

11 December 2023

Department of Climate Change, Energy, the Environment and Water
Via email: invasivespecies@dcceew.gov.au

Threat abatement plan (TAP) for predation by feral cats 2023

The Australian Local Government Association (ALGA) welcomes the opportunity to make a submission to the Department of Climate Change, Energy, Environment and Water on the draft updated threat abatement plan for predation by feral cats.

ALGA is the national voice of local government in Australia, representing 537 councils across the country. In structure, ALGA is a federation of State and Territory Local Government Associations. This submission should be read in conjunction with any separate submissions received from State and Territory Associations as well as individual councils.

Predation by feral cats is a significant detrimental impact on many native and threatened species. Pet cats may also prey on native species as well as move from a pet to feral scenario. ALGA is very supportive of moves to control the population of feral cats to protect biodiversity.

Local governments may undertake some actions for pet cat management through companion animal legislation in their respective jurisdiction. This role usually centres around the registration of microchipping information. Some councils go beyond requirements, introducing more strict companion cat controls. They do so in response to community surveys showing that a large proportion of their local ratepayers favour strong action to curb owned-cat impacts on wildlife and nuisance behaviour. Such councils are typically peri-urban, with bushland interfaces. Councils in these areas use a number of tools including cat management by-laws to enact:

- Registration of cats;
- Limits on the number of cats;
- Identification by microchip;
- De-sexing;
- Curfews;
- Confinement and/or control; and
- Nuisance and wandering controls.

However, doing so requires extra resources, such as the employment of additional staff, and acquisition of software, additional vehicles, microchip scanners and holding facilities to house caught animals after hours before transport to an animal pound. To enact such by-laws requires the building and maintenance of social licence, handling queries and complaints, seizing and impounding cats and ensuring compliance through issuing and administering penalties. This can be more resource intensive in some jurisdictions, if it's a roaming or a feral cat contained that must be housed until it is either rehomed or declared feral by a veterinarian before being euthanised. It is possible that if more resources were available, more councils might work to build social licence and introduce more stringent controls.

However, the way pet cat control is discussed can be barrier to building social licence. A very balanced approach is needed to prevent cat owners becoming defensive and disengaged from control actions.

Unfortunately, there is usually some community members or groups blaming cat owners making the challenge of behaviour change of cat owners even harder. ALGA is supportive of actions under Objective 2 of the Feral Cat TAP to engage and communicate with the broader public and increase support for improved cat management as this will assist local governments when they undertake their own engagement on whether to introduce further companion animal controls. Actions under this objective should move beyond general awareness raising and focus on behaviour change.

Even the language in the suite of documents around the draft Feral Cat TAP seems to suggest that councils are not doing enough. Local government raises less than 4% of taxation in Australia. Along with constrained budgets, competing priorities, skill shortages and inflation all limit local government's ability to manage cats. ALGA recommends reframing action statements as calls to support local governments undertake action. For example, TAP Action 9.2 could be reframed to "Support local governments to improve pet cat management" rather than "Local governments improve pet cat management".

ALGA welcomes additional tools and policy levers for councils to limit pet cat movements, if it is a priority in their community. However, any move to align and improve state and territory legislation to impose additional council-led cat management duties must consider the burden this places on local governments and any move that places additional responsibility without commensurate ongoing funding is unsupported.

Some councils undertake feral cat management controls and/or support local landholders to take action. In most jurisdictions, this is not a local government responsibility and is often undertaken with the support of the state or territory governments, conservation groups or research organisations.

The draft Feral Cat TAP acknowledges that some of the actions local government can take to limit feral cats is not restricted to controlling cat movements. An action to improve waste management to reduce rodents that feral cats predate on is supported. However, it should be noted that the kerbside collections provided by councils are transitioning to separate food and garden organics collections that have the potential, if managed correctly, to reduce rodent food sources from the general waste collections that end up in landfills. It is recommended that rodent management be a focus on collection and processing of food and garden organics.

Conclusion

ALGA is supportive of coordinated action to control feral cats and providing additional tools for local government to manage pet cat movements. Any additional responsibilities conferred to local government through the state and territory government must be sustainably resourced. There is significant work to be done to achieve social licence for local government to enact stricter controls on the movement of pet cats.

Thank you again for the opportunity to comment on the threat abatement plan for predation by feral cats 2023. For further information on ALGA's position, please contact Denise Anderson on 02 6122 9400 or denisea@alga.asn.au.

Yours sincerely,



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