



Biodiversity Council

Biodiversity Council submission in response to the Victorian cat management strategy

26 April 2023

About The Biodiversity Council

The Biodiversity Council brings together leading experts including Indigenous knowledge holders to promote evidence-based solutions to Australia's biodiversity crisis. The Council was founded by 11 universities with the support of Australian philanthropists.

The Biodiversity Council acknowledges the First Peoples of the lands and waters of Australia, and pays respect to their Elders, past, present and future and expresses gratitude for long and ongoing custodianship of Country.

Our founding partners



Introduction

A large body of science has demonstrated that cats are one of the most damaging invasive species to Australia's natural biodiversity; feral cats affect at least 230 nationally-listed threatened animal species and have been the key driving factor of 30% of Australia's faunal extinctions^{1,2}.

Cats – feral and otherwise – occur across Australia, including Victoria and some of its offshore islands. Thus, reducing the impacts of cats on native wildlife is challenging, complex and requires concerted, long-term efforts to ensure resources are used in ways that deliver the best environmental benefits.

The Biodiversity Council commends the Victorian government for taking a pro-active and strategic approach to cat management by developing the first Draft Victorian cat management strategy. However, the content is skewed towards domestic cat management and is not suitable to achieve the effective management of all cats in Victoria or to achieve significant and enduring conservation gains.

We urge the Victorian government to redraft the strategy so that it comprehensively addresses the management of all categories of cats, including the detrimental impacts of feral cats.

Below we detail 25 recommendations with a focus on feral cat management to improve biodiversity outcomes. If the management of all cats is not the desired intention of the strategy, the strategy should contain explicit language to distinguish that the plan is a pet cat management strategy that incorporates some actions on feral cats as an important complementary focus.

Applying an environmental lens from the strategy's outset

Cats have had a devastating impact on Australia's biodiversity and continue to have major impacts.

Predation by cats is one of the most significant threats to Australia's fauna. Predation by feral cats is recognised under the national environmental law, the *Environment Protection and Biodiversity Conservation Act 1999*, as a Key Threatening Process that is driving the imperilment of many mammal, bird and reptile species, including many threatened species. Similarly, this threat is recognised under Victorian state law, where 'the threat of predation on native wildlife by the cat, *Felis catus*' is listed as a potentially threatening process by Victoria's *Flora and Fauna Guarantee Act 1988*.

The Biodiversity Council considers that the language and content of the strategy does not recognise nor address the magnitude of the feral cat problem, which is a missed opportunity to improve the protection of biodiversity from cat predation. Wildlife and the environment are not prioritised within the strategy from the outset. For example, biodiversity protection is not acknowledged in the guiding principles of the strategy and the role of cats in extinction is not mentioned until page 20. Similarly, the actions proposed do not provide a clear pathway for reducing, and where possible eliminating, the impact of feral cats or of adequately constraining the impact of pet cats on biodiversity.

The recommendations below, and throughout our submission, detail ways to increase the environmental value of the strategy.

Recommendation 1: Rework the vision in a way that acknowledges the need to protect biodiversity through cat management (including feral and pet cats). An appropriate example to consider could be "All pet cats in Victoria are cared for by responsible owners in a way that: supports the wellbeing of cats, protects the community, and minimises their impacts upon wildlife."

¹ Department of Climate Change, Energy, the Environment and Water 2023, *Background document for the threat abatement plan for predation by feral cats*, <<https://consult.dcceew.gov.au/draft-updated-threat-abatement-plan-for-predation-by-feral-cats>>

² Woinarski et al. 2019, 'Reading the black book: the number, timing, distribution and causes of listed extinctions in Australia', *Biological Conservation*, vol. 239.

All non-owned (feral) cats in Victoria are subject to management programs whose primary aim is to reduce their impact on, and allow for the recovery of, wildlife.

Recommendation 2: Acknowledge biodiversity protection and recovery in the guiding principles of the strategy.

Recommendation 3: Review information with an environmental lens to ensure the environment is considered throughout, including but not limited to:

- 1) expand the background information on ‘biodiversity’ to acknowledge the number of wildlife impacted by cats and the role of cats in extinction, and
- 2) under the heading ‘why is a cat management strategy necessary’, include wildlife welfare/deaths as one of the concerns of roaming pet cats
- 3) in cat definitions, acknowledge the dependence of unowned cats (including ‘semi-owned’) on animals, including native wildlife, as a food source.

Recommendation 4: Reconsider the balance of imagery and incorporate visual associations for the conservation management theme, e.g. cat in an enclosure looking at wildlife, range of wildlife hunted by cats, predator-proof fencing around a wildlife reserve.

Recommendation 5: In the stakeholder/role list, recognise that conservation groups have a role to play in raising awareness amongst the general public about the conservation impact of cats, as well as collaborating and contributing to education programs and dissemination of information on feral and domestic cats.

Reworking themes so that they are SMART (specific, measurable, achievable, realistic, time-bound)

The planned monitoring, evaluation, reporting and improvement framework (page 15) should have been developed simultaneously with the strategy. It would be counter-intuitive to develop metrics by which the success of the strategy will be evaluated, after the strategy is already finalised. As is, the document provides no quantitative targets and is unclear about what specific outputs the strategy will aim to achieve through the identified actions.

For example, Action 13 reads ‘explore options to improve cat management on private land’. This is a vaguely written action that does not provide enough detail to understand what body of work will be undertaken. Another example is provided by Action 19 ‘Share cat management data on centralised platforms’. This is a weak action that does not provide essential details like: a) what type of cat management data will be shared, b) what platform information will be shared on (whether a platform/s already exists or will be created) or c) how regularly information will be shared.

Without specific targets and actions, it is impossible to assess whether the strategy is ambitious enough to effectively improve cat management in Victoria. In order to effectively steer and implement the strategy, and track progress, the strategy should use SMART actions and targets; targets that are Specific, Measurable, Achievable, Realistic and Time-related.

Recommendation 6: Reword actions to ensure they are SMART (specific, measurable, achievable, realistic and time-related).

Recommendation 7: Set quantitative targets and develop the monitoring, evaluation, reporting and improvement framework before the strategy is finalised.

Consulting and involving first Australians

The Biodiversity Council recognises that cats have had significant detrimental impacts on Culturally Significant Species and Country. First Nations land managers and ranger groups could play an increasingly important role in the direction and implementation of management of feral cats. The Biodiversity Council believes the Victorian Government should consult with First Nations groups about how they would like to be involved in decision-making and on-ground management regarding feral cats.

Recommendation 8: Prioritise consultation and engagement with Traditional Owners (action 16).

Prioritising high conservation impact actions

Feral cats affect at least 27 native animal species that are listed as threatened in Victoria³. Feral cats occupy almost all lands in Victoria, including areas of iconic natural and cultural value such as: the Central Highlands where feral cats have been reported as predators of the critically endangered Leadbeater's possum⁴, Phillip Island where penguin and other ground-nesting shore-bird populations are particularly susceptible to predation⁵ and the world-heritage listed Budj Bim cultural landscape and national park where a host of introduced species damage ecological-cultural values⁶.

As feral cats are so pervasive, it is critical to prioritise the management of feral cats to enhance the protection of those threatened species with high or extreme susceptibility to cats; these species are most likely to become extinct in the near future unless appropriate actions are taken to protect them from the impacts of cats. The Biodiversity Council recommends that the strategy refines its actions to focus on protecting the native animals most susceptible to predation by feral cats, followed by a prioritisation of actions that will achieve the biggest wins for biodiversity.

One high value conservation action is the removal of invasive species from islands; once free of introduced species, like feral cats, islands can function as natural safe havens for threatened species and create important biodiversity conservation hubs. Islands are a more cost-effective option than fenced reserves for conserving species that cannot coexist with feral cats (and foxes)⁷. Islands such as French Island and Phillip Island have already set aims to achieve cat-free status in the near-future, and should be ongoing recipients of state government collaboration and support.

We note, that Victoria's biodiversity strategy ([Protecting Victoria's Environment - Biodiversity 2037](#)) sets a target of 1.5 million hectares of control of pest predators (e.g. foxes, feral cats) in priority locations per year. The draft Victorian Cat Management Strategy should incorporate this existing target and ensure control is directed to areas of highest biodiversity benefit.

Recommendation 9: Consult with relevant environmental authorities and experts to determine feral cat management priorities for Victoria.

³ The State of Victoria 1997, *Action statement, Predation of native wildlife by the cat Felis catus*, <https://www.environment.vic.gov.au/data/assets/pdf_file/0026/32489/Predation_of_Native_Wildlife_by_the_Cat_Felis_catus.pdf>

⁴ McComb, LB *et al.* 2019, 'Feral cat predation on Leadbeater's possum (*Gymnobelideus leadbeateri*) and observations of arboreal hunting at nest boxes', *Australian Mammalogy*, vol. 41, pp. 262-265.

⁵ 7 News Melbourne 2017, <<https://www.facebook.com/watch/?v=10155237397839301>>

⁶ Commonwealth of Australia 2017, *Budj Bim Cultural Landscape*, <<https://www.dcceew.gov.au/sites/default/files/env/pages/b42e9c8e-370d-4094-8cef-37ce503e81a3/files/budj-bim-nomination-dossier.pdf>>

⁷ Woinarski, J, Legge, S & Dickman, C 2019, *Cats in Australia: companion and killer*, CSIRO Publishing, Clayton South, VIC.

Recommendation 10: Ensure the strategy complements any of Victoria’s existing targets and goals around feral cat management. For example, the strategy should incorporate Victoria’s Biodiversity 2037 target of 1.5 million hectares of control of pest predators (e.g. foxes, feral cats).

Recommendation 11: Prioritise and include SMART actions and targets that consider the need to protect cat-susceptible threatened species in Victoria.

Recommendation 12: Integrate additional outcome/s (page 14) that focus on improving the conservation outlook for cat-susceptible species.

Recommendation 13: Prioritise and include SMART actions and targets that consider the need to eradicate feral cats from sites of significant biodiversity such as islands, including French Island.

Enabling effective feral cat management

Feral cat control is complex in nature and requires the availability of a broad suite of management tools that can be implemented as appropriate to the local management context. Victorian legislation currently prevents the use of an emerging, effective control tool – the Felixer. Felixers are a target-specific toxin-delivery device that uses a camera equipped with artificial intelligence to detect cats, then spray them with a lethal dose of the toxin sodium fluoroacetate (1080). In Victoria, 1080 is currently authorised for use to manage rabbits, feral pigs, foxes, feral dogs and native dingoes but not cats. Thus, Felixers have been unable to be deployed in Victoria. All lethal control tools have animal welfare consequences. The major benefits of the Felixer is 1) its specificity, which highly reduces the risk of off-target impacts and 2) the capacity of the device to be deployed remotely for extended periods of time. Unlike conventional lethal control methods such as trapping, Felixers do not require frequent checking and rebaiting; they are solar powered and can be deployed in the field for extended periods of time, making them useful in areas that require targeted effort where cats are persistent. Land managers and conservation groups have raised concern about the inability to use Felixers in Victoria⁸; in areas like French Island, Felixers would be an incredibly useful supplementary tool, where more targeted tools are required after broad-scale feral cat removal.

Under current CALP legislation, any feral cat that is trapped must be destroyed, which can inhibit high quality research and intelligence gathering. It should be recognised that research on feral cat movements, habitat use and behaviour which involved catching, GPS, radio or video collaring feral cats then releasing and tracking them has provided highly valuable evidence to guide feral cat control strategies and management actions. While an exemption under the CALP can be applied for to be able to release a feral cat during research, the process should be streamlined in cases of genuine research that also includes animal ethics approval and the findings of which will have clear public good application.

Recommendation 14: Prioritise and include SMART actions and targets that consider the need to improve the availability of effective, target-specific control tools, including registering Felixers for use in Victoria.

Recommendation 15: Develop criteria for timely regulatory assessment (of safety, efficacy, animal welfare) of new target-specific control tools for feral cats when they become available.

Recommendation 16: Develop a clear and practical pathway for land managers to obtain permits to use leghold traps for feral cat control.

⁸ Sydney Morning Herald 2019, *Why this green box might be able to solve the feral cat problem*
<<https://www.smh.com.au/environment/conservation/feral-cats-australia-solutions-20240117-p5exvk.html>>

Recommendation: 17 Develop a streamlined process to apply for CALP exemptions to permit feral cats to be released in cases of genuine research, that also includes animal ethics approval and the findings of which will have clear public good application.

Funding and coordinating the strategy

No matter how well-intentioned the Victorian Cat Management Strategy is, its success or failure will be dependent upon the extent of its resourcing and implementation. The Biodiversity Council recommends that the Victorian government identifies the costs of the plan and commits to funding priority actions. The Victorian government should also make a commitment to resource the chairing and facilitation of the working group that will be responsible for driving and monitoring the strategy implementation (Action 18). Other jurisdictions have demonstrated that without a designated leader and resources, working groups are likely to fail and discontinue. For example, the federal government established the National Domestic Cat Management Working Group that brought together a broad cross section of stakeholders across research, companion animal management, conservation, animal welfare and zoo sectors, as well as all levels of government. The Federal Government only provided enough resources to chair one meeting; an additional three meetings were hosted in-kind by participating stakeholders, before the group collapsed due to no resources.

Additionally, we note, the draft strategy delays ‘supporting integrated feral cat programs’ until the last phase of implementation of the plan, at the 7-10 year mark. Feral cat control is needed now to support the persistence of many threatened native wildlife populations that are susceptible to cats. Feral cat management is also already occurring in Victoria, and existing priorities lie in scaling up feral cat management (as recognised in other Victorian strategies, such as Biodiversity 2037). Therefore, ‘supporting integrated feral cat programs’ should be incorporated into the plan to commence immediately.

Recommendation 18: Identify funding requirements and commit funds required to implement the strategy over ten years.

Recommendation 19: Commit to facilitating the working group to ensure the longevity and continuity of the group.

Recommendation 20: Ensure the working group incorporates diverse interests, including Indigenous and conservation representatives, and is bound by an agreement to advance the shared goals of improving cat welfare and protecting wildlife.

Recommendation 21: Prioritise ‘support integrated feral cat programs’ for immediate commencement in the implementation plan, in recognition that feral cat management is already actively occurring across the state.

Refining definitions for cats

The definitions, thematic content and actions provided in the draft Victorian Cat Management Strategy for ‘semi-owned’ and ‘unowned’ cats do not recognise the significant impact free-roaming cats can have on biodiversity and are inconsistent with the objective to protect the environment.

The classification of cats as semi-owned and unowned downplays the conservation impact free-roaming cats have. As is, the proposed definitions overlook the dependence of semi-owned and unowned cats on animal food sources. Semi-owned and unowned cats are not solely dependent on humans (as the definitions provided in the Victorian cat management strategy would imply). Semi-owned and unowned cats utilise animals as a food source, including native Australian wildlife. In Victoria, there are well

documented cases of cats near urban areas contributing to species decline. For example, a long term study on the last wild population of endangered eastern barred bandicoots at Hamilton municipal tip, Victoria, found that cats were responsible for 18% of documented mortalities between 1980 and 1990 and that cats particularly targeted their predation on juvenile and subadult bandicoots, which could adversely affect the recruitment of new individuals to population and contribute to population decline⁹. This species eventually became extinct in mainland Australia, but has slowly recovered after a long-term (30 year) captive breeding and reintroduction program. By the definitions provided in the strategy, cats around Hamilton municipal tip would fall in the categories of ‘semi-owned’ and ‘unowned’, demonstrating that these categories of cat can have significant environmental impacts.

The Biodiversity Council favours the categorisation of cats by two terms: feral (=unowned) and pet (=owned). This is a straightforward and logical classification, with clear management implications. To some extent, the management of pet cats (and their owners) is conceptually simpler and more practicable than the management of feral cats. There is a clear ideal – responsible pet ownership, that encompasses de-sexing, registration, containment, and the establishment of cat-free areas in new suburbs constructed in and around areas of high biodiversity value. Such management benefits wildlife, the pet cats themselves, and their owners. The management of feral cats in urban and suburban settings has different challenges, but the objective of such management should be to control such cats through a practicable mix of adoption and lethal control, and better management of the waste and other resources that typically support higher densities of feral cats in urban settings. Trap Neuter Release (TNR) programs are ineffective for cat management as they do not reduce impacts on wildlife or provide adequate welfare for released cats.

Recommendation 22: Provide a future pathway to simplify the classification of cats to just feral and pets by clarifying the vision/goal for each cat category, e.g. the goal is that there are no semi-owned or unowned cats.

Recommendation 23: Refine the proposed cat category definitions to accurately acknowledge that semi-owned and unowned cats rely on native wildlife as a food source and aren’t just dependent on humans. E.g. update the provided definition to "Obtain food resources by killing animals, native and non-native, and indirectly from humans".

Protecting high conservation value areas from pet cats

The Biodiversity Council highly supports the use of actions within the strategy aimed to prevent pet cats coming into contact with wildlife, including desexing pet cats to prevent unwanted litters and cat dumping, and expanding cat containment policies. Another strategy to reduce the number of free-roaming cats is to create cat-free suburbs where cat ownership is prohibited. This can be effective in new housing development areas which fosters compliances by establishing strong rules before people choose to move to an area, and in suburbs with unique natural values. For example, Halls Gap, Victoria is nestled within Grampians National Park. The Northern Grampians Shire Council introduced a local law in 1993 that bans residents from keeping pet cats in order to help protect the Grampians’ native wildlife. The local law was considered contentious when it was first introduced, but was accepted and over time led to broad community awareness and created a strong culture of not keeping cats, that is socially enforced.

Recommendation 24: Incorporate SMART actions and targets that consider the need to introduce cat free suburbs in areas adjacent to natural areas with high biodiversity value.

⁹ Dufty, AC 1994, ‘[Population demography of the eastern barred bandicoot \(Perameles gunnii\) at Hamilton, Victoria](#)’, *Wildlife Research*, vol. 4, no. 21, 445– 457.

Cats as vectors of disease

A major impact that cats have that is not explicitly mentioned in the draft Victorian Cat Management Strategy is the spread of toxoplasmosis and other cat-borne diseases. *Toxoplasma gondii* is a cat-dependent pathogen that is spread in cat faeces to other warm-blooded mammals. The pathogen was introduced to Australia with the arrival of the cat. Toxoplasmosis can have major impacts on human health, reduce livestock production, and cause high rates of mortality in wildlife. A recent study found that toxoplasmosis cost the Australian economy about \$6 billion per year¹⁰.

Recommendation 25: The draft strategy should explicitly recognise the major impacts of cat-borne disease on people, livestock and wildlife, and include recommendations for regulations and other actions that aim to reduce such impacts.

¹⁰ Legge, S, Taggart, P, Dickman, C, Read, J, and Woinarski, J.2020, '[Cat-dependent diseases cost Australia AU\\$6 billion per year through impacts on human health and livestock production](#)', *Wildlife Research*, vol. 47, no. 8, pp. 731-746.