any staff, this is sadly something we are rarely able to help with. Yet to someone disabled and isolated, their cat is their only companionship, and literally their lifeline. So when rolling out compulsory desexing, it's important to consider individual circumstances like this, which is more common than you may realise.

Another very important aspect that absolutely must be considered and adequately addressed in relation to compulsory desexing is the reality of stray cats. While I would hope that over the coming years that the implementation of a well designed compulsory desexing program would result in declining numbers of cats and kittens being dumped to live as stray cats in our communities. However, right now the numbers of stray cats in Sydney is massive. So large that no one has any real idea of the numbers. But we do know that local Councils don't have the resources to trap and remove them all to be killed. So, like it or not, stray cats are a fact that we need to consider fairly, reasonably and humanely.

Particularly in the cities, many people feed stray cats, either routinely, or ad-hoc. They do this because they care about the cats. I don't believe in demonising these people, as many do, blaming them for the presence of stray cats. Instead, I try to encourage these people to take the next step, and trap the cats, take them to the vet for desexing, and then return them to the same location, where they can then continue to feed them without fear of them reproducing - also known as TNR or Trap Neuter Return. TNR has been proven both scientifically, and anecdotally to be extremely successful in urban areas (\*see citation i). However, given the law doesn't address TNR at all, those who carry out TNR put themselves at potential risk, yet they are doing a service to the community.

I suggest that the recommendations include an amendment to the Companion Animals Act to allow for the legalisation of TNR. This should further include regulations for free registration of cats who are desexed under a TNR program. Those carrying out TNR are already committing a large amount of their own money for the desexing and often, but not always microchipping. So as this benefits the community, why should that person also have to pay for council registration costs? By legislating to allow TNR and to waive the registration costs, I think you will find that a lot more people doing TNR will start to microchip the cats they are having desexed, which will allow the Government excellent access to the data surrounding TNR. I recommend taking up the Bill to Manage Stray Cats as proposed by M.P. Alex Greenwich (\*see citation ii).

In relation to the next recommendation:

- **Local Governments to declare and enforce cat confinement areas**

I don't feel I can adequately comment on this, as the statement is too vague in itself. I would ask the question, how can this truly be achieved? I refer to my above statements in relation to my issues of the past failures of mass cat culls, which I absolutely do not support for my above stated reasons

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In relation to the final recommendation:

- **Partner with the RSPCA and other organizations to deliver targeted education campaigns to raise awareness of the risks of stray and feral cats and to promote responsible pet ownership**

I have no objection to this recommendation on face value. However, I would like to see that any such education campaigns do not demonise cats, which can result in animal cruelty by children, but instead focus on the fact that any failures are caused by humans, and so it is up to us to do the right thing (such as desexing, vaccinating, microchipping, and registering your pet) to ensure we are not continuing to cause further problems into the future, while also slowly working to humanely address the failings of our past that have resulted in stray and feral cat populations.

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I would like to end by citing an article written by Arian Wallach, Postdoctoral research fellow, and Daniel Ramp, Senior Lecturer, both from the University of Technology Sydney. The article is controversially titled "Let's Give Feral Cats Their Citizenship". This article is published online at "theconversation.com" (\*see citation iii). This article looks at the issue of feral cats in Australia in a new way, and is based on both a scientific and humane basis, which so often are polar opposed. If the review panel is not familiar with this article, I implore you to at least read it before making any further decisions regarding the management of feral cat in Australia.

Citations / References

- i. The Veterinary Journal; Volume 201, Issue 3, September 2014, Pages 269–274 "Effect of high-impact targeted trap-neuter-return and adoption of community cats on cat intake to a shelter" by Drs J.K. Levy, N.M Isaza & K.C. Scott.
- ii. [http://www.alexgreenwich.com/bill\\_to\\_manage\\_stray\\_cats\\_introduced](http://www.alexgreenwich.com/bill_to_manage_stray_cats_introduced)
- iii. <http://theconversation.com/lets-give-feral-cats-their-citizenship-45165>

How to contact the writer of this submission:

- Name: Ms Erica Trinder
- Organisation: CatRescue901 Limited
- [REDACTED]
- Email: Either via the Contact Us form here <https://catrescue901.org.au/contact-us/>, [REDACTED]  
[REDACTED]