

**Submission
No 166**

INQUIRY INTO MANAGEMENT OF CAT POPULATIONS IN NEW SOUTH WALES

Organisation: Animal Welfare League (AWL) NSW

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**SUBMISSION TO THE ANIMAL WELFARE COMMITTEE
INQUIRY INTO THE MANAGEMENT OF CAT
POPULATIONS IN NEW SOUTH WALES**

NOVEMBER 2024

Introduction

The Animal Welfare League NSW (AWL NSW) appreciates the opportunity to submit to the Upper House Inquiry into the Management of Cat Populations in New South Wales.

While cat containment policies have been proposed to mitigate the impact of domestic cats on wildlife and are a particular focus of the Upper House Inquiry's Terms of Reference, AWL NSW believes that such policies should be encouraged, but not mandatory.

We argue that the better method for management should be:

- Desexing programs,
- Community Cat Management programs, and
- Public education campaigns to manage cat populations and prevent unintended consequences, such as a rise in stray cats from containment programs.

This submission will use specific reports and statistics to support this position. It should be noted that this submission uses RSPCA approved definitions for cats which are included in [Attachment A](#).¹

Recommendations

AWL NSW provides the following recommendations:

Recommendation 1: While the environmental threat posed by feral cats is substantial, focusing containment policies on domestic pet cats is disproportionate. Targeting feral cats in key conservation areas would be a more effective strategy.

Recommendation 2: AWL NSW supports voluntary cat containment programs with proper education and support for owners, rather than blanket mandatory laws. Voluntary measures can be more effectively implemented through incentives such as subsidised cat enclosures and ongoing public engagement.

Recommendation 3: Rather than making containment mandatory, authorities should emphasise the need for enrichment and stimulation for indoor cats to ensure their well-being, to encourage voluntary containment.

¹ Definitions are particularly important as in some policy papers there is a tendency to mischaracterise semi-owned and unowned cats as feral cats.

Recommendation 4: AWL NSW advocates for expanded community education campaigns to address both cat welfare and wildlife protection. These campaigns should encourage voluntary containment where feasible, alongside desexing, microchipping, and responsible pet ownership.

Recommendation 5. While not specifically in the Committee's terms of reference, AWL NSW recommends further work be undertaken to evaluate the costs and benefits, or otherwise, of cat registration in NSW.

Recommendation 6: Local councils would be better served by focusing on public engagement and funding large-scale desexing programs, rather than attempting to enforce containment. Such programs are more cost-effective and lead to better long-term outcomes.

Recommendation 7: AWL NSW strongly supports large-scale desexing programs as the primary solution for reducing the cat population. Such programs reduce unwanted litters and ultimately alleviate the pressure on shelters, pounds and wildlife.

Recommendation 8: AWL NSW recommends amending laws relating to Trap-Neuter-Return (TNR) along with further investment in Community Cat Management programs to enlist feeders of semi-owned cats to assist with the desexing efforts.

Recommendation 9: The Committee should consider whether there is merit in providing government support to expanding Community Cat Management programs, particularly in low socioeconomic areas with high domestic cat populations.

Recommendation 10: Instead of containment laws, AWL NSW supports voluntary measures paired with enhanced desexing and education programs to prevent the influx of cats into the pound system.

Recommendation 11: Rather than adopting mandatory containment across NSW, AWL NSW recommends adopting more flexible, voluntary containment approaches similar to those used in parts of South Australia and Victoria, with strong community engagement and education.

(a) The Impact of Cats on Threatened Native Animals in Metropolitan and Regional Settings

AWL NSW acknowledges that there are predation effects on native wildlife by cats. The impact has been estimated within many research papers and by animal welfare organisations such as the RSPCA. Despite small differences in findings, all reviewed studies show that cats prey on native wildlife.

There are however differing predation impacts from different cat typologies. Comparing two studies, it was found that feral cats killed 6.2 times as many birds as pet cats (377 million versus 61 million)

A study by Woinarski, et al. (2017) published in *Biological Conservation* estimated that feral cats kill around 377 million birds and 649 million reptiles annually across Australia. However, pet cats have a more limited impact.

The *Pet Cat Management in Australia* Report by the Threatened Species Recovery Hub (2021) highlights that pet cats kill around 61 million birds each year—significantly less than feral cats.

While there is little doubt that cats have an impact on native wildlife, mandatory containment of all owned cats would appear to be disproportionate.

Recommendation 1: While the environmental threat posed by feral cats is substantial, focusing containment policies on domestic pet cats is disproportionate. Targeting feral cats in key conservation areas would be a more effective strategy.

(b) The Effectiveness of Cat Containment Policies Including Potential Barriers

Cat containment policies have been trialled in various regions with mixed results. For example, a report by the ACT Government in 2019 revealed that 27% of residents were opposed to mandatory containment, citing concerns about enforcement difficulties and the impact on their cats' welfare. In addition, a review of cat containment in Canberra found no significant decline in wildlife predation rates despite the introduction of containment laws.

A mandatory cat containment policy would be regressive. From our experience, there is a high incidence of cat ownership in lower income households (predominantly because cats are lower cost than dogs). These households would be least able to bear the costs of mandatory cat containment or any fines that may arise from cats not being contained.

Moreover, larger free-roaming cat populations are concentrated in low socio-economic areas. Rental accommodation rarely provides for containment structures for cats, which can be quite expensive and unwieldy. Linked with the fact that many people in low socio-economic areas do not have the money to desex their pets, the imposition of mandatory containment effectively criminalises a large part of the population for desiring to own a pet, while discouraging responsible pet ownership practices such as desexing and identification.

Policies are only as effective as the extent to which they can be enforced. Policing of a mandatory cat containment policy would be substantial. The costs go beyond the additional rangers needed for enforcement by local councils. They extend to the additional costs borne by pounds and shelters in housing and euthanising cats.

Microchipping and registering a cat is associated with substantial costs and potential liabilities. Even without the need for mandatory containment some people do not microchip or register their cats, to avoid the costs or potential fines associated with ownership. This has led to an increase in semi-owned cat numbers. Mandatory containment could potentially lead to further increases in semi-owned cat populations, that could also potentially leak into increases in feral cat numbers. This would be a perverse outcome of mandatory containment policies.

Education campaigns on (voluntary) owned cat containment would reduce perverse outcomes that could arise from mandatory containment.

It has also been suggested that targeted mandatory cat containment for households in sensitive native wildlife areas could be implemented. While reducing the negative

externalities from a broad mandatory response, there are indigenous (and other) communities in many such areas that will be adversely impacted from targeted policy approaches that will disproportionately bear compliance costs.

Recommendation 2: AWL NSW supports voluntary cat containment programs with proper education and support for owners, rather than blanket mandatory laws. Voluntary measures can more effectively be implemented through incentives such as subsidised cat enclosures and ongoing public engagement.

(c) Welfare Outcomes for Cats Under Contained Conditions

Mandatory cat containment policies also have welfare impacts on owned cats.

Containing a cat in an apartment or a house is achievable with a locked door and a litter tray. However, cats need mental stimulation and exercise. Without this, their welfare and health are compromised.

While containment can improve safety for cats, it can also result in welfare issues if not managed appropriately.

Submissions to the Victoria Cat Management Strategy claimed that 60% of cats confined to homes without proper enrichment exhibited signs of stress or behavioural problems.

Even if cats are contained, with active measures to provide mental stimulation and exercise opportunity within the contained environment their welfare can still be compromised.

This highlights the need for carefully considered welfare strategies when promoting containment. There is no guarantee that mandatory cat containment policies can force owners to provide stimulation and given the costs these problems are most likely to manifest in the households that can least bear the cost of the policy.

Recommendation 3: Rather than making containment mandatory, authorities should emphasise the need for enrichment and stimulation for indoor cats to ensure their well-being, to encourage voluntary containment.

(d) The Effectiveness of Community Education Programs and Responsible Pet Ownership Initiatives

Education programs have demonstrated significant success in promoting responsible pet ownership.

The *Pet Ownership in Australia* Report, published by Animal Medicines Australia, showed that following targeted educational campaigns, desexing rates rose by 10% among cat owners. Similarly, numerous other research submissions showed increased compliance with vaccination and microchipping requirements following outreach efforts.

While AWL NSW has not undertaken any specific research on this matter, our anecdotal information would suggest that community education campaigns can be effective.

AWL NSW's Animal Care Truck has microchipped and/or vaccinated (with the support of the NSW Government) more than 5,000 animals across the State and undertaken numerous desexing drives. We have distributed educational material as part of our activities.

Users of our services have been receptive to educational material and want to follow best practice animal welfare. With greater exposure and continued funding, we are confident there will be greater compliance and material reductions in native wildlife predation.

While not strictly community education or a responsible pet initiative, registration and microchipping warrants discussion. Registration requirements of cats and microchipping may be inadvertently increasing semi-owned and unowned cat populations. Given that we know that there are larger cat populations in low-income areas, it is possible that people are not willing to bear the cost of registering their animals and instead prefer to have them as semi-owned to save money (and liability).

Registration costs in NSW are quite substantial (particularly with that extra fee if the cat was not desexed by 4 months old), and this is a strong disincentive for cats to be microchipped (and desexed). There is likely to be much higher rates of compliance with low-cost or free microchipping linked to a register of owners, and this would have significant benefits in terms of returning impounded cats to owners.

Registration laws have been repealed in Queensland. This warrants consideration in NSW. Microchipping could become the one-stop identification approach.

Recommendation 4: AWL NSW advocates for expanded community education programs to address both cat welfare and wildlife protection. These campaigns should encourage voluntary containment where feasible, alongside desexing, microchipping, and responsible pet ownership.

Recommendation 5: While not specifically in the Committee's terms of reference, AWL NSW recommends further work be undertaken to evaluate the costs and benefits, or otherwise, of cat registration in NSW.

(e) Implications for Local Councils in Implementing and Enforcing Cat Containment Policies

A Local Government NSW (LGNSW) review of enforcement costs in 2022 found that councils struggled with limited resources for managing compliance with containment policies.

Containment imposes a burden on local authorities to monitor, enforce, and handle complaints related to cat containment, which diverted resources from other animal welfare priorities.

As evidenced today, some Councils use the free roaming of cats under the Companion Animals Act **to not** undertake their current responsibilities with domestic cats. We do not support this approach.

AWL NSW believes there will be significant resource implications for local NSW Councils from the introduction of mandatory cat containment policies in terms of increased costs for enforcing compliance, detection and seizure of roaming cats, and other related activities including euthanasia of unclaimed cats.

Making cat containment mandatory in NSW will require significant resources being devoted to enforcement. These resources are unlikely to be recovered in fines. Further, the introduction of mandatory containment legislation may encourage people to avoid microchipping and registering their cats to avoid penalties, and consequently more cats will become semi-owned.

As identified earlier there are also other downstream impacts. Pounds (and shelters) will experience additional demand to hold and manage seized cats from non-complaint owners, and semi-owned and unowned roaming domestic cats, and there will be a likelihood of increased euthanasia costs.

It would be more cost effective to run local public awareness campaigns and subsidised desexing campaigns to achieve better long-term outcomes.

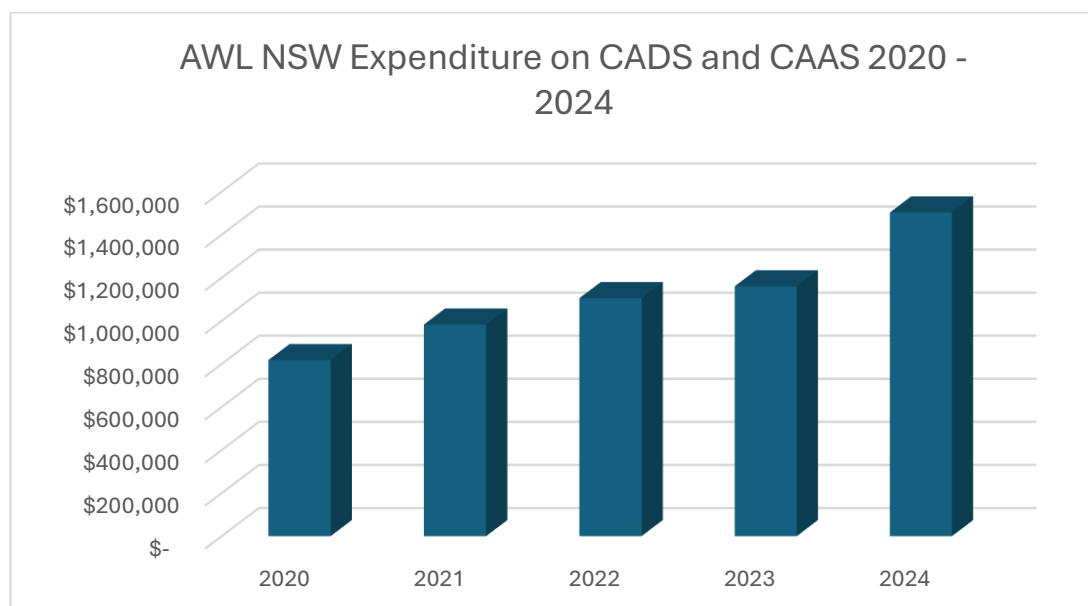
Recommendation 6: Local councils would be better served by focusing on public engagement and funding large-scale desexing programs, rather than attempting to enforce containment. Such programs are more cost-effective and lead to better long-term outcomes.

(f) The Effectiveness and Benefits of Implementing Large-Scale Cat Desexing Programs

Desexing is the cornerstone of managing cat populations. A study by Professor Jacque Rand (2024) of the *Australian Pet Welfare Foundation* showed that a large-scale targeted desexing campaign in a small rural town in Ipswich, Queensland, led to a 60% reduction in stray cat intake at pounds and shelters over three years. The same report noted that desexing is the most humane and effective way to control cat numbers, especially in low-income areas.

People do not avoid desexing their cats because of choice, but primarily due to factors such as cost and feasibility (e.g. transporting the cat to the vet). The strongest predictor of the rate of desexing of cats in a particular suburb is the average income. People know this is a good thing to do but cannot afford it. Low socioeconomic areas have the highest numbers of undesexed cats and the largest populations of semi-owned and unowned roaming domestic cats.

AWL NSW runs the most extensive, privately funded desexing and animal care program in Australia. Each year, AWL NSW provides subsidised desexing of animals to low-income households under a program called the Companion Animal Desexing Scheme (CADS). It also provides funding through the Companion Animal Assistance Scheme (CAAS) to low-income households to cover veterinary fees. More than \$5.5 million has been provided across 20 branches over the past five years to improve animal welfare. Last year both schemes were funded at a cost of \$1.5 million. Over the last five years, it is estimated that around 14,000 animals were assisted under both schemes.



We appreciate the benefits of large scale desexing of companion animals and have successfully run programs to support desexing for many years. Our major issue is that we never have sufficient resources to cover demand. Cats comprise the overwhelming majority of animals covered under our schemes. Many of our cases involve hoarders, where cats move between owned, semi-owned and unowned status (as the household population of cats increases and becomes unmanageable). Such cats from households in rural areas may also swell the feral cat population. While not documented, there will undoubtedly be significant positive outcomes on wildlife predation through cat desexing simply through a reduction in the numbers of cats.

Community cat management is also an effective means of reducing cat populations, and thus may reduce wildlife predation. A limitation is that such programs need to be conducted on domestic cats. A very successful community cat program (based on a trap-neuter-return model) has been the Campus Cats program. Run out of the University of New South Wales over a period of seventeen years it managed to reduce a population of approximately 90 cats to 8 cats today. Note that these cats were not “owned cats” but free-roaming and unowned until trapped – they then became semi-owned as they were microchipped and registered to program volunteers.

AWL NSW is currently funding a Community Cat Management Pilot Program, where cats in a targeted area are being desexed, microchipped, and moved from semi-owned to owned status before return. They will subsequently be monitored to ensure continuing welfare. AWL NSW will undertake research into this approach including its effectiveness in reducing cat population numbers over time.

There are numerous community cat feeders across New South Wales managing and feeding thousands of semi-owned cats. These cats are typically on public and sometimes private land. There are uncertainties about the legality of desexing these cats because of Section 11 of the POCTA Act, which makes it an offense to abandon an animal. This is often used to argue that legally these semi-owned cats cannot be desexed and returned to their home range.

A particularly effective approach to reducing semi-owned cat numbers, therefore, would be to amend the law to specifically legalise trap-neuter-return, and then to fund and implement a widespread targeted desexing program. Such a program would effectively enlist semi-owners to take ownership of their cats and would also reduce uncontrolled breeding thus reducing the number of semi-owned cats over time.

Recommendation 7: AWL NSW strongly supports large-scale desexing programs as the primary solution for reducing the cat population. Such programs reduce unwanted litters and ultimately alleviate the pressure on shelters and wildlife.

Recommendation 8: AWL NSW recommends amending laws relating to Trap-Neuter-Return along with further investment in Community Cat Management programs to enlist feeders of semi-owned cats to assist with the desexing efforts.

Recommendation 9: The Committee should consider whether there is merit in providing government support to expanding Community Cat Management programs, particularly in low socioeconomic areas with high domestic cat populations.

(g) The Impact of Potential Cat Containment Measures on the Pound System

This matter has been addressed in other parts of this submission. Mandatory cat containment risks overwhelming the pound system. There is likely to be increases in surrendered and abandoned cats after the introduction of containment laws. Many owners could not (or chose not to) comply with containment regulations, resulting in more cats being surrendered at pounds and shelters.

One of the issues relating to mandatory containment is that many free-roaming cats that give rise to unwanted breeding, complaints to councils, and threats to wildlife are not owned by anyone, or have a semi-owner (occasional feeder) who does not acknowledge ownership. These cats are not likely to be contained by anyone because no-one is specifically taking responsibility for them. If containment laws are enforced, this will increase stray cat populations in pounds and shelters, as well as necessitating extra resources and staffing for councils. It will also significantly increase rates of euthanasia.

Recommendation 10: Instead of containment laws, AWL NSW supports voluntary measures paired with enhanced desexing and education programs to prevent the influx of cats into the pound system.

(h) The Outcomes of Similar Policies on Cat Containment in Other Australian States or Territories

When reviewing vat management in Victoria in 2020, the Victorian Government noted that while cat containment laws may have helped reduce some nuisance behaviours, they did not significantly lower cat predation on wildlife. Compliance rates also remained low, and enforcement was a continual challenge. Similarly in the ACT, it has been found that containment laws did not achieve their full potential due to public resistance and inconsistent enforcement.

There appears to be limited practical evidence to support that mandatory cat containment leads to reductions in predation of native wildlife in the short term. Both jurisdictions self-reported limited impacts.

It would appear the issues are with compliance cost and public resistance. A simple way to solve these issues is to make the process voluntary through public awareness, education and desexing campaigns. Those that can afford to contain their cats will, and those who can't can be supported by broader desexing campaigns. This will significantly improve policy effectiveness.

Recommendation 11: Rather than adopting mandatory containment across NSW, AWL NSW recommends adopting more flexible, voluntary containment approaches similar to those used in parts of South Australia and Victoria, with strong community engagement and education.

(i) Options for Reducing the Feral Cat Population

AWL NSW primarily focusses on welfare of companion animals, and our main interest is in the management of domestic cats (including owned, semi-owned and unowned cats). We therefore do not consider it appropriate to comment extensively on the management of the truly feral cat population.

Nevertheless, we would like to stress that AWL NSW strongly opposes the use of 1080 poison to control feral cats (especially given creeping cat definitions) as it has the potential to kill other animals and is a particularly inhumane poison. Other more humane approaches to reducing and managing the feral cat population are required. Examples include the use of islands and fenced enclosures to exclude predators from vulnerable wildlife populations, and the development of novel measures such as contraceptive pharmaceuticals that could reduce feral cat breeding rates.

Conclusion

AWL NSW believes that mandatory cat containment policies may lead to unintended consequences such as increased stray populations and overburdened shelters. We urge the committee to prioritise large scale desexing programs, Community Cat Management, Trap-Neuter-Return, and community education over restrictive laws that could have negative welfare and enforcement outcomes.

The Animal Welfare League NSW advocates for voluntary cat containment supported by education, desexing programs, and TNR initiatives. These approaches are more effective in protecting wildlife and managing cat populations without the downsides of mandatory containment laws.

Attachment A. RSPCA Approved Cat Definitions

Domestic

- **Owned** - These cats are identified with and cared for by a specific person and are directly dependent on humans. They are usually sociable, although sociability can vary.
- **Semi-owned** - These cats are fed or provided with other care by people who do not consider they own them. They are of varying sociability, with many socialised to humans, and may be associated with one or more households (or business premises, university campuses etc).
- **Unowned** - These cats are indirectly dependent on humans with some having casual and temporary interactions with humans. They are of varying sociability, including some who are unsocialised to humans, and some may live in groups (colonies).

Feral

- **Feral** - These cats are unowned, unsocialised, have no relationship with or dependence on or contact with humans, predate for food, and reproduce in the wild. They are rarely seen near human habitation.