

**Submission to**

**Draft threat abatement plan  
for predation by feral cats**

**July 2015**

## **Introduction**

The Invasive Species Council welcomes the federal government's focus on addressing the environmental impacts of feral cats in Australia.

Feral cats are widely recognised as a serious threat to the survival of many native animals yet there has been little nationally coordinated action. This third feral cat threat abatement plan (TAP) must be different to the last two if it is to meaningfully address the problems.

## **Progress since 2008 threat abatement plan**

The 2014 review of the 2008 TAP provides a comprehensive summary of progress with feral cat management since 2008, outlining a range of achievements and under-achievements.

Misleadingly, the review appears to give the TAP credit for all progress, as there is no disclaimer to state otherwise.

Determining the progress that has occurred specifically in response to the TAP is not easy. Clearly, some progress can be linked to the TAP through projects funded by the Australian government under natural resource and conservation programs such as Caring for our Country. But the lack of national coordination to facilitate projects and activities that align to the TAP, and the lack of specific feral cat funding, mean that most progress has probably occurred irrespective of the TAP.

Overall, the Minister and readers are potentially misled about the role and importance of the TAP.

TAPs specifically state that they will be implemented on Commonwealth lands and yet there is no mention of any action on Commonwealth lands.

## **Objective 1: Effective control**

This objective is extremely important and one that the federal government can play an important role in leading, facilitating and funding. We agree with the objective, actions and proposed priorities, with the following additions.

Federal government funding is critical for research efforts required. It is unlikely there will be significant commercial funds available for this public-interest work.

Despite the action being a very high priority in the 2008 plan, progress on the development of the Curiosity bait and other bait options has been disappointingly slow.

A code of practice for the use of new tools needs to be a very-high priority. Such a code is a necessary part of making a control tool or bait widely available, and builds community confidence that the bait will be used humanely and effectively.

PAPP, the active agent used in the Curiosity bait, is regarded as a relatively humane poison for the broad-scale control of feral cats, foxes and wild dogs. However, there is no published information confirming this in Australia.

Objective measures of the animal welfare impact of poisons used in feral animal control are necessary in order to accurately assess their relative humaneness. A peer-reviewed research paper documenting evidence of the humaneness of PAPP on target species will be essential to gain public support for the use of PAPP as a feral animal population management tool in Australia. Without it, the inevitable objections to the use of poison on cats will be stronger than otherwise, and could stymie its effective use.

This action must be allocated a very high priority, accompanying the regulatory approval for the use of the bait.

## **Objective 2: Control options**

This objective is valuable. We agree with the objective, actions and proposed priorities, with the following additions.

Pest declaration under state laws, accompanied by other measures, may be useful. But on its own this would have limited effect because few control options are available to landowners and most effort to protect threatened species is required in remote areas.

We strongly support nationally consistent laws to enforce responsible pet ownership.

An important emerging issue amongst pest control operators and land managers is the administrative and regulatory burden in undertaking feral cat control. While the intent of these requirements may be good (eg. avoiding human exposure to poisons, animal welfare outcomes), the requirements imposed often are impractical and inefficient. This results in valuable effort wasted. They may also act as an impediment to any action.

This issue would be best dealt with more broadly for all vertebrate pest control activities through a high priority project for the national inter-government Invasive Plants and Animals Committee.

Action 2.3 to prioritise areas for cat management is very important. The growing community interest in tackling feral cats will inevitably raise expectations across the country and result in proposals for activities that do not warrant high priority action, diverting scarce resources. We recommend elevating the priority of this action.

## **Objective 3: Alternative strategies for threatened species recovery**

This objective is extremely important. We agree with the objective, actions and proposed priorities, with the following additions.

We strongly support the action to give cat control on offshore islands a very high priority.

There are a number of federally managed offshore islands with feral cats. The federal government should commit in this plan to an offshore island eradication program for the islands it manages. Priorities would be determined by reviewing eradication benefits and feasibility. Christmas Island and Norfolk Island would be potential candidates.

It is essential to add prevention to the strategies under this and the subsequent objective. Otherwise, control programs will be undermined by the continual replenishment of feral cat populations, cat problems may be exacerbated by the addition of new genes (through new breeds), and eradication efforts and funds will be wasted by recolonisation.

We support the action for stronger biosecurity on cat-free islands and encourage specific regulations and funding to put this in place.

## **Objective 4: Increased public support**

The social aspects in relation to feral and domestic cats are critical to the plan's success. We agree with the objective, actions and proposed priorities.

Effective national action on feral cats needs strong public support to maintain political support and funding. It will also assist cooperative action from land managers and pet owners.

We support targeted control of large stray cat populations in places such as garbage tips.

## **Funding**

The plan notes that "Australian Government funds may be available to implement key national environmental priorities" of the plan. It is disappointing that there is no explicit commitment to federal government funding to implement the actions in the plan nor confirmation of indirect funding through natural resource and conservation programs.

Significant new, long-term resources are needed for research and control programs. This means reversing the downward funding trends of the last decade.

## **Implementation**

Implementation of the plan should be overseen by a committee that includes government and non-government members, with a strong mandate for action by state and federal environment ministers.

We welcome the statement in the draft plan that the federal environment department will convene an implementation team. This is an improvement on the 2008 plan that stated that “DEWHA will support a TAP implementation team”. To our knowledge, since 2008 there have been no regular meetings of a feral cat TAP implementation team. We believe this is one of the reasons for the poor implementation of the 2008 plan. It is important that the implementation team includes non-government partners, especially due to the heavily reliance on their actions to deliver many of the plan actions.

There is a general pattern of poor implementation of federal threat abatement plans, which raises questions about the effectiveness of the threat abatement planning process.

Because TAPs are developed by the federal environment department, approved by the environment minister and branded as an Australian government document, it is entirely unreasonable for the Australian government to then expect all other stakeholders to provide the major contribution to implementation. There is a period of public comment, but this is very different from developing a plan in a team effort with stakeholders, a process that would help to achieve broad ownership. There is no opportunity for stakeholders to “own” and commit to this plan as a national direction.

## **Alternative Models for Threat Abatement Planning**

Given the severity of invasive species problems in Australia and the limited effectiveness of the TAP process for addressing the problems, we strongly recommend the government, in collaboration with major stakeholders, evaluates alternative national models for threat abatement planning and implementation.

One possible model for addressing invasive animal KTPs such as feral cats could be the development of broadly developed and owned national pest-specific strategies under the Australian Pest Animal Strategy. A possible model has been established for feral camels, which were declared an Established Pest of National Significance with a National Feral Camel Action Plan.

If this was implemented for feral cats, such a national strategy or action plan for feral cats would incorporate the TAP for predation by feral cats and be named accordingly (that is, “incorporating the TAP for predation by feral cats”). The strategy would involve key stakeholders and be approved through inter-governmental processes to engender a commitment by states and territories. The environment minister would then sign off the

strategy as a TAP. In the unlikely event that the minister required an amendment, it could be returned to key stakeholders and the inter-governmental process. This would provide a national plan with a much broader commitment, more meaningful actions and a greater chance of success.

While there are benefits of such a process, it may have downsides. For example it may lengthen the preparation time and may make it more resource intensive. It might generate conflicting approaches that may be difficult to reconcile. The nature of such a process must be measured against the likelihood or otherwise of it resulting in a reduction of the threat.

This suggestion for a broadly developed national pest-specific strategy is one of many possible solutions to improving the effectiveness of the threat abatement planning process. Other options should also be considered.

Improvements to the threat abatement model must also consider the EPBC Act listed 'novel biota' key threatening process. At present, there is no systematic process to prioritise the threat from many current and future novel biota and to reduce that threat. This serious weakness has important implications for the long-term management of a large number of threatened and non-threatened species and must ultimately be addressed.