## INQUIRY INTO MANAGEMENT OF CAT POPULATIONS IN NEW SOUTH WALES

Organisation: Australian Institute of Animal Management

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# AUSTRALIAN INSTITUTE OF ANIMAL MANAGEMENT SUBMISSION

Inquiry into the management of cat populations in New South Wales

The Australian Institute of Animal Management (AIAM) is the national peak body representing Local Government Animal Management Officers. The AIAM Board consists of a wide range of professionals engaged in the various aspects of companion animal management.

AIAM seeks to support those engaged in the business of companion animal management, and the function itself, by providing training and information, opportunities for networking and collaboration and by encouraging the use of best practice policy and practices. AIAM promotes consistency of legislation, consultation in the creation of legislation, and workplace processes and healthy relationships with external stakeholders and the community. AIAM supports cross sector collaboration and co-design of projects and initiatives. The Board of AIAM welcomes the opportunity to engage and advocate at all levels on topics relevant to or inclusive of companion animal

AIAM Directors are active in the space of domestic cat management policy and practice development, through membership in multiple working groups, and ongoing advocacy and research work on the topic of cat management through Local Government. AIAM also runs a National Local Government Domestic Cat Management Discussion Group, in which Local Government staff involved in domestic cat management regularly come together to discuss topics of interest and share learnings.

This submission focuses primarily on the Terms of Reference (a) through to (g), however, also includes some feedback on the other two Terms of Reference. As the Inquiry topic closely aligns with issues examined in the Draft Victorian Cat Management Strategy 2024 Consultation and the Draft Threat Abatement Plan for Predation by Feral Cats 2023 Consultation, AIAM recommends that this submission be read in conjunction with the detailed AIAM submissions for these consultations (attached).



## Responses to Terms of Reference

(a) The impact of cats on threatened native animals in metropolitan and regional settings

AIAM acknowledges the negative impact that free roaming cats have on wildlife populations that exist within the same ecosystems, including those in metropolitan and regional settings. AIAM also recognises that cats are an established species within Australia. The management of cats in the community is necessarily complex due to a multitude of factors related to the cats themselves, the environments they live in, and the people they live alongside. Cats predate on native and other wildlife to varying degrees depending on many factors - their individual characteristics (e.g., age, personality), where they live, how they are cared for by humans, and sources of food (Dickman and Newsome, 2015).

Accessibility of resources, services such as animal shelters and veterinary clinics, and methods to manage cat populations varies according to location, with more options typically available in urban than remote areas. Additionally, division of cat management responsibilities between levels of government is based on human-centric factors, such as population density and land ownership, resulting in disjointed and sometimes conflicting cat management practices occurring across the landscape.

As such, AIAM advocates for the use of collaborative, micro-targeted desexing as the core approach to driving down free roaming cat population numbers in areas of human habitation and minimising the negative impacts of free roaming cats on wildlife.

The reduction in population of free roaming cats, and in nuisance issues, are the essential issues for Local Government. Making gains in these areas also reduces negative impacts on people who care about cats, people who live in proximity to cats and those involved in the sectors tasked with managing cats. In addition, trapping and killing (with or without impoundment and holding) is an extremely expensive exercise for Local Government (LG) (Rand et al., 2019). Reallocating the limited resources to more progressive, effective, humane, and socially acceptable and equitable cat management practices is possible and advised.

- (b) The effectiveness of cat containment policies including potential barriers
- (e) Implications for local councils in implementing and enforcing cat containment policies
- (g) The impact of potential cat containment measures on the pound system
- (h) The outcomes of similar policies on cat containment in other Australian states or territories



AIAM strongly supports containment on owner's property where possible but does not support making cat containment a mandatory requirement for cat ownership as this presents a barrier to cat caretakers transitioning to cat owners, which reduces participation in cat desexing programs; this is contrary to the goal of desexing as many cats as possible. There is no evidence that supports the efficacy of mandatory containment legislation or cat curfews, as an effective cat management strategy (RSPCA Australia, 2018).

Australian Councils who have implemented mandatory 24/7 containment of cats have reported an increase in cat related complaints, impoundments and euthanasia, and have been unable to demonstrate a reduction in cats wandering at large (RSPCA Australia, 2018). Most admissions of free-roaming cats to shelters and pounds are from low socio-economic areas (Ma et al., 2023). Around 5% of impounded cats are reclaimed (Lancaster et al., 2015; Chua et al., 2023). There are multiple reasons for this, but the primary reason is that these cats are not fully "owned" by one person and are cared for by multiple individuals within the community who each cannot afford to comply with legislative requirements.

Mandatory containment policies are generally not viewed as being effective in achieving an improvement in reduction of free roaming cat populations, complaints about wandering cats, reduction in intake to municipal or private animal shelters, or any other metric currently in use. The main reasons reported for this are:

- Majority of cats who are impounded do not have "owners" (as per the description of an owner in most legislation) and therefore there is no one to contain them.
- Lack of support services provided alongside the implementation of the legislation to enable community members to comply with the policy i.e. financial and practical support to develop cat containment infrastructure.
- Mandatory containment policies effectively criminalise cat caretakers that do not (or cannot) comply with the legislation.
- Mandatory containment policies effectively criminalise those cats that are not complying
  with the legislation and classifies them as stray or feral with the more frequent outcome
  for them being euthanasia.
- Mandatory containment policies (without significant support mechanisms) are not
  equitable or inclusive and feeds into broader social issues of equity and human rights.



- (c) Welfare outcomes for cats under contained conditions
- (d) The effectiveness of community education programs and responsible pet ownership initiatives

AIAM has discussed best practice promotion and behaviour change approach to encouraging improved feline welfare and cat keeping practices, in the section "Theme 1: Promote cat welfare and responsible cat ownership" in our submission to the Draft Victorian Cat Management Strategy 2024 Consultation. The following information is restricted to the key points and should be read in conjunction with the more complete discussion in the VCMS 2024 Consultation submission, attached.

Despite wide variation in how community members practically manage their pets, people view themselves as responsible owners (Westgarth et al 2019). This mismatch between the perception of individuals and regulators has implications for education and public messaging campaigns about "Responsible Pet Ownership", resulting in lack of market penetration in target groups simply because people do not see the messaging as relevant to themselves. It is also important to note here that education on its own is not an effective behaviour change strategy for community pet issues (Philpotts et al 2019).

AIAM recommends a shift away from traditional 'education and enforcement' models in the management of pet animals, including domestic cats, towards proven behaviour approaches promoting cat welfare and desired or positive cat care behaviours, such as the 'Ten Task' model proposed by Glanville et al (2020).

AIAM suggests the following themes be considered for community engagement material to increase the performance of desired cat caring behaviours and improve cat welfare:

- 1) In order to achieve optimal welfare, environments provided by cat caretakers must meet the 'Five Pillars of a Healthy Feline Environment'. These are:
  - a. Pillar 1 Provide a safe place
  - b. Pillar 2 Provide multiple and separated key environmental resources
  - c. Pillar 3 Provide opportunity for play and predatory behaviour
  - d. Pillar 4 Provide positive, consistent and predictable human–cat social interaction
  - e. Pillar 5 Provide an environment that respects the importance of the cat's sense of smell
- 2) Content to help individual cat carers identify when total confinement and maintaining acceptable cat welfare are mutually exclusive, as the individual cat does not thrive when contained. In these situations, owners must be supported to make balanced, considerate decisions about their keeping practices.



- 3) "Desexed cats make great neighbours". Cat desexing reduces 'nuisance' behaviours (fighting, breeding, spraying and vocalisations) and associated complaints from neighbours and other community members, and improves cat health.
- (e) The effectiveness and benefits to implementing large scale cat desexing programs

AIAM included a detailed discussion of cat desexing programs as a core component of domestic cat management in the section "Theme 2: Increase cat desexing rates" of our submission to the Draft Victorian Cat Management Strategy 2024 Consultation. The following information is restricted to the key points and should be read in conjunction with the more complete discussion in the VCMS 2024 Consultation submission, attached.

In Australia, we have a growing body of evidence showing that collaborative, targeted cat desexing programs in which local authorities, local animal welfare organisations and members of the community invested in cat wellbeing work together to identify and desex free-living cats, and recruit their current caretakers to become full, legal owners of these cats, are the cheapest, quickest and more effective way to achieve control of local breeding populations of domestic cats.

Successful examples of this approach include, but are not limited to:

- The City of Banyule targeted cat desexing program in Victoria, which demonstrated city-wide decreases in cat impoundments by 66%, cat euthanasia by 82%, and cat-related calls by 36% over 8 years, with savings to council of AU \$440,660 for an outlay of AU \$77,490 (Cotterell et al., 2024)
- RSPCA NSW Keeping Cats Safe at Home project, which combines behaviour change strategies aimed at improving cat caring and keeping practices with targeted cat desexing. This program has demonstrated successful results across 11 councils in a variety of community types from rural to inner suburban.
- The Australian Pet Welfare Foundation Community Cat Programs in the municipality of Ipswich, that has <u>demonstrated consistent reductions in cat intakes, nuisance calls and euthanasia through targeted, free cat desexing across three primary target areas in Queensland.
  </u>

Additionally, there is a wealth of published research demonstrating that non-lethal management approaches based on desexing, adoption of socialised cats, and leaving unsocialised desexed strays in their home location, have led to significant reductions in urban stray cat populations internationally (Levy et el.,2014; Nutter 2005; Spehar & Wolf 2018; Spehar & Wolf 2019; Zito et el., 2018), and in Australia (Swarbrick & Rand 2018; Tan et el., 2017).

Importantly, to be effective in the long term, this approach must replace 'trap and kill' cat management as the default domestic cat management practice, with trapping and removal of



cats from communities used only when necessary, with the consensus of the community that this is required or desirable in specific circumstances.

### (i) Options for reducing the feral cat population

AIAM included a detailed discussion of the factors impacting management of feral domestic cats in natural areas adjacent to human populations in the submission to the Draft Threat Abatement Plan for Predation by Feral Cats 2023. The following information is restricted to the key points and should be read in conjunction with the more complete discussion in the submission, attached.

Domestic cat management policies and actions must reiterate a clear definition of feral cats and distinguish between cats who are genuinely unowned, unsocialised, and have no relationship with or dependence on humans, and domestic cats who are physically present on public land at the time of cat control activities.

Management of domestic cats who are on Crown land that is adjacent to or close by to human habitation and infrastructure, should be consistent with management practices for cats in the residential areas. Local Government Animal Management departments and those working on cat control on Crown land must closely collaborate and coordinate activities, to ensure that domestic cat management actions are carried out appropriately.

AIAM strongly supports the formation and use of "stakeholder coalitions" for each community/municipality, and at state level, to maximise cooperation, collaboration, resourcing, information sharing and the improvement of relationships between government and non-government service providers is recommended.

State provision of the following services to stakeholders would be of great benefit:

- Access to a reference library of accurate, evidence-based reference materials and resources, and associated continuing education opportunities for development of evidence-based, progressive cat management service
- Access to, with the requirement to use, shelter management software with the capability to produce compliant reporting for animal services and outcomes.
- In-depth training on data management, cat management methodology and issues, and community engagement



(j) Any other related matters.

Align definitions of cat cohorts with current understanding of how cats live

The ecological niches filled by feral cats and domestic cats are very different. Feral cats live independently of humans in remote areas and management methods can be mostly decided without regard to impacts on humans living in these areas. Domestic cats live with and alongside humans who care for and are bonded to them (Zito et al., 2015), so management measures for these cats must consider the impacts of humans on the methods chosen, and of the method chosen on the humans affected. Classing semi-owned and unowned domestic cats as feral cats, ignores the significant differences between the environments in which these cats exist and is inconsistent with RSPCA's 2018 Best Practice Domestic Cat Management report (Identifying best practice domestic cat management in Australia – May 2018).

To effectively manage cats who fulfil different ecological niches across the spectrum of human population density and involvement, it is essential that we identify and classify these different groups of animals and apply specific strategies to reduce their numbers while achieving community, animal welfare, and ecological goals.

AIAM has worked with stakeholders from 2014 to develop consistent national definitions of cats (https://www.g2z.org.au/national-cat-action-plan.html) which align with those in RSPCA Australia's 'Identifying Best Practice Domestic Cat Management in Australia' (RSPCA Australia, 2018). These are:

**Domestic cats**: cats with some dependence (direct or indirect) on humans. The three subcategories of domestic cats are:

- I. **Owned** these cats are identified with and cared for by a specific person and are directly depending on humans. They are usually sociable although sociability varies
- II. 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.
- III. **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.

**Feral cats** are unowned, unsocialised, have no relationship with or dependence on humans, and live and reproduce in the wild (e.g. in forests, grasslands, deserts). This definition is aligned with feral cat definitions in the Australian Government Threat Abatement Plan (2015).

**Stray cats** are cats who wander (straying refers to the activity of wandering away, not an ownership status). Stray cats may be:



- I. responsibly owned and temporarily escape from their property (e.g. a gate or door left open),
- II. casually owned and wander from their property regularly
- III. semi-owned (e.g. cats making regular visits to one or more households which do not own them, but who may be currently owned, or lost or abandoned)
- IV. born to previously owned cats and live in colonies, directly or indirectly being fed by humans

Recognise the role of volunteer-run animal rescue and rehoming groups in domestic cat management

AIAM suggests that the role of volunteer-run rescue groups in urban cat management be more explicitly recognised in discussions about domestic cat management in urban and suburban contexts.

Lack of recognition of the current contribution of Volunteer-run rescue groups in the management of domestic cats is detrimental to relationships within the sector. These groups are not shelters and the work they do is often not in collaboration with councils for a variety of reasons. Where groups are working with councils, they commonly take on care and rehoming responsibility for animals taken into care by councils, at their own cost, with no financial or other practical contribution from Councils. AIAM encourages Local Government to, at the very least, actively participate in and support provision of positive outcomes for the cats that come into their care. Ideally, municipal shelters should be facilitating direct rehoming (amongst other proactive programs such as foster, intake reduction etc.) of the community's pets that require the shelters' services.

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## AUSTRALIAN INSTITUTE OF ANIMAL MANAGEMENT SUBMISSION

Draft Victorian Cat Management Strategy 2024 Consultation

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AIAM are encouraged to see the focus on collaboration, proactivity and improvement in language regarding cats in this draft Victorian Cat Management Strategy (CMS). We commend Animal Welfare Victoria (AWV) for taking strides towards more effective, inclusive and evidence-based cat management for our state.

**AIAM AGREES** with **WHAT** the plan wants to achieve. **AIAM DISAGREES** with **SOME** of the proposed **HOW** it is to be achieved.

Providing sustained support for the required veterinary procedures (desexing, vaccination and microchipping) of cats along with other support to build capacity in the human cat caretaking population (capture, transportation, containment etc), is the most effective, socially acceptable, equitable, least harmful and most humane means of reducing cat numbers, provided it includes



all categories of domestic cats i.e. owned, semi-owned and unowned (Crawford et al 2023). Desexing not only prevents growth in cat populations, and reduces cat numbers over time, but also prevents fighting and wandering for reproductive purposes, which reduces nuisance issues and cats being impounded and killed.

The reduction in population of free roaming cats, and in nuisance issues, are the essential issues to be addressed in this plan. Making gains in these areas also reduces negative impacts on people who care about cats, people who live in proximity to cats and those involved in the sectors tasked with managing cats. In addition, trapping and killing (with or without impoundment and holding) is an extremely expensive exercise for Local Government (LG) (Rand et al 2019). Reallocating the limited resources to more progressive, effective, humane, and socially acceptable and equitable cat management practices is possible and advised.

## Summary Of Recommendations and Feedback:

Vision and Objectives

AIAM proposes an amended vision to be "A future in which cats are valued and cared for by supported caretakers, ensuring the wellbeing of cats, wildlife, and the community".

AIAM recommends amended language be used throughout the CMS to improve inclusivity of all members of the community, ensure that cats and cat caretakers are not demonised, and to provide more clarity around desired cat caretaker behaviours.

AIAM proposes amending **Objective 2** to recognise that cats are now considered an established pest species that are abundant to widespread across Australia, and landscape-scale eradication is not considered feasible. Instead, the objective should focus on effective harm minimisation and effective population suppression.

AIAM strongly supports **Objective 3**.



Roles, responsibilities, and challenges for stakeholders

AIAM suggests that the role of volunteer-run rescue groups in urban cat management be more explicitly recognised in the CMS.

AIAM suggests that the roles and responsibilities of LG detailed within this section be expanded to clearly state that proactive actions aimed at improving voluntary compliance with the Victorian regulatory structure and CMS, and the provision of care sufficient to provide positive animal welfare and rehoming of companion animals taken into care by council, also fall within the remit of Victorian LG Animal Management (AM) departments.

There appears to be a section of the Appendix missing from the document. The Appendix linked in this section is a glossary and no management framework was included in the Appendix of the Draft Strategy.

#### Introduction

There are several statements mentioned in the sections falling under the Introduction, from page 6, that require clarification or further evidence. See Detailed Response below for more information.

## Theme 1: Promote cat welfare and responsible cat ownership

AIAM suggests removing the term 'responsible ownership' from Theme 1, and stating more explicitly the desired cat carer behaviours that AWV would like to see increased in the community.

AIAM recommends that AWV move away from an 'education' model of promoting cat welfare and desired or positive cat care behaviours, and applies known behaviour change models such as the 'Ten Task' model proposed by Glanville et al (2020).

AIAM suggests the following themes be considered for community engagement material:

1) The Five Pillars of Feline Friendly Environment from the AAFP and ISFM Feline Environmental Needs Guidelines



- 2) Content to help individual cat carers identify when total confinement and maintaining acceptable cat welfare are mutually exclusive, and guidance for navigating these situations as a concerned cat owner.
- 3) Desexed cats make great neighbours.

## Theme 2: Increase cat desexing rates

AIAM supports all of these actions. It is important, particularly in reference to affordable desexing options, to make these available to ALL of the community, and to remove the requirement to essentially demonstrate how needy the individual is before they can access the program.

Additionally, AIAM suggests that key learnings (detailed in long response below) from existing and previous successful cat desexing programs be shared with LG and applied in all municipalities.

## Theme 3: Expand cat containment

AIAM strongly supports containment on owner's property where possible, but does not support making cat containment a mandatory requirement as it does not work to achieve the proposed goals of the CMS, and creates barriers to cat caretakers taking ownership of and desexing cats.

In principle, AIAM supports proposed Actions 7 and 8 where these include proactive initiatives as described in Detailed Response below.

## Theme 4: Reduce the impacts of semi-owned and unowned cats

AIAM supports effective, humane and ethical actions to reduce populations of free-roaming cats around areas of human habitation and infrastructure.

AIAM recommends that well-managed, well-funded supportive programs including targeted free cat desexing, replace 'trap and kill' as the default foundation of all domestic cat management.

AIAM suggests that alternatives to trapping and removal of adult cats, especially those with whom a community member has an existing bond, be avoided at all costs. Alternatives may include suspension or removal of excess animal permits, and fines, for non-compliance with existing mandatory requirements for cat owners (e.g. containment, desexing).



AIAM supports decreasing the mandatory holding period for unidentified cats in holding facilities, and encourages AWV to use Victorian reclaim data for cats to inform development of evidence-driven timeframes and actions to be adhered to by councils when cats are taken into care.

In addition, AIAM strongly suggests that Section 84O (1) of the Victorian Domestic Animals Act, 1994, should be removed, as accurate assessment of human socialisation in cats confined to shelters facilities requires a minimum of 3 days observation.

AIAM strongly suggests that the minimum standards of care required in all facilities in which cats are held, be revised to make cat housing requirements consistent with those described in the ASV Guidelines for Standards of Care in Animal Shelters.

AIAM recommends that AM departments collaborate with Local and State Government conservation and land management departments to concurrently promote and facilitate cat management and habitat restoration on private land. Furthermore, these efforts should focus on private land neighbouring environmentally sensitive areas, for example sensitive or important habitat on Crown land, to create 'reduced cat impact' buffer zones around and improve cat management in these areas.

## Theme 5: Manage feral cat populations and impacts

Importantly, actions must reiterate a clear definition of feral cats and distinguish between cats who are genuinely unowned, unsocialised, and have no relationship with or dependence on humans and domestic cats who are physically present on public land at the time of cat control activities.

Management of domestic cats who are on Crown land that is adjacent to or close by to human habitation and infrastructure, should be consistent with management practices for cats in the residential areas.



AM departments and those working on cat control on Crown land must closely collaborate and coordinate activities, to ensure that domestic cat management actions are carried out appropriately.

AIAM strongly recommends that a revised Victorian Cat Management Working Group be developed with representatives from ALL stakeholder groups, with a focus on developing frameworks to guide stakeholder coalitions in local areas in collaborative, tailored cat management. As a current member of the Victorian Domestic Cat Management Working Group, AIAM would welcome continued involvement in this action.

AIAM urges a greater emphasis on promoting the modification of human actions, such as habitat clearing, degradation and fragmentation, to prevent risk to threatened species.

AIAM does not support the trapping and shooting of cats, especially those in close proximity to residential areas. AIAM does not support bounties as an animal population control.

## Theme 6: Improve collaboration and information sharing

AIAM strongly suggests that all contributions to cat management must be acknowledged and recognised, including the significant role that unfunded, volunteer-run rescue groups play in the capturing and/or rehoming of unowned and semi-owned cats currently.

AIAM proposes that descriptions of LG roles and responsibilities in animal management include an explicit acknowledgement of the shift in community expectation that these activities will be supportive and inclusive of human and animal welfare considerations, and that Local Councils devote resources to:

- Proactive animal management practices, such as targeted desexing of cats, that reduce the demand on the system and support people and pets to stay together
- Ensuring high quality care and prioritising live outcomes of all pets who enter their care through animal management activities.

AIAM proposes that concerted effort be devoted to improving the language used by Local and State Governments to discuss cats, cat management, cat ownership, and those who care for cats



in any capacity. AWV is in a unique position to influence this change in language use, which is one important step forward towards open communication and collaborative working relationships within the cat management space.

AIAM supports unified strategies by LG AM, animal welfare and sheltering organisations, human welfare organisations, conservationists and ecologists, and communities to achieve the best outcome for people, cats and wildlife.

## Theme 7: Improve laws and processes

AIAM recommends the removal of mandatory desexing legislation (MDL) and mandatory containment legislation (MCL) as proposed cat management strategies in the Victorian Cat Management Strategy.

AIAM recommends that cat ownership limits be removed, at least temporarily, to facilitate recruitment of cat carers into desexing programs.

AIAM supports incentive programs for desexing and identification, but not packaged with mandatory registration, or containment.

## **Implementation**

AIAM recommends that the implementation timeline is reviewed as follows:

- Actions 3 and 4 are moved to Short Term from Medium Term goals. As detailed in our response to Theme 2, desexing programs are the most effective and humane way to reduce cat populations overall.
- 2) Action 6 be moved to Long Term from Medium Term goal. As detailed in our response to Theme 3, mandatory containment legislation (MCL) is counterproductive to the overall goal of working towards reproductive control over the cat population. There is no evidence that supports the efficacy of MCL (or cat curfews) as an effective cat management strategy i.e. achieving an improvement in reduction of free roaming cat populations, complaints



- about wandering cats, reduction in intake to municipal or private animal shelters, or any other metric currently in use (RSPCA Australia, 2018).
- 3) Action 24 is moved to Short Term from Long Term goal. As detailed in our response to Theme 7, AIAM supports incentive programs for desexing and identification, but not packaged with mandatory registration. Cat management actions based on imposing legislative requirements, and fining people for unregistered, excess or wandering cats are ineffective as they do not address the causes of stray or overpopulation of cats. It is imperative to remove as many barriers as possible, as quickly as possible, to encourage voluntary engagement with cat desexing programs.

Monitoring, evaluation, reporting and improvement framework

AIAM recommends that regular, timely, publicly available, progress reports are included as part of the monitoring and reporting framework. To ensure success of the CMS, it is essential that the outcomes from this framework are as transparent and accessible as possible to ensure engagement, confidence, and the ability for continuous improvement from all stakeholders.

## **DETAILED RESPONSE**

#### Vision

The vision, "Cats are cared for by responsible owners, ensuring the wellbeing of cats, wildlife and the community" is a sound long term goal. However, there needs to be a clear understanding that fulfilment of the vision is a long term process. This is referred to under the Guiding Principles ("Progress over perfection") however, this sentiment needs to be reflected throughout the entire document and embedded in all sections.

HOW the vision is fulfilled is as important as the vision itself. For example, euthanising every cat that does not conform with the vision is theoretically possible but not the best or most ethical way to get where we need to go.



While we are making our way towards fulfilment of the vision, we need to be careful not to alienate those who don't consider themselves as 'owners'. Language matters and we need to ensure inclusivity. We need to ensure that the vision is not exclusive of those cats and their caretakers that do not yet conform with it. The emphasis must be on "the future" and it must be understood that there will always be people and cats that cannot conform to the vision.

AIAM proposes an amended vision to be "A future in which cats are valued and cared for by supported caretakers, ensuring the wellbeing of cats, wildlife, and the community".

## **Objectives**

1) Promote cat welfare and responsible ownership.

While the terms "welfare" and "responsible pet ownership" have considerable appeal as concepts, and are widely used, how they are perceived and interpreted by the general community varies so extensively that simply telling owners that they should "be responsible" and "ensure good welfare" is of limited use as a message to promote behaviour change (Westgarth et al 2019). Pet owners of any species need to have specific, clear criteria and actions communicated in a variety of ways to be of any use for them. In addition, they need to be ABLE to undertake the actions and achieve the criteria and therefore it is up to us, in the animal management sector, to assist them to be the caretakers that we need them to be.

We recommend that alternative terminology is used. As examples, Animal Welfare League of Queensland uses 'Desex, Identify, Contain and Keep Safe' for cats and 'Desex, Identify, Train and Keep Safe' for dogs.

2) Protect the environment and community from the negative impacts of cats.

AIAM supports this objective in principle. However, given that *felis catus* is considered widespread to abundant across mainland Australia, and an established pest species in Victoria, it must be acknowledged in this CMS that elimination of free-living cats from the Australian environment is not considered feasible by the Federal or State Government. Actions proposed under this objective must strive for effective harm minimisation and population



control of cats in human-centric environments, rather than total eradication of free-living cats and separation of all cats from the natural environment.

3) Improve processes, cooperation and knowledge sharing in cat management.

AIAM strongly supports this Objective. Encouragement of formation and use of "stakeholder coalitions" for each community/municipality, and at state level, to maximise cooperation, collaboration, resourcing, information sharing and the improvement of relationships between government and non-government service providers is recommended.

State provision of the following services to stakeholders would be of great benefit:

- Access to a reference library of accurate, evidence-based reference materials and resources, and associated continuing education opportunities for development of evidence-based, progressive cat management service
- Access to, with the requirement to use, shelter management software with the capability to produce compliant reporting for animal services and outcomes.
- In-depth training on data management, cat management methodology and issues, and community engagement

Roles, responsibilities and challenges for stakeholders

"Councils are responsible for implementing and enforcing domestic cat management laws."

The stated scope of responsibility for LG in the implementation of the Draft CMS is not in line with current community expectations for companion animal management (Taskforce on Rehoming Pets, 2021), nor with AWV suggested actions for councils within this document, such as investing in proactive, targeted desexing programs, or the responsible rehoming of pets who come into council care through AM actions.

Currently, the above definition of LG scope of action is adhered to rigidly by some councils and used as justification for focusing on enforcement-centric approaches with no consideration for voluntary compliance or animal welfare concerns. This means that domestic, unowned and semi-owned cats are essentially left unmanaged, or at best, AM teams are working against



communities by trapping and killing cats with which community members have emotional bonds (Chua, Rand and Morton, 2023).

AIAM suggests that the statement above and paragraph detailing LG roles, responsibilities and challenges is modified to clearly state that proactive actions aimed at improving voluntary compliance with the Victorian regulatory structure and cat management plan, and the provision of care sufficient to provide positive animal welfare and rehoming of companion animals taken into care by council, also fall within the remit of Victorian LG AM teams.

Lack of recognition of the current contribution of Volunteer-run rescue groups in the management of domestic cats in Victoria is detrimental. These groups are not shelters and the work they do is often not in collaboration with councils for a variety of reasons. Where groups are working with councils, they commonly take on care and rehoming responsibility for animals taken into care by councils, at their own cost, with no financial or other practical contribution from Councils. During the 2022-2023 financial year, 101 volunteer-run Victorian rescue groups took in and rehomed 6,992 cats through the online PetRescue adoption platform; these cats were all fully vet worked and this number does not account for the cats rehomed via other pathways. AIAM encourages LG to, at the very least, participate in and support provision of positive outcomes for the cats that come into their care. Ideally, municipal shelters should be facilitating direct rehoming (amongst other proactive programs such as foster, intake reduction etc.) of the community's pets that require the shelters' services.

"These organisations face significant emotional and financial strain due to the large number of cats that are impounded, adopted or euthanised each year. A more detailed overview of the current management framework is provided in the Appendix."

The Appendix linked is a glossary and no management framework was included in the Appendix of the Draft CMS.



#### Introduction

There are a number of statements mentioned in the sections falling under the Introduction, from page 6, that require clarification or further evidence.

Cat Management Challenges

"Domestic cats can begin breeding as early as 4 months of age and can produce up to three litters a year" page 6.

While this statement is true, it does not tell the whole story which is necessary for the public to develop an educated view on the topic. According to the work of Miller et al (2014), Boone et al (2019) and Benka et al (2021) free roaming cats have on average 1.4 litters per year and the survival rate of kittens to 6 months of age is 0.9 per litter, contrary to the previously outed number of 2.8.

"While some of the challenges of cat over-population can be addressed for registered pets by providing incentives for owners to desex their pets," page 7

Most (reportedly 90%) of owned (registered) cats are desexed (Johnson and Calver 2014). This indicates that this is not the cohort of cats and owners that need the most support for desexing services.

"Consequently, they are more likely to reproduce uncontrollably and live short, precarious lives." page 7

The evidence available for this statement is lacking. We request that evidence is provided for this statement or that it is retracted.

Categories of cats for management purposes - Unowned - page 6.

The language used to describe the living conditions of unowned cats is not only misleading, but it perpetuates the damaging narrative that exists for this population of cats. A simple change to "may live in groups where resources are provided by the existence of humans" would suffice.



"These statistics paint a troubling picture when it comes to cat welfare outcomes, especially considering many of these cats are unowned and semi-owned, often with underlying health or behaviour issues that make them unsuitable for rehoming." page 7

The welfare concerns for these cats are mainly related to how they are being managed, as "management" is often a euphemism for euthanasia. In reality, this population of cats are mainly healthy and although may not be ideal for a 'family cat' situation, their behaviour is appropriate for their species, acceptable to their existing caregivers, and does not present a public health risk. Dale et al (2015) found that overall, the welfare status of managed un/semi-owned cats was relatively comparable to owned cats, with both groups having a slightly higher welfare status than unmanaged un/semi-owned cats, suggesting that human assistance benefits the welfare status of un/semi-owned cats.

Many un/semi owned cats have people that care about them (Neal and Wolf, 2023) and with assistance are willing to undertake the behaviours that AM Officers require (Rand and Lancaster, 2022) and so we already have the human assistance, referred to by Dale, that they need at our disposal. The barrier to achieving higher ownership rates for these cats is not that nobody wants to adopt them, but rather that current management actively separates the cats from the people most bonded to them.

Why is a Cat Management Strategy necessary?

"Unrestricted domestic cat roaming and reproduction cause concerns for animal welfare, nuisance and disease". Page 8

This sentiment is uniquely Australian with the majority of other jurisdictions around the world having a very different (and more tolerant) view of cats existing in the community. This CMS is necessary because the human-centric landscape in Australia, and how we interact with cats, is complex. Cats play a wide variety of roles in human communities which makes their management equally complex. Regulatory frameworks are designed to regulate human behaviour, not the cats themselves, and therefore the most important issue is how effective the framework interacts with its intended users, the humans.



### **Guiding Principles**

"It is important for cat management decisions to acknowledge that populations of roaming, unowned cats are not having their basic welfare needs met." page 9

This statement requires evidence to support it. Being that cats are incredibly successful as a species in an urban environment, breed prolifically and are successful hunters, it is incongruent that they would simultaneously be experiencing poor welfare.

"Cats deserve caring owners" page 9

This statement is also not based on any evidence. The classification of the human-cat relationship is not what provides the cat with good care or welfare. The behaviour of the human is the key and reducing the classification to one possible option is neither realistic nor helpful. We recommend changing the term from owner to caretaker.

Theme 1: Promote cat welfare and responsible cat ownership

#### Response

Language matters. Despite wide variation in how community members practically manage their pets, people view themselves as responsible owners (Westgarth et al 2019). This mismatch between the perception of individuals and regulators has implications for education and public messaging campaigns about "Responsible Pet Ownership", resulting in lack of market penetration in target groups simply because people do not see the messaging as relevant to themselves.

It is also important to note here that education on its own is not an effective behaviour change strategy for community pet issues (Philpotts et al 2019). What we are really looking for is social change - the lasting transformation of human behaviour patterns and cultural norms. Behaviour is a by-product of cultural norms which are themselves generated by peoples' values, beliefs, implicit biases and systemic issues such as public policy, infrastructure, racism, inequality, poverty etc. Cultural norms and behaviour patterns are often entrenched from years of habituation, and are not easy to shift, especially without having a good understanding of the root causes.



To address the limitations of traditional approaches to community education and compliance, modern behaviour change approaches are multi-faceted, using social marketing techniques (David et al., 2019), behavioural economics approaches such as 'nudging' (the facilitation of desired behaviours to make the performance of desired behaviours easier than non-desired behaviours) (Forberger et al., 2020), 'budging' (a version of nudging supported by regulation) (Oliver, 2013), and harnessing technology to interact with community members in a targeted and direct way (Oxley et al., 2022) or facilitate desired learning outcomes (EUFIC 2014). These combined approaches have been repeatedly shown to effectively shift social norms towards desired behaviours and increase the likelihood that individuals within a community will perform them.

The tools required to shift behaviours and create social change are generally; programs, services, messaging and products. The process of social change is: exposure to a message or idea delivered in an appropriate manner, a positive experience related to that messaging, transformation due to the experience and sharing of that experience and new information with the social group (Chadwick, 2019).

The role of regulatory enforcement is then to manage the behaviour of individuals who act outside of accepted social norms, leveraging social and material/financial motivations to improve compliance of the majority of the population (Scalco et al 2017; Mak et al 2019), rather than relying on punishments as a motivator to perform desired behaviours.

Glanville and colleagues (2020) examined existing Australian behaviour change strategies aimed at improving pet keeping practices, and found several common limitations:

- Failure to accurately identify the target behaviours
- Failure to identify and apply a known behaviour change intervention
- Lack of information about the program and how it was delivered

By applying best practice principles for behaviour change to pet keeping situations they then developed the 'Ten Task' model to assess, design, apply and evaluate behaviour change interventions aimed at pet owners. This model is an ideal template for AWV to apply when



developing cat ownership interventions to increase the performance of desired ownership behaviours.

We support the development of culturally and linguistically diverse (CALD) resources and the use of existing cultural channels and we encourage AWV to extend this courtesy to other sections of the community. It is imperative to keep diversity, equity and inclusion front and centre and this includes the development and delivery of communications and engagement initiatives.

AIAM recommends the term "enrichment" replaces "play" on page 16. We also suggest the following themes be considered for community engagement material to increase the performance of desired cat caring behaviours and improve cat welfare:

1) In order to achieve optimal welfare, environments provided by cat caretakers must meet the 'Five Pillars of a Healthy Feline Environment'

#### These are:

- Pillar 1 Provide a safe place
- Pillar 2 Provide multiple and separated key environmental resources
- Pillar 3 Provide opportunity for play and predatory behaviour
- Pillar 4 Provide positive, consistent and predictable human–cat social interaction
- Pillar 5 Provide an environment that respects the importance of the cat's sense of smell
- 2) Content to help individual cat carers identify when total confinement and maintaining acceptable cat welfare are mutually exclusive, as the individual cat does not thrive when contained. In these situations, owners must be supported to make balanced, considerate decisions about their keeping practices.
- 3) "Desexed cats make great neighbours'. Cat desexing reduces 'nuisance' behaviours (fighting, breeding, spraying and vocalisations) and associated complaints from neighbours and other community members, and improves cat health.

It's important to note that containing cats to their properties does NOT always ensure their safety and wellbeing as mentioned on page 16. Foreman-Worsley et al (2021) explored lifestyle factors associated with indoor and outdoor cats and found that indoor cats experienced health and welfare risks associated with being kept indoors. Ingestion of toxins, obesity, behaviour problems associated with stress and improper social and housing conditions, medical problems associated



with stress and electrocution being some of the risks indoor cats are exposed to. Behavioural needs of cats are generally better met with an outdoor lifestyle (<u>Bradshaw 2018</u>). Dr Dennis Turner, notable cat behaviour specialist and researcher, has found that containment of cats with previous outdoor access is associated with increased frequency of behaviour issues and subsequent abandonment. He reiterates that the past housing experience of the individual cat is associated with how "well" (from a cat and an owner's view) the cat adjusts to indoor life.

## Theme 2: Increase cat desexing rates

#### Response

AIAM supports all of these actions. It is important, particularly in reference to affordable desexing options, to make these available to ALL of the community, and to remove the requirement to essentially demonstrate how needy the individual is before they can access the program. All cats can breed no matter who they belong to, or what car they drive. Although targeting desexing efforts to areas of high intake and nuisance complaints is the priority, the fewer barriers that are in place for people to undertake the behaviours that the cat management community require, the better.

Given the growing body of evidence showing that targeted cat desexing programs centred on proactive, supportive community engagement, are essential, it is critical to appreciate the lessons learned by those who have gone before us. We can look to both international and Australian examples of how effective control of reproduction in urban cat populations can be achieved through working together with the community to desex, microchip and vaccinate community cats, and where possible adopt out sociable cats or have caretakers become cat owners.

We have three robust Australian examples of how effective this approach can be:

 The Banyule Desexing Program in Victoria which consistently demonstrated a two thirds reduction in intake, a greater than 5 fold reduction in euthanasia, and improvements in relationships between animal management staff and community members, through targeted free desexing of cats from high intake areas.



- The Community Cat Programs led by the Australian Pet Welfare Foundation with the initial pilot area in the greater Ipswich area of Queensland, where microtargeting of cats from high intake properties reduced in cat intakes by council by 30-50% within one year.
- The RSPCA NSW 'Keeping Cats Safe at Home' program in which RSPCA partners with councils to implement proactive and targeted desexing of cats cared for by local community members, using microtargeting to quickly reduce free-living cat populations.

Key learnings from existing programs include:

- Program success hinges on effective recruitment of cat caretakers, especially those from multicat sites, into the program (Cotterell et al 2024; Rand 2023). This involves trust building and open communication with community members, supported by enforcement applied as a last resort where voluntary compliance could not be achieved through complete removal of barriers and assistance to facilitate desexing, vaccination, and identification services.
- Focus on microtargeting of individual properties and streets with high numbers of sexually entire cats is most effective at achieving reproductive control over urban cat populations (Ma, AIAM webinar 2022). This requires a specific focus on working with all caretakers that are supporting a breeding population of sexually entire cats.
  - N.B. To perform targeted programs, AM teams require accurate information about cat p populations within their municipality, including:
    - Detailed information about community complaints about cats. This should include location, type of nuisance, whether a caretaker or owner is known or suspected by the complainant, and whether the council followed up with residents in surrounding properties to ascertain who is caring for the cat/s involved.
- Increasing or introducing additional mandatory ownership requirements creates or heightens barriers to carers taking ownership (Cotterell et al., 2024; Australian Pet Welfare Foundation Response to Draft Threat Abatement Plan, 2023). Programs should strive to eliminate all barriers to ownership in order to recruit carers, then facilitate improved behaviours by leveraging relationships with caretakers that develop through the program delivery.
- Collaborative relationships between AM teams, other Council departments and community service organisations are critical to improve the reach and impact of the program within



target areas (Cotterell et al 2024). This includes both animal-centric organisations such as volunteer-run rescues, and human-centric organisations such as housing support, community Neighbourhood Houses, and other support services that interact with residents in target areas.

- Monitoring and evaluating program outcomes is imperative to assist in further program development and assessment. This requires detailed information collection systems (although not necessarily complex) collecting, including but not limited to:
  - The number and location of cat carers or semi owners who took ownership of a cat/s through the program
  - The number of desexings, microchips, vaccinations and registrations that were provided through the program, and how many were provided for free vs low cost.
  - The number, age and sex of cats that were desexed and microchipped to their carers through the program (Note: Some carers may take ownership of more than one cat)
  - If possible, information on whether the cat has produced kittens
  - The number of complainants (and type of complaints) who engage with council to help identify the source property of cats creating nuisance issues in their neighbourhood
  - In addition to the total number of cat traps hired by members of the public, information should be collected about:
    - Who the traps are hired by (e.g. complainant or a cat caretaker who is participating in the program)
    - Whether council officers are delivering, monitoring, and managing traps (if yes, how many and which ones)
    - Whether members of the public paid fees (and how much) to hire traps
  - For all cats brought into care, data should be collected to allow identification of the source cohort of the cats, including evidence of human interaction at time intake, age, health and behavioural information, and ultimate outcome. This allows more accurate assessment of the impact of targeted desexing on different cohorts of cats in the community. Example data points to collect include:
    - Desexing status and sex
    - Microchip status



- Presence of signs of human interaction (e.g. collars or tags, indicators of previous vet care)
- Estimated age (or age cohort)
- Health information
- Objective description of behaviour
- Outcome
- It typically takes 1-2 years of targeted desexing of cats from high intake areas to reduce intake numbers (Australian Pet Welfare Foundation FAQs Community Cat Programs). In early stages of desexing programs, adult cats with poorer socialisation status typically make up a substantial portion of the cats in the program. These cats may require trapping despite being cared for and bonded to an individual in the community (Personal Communication, Jennifer Cotterell 2024).
- It is crucial for field officers to be mindful that residents in target cohorts will often have histories of negative interactions with regulatory authorities and this may present a challenge during recruitment. Effective communication of the goals of the program and benefits to cat carers and semi-owners is critical to uptake by residents.

NOTE: Uptake into targeted desexing programs typically starts at low levels and builds over time as word gets out and local knowledge of, and confidence in, the program expands.

## Theme 3: Expand cat containment

#### Response

In principle, AIAM supports proposed Actions 7 and 8 where these include proactive initiatives to:

- More fully understand how full time confinement impacts the welfare of adult cats who have previously had unrestricted outdoor access.
- More fully understand how to provide an enriched, feline friendly environment while achieving confinement to private property
- More fully understand how cat populations interact with diverse residential areas, with sensitive indigenous fauna, and with introduced species such as rodents, rabbits, and foxes.
- Support cat caretakers to confine their cats in a manner that promotes positive welfare outcomes for the individual cat/s



• Increase feasibility and accessibility of outdoor cat containment options for all cat carers, including renters and low-income families.

AIAM strongly supports containment on owner's property where possible but does not support making cat containment a mandatory requirement for cat ownership.

We strongly suggest that mandatory containment be removed as a proposed cat management strategy, as this presents a barrier to cat caretakers transitioning to cat owners and reduces participation in supportive programs where containment is required. This is counterproductive to the overall goal of working towards reproductive control over the cat population. There is no evidence that supports the efficacy of mandatory containment legislation (MCL) (or cat curfews) as an effective cat management strategy i.e. achieving an improvement in reduction of free roaming cat populations, complaints about wandering cats, reduction in intake to municipal or private animal shelters, or any other metric currently in use (RSPCA Australia, 2018). There are a range of reasons why this might be the case:

- Majority of cats who are impounded do not have "owners" (as per the description of an owner in most legislation) and therefore there is no one to contain them.
- Lack of support services provided alongside the implementation of the legislation to enable community members to comply with the policy i.e. financial and practical support to develop cat containment infrastructure.
- MCL effectively criminalises cat caretakers that do not (or cannot) comply with the legislation.
- MCL effectively criminalises those cats that are not complying with the legislation and classifies them as stray or feral with the more frequent outcome for them being euthanasia.
- MCL (without significant support mechanisms) is not equitable or inclusive and feeds into broader social issues of equity and human rights.

Overall, Australian Councils who have implemented mandatory 24/7 containment, or curfews, have reported an increase in cat related complaints, impoundments and euthanasia, increased costs to councils, increased exposure to adverse mental health effects (including PTSD) of staff involved in killing healthy cats and kittens, and no decrease in the number of free-roaming cats (RSPCA Australia, 2018; Australian Pet Welfare Foundation 2022).



This is because cat reproduction greatly exceeds the numbers of cats trapped and killed in our cities and towns, and mandating containment of cats simply makes other residents more aware of the number of urban stray cats in their neighbourhood who have no owner to confine them. If the only option given to community members to address concerns about cat predation on wildlife is a punitive system of trapping and killing cats, then it is logical that publicising this leads to increased use of that option.

Most admissions of free-roaming cats to shelters and pounds are from low socio-economic areas (Ma et al 2023). Around 5% of impounded cats are reclaimed (Lancaster et al 2015; Chua et al 2023). There are a number of reasons for this, but the primary reason is that these cats are not fully "owned" by one person and are cared for by multiple individuals within the community who each cannot afford to comply with legislative requirements.

Research has found that cat owner's perception of their ability to contain their cat is an important predictor of whether someone fully contains their cat, along with valid concerns about mental and physical well-being of cats being negatively impacted by confinement (Rand et al 2023).

MCL also precludes the option of "working cats" for appropriate environments and reduces a complex matter down to black and white, yes or no, discussions. Most working cats are in environments that are appropriate and that do not sustain a population of threatened species (i.e. commercial, industrial and/or agricultural spaces) and have positive impacts on the environment by reducing populations of introduced rodents (Badenes-Perez, 2022). Many people are aware of the enormous negative impacts of rodenticide use and secondary poisoning on native predators and prefer to use a less negative solution for rodent control.

In Australia, 20% of households live on less than \$650 a week (Australian Bureau of Statistics, 2021). Cat containment systems suitable for suburban backyards cost hundreds to thousands of dollars (Catnets, n.d.; Oscillot® Proprietary Ltd, n.d.) which low-income families typically cannot afford. Additionally, many cat caretakers and owners live in rental accommodation with inadequate fencing and do not have permission from property owners to make property modifications.



Indoor confinement of cats is also difficult to perform reliably as children or other residents may not prioritise closing of doors and windows, allowing confined cats to escape. Some cats are notoriously difficult to contain due to their temperament, history of outdoor access, and physical capabilities. Physical and financial capacity for ongoing care of an indoor cat (i.e. litter box maintenance, enrichment etc) are also important considerations that need to be addressed.

Supporting people to implement various cat containment methods based on their living circumstances and proximity to native species susceptible to cat predation, will provide a more targeted approach to prevent impacts on native wildlife and raise community awareness of the need for and possible options to achieve cat containment (RSPCA Australia, 2023).

Providing subsidised access to low-cost mesh, fence additions or enclosures is essential to achieving improved containment of cats in wildlife sensitive areas, or where owned cats are causing an ongoing nuisance issue to neighbours. Consideration of the introduction of building regulations to require appropriate fencing and enclosures in new builds in environmentally sensitive areas would also be helpful.

These initiatives will help create a cultural change to prevent wandering, predation, and unwanted cats. In many urban areas, the culture has changed regarding keeping dogs safely enclosed and personally walked for daily exercise. Similarly, cultural change is needed regarding cat caretakership which cannot occur with punitive strategies only.

Theme 4: Reduce the impacts of semi-owned and unowned cats

### Response

AIAM supports effective, humane, and ethical actions to reduce populations of free-roaming cats around areas of human habitation and infrastructure.

It is also important to have consideration for those currently caring for cats, and to understand and prioritise positive outcomes and benefits for this population. Understanding why people might want to, or not, engage with a cat management program is an important part of the equation. We need to ensure that we can answer the question, "What's in it for me" for cat caretakers.



Well-managed support programs by AM Officers, animal welfare and sheltering organisations and community volunteers have been shown to be effective in sustainably reducing cat numbers and do so more ethically by preventing or minimising harm to people, cats and wildlife (Rand et al 2018; Swarbrick and Rand 2018; Spehar and Wolf 2020; Spehar and Wolf 2019; Kreisler et al 2019). As such, AIAM recommends that such programs replace 'trap and kill' as the standard foundation of all domestic cat management in all human-centric environments.

#### Language and overall approach

The language used in all actions should be revised to maximise inclusivity and reduce potential limiting of impact through failure to engage all cohorts of cat carers. Specifically, change descriptors used for semi- and unowned domestic cats to an all-inclusive term such as 'urban stray cat' or 'community cat, in communications with the general public. Remove specific references to cat semi-owners and replace with 'cat caretakers', to include all people who provide any level of care to cats within their community.

As an 'education only' approach, proposed **Action 9** is not designed to achieve behaviour change within the community and should be revised in accordance with the feedback provided under **Theme 1**.

Provide support for caretakers to be converted into owners

Proposed **Action 12** already happens informally, largely through the actions of volunteer-run rescues and 'street cat' advocacy groups with adoption programs. Rescues and shelters have been performing these services for decades, with little appreciable reduction in free-living cat populations, and ongoing issues with financial sustainability of maintaining these programs at the scale required to keep up with demand.

While 'trap, desex, adopt' approaches are a vital part of proactive cat management, the separation of cats from their human caretakers should only be performed where unavoidable, and while working with the caretaker to achieve mutually agreed goals (e.g. reduction in numbers of kittens at a site). Where the cats involved are under-socialised and unlikely to be rehomed successfully, priority should be given to supporting these cats in place, through desexing, microchipping,



vaccination, and allowing the caretaker to take ownership of all cats that fit this category even where numbers exceed Council pet limits, or containment legislation.

Trapping and killing these cats leads to a loss of trust and engagement between council and their community. Alternatives to this must be considered where cat caretakers are not able to be recruited to become owners, even if they are temporary measures put in place to maintain or improve community relationships while more effective management initiatives are developed.

Alternatives may include suspension or removal of excess animal permits and fines for non-compliance with existing mandatory requirements for cat owners (e.g. containment, desexing), or desexing of cats without concurrent microchipping and registration to an owner, in situations where carers of poorly socialised adult cats are known and identified but active participation in the program cannot be achieved with the resident. Their cats should be desexed and vaccinated in preference of leaving them sexually entire at the site or trapping and killing them.

Well-managed community desexing programs in urban/peri-urban areas where there is no immediate threat to threatened native species, further enable communities to manage cats ethically and reduce their numbers over the long term. Desexing and returning cats to caretakers provides the opportunity for guidance to manage the cats in their care to ensure they cause the least possible nuisance to the rest of the community. The caretakers can identify any newcomers and take action to trap and desex them. Assistance can be provided to develop cat safe fencing and deterrents if necessary. Many community members are environmentally aware and want to prevent unwanted cats and kittens and protect wildlife (Crawford et al 2023). Utilising their compassion and providing support is a much quicker way of managing the local cat population.

Improve standards of care for cats in municipal facilities and Not For Profit shelters

AIAM supports decreasing the mandatory holding period for unidentified cats in holding facilities and encourages AWV to use Victorian reclaim data for cats to inform development of evidence-driven timeframes and actions to be adhered to by councils when cats are taken into care. In addition, Section 84O (1) of the Victorian Domestic Animals Act, 1994, should be removed as accurate assessment of human socialisation in cats confined to shelters facilities requires a minimum of 3 days observation (Slater et al 2013); it is simply not possible to accurately identify



unsocialised cats on intake into a council facility or shelter. Additionally, this section only applies to cats, which is inequitable and speciesist. A lack of sociability in a foreign environment and a lack of identification are not appropriate reasons to kill an individual animal.

Evidence-driven guidelines for the behaviour assessment of cats to determine sociability already exist. These include both environmental and housing requirements and specific assessments conducted over several days in which behaviours indicative of socialisation are monitored for and recorded (Slater et al 2013). These research findings have been operationalised in the ASPCA 'Feline Spectrum Assessment'.

Additionally, to facilitate improved behaviour assessment of cats in care, AIAM strongly suggests that the minimum standards of care required in the Code of Practice for the Management of Dogs and Cats in Shelters and Pounds be revised to make cat housing requirements consistent with those described in the ASV Guidelines for Standards of Care in Animal Shelters.

Improve cat management on private land

Actions to reduce the negative impact of free-living domestic cats on private property should be evidence-driven and aim to achieve the mutually beneficial goals of reducing cat populations and minimising the impact of existing cats on native wildlife through improved habitat.

AWV should prioritise working with, and understanding how to, help and support communities to contribute to what they value and support – both protection of native wildlife AND a reduction in unwanted kittens and cats by desexing cats rather than killing them.

In areas of critical habitat, animal management, welfare and conservation organisations and local community members can work together to develop solutions appropriate for that community and environment. There are over 2000 species listed on the Victorian Flora and Fauna Guarantee Act 1999 Threatened List. We estimate that at most, around 10% of the listed species could be impacted by cats.

Australian studies have shown that vegetation characteristics are likely more important for species diversity than the regulation of cats (Lilleth et al 2010; Franklin et al 2021) and that habitat destruction and degradation is the critical factor affecting richness of bird species (Grayson et al



2007). Therefore, AIAM recommends that AM departments collaborate with Local and State Government conservation and land management departments to concurrently promote and facilitate cat management and habitat restoration on private land. These efforts should focus on communities neighbouring environmentally sensitive areas, for example sensitive or important habitat on Crown land, to create 'reduced cat impact' buffer zones around and improve cat management in these areas.

All stakeholders need to be aided to work collaboratively in their communities to provide direct support to reduce cat numbers whilst minimising harm to people, cats and wildlife and working to preserve threatened species.

In addition to restoration and improvement work in 'buffer' zones, Local Government can minimise the negative impacts of cats in human-centric residential areas by working to restore native habitat in existing urban areas, limiting land clearing, and encouraging indigenous plantings in new and expanding suburban areas.

Replace 'trap and kill' as the default approach for urban cat management

Trapping is the current traditional action taken by the majority of Council AM and Pest Management Departments which has historically been done in the interests of public health and safety or conserving valued wildlife, but with a lack of knowledge of alternative effective strategies. However, there is no evidence that these interests are being protected, and that this traditional management strategy has any effect on the reduction of populations of free roaming cats. Trap and kill programs are ineffective in the long term, not cost-effective and unacceptable to a large proportion of people (Benka et al 2022; McCarthy et al 2013).

AM Officers responding to complaints by the trapping cats and impounding of cats, enabling community members to hire traps and impound cats, and charging pound fees before reuniting cats is ad hoc management with no evidence of reduction in cat populations, impact of cats on the environment or reduction of cat related complaints (Australian Pet Welfare Foundation, 2022). It does not address the source of the problem, does not support the owner/caretaker to comply, and does not develop trust or community support to address free-roaming cat issues more broadly.



In addition, according to Hurley and Levy (2022), "untargeted removal of cats or other litter bearing mammals leads to a destabilisation of age and dominance structures, resulting in paradoxical increase in numbers as well as potential harms and impounding, caring for and potentially euthanizing free-roaming cats also diverts resources which could be invested more proactively."

Considerable harm is being done to people by impounding and killing cats. Research on management programs of free-roaming cats has assumed that individuals value wildlife but do not value free-roaming cats (Thompson, 2022). This is not the case. Cat assistance teams in the community find that many people care about free-roaming cats and develop a strong bond with the cats they care for, and free desexing programs have a positive impact on the cat carers' well-being and quality of life (Crawford et al 2023). People feeding un/semi owned cats bond with the cats they care for – a bond which is nearly identical to the bonds pet owners have with their cats (Neal and Wolf, 2023).

Harm to free-roaming cats has a significant impact on people's mental health and well-being, both the people who own or feed them (Scotney et al 2023) and the people who care for these cats at pounds or shelters (Andrukonis et al 2020) who struggle to manage the cats' health and welfare until they find a caring home or are killed. Impounding free-roaming cats disproportionately impacts lower income families due to numerous barriers including cost, transportation, language. People earning less than \$30 000 have been shown to be one tenth as likely to find a lost cat as those who earn more than \$50 000 (Weiss et al 2012).

# Theme 5: Manage feral cat populations and impacts

#### Response

Importantly, actions must reiterate a clear definition of feral cats and distinguish between cats who are genuinely unowned, unsocialised, and have no relationship with or dependence on humans (unlikely in most situations that AM Officers in Victoria are called to respond to), and domestic cats who are physically present on public land at the time of cat control activities.



Given the complexity of human, environmental and cat factors that impact management decisions across the diversity of communities in Victoria, it is vital that approaches to cat management are not black and white. Cat population characteristics and cat-human relationships do not conform to definitions based on land ownership, and as such, management of cats across private and public land must be carefully integrated.

Management of domestic cats who are on Crown land that is adjacent to or close by to human habitation and infrastructure, should be consistent with management practices for cats in the residential areas. This requires that AM teams and those working on cat control on Crown land to closely collaborate and coordinate activities.

As such, AIAM strongly recommends that a revised Victorian Cat Management Working Group be developed with representatives from ALL stakeholder groups, with a focus on developing frameworks to guide stakeholder coalitions in local areas in collaborative, tailored cat management. As a current member of the Victorian Domestic Cat Management Working Group, AIAM would welcome continued involvement in this action.

The Victorian Cat Management Working Group would be funded and managed by AWV in conjunction with the Department of Energy, Environment and Climate Action and coordinate collaboration between experts and researchers in ecology, domestic animal management, conservation and animal welfare and sheltering organisations, as well as the Australian Institute of Animal Management, and both environment and animal welfare state government departments to develop understanding and cohesive effective and ethical action.

AIAM recommends that the current Victorian Domestic Cat Management Working Group expands to include veterinarians and other stakeholders. In addition, we recommend that the responsibilities for the Group be expanded beyond "Facilitate information sharing, collaboration, and shared objectives among working group members and organisations." (VDCMWG draft TOR October 2022).

Veterinarians are an important stakeholder and have an essential role to play in intensive desexing support programs. The proposed action to contract vets to travel to rural and remote



communities that lack vet services to carry out free desexing is supported by AIAM if these programs are delivered in a culturally appropriate and respectful way. In addition, desexing clinics need to be funded in all areas to enable timely, no/low cost desexing, vaccinations and microchipping. This can be facilitated by organisations through existing community, shelter, or private clinics. Veterinarians need to be further encouraged to practise and promote pre-pubertal desexing (from 2- 4 months of age).

Regarding feral cat population controls, to not undermine efforts to build trust and open communication with cat living Victorians, all controls used must be seen to be, as well as being, humane and mindful of cat welfare. Additionally, consideration of the potential impact on other animals, including domestic pets, must be given when feral cat control programs are developed.

Currently, Agriculture Victoria condones and supports cage trapping, and shooting where feasible, of cats found on Crown and by land managers. Shooting is not an acceptable or effective method of domestic cat management anywhere in the world, as far as we are aware. Not only does this place Australia in the unique position of being the nation that shoots (potentially) pet cats, but it also encourages anti-cat sentiment and behaviours. A review of any "lost cat" or "found cat" post on social media brings up a multitude of comments (and often associated photos) from people declaring what they would do with "the" cat if found. Many of these comments refer directly to the Australian Government's stance cats (Example on https://minister.dcceew.gov.au/plibersek/media-releases/government-declares-war-feralcats#:~:text=The%20Albanese%20Government%20has%20today,feral%20cat%20numbers%2 Oacross%20Australia.) as justification for the actions proposed.

AIAM has welfare concerns about the competency of volunteer shooters engaged in cat shooting activity and the risk of leaving maimed cats alive in the field. We do not support bounties because there is a high risk that pet cats will become an easy target to collect a bounty, and there does not appear to be any evidence indicating that they are an effective form of animal control (Cooke 2018; Ditchkoff et al 2017; Proulx and Rodtka, 2017).

AIAM urges a greater emphasis on promoting the modification of human actions to prevent risk to threatened species. It is well-recognised internationally and nationally that climate change and



habitat degradation and loss are the greatest threats to native species and the environment generally (Nelder et al 2017).

The United Nations Biodiversity Conference in December 2022 identified that:

The biggest driver of biodiversity loss is how people use the land and sea. This includes the conversion of land covers such as forests, wetlands and other natural habitats for agricultural and urban uses. Since 1990, around 420 million hectares of forest have been lost through conversion to other land uses. Agricultural expansion continues to be the main driver of deforestation, forest degradation and forest biodiversity loss. The global food system is the primary driver of biodiversity loss, with agriculture alone being the identified threat of more than 85 per cent of the 28,000 species at risk of extinction (https://www.unep.org/news-and-stories/story/five-drivers-nature-crisis)

And

... Agriculture has altered the face of the planet more than any other human activity. We need to transform our food systems to become more sustainable and resilient in order to reverse environmental degradation, restore ecosystems and ensure food and nutritional security (https://www.unep.org/facts-about-nature-crisis)

Government departments should collaborate on communications, policy, and legislation (such as the Victorian CMS) to highlight the need for humans to modify their behaviour for more sustainable practices that limit clearing of habitat and enable regeneration, slow climate change as well as address impacts of novel biota and introduced species.

Theme 6: Improve collaboration and information sharing

Response

To improve relationships between stakeholders in the sector, and facilitate open communication, all contributions to cat management must be acknowledged and recognised, including the significant role that unfunded, volunteer-run rescue groups play in the capturing and rehoming of unowned and semi-owned cats currently.



Additionally, concerted effort must be devoted to improving the language used by Local and State Governments to discuss cats, cat management, cat ownership, and those who care for cats in any capacity. AWV is in a unique position to influence this change in language use, which is one important step forward towards open communication and collaborative working relationships within the cat management space.

AIAM recommends unified strategies by Local Government animal management, animal welfare and sheltering organisations, human welfare organisations, conservationists and ecologists, and communities to achieve the best outcome for people, cats and wildlife. Acknowledging that black and white, yes or no policy is counterproductive and working together tailoring responses to the needs of each situation and community and sharing resources from each sector will enable successful reduction in cat numbers that is sustainable and socially acceptable.

Federal and State Government funded human social services are also recognising that the people who need human welfare support also need support for animals they care for. Animal support services should be built into human service providers' roles in partnership with LG and animal welfare organisations.

Nationally and internationally LG AM departments are moving toward community support (National Animal Care & Control Association Position Statement: Animal Control Intake of Free-Roaming Cats; Human Animal Support Services Policy Agenda 2024; Mike Wheeler Summit Presentation, 2023; Dr Rebecca Goode and Elle Tonks Summit Presentation, 2023) rather than punitive models, working with animal welfare and sheltering organisations and the community to find no or least harm solutions.

Some Councils are recognising the importance of adequately funding animal welfare and sheltering organisations who currently do much of the work for Councils. This includes those organisations that take in stray and surrendered animals for the municipality into their own shelters, or by managing their impound and holding facilities. Helping with funding to support cat management activities performed by rescue groups, and to enable organisations to extend their services to prevent impoundment and reduce overpopulation is an important next step.



AIAM also strongly recommends that AWV be more specific when describing the role of LG in the modern animal welfare and management space. Discussion of LG roles and responsibilities in animal management must include an explicit acknowledgement of the shift in community expectation that animal management activities will be supportive and inclusive of human and animal welfare considerations, and that an expectation exists that Local Councils devote resources to:

- Proactive animal management practices, such as targeted desexing of cats, that reduce the demand on the system and support people and pets to stay together
- Ensuring high quality care and prioritising live outcomes of all pets who enter their care through animal management activities.

The core message to LG from AWV must shift from a focus on enforcement of existing regulatory tools being the primary or only role of Council AM teams, to more holistic, modern, and proactive approaches to companion animal management that improve human and animal welfare, as well as community amenity and safety.

AWV can further assist collaboration and information sharing in the broader sector by making resources currently only provided to AM Officers and departments, accessible to other stakeholders. In addition to improving stakeholder access to support materials, this action would assist increased understanding by all stakeholders about the context in which AWV and Local Governments operate, and factors affecting decision-making and animal management actions.

An effective, and collaborative, strategy currently employed in Ipswich, Queensland, is the Cat Assistance Team (CAT). Consisting of AM Officers working with animal welfare organisation staff and volunteers to locate sexually entire, roaming cats and providing no/low cost desexing and other support services in targeted low socio-economic areas with high cat intake (Emma Richardson Summit Presentation, 2023). In NSW, Ma et al (2023) found that urban stray cats are predominantly owned or cared for by someone (semi-owners) and have varying levels of socialisation. People feed them because these cats visit or live nearby their properties or workplaces, and they want to help them. Providing no/low cost desexing and free microchipping, and other support (e.g. transport) ensures that people who are willing to take ownership of unowned adult cats and kittens of stray urban cats can do so more easily.



The National Desexing Network (www.ndn.org.au) currently supports 24 Councils, at no cost, to develop and manage Co-operative Desexing programs to facilitate more proactive, humane and socially acceptable cat management. The biggest increase in the number of LG funding desexing subsidies has occurred where State Governments have matched funding Councils have agreed to budget for subsidised desexing for their residents.

Theme 7: Improve laws and processes

Response

Mandatory Cat Containment legislation has been addressed under Theme 3: Expand Cat Containment.

Mandatory limits on the number of cats per household prohibits people accessing LG subsidised desexing, particularly in low socio-economic areas where people cannot afford to desex a cat they may have acquired as a stray, or to help a family or friend with an unwanted litter. Councils often allow only two cats per household and therefore offer free desexing for that number. This means if a pregnant stray cat appears and has a litter, the person who finds the female cat often takes ownership of her, but kittens are kept undesexed, or given away undesexed, and the breeding cycle continues; again, this is counterproductive to the goal of increasing population control of cats in the community.

AIAM recommends the removal of mandatory desexing legislation (MDL) as a proposed cat management strategy in the CMS. There is no evidence that supports the efficacy of MDL as an effective cat management strategy. In fact, the three states with the highest per capita cat intake into shelters and pounds have mandated desexing (Chua et al., 2023) and another study of 191,000 cats entering RSPCA shelters around Australia (Alberthson et al, 2016) also documented no benefit of mandated desexing.

Mandatory desexing policies are not viewed as being effective in achieving an improvement in reductions of free roaming cat populations, complaints about wandering cats, reduction in intake



to municipal or private animal shelters, or any other metric currently in use. There are a range of reasons why this might be the case:

- Majority of cats who are impounded do not have "owners" (as per the description of an owner in most legislation)
- Lack of support services provided alongside the implementation of the legislation to enable community members to comply with the policy i.e., low or no cost desexing services.
- MDL effectively criminalises cat caretakers that do not (or cannot) comply with the legislation.
- MDL effectively criminalises those cats that are not complying with the legislation and classifies them as stray or feral with the more frequent outcome for them being euthanasia.
- MDL (without significant support mechanisms) is not equitable or inclusive and feeds into broader social issues of equity and human rights.

Mandatory containment of cats, mandatory desexing and and limiting cat numbers per household, seem to be logical management strategies in the absence of understanding of the factors affecting cat populations in human-centric areas and practical considerations for working with the community to achieve cat management goals. In practice, they are ineffectual, at best, as sufficient support has not been provided to ensure that all residents can comply, and punitive approaches to managing companion animals rarely achieve the support required to achieve voluntary compliance at a high enough level to be effective.

AIAM supports incentive programs for desexing, containment and identification, but not packaged with mandatory registration. Cat management actions based on imposing legislative requirements, and fining people for unregistered, excess, or wandering cats are ineffective as they do not address the causes of stray or overpopulation of cats.

Most people now support desexing of cats and those who can afford to desex their cats do. However, as previously explained in the response to 'Theme 2: Increase cat desexing rates', lack of resources prevents people on low incomes getting cats desexed i.e. they can't afford the large vet payment, or carriers or sometimes even a car or petrol to get their cat(s) to the vet. The strongest predictor for whether a cat in a household is desexed is family income (Chu et al 2009). This is compounded in lower socio-economic areas where one undesexed cat in the



household can lead to 5-10 cats in a year (one or two litters) further increasing the difficulty in affording the desexing of multiple cats. Desexing and microchipping a female cat can cost between \$300 to \$500 depending on whether it is pregnant or lactating (common in spring and summer), and which veterinary clinic is providing the service. Mandated desexing is a huge barrier to semi-cat owners (people feeding more or more stray cats) taking ownership of these cats, which is a key solution to the problem.

Registration is an added cost burden which is counterproductive. It often prevents people taking advantage of local government desexing programs as they are fearful of being required to pay an additional ongoing expense, which people on low incomes cannot afford. If people are feeding multiple cats, they cannot afford to register them all. The costs involved in managing a cat registration program, for local government, are prohibitive, with little to no advantage gained. Expending the same resources on a free microchipping program achieves the desired outcomes for Council, as well as the caretaker of the cat.

As discussed in "Theme 4: Reduce the impacts of semi-owned and unowned cats", AIAM strongly suggests that Section 84O (1) of the Victorian Domestic Animals Act, 1994, should be removed, as accurate assessment of human socialisation in cats confined to shelters facilities requires a minimum of 3 days observation.

AIAM also recommends the removal of Section 20 of the Victorian Domestic Animals Act, 1994 (Registered cat to have identification marker outside premises) as this is not as practical for cats as it is for dogs and many owners have safety concerns for the use of collars by cats. The requirement for microchipping largely resolves the issue that this section was intended to address.

#### Conclusion

The methods proposed for managing cats in the vicinity of humans (i.e. domestic cats (owned, semi-owned and unowned with individual cats often moving between these 3 categories), need to be in line with recent experiences with cat management programs in the community and developments in cat management and welfare in Australia and internationally.



International consensus principles for ethical wildlife control (Dubois et al., 2017) advocate for firstly altering the human practices that cause human-wildlife conflict and developing a culture of coexistence, as well as minimising animal welfare harms to the fewest numbers of animals.

An ethical approach to animal management involves supporting all stakeholders (Verrinder & Phillips, 2022), not only the native wildlife and non-pet owners, but also the cats and the people who care about them. Conservationists are seeing increasing impacts on wildlife populations and animal management and welfare and sheltering organisations are seeing the suffering of people and animals using current outdated animal management strategies (Scotney et al., 2023). Planning together to maximise positive outcomes for people, cats and wildlife is therefore imperative for an effective, economical, ethical and socially accepted Victorian Cat Management Strategy.



# AUSTRALIAN INSTITUTE OF ANIMAL MANAGEMENT SUBMISSION

Draft Threat Abatement Plan for Predation by Feral Cats 2023

Consultation

The Australian Institute of Animal Management (AIAM) is the national peak body representing Local Government Animal Management Officers. The AIAM Board consists of a wide range of professionals engaged in the various aspects of companion animal management.

AIAM seeks to support those engaged in the business of companion animal management, and the function itself, by providing training and information, opportunities for networking and collaboration and by encouraging the use of best practice policy and practices. AIAM promotes consistency of legislation, consultation in the creation of legislation, and workplace processes and healthy relationships with external stakeholders and the community. AIAM supports cross sector collaboration and co-design of projects and initiatives. The Board of AIAM welcomes the opportunity to engage and advocate at all levels on topics relevant to or inclusive of companion animal management.

This submission focuses primarily on **Objective 9: Reduce density of free-roaming cats around areas of human habitation and infrastructure** of the draft Threat Abatement Plan for Predation by Feral Cats 2023 (TAP). However, it also includes some feedback on other areas of the TAP, including the broader issues of managing cats as a whole species.

The current draft TAP reflects the lack of consultation with experts in contemporary urban cat management. The proposed actions in the plan regarding cat curfews, mandatory desexing, caps on cat ownership, and restricting ownership of cats in local government areas demonstrates a lack of awareness of current best practice domestic cat management and poor understanding of



the cause of the free-roaming cat problem in our cities and towns based on current Australian research.

Therefore, the proposed solutions are flawed. They will be more costly to implement than other solutions detailed in our submission, are unenforceable for a substantial portion of free roaming cats in human-centric environments, and will be ineffective at protecting wildlife populations of concern, particularly in urban and peri-urban areas.

# **Summary Of Recommendations:**

**Recommendation 1**: Align definitions with current understanding of cohorts of cats to clearly distinguish between **domestic cats** (owned, semi-owned or unowned living around areas of human habitation and infrastructure) and **feral cats** (living in remote areas who have no dependence on humans).

**Recommendation 2**: Focus this Threat Abatement Plan solely on feral cats (as per Recommendation 1 definitions) and consult members of the National Domestic Cat Working Group to develop a separate plan focusing on domestic cats as per the definitions in Recommendation 1.

**Recommendation 2a:** Revise the Actions in 9.1 to support and encourage more research into domestic cat management strategies that involve desexing and returning the cats to their home base, where appropriate.

**Recommendation 2b:** Remove mandatory desexing as a proposed cat management strategy from the TAP

**Recommendation 2c:** Remove mandatory containment as a proposed cat management strategy from the TAP

**Recommendation 2d:** Remove the proposal for the development of cat free suburbs from the TAP

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**Recommendation 3**: Include more effective, humane and socially acceptable strategies for cat management that support all stakeholders, and that are already being implemented in Australia and internationally.

**Recommendation 4**: Review the proposed actions in Objective 9 for efficacy, feasibility, economy and humaneness, and direct resources to the implementation of more effective actions for achievement of the plan's objectives.

**Recommendation 5:** Ensure the Threat Abatement Plan for Predation by Feral Cats highlights the need for humans to modify their behaviour for more sustainable practices that limit clearing of habitat and enable regeneration, slow climate change, as well as address impacts of novel biota and introduced species.

**Recommendation 6:** Revise negative language when referring to cats.

# Discussion

#### Introduction

The management of cats in the community is necessarily complex due to a multitude of factors related to the cats themselves, the environments they live in, and the people they live alongside. Cats predate on native and other wildlife to varying degrees depending on many factors - their individual characteristics (e.g., age, personality), where they live, how they are cared for by humans, and sources of food (Dickman and Newsome, 2015). Accessibility of resources, services such as animal shelters and veterinary clinics, and methods to manage cat populations varies according to location, with more options typically available in urban than remote areas. Additionally, division of cat management responsibilities between levels of government is based on human-centric factors, such as population density and land ownership, resulting in disjointed and sometimes conflicting cat management practices occurring across the landscape.



Urban stray cats are predominantly owned or cared for by someone (semi-owners or cat caretakers) and have varying levels of socialisation. People feed them because these cats visit or live nearby their properties or workplaces and they want to help them (Ma et el., 2023). Approximately 3% of Australian adults feed an average of 1.5 cats that are not their cat and have no known owner (Rand et el., 2019). While these cats are rarely desexed or microchipped, the people caring for them demonstrate strong bonds with these cats comparable to those between owners and owned cats, even when one person is feeding multiple cats they do not own (Crawford et al.,2023; Scotney et al.,2023; Neal & Wolf 2023; Zito et el.,2015). Crawford and colleagues (2023) found that many of these cat caregivers (semi-owners) reported the cat helps them through tough times. Caregivers feed the cats once or twice daily and talk to the cats daily. Harm to free-roaming cats has a significant impact on the mental health and well-being of the people who own or feed them (Scotney et al., 2023)

Cats who live around humans have some degree of socialisation, even if contact is indirect and they appear unsocialised if trapped, thus determining whether cats in populated areas are owned, semi-owned or unowned is difficult (Slater et al., 2013). Cats can also easily transition between these categories at different times and under differing circumstances (Slater et al., 2010). All cats are individuals and have different genetic makeup and experiences that determine how they will react in any given situation. Even if cats appear to be unsocialised in a cage trap or do not have a microchip or collar, they may be a lost owned cat or a free living cat with a bonded human caregiver that would take ownership if given the opportunity (Crawford et al., 2023). According to Slater (2013), many cats only show their normal behaviour once they are removed from a stress-inducing environment of a trap or a holding facility. When trapped, even socialised cats often display unsociable behaviour due to the stressful experience and environment. It is common that once settled in a less stressful environment they display very different, more sociable, behaviour. The difficulty in identifying cats 'adoptable' cats using traditional sheltering approaches, along with multiple other factors, strongly impacts cat outcomes once they enter the shelter system (Kilgour & Flockhart, 2022).

Identification of owned cats through visible identification or microchipping is also not reliable. Many owned cats are not microchipped (Rand et al., 2023) and it is common for microchip details to be not kept up to date leading to an inability to reunite the animal with its owner (Goodwin et al., 2017). As well, microchips may not be read through a metal cage trap (Lord et al., 2008); if



best practice procedures are not being followed by the trapper, the trapped cat may not even have the opportunity to be scanned before it is killed. Many owners do not put a collar on their cat for fear of injury (Lord et al., 2010). Through our work with Local Governments across Australia, AIAM can confirm that supportive strategies that can be utilised to address challenges related to identifying the ownership status and sociability of trapped cats are not currently being employed on a widespread basis.

Ma and colleagues (2023), found that cat semi-ownership is more common in low socioeconomic areas where the cost of sterilisation for owned and semi-owned cats is often unaffordable for cat caretakers. Cat semi-owners have very similar characteristics to cat owners in the same area, and cat semi-owners often also own one or more cats. Semi-owners feeding 1 to 2 cats represent a huge pool of adopters for these cats, who are often poorly socialised and would otherwise be at high risk of euthanasia. By providing free desexing, microchipping and (if necessary) registration for these cats, many semi-owners can be converted to owners. Helping cat semi-owners to have their cats desexed, microchipped and to adopt the cats they are caring for is a holistic, One Welfare approach which will improve the wellbeing of people, animals and the environment, as well as increase public support for cat management initiatives.

Semi-owned cats are not feral cats, despite displaying behaviours which may make them challenging to adopt into pet homes without a long period of socialisation. Admitting them to a shelter or municipal pound is often a death sentence (RSPCA Australia, 2022). Most are healthy or treatable (i.e. reasonably healthy, , reasonably well-adjusted pets over the age of eight weeks or dogs and cats who are rehabilitatable if given the care typically provided to pets by reasonable and caring pet owners/guardians in the community (Maddies Fund), and for Local Government and Not For Profit shelter staff having few options other than euthanasia for these cats, constant intake and euthanasia of semi-owned cats is traumatising (Rollin, 2011; Scotney et el., 2015; Andrukonis and Protopopova, 2020). Veterinary personnel that have to euthanase these cats are at particular risk of moral injury and psychological distress (Scotney, McLaughlin and Keates, 2015). Recent changes to Australian Work Health and Safety Regulations clarifying employer responsibilities to provide psychologically safe work environments, and increasing accountability for those who do not appropriately control for psychosocial and psychological injuries (https://www.apsc.gov.au/initiatives-and-programs/aps-professional-streams/aps-hr-



professional-stream/aps-hr-professional-news/psychosocial-safety), will likely impact the long term sustainability of broadscale trap and kill approaches to managing domestic cats, due to their known strongly negative impact on the health and welfare of staff performing these tasks.

# Recommendation 1. Align definitions of cat cohorts with current understanding of how cats live

The ecological niches filled by feral cats and domestic cats are very different. Feral cats live independently of humans in remote areas and management methods can be mostly decided without regard to impacts on humans living in these areas. Domestic cats live with and alongside humans who care for and are bonded to them (Zito et al., 2015), so management measures for these cats must consider the impacts of humans on the methods chosen, and of the method chosen on the humans affected. Classing semi-owned and unowned domestic cats as feral cats, ignores the significant differences between the environments in which these cats exist and is inconsistent with RSPCA's 2018 Best Practice Domestic Cat Management report (Identifying best practice domestic cat management in Australia – May 2018).

In order to effectively manage cats who fulfil different ecological niches across the spectrum of human population density and involvement, it is essential that we identify and classify these different groups of animals and apply specific strategies to reduce their numbers while achieving community, animal welfare, and ecological goals.

AIAM has worked with stakeholders from 2014 to develop consistent national definitions of cats (<a href="https://www.g2z.org.au/national-cat-action-plan.html">https://www.g2z.org.au/national-cat-action-plan.html</a>) which align with those in RSPCA Australia's 'Identifying Best Practice Domestic Cat Management in Australia' (RSPCA Australia, 2018). These are:

- Domestic cats: cats with some dependence (direct or indirect) on humans. The three sub-categories of domestic cats are:
  - Owned these cats are identified with and cared for by a specific person, and are directly depending on humans. They are usually sociable although sociability varies.
  - ii. 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.



- **iii. 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.
- **Feral cats** are unowned, unsocialised, have no relationship with or dependence on humans, and live and reproduce in the wild (e.g. in forests, grasslands, deserts). *This definition is aligned with feral cat definitions in the Australian Government Threat Abatement Plan (2015).*
- Stray cats are cats who wander (straying refers to the activity of wandering away, not an ownership status). Stray cats may be:
  - i. responsibly owned and temporarily escape from their property (e.g. a gate or door left open),
  - ii. casually owned and wander from their property regularly,
  - **iii.** semi-owned (e.g. cats making regular visits to one or more households which do not own them, but who may be currently owned, or lost or abandoned).
  - iv. born to previously owned cats and live in colonies, directly or indirectly being fed by humans.

The Australian Government Threat Abatement Plan (2015) and the latest draft TAP contain contradicting definitions of the classes of cats within the scope of each plan.

The Australian Government Threat Abatement Plan (2015) recognised stray cats as a distinct category but domestic cats as owned cats only:

- stray cats are those found in and around cities, towns and rural properties; they may depend on some resources provided by humans but are not owned; and
- domestic cats are those owned by an individual, a household, a business or corporation; most or all of their needs are supplied by their owners. If the confinement of domestic cats becomes more common, the category of a domestic cat may need to be divided to confined and unconfined cats because the potential for these two groups to impact on native fauna is different.



Confusingly, while claiming a stray cat was not owned, this plan identified that domestic cats may have to be divided into those confined and not confined i.e. stray owned cats, which aligns with our definitions above. The 2015 plan acknowledged that:

These categories of cats are artificial and reflect a continuum, and individuals may move from one category to another (Newsome 1991; Moodie 1995). In any given situation, the category causing the most damage to wildlife needs to be identified because management actions will depend on the type of cat causing the damage. ...The approach taken will need to be developed in consultation with the communities.

The latest draft TAP identifies stray cats living in cities and towns as feral cats, despite acknowledging that some "pet" cats roam widely and feed themselves. This is a clear acknowledgement that the Federal Government condones and supports lethal control of owned pet cats living in urban environments. Additionally, given that Local Government is responsible for domestic cat management but not feral cat management, this leads to confusion of responsibilities for management purposes, and will reduce the capacity of councils, private organisations, and veterinarians to effectively manage these cats using modern practices shown to reduce their numbers.

Cats who live near people all need to be defined as domestic cats who may move along the cat continuum from being owned, semi-owned or unowned. Domestic cat management requires different strategies from feral cat management due to the resources available, cat and human behaviour and social implications for cat management strategies. Many community members, organisations and Veterinarians are willing to help with humane, sustainable and effective management solutions to prevent further breeding and reduce numbers, provided support services, such as access to low/no cost desexing, vaccination and microchipping, are available for those who need it.

As a national document intended to provide guidance at national, state and local levels on activities and research needed to abate the threat posed by cats, the draft TAP should use clear, accurate language consistent with current knowledge to demonstrate a thorough understanding of the complexity of cat management in Australia, including best practice cats



management in all environments. As such, AIAM recommends the draft TAP be updated to use the definitions above to describe different cohorts of cats.

Recommendation 2. Create separate Threat Abatement Plans for feral and domestic cats, and consult the National Domestic Cat Working Group in the creation of the domestic cat TAP

The National Domestic Cat Management Working Group (NDCMWG) was formed by the Office of the Threatened Species Commissioner to "share evidence based, best practice advice and resources for improved domestic cat management across Australia" (email invitation to participate in the NDCMWG by Dr Zoe Squires to AIAM on behalf of the Office of the Threatened Species Commissioner 4/5/22) and to progress recommendations from the "Inquiry into the problem of feral and domestic cats in Australia 2020". It was established to complement the objectives of the Feral Cat Taskforce, recognising the complex legislative and management landscape for domestic cats in Australia (NDCMWG Terms of Reference 2022) and the vital role that tailored, evidence-driven management of domestic cats plays in the management of feral cats. The Terms of Reference for the group state that its focus is guided by both the "Inquiry into the problem of feral and domestic cats in Australia" (2020) and the RSPCA Australia's "Identifying Best Practice Domestic Cat Management in Australia" (2018).

The NDCMWG was only funded by the Office of the Threatened Species Commissioner for one meeting held in May 2022. A second meeting was facilitated by sector stakeholders, without funding from the Office, and subsequent meetings have been unfunded and have prioritised considerations for accessing funding for continuing operation of the Working Group.

As has been acknowledged repeatedly by the Threatened Species Commissioner, the Office of the Threatened Species Commissioner, and again within the draft TAP a "different suite of actions' will be needed to reduce the impacts of cats living around people and that actions need to be informed by social science research. Some level of awareness that domestic cat management is a separate but related area of expertise to feral cat management is apparent, yet, the writers of the current Draft Threat Abatement Plan did not consult with the NDCMWG for definitions of cat cohorts, advice on areas of research need and interest, or current best practice domestic cat



management strategies. As such, advice from researchers and organisation representatives with specific expertise in the population management of domestic cats in human-centric environments is not reflected in the current draft TAP.

Draft TAP recommendations relevant to the NDCMWG include developing consistent definitions of feral, stray and domestic cats, and developing and disseminating best practice domestic cat management strategies.

Given the significant differences in the challenges posed by domestic cat and feral cat management, it is clear that a separate Threat Abatement Plan is required for each cat cohort. As the only national group with expertise in domestic cat management, which includes social science researchers, ecologists, companion animal researchers, and industry experts in this area, the NDCMWG, must be consulted during development of any actions recommended for the Federal Government as part of a Threat Abatement Plan and Advice covering domestic cats.

The NDCMWG must be funded as part of a comprehensive plan to address the threats posed by cats in Australia, and, at the very least, enabled to be a significant contributor to the current draft TAP, before it is finalised, on both cat cohort definitions and Objective 9 for effective strategies to reduce cat density in areas of human habitation and infrastructure, and subsequently to provide advice for and guidance on the implementation of Objective 9.

Recommendation 2a. Revise the Actions in 9.1 to support and encourage more research into cat management strategies that involve desexing and returning the cats to their home base, where appropriate

In addition to appropriately funding the NDCMWG, the draft TAP should encourage research into non-lethal population control strategies for cats, including desexing and returning domestic cats to their home base.

Crawford and colleagues (2019), referred to in the Background Document P.45, argues that there are only very limited circumstances where trap-neuter-release can be viable: when the cat population is closed (ie. no immigration); when the desexing rate is high enough to cause



population decline, and those rates can be maintained as kittens mature to breeding age; when there is sufficient funding to provide veterinary care and food to the released cats and maintain the program until the last cat has died; and when there are no cat-susceptible native species at risk from the released cats.

However, similar conditions affect the viability of trap and kill as a population management method. Computer simulation modelling by Benka and colleagues (2022) indicate that cost-effective reduction of free roaming cat numbers requires sufficient management intensity, regardless of management approach, and greatly improves when cat abandonment is minimised. Removal yielded the fastest initial reduction in cat abundance, but trap-neuter-return was a viable and potentially more cost-effective approach if performed at higher intensities over a sufficient duration. Of five management scenarios that reduced the final population size by approximately 45%, the three scenarios that relied exclusively on removal were considerably more expensive than the two scenarios that relied exclusively or primarily on sterilisation.

Thompson and colleagues (2022) note that much of the ongoing debate about trap-euthanise and Trap Neuter Return (TNR), and indeed related research up until that point in time, hinges on the assumption that individuals value wildlife but do not value free-roaming cats. Earlier studies that omitted the value individuals place on free-roaming cats over-estimated the economic case for trap-euthanise programs, indicating that trap-euthanise was the least costly alternative (Lohr et al., 2013).

Van Patter and Hovorka (2018) believe they are the first to include the intrinsic value of free-roaming cats in their cost analysis. In this scenario, where it was assumed community cooperation only occurred under TNR (as is borne out by practical experience), regardless of the value of cats and birds, it was the most cost-effective solution to conduct a TNR program for a 20-year planning horizon. Regardless of method of control, a reduction in cat numbers requires allocation of resources over an extended period of time. In the scenario where caretaker cooperation occurred under TNR, the least cost-option for a 20-year program was TNR, and no control and trap-euthanise had costs that were 1.8 and 1.6 times higher respectively. Trapeuthanise had the lowest population over the first 50 months. However, under cooperation, the population for TNR fell over time, and had the lowest population after 5 years, as caretakers



reduced feeding levels for the group. Obtaining cooperation from caretakers is an important part of the success of a local program and is an essential part of their modelling process. They showed that the act of reducing free-roaming cat feeding by caretakers can considerably reduce group sizes and reverse conclusions about the cost-effectiveness of TNR relative to the case of no caretaker cooperation. As population falls in this scenario, it is possible that TNR becomes more effective because the rate of TNR will remain the same and more cats will be exposed to TNR. Centonze and Levy (2002) propose that cooperation may be plausible since caretakers are often more likely to approve of TNR because they enjoy the company of the cats, they believe the cats help reduce rodent abundance, and they claim that neutering improves the quality of the lives of the cats.

As presented by Emma Richardson (conference presentation, 2023), well-managed cat assistance programs in populated areas rarely have to return a cat without an owner or carer. By offering free desexing and microchipping services for stray cats, there are usually people willing to care for and/or take ownership of these cats once desexed and microchipped. When a cat without an owner or carer is released, desexed and microchipped, an owner or carer is often discovered after the release, resulting in the desired cat ownership behaviour outcome, instead of killing cats, trauma for owners and carers, and loss of trust within the community.

The best practice approach to managing domestic cats is to increase the proportion that are cared for in an environmentally sustainable way. There is a wealth of published research demonstrating that non-lethal management approaches based on desexing, adoption of socialised cats, and leaving unsocialised desexed strays in their home location, have led to significant reductions in urban stray cat populations internationally (Levy et el.,2014; Nutter 2005; Spehar & Wolf 2018; Spehar & Wolf 2019; Zito et el., 2018), and in Australia (Swarbrick & Rand 2018; Tan et el., 2017). According to Swarbrick & Rand (2018), leaving cats in their home location helps stabilise the social structure of the stray cats in that location, preventing immigration of stray cats from surrounding areas. When a large enough proportion (about 54%) of the stray cat population is desexed, and when immigrant cats are promptly managed through adoption or desexing and return to the colony, stray cat numbers decrease by 30% over 2 years and 50% over 5 years.



Additional research from overseas has demonstrated that targeted desexing of unowned urban cats results in a substantial reduction in the intake of cats and kittens to local shelters, and reduced calls to local government relating to dead cats on streets, strongly suggesting the approach also results in a smaller unowned cat population in the community (Levy et al., 2014; Spehar & Wolf 2018; Spehar & Wolf 2019). This approach, often referred to as a Community Cat Program, is widely used by local authorities in the USA and Europe where it is generally regarded as best practice, and typically receives strong community support. For example, in a Florida study where 60 cats/1,000 residents were desexed (about 54% of the stray cat population), cat admissions to the local shelter decreased from 13 to 4 cats/1,000 residents, and euthanasia decreased from 8 to 0.4 cats/1,000 residents (Levy et al.,2014). Other studies from the USA have reported euthanasia rates for cats dropping from over 70% to 2-5% in shelters that have implemented such programs (Spehar & Wolf 2018). Many of these shelters are now well below their carrying capacity for cats, with cat housing being reallocated for other activities, and the change is affecting the design of new shelter buildings. There is growing support for large-scale trials to confirm the efficacy of such programs in an Australian context (Wolf et al.,2019).

A successful small-scale trial based on desexing has already been piloted in the City of Banyule, Victoria (Cotterell et al., 2021). This program offered free desexing, microchipping, and registration for all non-desexed cats in the targeted suburbs with 70% of participants being semiowners and 30% owners. Target areas were selected using existing information held by the council, which was used to identify cat hotspots in the local area using the addresses from which most cats surrendered to the shelter originated, and the areas where residents had expressed concerns about stray cats. This strategy reduced council impoundments from 1,004 cats in 2010-11 (8 cats/1,000 residents) to 141 in 2018-19 (1 cat/1,000 residents), and euthanasia from 578 cats/year to 41 cats/year (from 5 to 0.3 cats/1,000 residents). Between 2017 and 2019, the council used a targeted approach for the desexing strategy and over that 2 year period, impoundments decreased by 71% and euthanasia by 60%, with a concurrent reduction in catrelated complaints. When surveyed, many residents enrolling a cat in the Banyule program stated that they had been caring for and interacting with the cat on a daily basis, often multiple times each day. They described themselves as being very attached to the cat that they care for and that it gave them a reason to get up in the morning. Most residents reported that the primary reason they had not already had the cat desexed was because it was unaffordable. When they



were offered desexing, microchipping, vaccination and registration free of charge, they supported it and took on official ownership of the cat.

Further research into new methods of management of cats in urban and peri-urban areas is urgently needed. The current legislative and regulatory approaches for managing cats in urban areas, primarily using a trap-and-kill approach, has not been effective thus far. Furthermore, statistical modelling, cost analyses and reports from Council staff, have shown that this approach is not financially sustainable for governments or local councils (Chua et al., 2023).

Recommendation 2b. Remove mandatory desexing as a proposed cat management strategy from the TAP

Actions relating to domestic cats should not be included in the draft TAP for Feral Cats and should be removed.

There is no evidence that supports the efficacy of mandatory desexing legislation (MDL) as an effective cat management strategy on mainland Australia. The three Australian states with the highest per capita cat intake into shelters and pounds have mandated desexing (Chua et el., 2023) and a 2016 study of cat intake into RSPCA shelters around Australia also documented no benefit of mandated desexing in reducing cat populations within the community (Alberthsen et al., 2016).

Mandatory desexing policies are generally not viewed as being effective in achieving reductions of free roaming cat populations, complaints about wandering cats, intake to municipal or private animal shelters, or any other metric currently in use to assess the impact of cat management. There are a range of reasons why this might be the case:

- o Majority of cats who are impounded do not have "owners" (as per the description of an owner in most legislation)
- o Lack of support services provided alongside the implementation of the legislation to enable community members to comply with the policy i.e. low or no cost desexing services.
- o MDL effectively criminalises cat caretakers that do not (or can not) comply with the legislation.



- o MDL effectively criminalises those cats that are not complying with the legislation and classifies them as stray or feral with the more frequent outcome for them being euthanasia.
- o MDL (without significant support mechanisms) is not equitable or inclusive and feeds into broader social issues of equity and human rights.

AIAM supports incentive programs for desexing and identification rather than mandatory requirements (as mentioned in the Background document), as this directly addresses the core barrier to wide scale uptake of companion cat desexing; that is, accessibility of veterinary services for people in low socioeconomic communities who are caring for the majority of urban stray cats. However, these must not be packaged with mandatory registration (unless provided freely for the life of the cat), as this prevents engagement with programs by cat caretakers. Registration is an added cost burden on cat caretakers which is counterproductive to the goal of cat population management; that is, to harness community engagement to desex as many cats within the community as possible. Mandatory registration (unless provided freely for the life of the cat) of cats as part of local government desexing programs often prevents people from partaking in the program as they are fearful of being required to pay an additional ongoing expense, which people on low incomes cannot afford. If people are feeding multiple cats, they often cannot afford to register them all. The stated purpose of pet registration is to fund pet-related animal management services through an 'user pays' system (Animal Welfare Victoria, 2020). At present the vast majority of cats entering local government holding facilities and shelters are unowned urban stray cats (Marston et al., 2006; Alberthson, 2016; Chua, 2023), meaning that the 'user' is the community, not an individual. This contradicts the core requirement for a functional 'user pays' animal management system. Additionally, the costs involved in managing a cat registration program for local government typically exceed any financial income received (Chua et al., 2023) and the information collected does not contribute to improved management of companion cats in the community. Expending the same resources on a free desexing, microchipping (and registration if necessary) program achieves the desired outcomes for Council, in a manner that is attractive and acceptable to cat caretakers and increases the success of cat population management programs.

Cat management actions based on imposing legislative requirements, and fining people for unregistered, excess, or wandering cats are ineffective as they do not address the ecological



niche in which these cats live; unowned urban stray cats live alongside community members and do not have owners. Punishing people for showing compassion to these cats by feeding or caring for them is both ineffectual and erodes community support for cat population management.

Recommendation 2c. Remove mandatory containment as a proposed cat management strategy from the TAP

Actions relating to domestic cats should not be included in the draft TAP for Feral Cats and should be removed.

AIAM strongly supports containment on owner's property where possible but does not support making cat containment a mandatory requirement for cat ownership as this presents a barrier to cat caretakers transitioning to cat owners, which reduces participation in cat desexing programs; this is contrary to the goal of desexing as many cats as possible. There is no evidence that supports the efficacy of mandatory containment legislation (MCL) or cat curfews, as an effective cat management strategy (RSPCA Australia, 2018).

Mandatory containment policies are generally not viewed as being effective in achieving an improvement in reduction of free roaming cat populations, complaints about wandering cats, reduction in intake to municipal or private animal shelters, or any other metric currently in use (RSPCA Australia, 2018). There are a range of reasons why this might be the case:

- o Majority of cats who are impounded do not have "owners" (as per the description of an owner in most legislation) and therefore there is no one to contain them.
- o Lack of support services provided alongside the implementation of the legislation to enable community members to comply with the policy i.e., financial and practical support to develop cat containment infrastructure.
- o MCL effectively criminalises cat caretakers that do not (or cannot) comply with the legislation.
- o MCL effectively criminalises those cats that are not complying with the legislation and classifies them as stray or feral with the more frequent outcome for them being euthanasia.



o MCL (without significant support mechanisms) is not equitable or inclusive and feeds into broader social issues of equity and human rights.

Overall, Australian Councils who have implemented mandatory 24/7 containment of cats have reported an increase in cat related complaints, impoundments and euthanasia's, and have been unable to demonstrate a reduction in cats wandering at large (RSPCA Australia, 2018). Most admissions of free-roaming cats to shelters and pounds are from low socio-economic areas (Ma et al., 2023). Around 5% of impounded cats are reclaimed (Lancaster et al., 2015; Chua et al., 2023). There are a number of reasons for this but the primary reason is that these cats are not fully "owned" by one person and are cared for by multiple individuals within the community who each cannot afford to comply with legislative requirements.

In Australia, 20% of households live on less than \$650 a week (Australian Bureau of Statistics, 2021). Cat containment systems suitable for suburban backyards cost hundreds to thousands of dollars (Catnets, n.d.; Oscillot® Proprietary Ltd, n.d.) which low-income families typically cannot afford. Additionally, many cat caretakers and owners live in rental accommodation with inadequate fencing and do not have permission from property owners to make property modifications. Indoor confinement of cats is also difficult to perform reliably as children or other residents may not prioritise closing of doors and windows, allowing confined cats to escape. In addition, research has found that cat owner's perception of their ability to contain their cat is an important predictor of whether someone fully contains their cat along with valid concerns about mental and physical well-being of cats being negatively impacted by confinement (Rand et el., 2023). Some cats are notoriously difficult to contain due to their temperament, past history and physical capacities. Supporting people with various cat containment methods based on their living circumstances and proximity to native species susceptible to cat predation, will provide a more targeted approach to prevent impacts on native wildlife and raise community awareness of the need for and possible options to achieve cat containment (RSPCA Australia, 2023). Providing subsidised access to low-cost mesh, fence additions or enclosures is essential to achieving improved containment of cats in wildlife sensitive areas, or where owned cats are causing an ongoing nuisance issue to neighbours. Consideration of the introduction of building regulations to require appropriate fencing and enclosures in new builds in environmentally sensitive areas would also be helpful. These initiatives will help create a cultural change to prevent wandering, predation and unwanted cats. In many urban areas, the culture has changed regarding keeping dogs safely



enclosed and personally walked for daily exercise. Similarly, cultural change is needed regarding cat caretakership which cannot occur with punitive strategies only.

Similarly to full time mandatory containment, cat curfews increase complaints to councils, increase costs to councils, increase the number of cats impounded, increase exposure to adverse mental health effects (including PTSD) of staff involved in killing healthy cats and kittens, and result in no decrease in the number of free-roaming cats (RSPCA Australia, 2018). This is because cat reproduction greatly exceeds the numbers of cats trapped and killed in our cities and towns, and mandating containment of cats simply makes other residents more aware of the number of urban stray cats in their neighbourhood who have no owner to confine them. If the only option given to community members to address concerns about cat predation on wildlife is a punitive system of trapping and killing cats, then it is logical that publicising this leads to increased use of that option.

Mandatory limits on the number of cats per household also prohibits people accessing local government subsidised desexing, particularly in low socio-economic areas where people cannot afford to desex a cat they may have acquired as a stray or to help a family or friend with an unwanted litter. Councils often allow only two cats per household and therefore offer free desexing for only two cats. This means if a pregnant stray cat appears and has a litter, the person who finds the female cat often takes ownership of her, but kittens are kept undesexed, or given away undesexed, and the breeding cycle continues; again, this is counterproductive to the goal of increasing uptake of participation in desexing programs and achieving wide scale desexing of cats in the community.

Mandatory containment of cats, and limiting cat numbers per household, seem to be logical management strategies in the absence of understanding of the factors affecting cat populations in human-centric areas and practical considerations for working with the community to achieve cat management goals. In practice, it is ineffectual as sufficient support has not been provided to ensure that all residents can comply, and punitive approaches to managing companion animals rarely achieve the support required to achieve voluntary compliance at a high enough level to be effective.



Recommendation 2d. Remove the proposal for the development of cat free suburbs from the TAP

Actions relating to domestic cats should not be included in the draft TAP for Feral Cats and should be removed.

This proposed cat management strategy is inequitable. As well, banning cats from suburbs has not been shown to have any beneficial effect on native mammals in adjacent bushland. Similarly, the presence of cats had no effect on the density and diversity of birds, but density of housing, distance from bushland and decreasing size of remnant bushland had a strong negative effect on bird populations (Grayson et al., 2007; Lilith et el., 2010). The focus must be on progressive and innovative planning strategies when developing new suburbs that incorporate assistance for cat caretakers to contain cats wherever possible, appropriate density and design of housing, appropriate design of recreational space, appropriate design and planting strategies to create quality habitat for native species, and overall minimisation of environmental impact.

Recommendation 3. Effective, humane and ethical actions to reduce populations of free-roaming cats around areas of human habitation and infrastructure

AIAM recommends unified strategies by Local Government animal management, animal welfare and sheltering organisations, human welfare organisations, conservationists and ecologists, and communities to achieve the best outcome for people, cats and wildlife. Working together using evidence-driven and tailored approaches to address the challenges and needs of each situation and community achieves 'buy-in' from both stakeholders and the local community, and most efficiently resources to achieve joint goals. Additionally, active sharing of resources between stakeholders within the sector speeds progress in process development across the sector and prevents 'reinventing the wheel' within individual communities.

Well-managed, supportive programs to manage domestic cats, implemented collaboratively by Animal Management Officers, animal welfare and sheltering organisations, and community volunteers have been shown to be effective in sustainably reducing cat populations in both the



Australian and international context (Swarbrick and Rand 2018; Rand et el., 2019; Spehar & Wolf 2019; Kreisler et al., 2019; Spehar & Wolf 2020). These structured and sustained programs are evidence-driven and utilise multiple strategies for reducing cat numbers and improving the health and welfare of cats, people, and the environment. Strategies shown to effectively engage the community and reduce cat populations in communities include free and low cost desexing, vaccination and microchipping of domestic cats, along with other supports such as capture, transportation, adoption, and encouraging and facilitating containment of pets cats (Swarbrick and Rand 2018; Rand et el., 2019; Spehar & Wolf, 2019; Kreisler et al., 2019; Spehar & Wolf, 2020). These strategies are socially acceptable and equitable, and the least harmful means of reducing cat numbers, provided that all categories of domestic cats (i.e., owned, semi-owned and unowned) are included in management programs (Crawford et al., 2023).

Local Government Animal Management Departments are essential contributors to domestic cat management efforts. Nationally and internationally, Local Governments are moving toward prioritising community support over enforcement-centric animal management (National Animal Care & Control Association, 2021; Human Animal Support Services, 2024; Wheeler, 2023 conference presentation; Goode and Tonks, 2023 conference presentation), working with animal welfare and sheltering organisations and the community to find no or least harm solutions to the long-term challenge of managing domestic cats.

In addition to preventing growth of cat populations and reducing cat numbers over time, desexing also significantly reduces fighting and wandering for reproductive purposes; these are common causes of nuisance complaints to councils, leading to cats being trapped, impounded, and killed. Reduction in impoundment and killing of cats due to nuisance complaints, in turn reduces negative impacts related to lethal control methods on the community members who care about cats, and those tasked with carrying out trap and kill tasks.

Importantly, given the constrained resources available for Local Governments to implement domestic cat management, trapping and killing (with or without impoundment and holding) of domestic cats is an extremely expensive exercise (Rand et el., 2019). Desexing programs delivered using best practice principles of 'microtargeting' cats from high intake areas are comparatively cheaper and more effectively reduce cat population numbers than trap and kill



approaches. Reallocating the limited resources available to more progressive, effective, humane and socially acceptable and equitable cat management practices is both possible and advised.

A fantastic example of effective collaboration on domestic cat management in Australia, currently employed in the Ipswich community in Queensland, is the Cat Assistance Team (CAT). CAT consists of Animal Management Officers working with animal welfare organisation staff and volunteers to find undesexed roaming cats and providing no/low cost desexing and other support services targeted to low socio-economic areas with high cat intake (Richardson, 2023 conference presentation). This program has shown that providing no/low cost desexing and free microchipping, and other support (e.g., transport) ensures that people who are willing to take ownership of unowned adult cats and kittens of stray urban cats can do so more easily and will if afforded the opportunity. Other benefits of the CAT pilot program include active management of cats returned to their caregivers, to ensure they cause the least possible nuisance to the rest of the community and enlisting the help of caregivers to identify any newcomers and act quickly to trap and desex them. Improved relationships with the broader community also means the CAT can provide assistance to develop cat safe fencing and deterrents, if necessary, to alleviate concerns from other community members. Many community members are environmentally aware and want to prevent unwanted cats and kittens, and protect wildlife (Crawford et al., 2023); Utilising their compassion to leverage practical assistance is a much quicker and more effective way of managing the local cat population.

Well-managed community desexing programs in urban/peri-urban areas where there is no immediate threat to threatened native species, enable communities to manage cats ethically and reduce their numbers over the long term. In Portland, Oregon, USA, Local Government animal management, Not For Profit animal welfare and sheltering organisations and bird conservation groups work together to develop solutions appropriate for that community and environment. <a href="https://audubonportland.org/our-work/protect/habitat-and-wildlife/urban/cats-safe-at-home-campaign/">https://audubonportland.org/our-work/protect/habitat-and-wildlife/urban/cats-safe-at-home-campaign/</a>

Some Australian Councils are recognising the importance of adequately funding animal welfare and sheltering organisations to better enable them to continue to do a significant portion of companion animal management work, either alongside Councils by taking in stray and



surrendered animals for the municipality into their own shelters, or by providing management services for council impound and holding facilities. Currently however, this funding is tied to numbers of animals taken into care, limiting the ability of these organisations to take a more proactive approach. Helping with funding to enable companion animal sheltering and rehoming organisations to extend their services to intake prevention and proactively reducing reproduction of companion animals in the community through desexing programs is an important next step.

The National Desexing Network (<a href="www.ndn.org.au">www.ndn.org.au</a>) currently supports 24 Councils, at no cost, to develop and manage <a href="Co-operative Desexing">Co-operative Desexing</a> programs to facilitate more proactive, humane and socially acceptable cat management. These councils have agreed to budget for subsidised desexing for their residents. The biggest increase in the number of local governments funding desexing subsidies has occurred where State Governments have matched funding. The Victorian (<a href="https://agriculture.vic.gov.au/livestock-and-animals/animal-welfare-victoria/community-and-education/animal-welfare-fund-grants-program#h2-2">welfare-victoria/community-and-education/animal-welfare-fund-grants-program#h2-2</a>) and South Australian Governments (<a href="https://dogandcatboard.com.au/about/achievements">https://dogandcatboard.com.au/about/achievements</a>) have programs working towards this, and it is needed in all other states. All State and Territory Governments should contribute by matching funding that Councils invest in desexing subsidies and community support programs as an incentive to encourage these proactive initiatives. Funding costs can be shared across State and Local Government Pest Management and Animal Management Departments as these programs will assist in achieving both their respective goals.

The Australian Government Department of Climate Change, Energy, the Environment and Water can contribute by funding the coordination of collaboration between experts and researchers in ecology, domestic animal management, conservation and animal welfare and sheltering organisations, as well as the Australian Institute of Animal Management, and both environment and animal welfare state government departments to develop understanding and cohesive effective and ethical action. Funding of the NDCMWG is a cost-effective way to provide the necessary framework for this proposal.

There are also other opportunities to collaborate at government level to maximise efficiency of funding. Federal and State Government funded human social services are also recognising that the people who need human welfare support also need support for animals they care for. AIAM



strongly believes that animal support services should be built into human service providers' roles in partnership with Local Government and animal welfare organisations.

Veterinarians have an important role to play in intensive desexing support programs for domestic cats. AIAM supports the proposed action in the draft TAP to contract vets to travel to rural and remote communities that lack vet services to carry out free desexing, as long as these programs are delivered in a culturally appropriate and respectful way. In addition, desexing clinics need to be funded in all areas to enable timely, no/low cost desexing, vaccinations and microchipping. These can be facilitated by organisations through community, shelter or private clinics, however the current veterinary shortage and lack of vets who are trained and confident performing High Quality High Volume Spay Neuter surgical techniques must be addressed. Veterinarians also need to be further encouraged to practise and promote pre-pubertal desexing (from 2- 4 months of age).

Recommendation 4. Revise proposed actions in Objective 9 for efficacy and best practice

All stakeholders need to be aided to work collaboratively in their communities to provide direct support to reduce cat numbers whilst minimising harm to people, cats and wildlife and working to preserve threatened species.

Objective 9 Actions: Maintain Public Support 9.4 needs to include an action that involves working with, and understanding how to, help and support communities to contribute to what they value and support – both protection of native wildlife and a reduction of free-living cat populations by desexing cats rather than killing them.

The Actions in 9.1 propose trapping (and shooting where feasible) of stray cats in populated areas by local government and community members. Trapping and removing cats is currently the most common action taken by the majority of Council Animal Management and Pest Management Departments. Consistent trapping and killing of cats by Local Governments has been done over decades in the interests of public health and safety or conserving valued wildlife. Animal management officers responding to complaints by trapping and impounding of cats, enabling



community members to hire traps to catch and impound cats, and charging reclaim fees before reuniting cats with their carers, is ad hoc management done because of a lack of knowledge and support for more effective, more cost-effective approaches to reducing cat populations.

Despite decades of wide scale use of this approach, there is no evidence that it has had any protective impact on public safety, amenity, or wildlife protection, nor that traditional trap and kill strategies reduce populations of free roaming cats. In addition, according to Hurley and Levy (2022), "untargeted removal of cats or other litter-bearing mammals leads to a destabilisation of age and dominance structures, resulting in paradoxical increase in numbers as well as potential harms. Impounding, caring for and potentially euthanizing free-roaming cats also diverts resources which could be invested more proactively." In short, trapping and killing domestic cats does not address the source of the problem, does not support the owner/carer to comply, and does not develop trust or community support to address free-roaming cat issues more broadly.

Shooting is not an effective or endorsed method of domestic cat management anywhere in the world, as far as we are aware. Not only does this place Australia in the unique position of being the nation that shoots cats that are being cared for and potentially are owned by community members, encouraging members of the public to shoot cats in their neighbourhood condones anti-cat sentiment and behaviours, and alienates cat lovers, including those who are considered responsible cat owners; with at least 1 in 3 Australian households owning a pet cat (Animal Medicines Australia, 2022) and a further 3% feeding a cat they don't own, this recommendation has the potential to negatively impact a large portion of the Australian population. Cat assistance teams working with their communities to deliver cat desexing programs find that many people care about free-roaming cats and develop a strong bond with the cats they care for (Crawford et al.,2023); shooting these cats will lead to cats that are an important part of someone's life, being killed or injured.

# Recommendation 5. Modifying human behaviour

AIAM recommends that the Threat Abatement Plan for Feral Cats more strongly highlights the need for humans to modify their behaviour to improve the quality and quantity of natural environments, and prevent further habitat degradation, particularly in areas with higher numbers of cats or known increased levels of cat predation.



Australian studies have shown that vegetation characteristics within a habitat are likely more important for species diversity than the regulation of cats in the same area (Lilleth et al., 2010; Franklin et el., 2021) and that habitat destruction and degradation is the critical factor affecting richness of bird species (Grayson et al., 2007). The importance of land use on the intensity and success of predation by cats has been increasingly studied in the last decade. Cats are more effective predators in environments that have been heavily modified by humans to remove natural refuges for prey animal species (McGregor et al., 2015), and negatively impact other features of the habitat necessary for these animals to survive, such as food availability and safe movement across the landscape. Cat predation is highest in cropping areas, and highly fragmented reservoirs of native flora adjoining built up environments (Graham, Maron and McAlpine, 2012).

Specifically, AIAM recommends that Objective 9 Actions: Maintain Public Support 9.2 be amended to include actions working to restore native habitat in existing urban areas, limiting land clearing, and encouraging indigenous plantings in new and expanding suburban areas.

Furthermore, AIAM urges a greater emphasis on promoting the modification of human actions to risks to environments relied upon by threatened species and, as much as possible, the compounding of cat predation through human land use choices.

# Recommendation 6. Revise negative language when referring to cats

Current language used throughout the TAP when referring to cats is negative. Animals assigned labels with negative connotations often receive less welfare consideration than valued species (Dubois et al., 2017). The use of the divisive language throughout the TAP exacerbates societal divisions regarding management of cat populations, alienating cat lovers and condoning a disregard for the bond between cat caretakers/owners and domestic cats. Throughout the draft TAP, there is excessive emphasis on the utilisation of primarily lethal control methods which risks further demonising all cats, potentially leading to instances of animal cruelty. We recommend that the language used throughout the draft TAP be shifted to a neutral and scientifically accurate tone, and clearer acknowledgement is made of the importance of human-animal bonds with domestic cats and cat welfare is more highly prioritised.



Where advice is given to attempt to modify cat ownership and caretaking behaviours, such as encouraging and facilitating confinement of pet cats to the owner's property, this should be done within the framework of modern, best practice behaviour change principles that support and positively influence people towards the desired behaviours rather than advocating an 'enforcement first' approach to people who care for cats in our communities.

# **Conclusion**

The methods proposed in the draft TAP for managing domestic cats living in the vicinity of humans (i.e., domestic cats (owned, semi-owned and unowned with individual cats often moving between these 3 categories), lack knowledge of current best practice in this area, are out of touch with recent experiences with cat management programs in the community, and ignore significant developments in cat management and welfare in Australia and internationally.

The International Consensus Principles for Ethical Wildlife Control (Dubois et al., 2017) advocate for firstly altering the human practices that cause human-wildlife conflict and developing a culture of coexistence, as well as minimising animal welfare harms to the fewest numbers of animals.

An ethical approach to animal management involves supporting all stakeholders (Verrinder & Phillips, 2022), not only the native wildlife and non-pet owners, but also the cats and the people who care about them. Conservationists are seeing increasing impacts on wildlife populations and animal management, welfare and sheltering organisations are seeing the suffering of people and animals using current outdated animal management strategies (Scotney et al.,2023). Planning together to maximise positive outcomes for people, cats and wildlife is therefore imperative for an effective, economical, ethical and socially accepted Threat Abatement Plan.

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