



**Biodiversity
Council**

Response to the draft updated Threat Abatement Plan (TAP) for predation by feral cats

6 Dec 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.

Introduction

The Biodiversity Council welcomes the development by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) of a new Threat Abatement Plan (TAP) for feral cats. As described in the rich body of evidence collated in the draft TAP, cats have had a devastating impact on Australia's biodiversity and continue to have major impacts. Predation, and disease transmitted, by cats is one of the most significant threats to Australia's fauna, driving the imperilment of many threatened mammal, bird and reptile species.

A TAP is an appropriate mechanism to respond to the threats posed by feral cats, given their impacts affect biodiversity in all Australian jurisdictions, the challenges and complexity of issues and options involved in their management, the range of stakeholder interests, and the magnitude of the problem posed by feral cats. The new draft TAP builds on the substantial research and management progress supported and coordinated in part by previous feral cat TAPs and has many significant additional components.

The revised plan is comprehensive. We commend the evidence-based approaches and extensive consultation with Indigenous ranger groups, the national Feral Cat Taskforce and other relevant organisations across Australia that went into the development of the plan.

The Biodiversity Council supports the draft TAP generally and makes 8 recommendations in regard to specific points, as outlined below.

1. Indigenous consultation and involvement

A notable feature, welcomed by the Biodiversity Council, of the draft TAP is the extent of Indigenous consultation and contribution to its structure and content. The Biodiversity Council recognises that feral cats have had significant detrimental impacts on Country of First Nations landholders and that First Nations ranger groups and other related agencies should play an increasingly important role in the direction and implementation of management of feral cats. The Biodiversity Council recommends that the standard set for First Nations involvement in the feral cat TAP should provide a benchmark appropriate for other TAPs, Recovery Plans and comparable conservation planning and management instruments.

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 pet cat ownership is increasing in many communities, and in some communities cats are utilised as a source of food. Additionally in some communities cats have been incorporated into cultural stories and practices. 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. The Biodiversity Council recommends that the Federal Government establish a funding pool of at least \$28 million over 5 years to support Indigenous-led management of feral cats.

2. Resource commitment

No matter how comprehensive and well-conceived the feral cat TAP may be, its success or failure will be dependent upon the extent of its resourcing and implementation. The feral cat TAP clearly indicates priority actions that need to be taken immediately; it also recognises that the management of feral cats and the recovery of native species affected by cats is a long-term challenge that must be met with strategic and long-term secured funding. The Biodiversity Council recommends that the Australian government commits to full funding for all very high and high priority actions and that it develops a longer-term strategic program that secures sufficient resources over at least decadal scales. Such a program could encompass not only the control of feral cats but also other significant pest species.

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. Additional funds should be allocated to support Indigenous-led management of feral cats, bringing the required funding to \$88 million over 5 years. We call for \$88 million to be committed from the next Federal budget to cover the cost of implementing the plan. Conservation faces a chronic shortfall in funding nationally and many other factors also affect Australian biodiversity. Funding for the cat TAP should not be a redirection of conservation funding from elsewhere. Action to conserve cat-susceptible species should complement rather than re-direct funding for other highly imperilled biodiversity.

3. Mitigation hierarchy

The draft TAP recognises that the most critical need in the management of feral cats is for the enhanced 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 supports the focus on protecting the native animals most susceptible to predation by feral cats, and the prioritisation of actions that will achieve the biggest wins for biodiversity. The draft TAP lists all such cat-susceptible threatened species and recognises that many are not afforded such protection. The Biodiversity Council recommends that the Australian government take immediate actions, in collaboration with state and territory governments and other groups, to strategically expand the haven network to more comprehensively represent all cat-susceptible threatened species, with such expansion including further eradications of cats from priority islands, establishment of further predator-proof enclosures, and nationally coordinated translocations of threatened species across this expanded haven network.

4. Obligation to implement the TAP

A shortcoming of the current *Environment Protection and Biodiversity Conservation Act* (EPBC Act) is that there is no general obligation to implement TAPs, notwithstanding their critical importance for the conservation of Australia's biodiversity. This deficiency should be remedied in the current overhaul of the Act. Nonetheless, the Act (at s. 269(1)) states 'the Commonwealth must implement a ... threat abatement plan to the extent to which it applies in Commonwealth areas': i.e., it must and should set a standard for implementation of the TAP on all Commonwealth lands, and especially those with high biodiversity values and at sites that are important for cat-susceptible threatened species. The Biodiversity Council recognises the Commonwealth satisfies this obligation – to good

effect – on some Commonwealth lands (such as Christmas Island). However, in contravention of the Act, there has been no effective implementation of previous feral cat TAPs on other biodiversity-critical Commonwealth lands, such as Kakadu National Park. The Biodiversity Council recommends that the Australian government properly implements the feral cat TAP on all Commonwealth lands of biodiversity significance, and regularly (and publicly) audits this performance and its outcomes.

5. Coordination

The national implementation of the current feral cat TAP has been greatly assisted through the establishment of a National Feral Cat Taskforce, and through attempts to harmonise policy and legislation across jurisdictions at Ministerial Councils. In particular, the taskforce has helped coordinate national actions across jurisdictions, provided a forum for exchange of knowledge from research and management, and helped inform national priorities. The Biodiversity Council recommends that the Australian government maintains the functioning of this Taskforce and commends this approach for other comparable national coordination of threat management.

6. Focus

As obliged under the EPBC Act, the TAP explicitly addresses the Key Threatening Process of predation by feral cats. However, the draft TAP also includes important components related to the pivotal role of cats in the spread of disease (with significant detrimental consequences to many threatened species, and also to human health and livestock production). In addition, the draft TAP includes consideration of the intertwined role of pet cats with feral cats, and the significant compounding impact upon Australian biodiversity of pet cats. The Biodiversity Council supports the inclusion of these additional foci within the TAP: the management and impacts of cats has many dimensions and permeates across much of our society. We recognise that these additional components can be managed only with the collaboration of additional stakeholder groups, and that such additional collaboration may add complexity but also is needed to achieve enduring benefits.

7. Feral and pet cats.

The draft TAP recognises two classes of cats: feral (=unowned) and pets (=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 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. The Biodiversity Council supports the classification of cats used in the draft cat TAP, and the recommendations within it to enhance the management of pet cats and feral cats in urban settings.

In response to a recommendation from the 2020 parliamentary inquiry on cats in Australia, the federal government initiated the formation of the National Domestic Cat Management Working Group in May 2022. However, the group lapsed in March 2023, due to a lack of dedicated resourcing for the chairing role. The Biodiversity Council recommends that dedicated funds from the Australian Government are committed to resume the National Domestic Cat Management Working Group for at least the 5-year period of the plan. The key function of the group will be to improve national coordination of pet cat management, drive concerted efforts to reduce the number of roaming pet cats and their impact on wildlife, and drive greater uptake of responsible cat ownership practices.

8. Research priorities.

The draft TAP recognises and is supported by knowledge arising from a highly productive program of research and management over recent years. However, it also recognises that there are some knowledge shortcomings, in areas instrumental for the optimal implementation of the TAP. These knowledge gaps mostly relate to the potential benefits and opportunities of landscape-scale control of feral cats through enhanced management of fire, livestock and feral herbivores, and dingoes. The Biodiversity Council supports the need for the priority research actions listed in the draft TAP that may help underpin such landscape-scale control of feral cats.

Conclusion

The revised TAP presents a significant opportunity to curb the impacts of feral cats on wildlife if adequately funded and implemented. The Biodiversity Council urges the Australian Government to make the required funding, policy and program commitments to fully implement the plan.