



Responding to the draft updated Threat Abatement Plan for predation by feral cats

Submission guide

Dec 2023

Feral cat with pygmy possum.
Image: BW Brook and JC Buettel, The University of Tasmania

Background

Feral cats are extremely capable and adaptive hunters that have had a devastating impact on Australian wildlife. Feral cats have driven the extinction of at least 20 native Australian animals and continue to be a direct threat to over 200 nationally listed threatened animal species.

Under our national environmental law, predation by feral cats is formally listed as a Key Threatening Process that is driving wildlife declines. Under this law, the Federal Government can decide to develop and implement a Threat Abatement Plan (TAP) to strategically address, and reduce the impact of, a listed Key Threatening Process.

The Federal Environment Minister, Tanya Plibersek, has released a draft updated TAP for predation by feral cats and is **currently seeking public feedback**. Submissions are **due next Monday – 11 December 2023**.

The revised plan is comprehensive and underpinned by extensive research. It focuses on protecting the native animals most susceptible to predation by feral cats and prioritises actions that will achieve the biggest wins for biodiversity – like, eradicating feral cats from islands and establishing more fenced safe havens for wildlife. The development of the plan included consultation with the national Feral Cat Taskforce and with Indigenous ranger groups and organisations across Australia. And for the first time ever, environment ministers in all states and territories have provided in-principle support for

the plan; this is a significant step towards improved national coordination to address the impacts of feral cats in Australia.

Although the TAP's focus is on feral cats, the plan also recognises the substantial impacts on wildlife of roaming pet cats, and that there is substantial scope for pet owners and governments to reduce that impact.

The revised TAP **presents a significant opportunity to curb the impacts of feral cats on wildlife if adequately funded and implemented**. However, **the federal government has not yet committed any funds to implement the plan.**

The next few days are critical.

We need to generate as many submissions as possible that ask the federal government to make a commitment to fully fund and implement the updated threat abatement plan for predation by feral cats.

What can I do?

If you've got an interest in protecting native wildlife – **we need you to make a submission!**

Anyone can make a submission. We've made it easy by including step-by-step instructions below to help you write and upload your submission. Your submission doesn't need to be long – it just needs to show the federal environment minister there is support to action the plan!

How to make a submission

1. Check out the federal government's website for the plan. Here you can find the proposed plan, and a detailed background document.
2. Prepare your written submission and save it as a document. In your submission, let the federal government know that you support the protection of native wildlife from cats. Ask the federal government to make a commitment to fully resource the implementation of the plan. We've summarised six key discussion points below that you can use to build your submission.
3. Upload your submission via the survey platform. To do this you need to go to the link below, scroll to the bottom of the webpage, and click 'take the survey'. You will need to complete your personal information, then you can skip forward to the last page where you can upload your submission. If you prefer, you can choose to complete the survey questions instead.

Upload your submission at <https://consult.dcceew.gov.au/draft-updated-threat-abatement-plan-for-predation-by-feral-cats>

Tips for writing a submission

- Include some brief introductory remarks about yourself, the organisation you represent (if applicable), and why you are concerned about the impacts of feral cats.
- Clearly identify the key issues you want to raise and potential solutions (in this case – ensuring there is funding to implement the plan so that it doesn't fail!).

- Keep your submission polite and respectful; the government will ignore any submissions that are rude or target individuals.

Six key points to include in your submission

Please consider making the following key points in your submission. We've included additional dot points as food for thought, that you can use to build your submission.

1. **Call on the Federal Government to urgently implement the plan to help protect native wildlife from feral cats and prevent any more cat-driven extinctions.**
 - The updated threat abatement plan for predation by feral cats must be fully implemented to reduce the impact of feral cats on native wildlife and prevent future extinctions.
 - The Federal Government should take immediate action to implement or help support high priority actions identified in the plan. The highest priority should be to ensure that all cat-susceptible threatened species are protected in safe havens by: eradicating feral cats from priority islands, establishing more predator-proof reserves, and coordinating translocations of threatened species across these safe havens.
 - The government should continue to invest in the Feral Cat Taskforce to help drive strategic implementation of the plan. Since 2015 the Federal Government has convened a national feral cat taskforce to help: coordinate national actions across jurisdictions on feral cats, provide a forum for exchange of knowledge from research and management, and inform national priorities.

Populations of many native mammals, like mala, can't survive with even low numbers of cats.

Image: A Critically Endangered Mala in a cat- and fox-free area at the Australian Wildlife Conservancy's Newhaven Sanctuary. Photo by Wayne Lawler/ Australian Wildlife Conservancy

Image: Critically Endangered Canberra grassland earless dragon. By Michael Mulvaney CC BY 3.0 Wikimedia



Image: Vulnerable Pookila. By Doug Beckers CC BY-SA 2.0 Wikimedia



Feral cats pose a major threat to populations of smaller ground dwelling threatened native animals like grassland earless dragons and native mice.

2. Ask the Federal Government to commit at least \$88 million from the next Federal budget to cover the baseline costs of implementing the plan.

- No matter how comprehensive and well-conceived the feral cat plan may be, its success or failure will be dependent upon the extent of its resourcing and implementation.
- Feral cat management is a long-term challenge. Strategic and secure long-term funding is needed to manage feral cats and assist the recovery of native species affected by feral cats.
- The table of costs within the plan estimates that around \$12 million per year (or \$60 million over five years) is needed to successfully undertake all the actions in the plan.

3. Request the Federal Government establish an additional funding pool to support Indigenous-led management of feral cats.

- Feral cats have had significant detrimental impacts on culturally significant species.
- First Nations ranger groups and other related agencies should play an increasingly important role in the direction and implementation of management of feral cats. Locally empowered management is important, noting that in some communities cats are utilised as a source of protein.
- Indigenous Protected Areas and other Indigenous-managed Country make a vital contribution to the conservation of cat-susceptible threatened species, but they currently receive much less funding per hectare than other protected conservation areas. Many Indigenous ranger groups face funding shortfalls for their important work.

4. Encourage the Federal Government to embrace a leadership role on responsible ownership of pet cats.

- Although the primary purpose of the plan is to address feral cat impacts, roaming pet cats also have a significant impact on wildlife.
- The federal government should allocate resources to re-establish the National Domestic Cat Management Working Group to drive the uptake of responsible pet ownership practices to reduce the impact of pets on wildlife; such a group was initiated by the government in May 2022, but ongoing support was not provided, and the group lapsed in March 2023.
- The plan attempts to address the impact of pet cats in Objective 9. This objective overlooks the current role animal shelters and rescues play, as a key provider of cat control services and public education and support. These stakeholders should be acknowledged and incorporated into the plan.

5. Emphasise that the Federal Government needs to maintain support for lethal control programs for feral cats by improving the use of tools that achieve better animal welfare outcomes (i.e. achieve the objectives of significant reduction in cat impacts through application of control methods that cause the least pain and suffering).

- A recent independent survey by Behaviour Works Australia found that community expectations for better animal welfare are not being met by the Australian Government.
- Improving animal welfare outcomes is important for maintaining social licence for cat management.

The population of threatened blue petrels that breeds on Macquarie Island is recovering since cats were eradicated from the island.



Image: Blue Petrel by J Harrison/Wikimedia Commons CC BY SA



- The adequacy of on-going funding is important to prevent feral cat numbers building back up in priority conservation areas and undermining long-term conservation outcomes.
- The plan should include more actions to improve the use of control tools, including: enabling and driving the uptake of more humane toxins like PAPP (a toxin considered relatively more humane than 1080) and continue to refine the humaneness matrix and model code of practice for feral cat control methods in Australia.
- We recommend a longer-term goal of considering the net welfare of both feral cats and cat-susceptible prey species in future humaneness assessments.

6. Emphasise the importance of research to address knowledge gaps that limit the development and implementation of optimal conservation strategies.

- There is large scope to improve conservation outcomes for cat-susceptible native wildlife in many regions through enhanced management of fire, livestock and feral herbivores, and dingoes. However there are still shortcomings in knowledge of how to best use these approaches. Some of these gaps have been identified in the TAP.
- The Federal Government should allocate resources to the priority research gaps listed in the draft TAP to help underpin effective landscape-scale control of feral cats.



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