



**Biodiversity
Council**

Submission to South Australia's proposed amendments to the Dog and Cat Management Act

6 September 2024

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.



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The Biodiversity Council welcomes the opportunity to provide feedback on the proposed amendments to the South Australian *Dog and Cat Management Act 1995* to improve cat management. The Biodiversity Council supports the South Australian Government's intentions to amend laws to remove barriers to control feral cats, particularly on rural lands.

We note:

Predation by feral cats is a key threat to Australian wildlife

- Cats – feral and otherwise – occur across all of Australia, including South Australia and some of its offshore islands.
- Cats have had a devastating impact on Australia's biodiversity and continue to have major impacts. Predation by feral cats is nationally recognised as a key threatening process driving faunal declines under the Environmental Protection and Biodiversity Conservation Act.
- 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, including many species found in South Australia^{1,2}.
- For example, on South Australia's Kangaroo Island, feral cats are a major threat to endemic native animals including the endangered Kangaroo Island dunnart, endangered Kangaroo Island echidna, endangered southern brown bandicoot and vulnerable hooded plover.

The Biodiversity Council supports intentions to improve cat management

- Amendments that allow landowners to manage feral cats on their own property are sensible. The existing law prevents feral cat control from within 1km of a residence, including a person's own place of residence. This has created uncertainty and barriers for rural landowners to manage cats on their own land.
- A definition for 'feral cat' should be included in the interpretation of the Act to provide clarity to users and ensure users can implement the Act and related legislation confidently, noting that proposed change 9A introduces the term feral cat to the legislation.
- The proposed changes allow persons authorised under the act to seize and destroy or dispose of any unidentified cat. While the existing legislation requires cats to be microchipped, this law was only introduced in 2018 and there is no data publicly available on the levels of compliance with this law. Therefore, it increases the risk that owned, unidentified cats could be destroyed or disposed of. The legislation should encourage authorised personnel to do sufficient checks to determine if a cat is owned. The South Australian Government should allocate resources to increase on-ground actions to increase responsible pet ownership practices of microchipping, desexing and containment.
- In addition to the proposed amendments, the mandatory desexing age for cats should be reduced to 4 months (instead of 6) to encourage cat owners to sterilise their cats before

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.

they reach puberty. Cats can begin reproducing from around four months old, thus, waiting to six months to desex a cat can increase the risk of breeding.

- The Biodiversity Council recognises that changing laws and policies is one step to reducing cat impacts but that to deliver true value, the changes should be accompanied by appropriate resource allocation to support the implementation of cat management programs and enforcement.

The South Australian Government should encourage local governments to manage pet cat impacts

- Pet cats that are allowed to roam collectively kill 323 million native mammals, birds and reptiles each year³.
- The South Australian Government should facilitate the introduction of local by-laws that limit the roaming of pet cats. The Dog and Cat Management Board have prepared a template of by-laws for South Australian Councils, but to date relatively few local governments in SA have adopted these⁴. Currently, pet cats are allowed to roam free in 90% of council areas; only 3% of councils have introduced a 24/7 cat curfew and 7% of councils have introduced a night-time curfew⁵. Cat containment by-laws should be accompanied by community education programs and appropriate enforcement.
- This year the Australian Government will release a new Feral Cat Threat Abatement plan that will require state governments to work with the federal government to reduce cats' toll on native wildlife⁶.

³ Biodiversity Council 2023, *The impacts of roaming pet cats on Australian wildlife factsheet*, <<https://invasives.org.au/wp-content/uploads/2023/06/Pet-cat-impacts-June-2023.pdf>>

⁴ Threatened Species Recovery Hub 2021, *The management of cats by local governments of Australia*, <https://www.nespthreatenedspecies.edu.au/media/uaoncte3/tsr-hub-project-7-4-report-the-management-of-cats-by-local-governments-of-australia_final.pdf>

⁵ Walkerville vet 2022, *Cat registrations and curfews by council area*, <<https://www.walkervillevet.com.au/blog/cat-curfew-registration-south-australia/>>

⁶ Tanya Plibersek 2024, *War on feral cats: report from the battlefield*, <<https://minister.dcceew.gov.au/plibersek/media-releases/war-feral-cats-report-battlefield>>