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Feral cat preying a native bush rat. VNPA

**SUBMISSION TO**

# *Victorian cat management strategy*

**Victorian National Parks Association**

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## Victorian National Parks Association, submission to Victorian Cat Management Strategy

### Summary of report

- Feral and free roaming domestic cats have an immense impact on local wildlife and negatively impact ecosystem integrity.
- Cats are appropriate in urban settings while being contained on the owners' own property, but cats in bushland and forested areas impact on local wildlife and ecosystem integrity, both feral and domestic.
- The scope of the Draft Victorian Cat Management Strategy largely neglects the task of reducing the impact and number of feral cats in Victoria.
- The Draft Victorian Cat Management Strategy does little to lay out a plan for state-based leadership on domestic cat containment on top of local government by-laws and local laws.
- Victoria must reverse its ban on the use of 1080 in controlling feral cats in areas of high conservation significance including parks, islands and areas of where endangered species are recovering from disturbance such as fire or windstorm or being re-released from captivity.
- The Felixer trap is used widely over the country and can target feral cats and foxes specifically. It must be used in Victoria to recover species such as the Critically Endangered Leadbeater's Possum.
- The technique referred to as trap-neuter-return must be ruled out and condemned by the document and strategy.

### Introduction

Make no mistake, free-roaming and feral cats are one of the greatest killing machines to ever tread upon the Australian continent. Their growing presence has and is wreaking havoc on native wildlife that has thrived here for millennia, much of it found nowhere else on our planet.

Cats threaten the survival of over 100 native wildlife species in Australia, while also being a carrier of deadly pathogens and diseases that impact both humans, livestock and wildlife<sup>1</sup>

Predation by free roaming and feral cats is a key threatening process under the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) as 'Predation by feral cats'<sup>2</sup>. There is a federal Threat Abatement Plan for predation by feral cats published in [2015](#).

In Victoria, under the state's threatened species legislation, the *Flora and Fauna Guarantee Act 1988*, the threats of cats to wildlife and ecosystems is listed under as 'Predation of native wildlife by the cat, *Felis catus*'<sup>3</sup>. This threatening process has a Recovery Plan that was published in [2004](#).

We acknowledge that the government declared feral cats as an established pest animal on public land under the *Catchment and Land Protection Act 1994* in July 2018<sup>4</sup>.

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<sup>1</sup> Feral cats, Department of Climate Change, Energy, the Environment and Water. 12 December 2023 <https://www.dcceew.gov.au/environment/invasive-species/feral-animals-australia/feral-cats>

<sup>2</sup> Species Profile and Threats Database, Listed Key Threatening Processes, *Predation by feral cats*. Department of Climate Change, Energy, the Environment and Water.

<sup>3</sup> Flora and Fauna Guarantee Act 1988 – Potentially Threatening Processes List July 2022

<sup>4</sup> Media Release: Feral Cats Declared As A Pest Animal In Victoria, 26 July 2018. Premier of Victoria

Threatened Species Recovery Hub reviewed the impact of Australia’s worst invasive species based on the number of threatened species they impact, **cats came in as the 4<sup>th</sup> greatest impact on native wildlife impacting 123 species**<sup>5</sup>. It noted that cats ‘have a particularly devastating effect on Australia’s small to medium sized mammals, and also impact many threatened birds and reptiles’.<sup>6</sup>

**As it is currently written, the *Draft Victorian Cat Management Strategy* fails to adequately address the severe and detrimental impact cats have on native wildlife and ecosystem function.**

Nor does the document lay out a clear way forward in eradicating where possible or reducing the impact of cats both domestic and feral on wildlife and their growing impact on ecosystem functions.

#### Australia's 10 worst invasive species

European rabbit	321
Phytophthora plant disease	236
Feral pig	149
Feral cat	123
Feral goat	116
European red fox	95
Lantana	95
Blackberry	47
Black rat	42
Feral cattle	39

Table 1. Top 10 invasive species in Australia, based on how many threatened species they impact (Kearney et al. 2019)

<sup>5</sup> Kearney Stephen G., Carwardine Josie, Reside April E., Fisher Diana O., Maron Martine, Doherty Tim S., Legge Sarah, Silcock Jennifer, Woinarski John C. Z., Garnett Stephen T., Wintle Brendan A., Watson James E. M. (2019) The threats to Australia’s imperilled species and implications for a national conservation response. *Pacific Conservation Biology* 25, 231-244. <https://doi.org/10.1071/PC18024>

<sup>6</sup> Australia’s 10 worst invasive species, study, Monday, 18 February 2019. <https://www.nespthreatenedspecies.edu.au/news-and-media/media-releases/australia-s-10-worst-invasive-species-study>



Brush-tailed phascogale predated by a cat. *Image: Centre for Invasive Species Solutions*

## Feral cat impacts on ecosystem function and wildlife

The impact of cats, both owned and feral, has been well studied and known for decades. The lack of acknowledgement of these impacts in the Draft Victorian Cat Management Strategy sets the document up to fail.

The Victorian Cat Management Strategy (VCMS) must reflect the immense impact cats both feral and domestic cats have on wildlife and ecosystem function. We will outline a few of these impacts and outcomes needed to allow the VCMS to actually have a meaning impact on the impact of cats both owned and feral on Victoria's wildlife and ecosystems.

The following dot points are from one fact sheet from the Threatened Species Recovery Hub and reflect contemporary science and knowledge on the impact of pet and feral cats in Australia:

- 2023 analysis found that, **roaming pet cats kill 546 million animals a year in Australia**, 323 million of which are native animals. The research also found that **pet cats kill 6000 to 11,000 native animals per square kilometre** each year in urban areas.<sup>7</sup> The analysis broken down averages, each roaming, **hunting pet cat kills more than three animals every week**. The numbers add up. **On average, over a year each roaming and hunting pet cat in Australia kills 186 animals**. This number includes 110 native animals (40 reptiles, 38 birds and 32 mammals)<sup>8</sup>. This means that each roaming pet cat kills, on average, more than two native animals every week. Collectively, roaming pet cats kill 390 million animals per year in Australia. This data does not include the impacts on frogs and invertebrates.

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<sup>7</sup> The staggering death toll of roaming pet cats finally revealed, Laura Chung June 9, 2023, The Age.

<sup>8</sup> The impact of roaming pet cats on Australian wildlife Fact Sheet (June 2023) See [here](#)



- **Cats have been a primary factor in the extinction of most of Australia's 34 mammal species since the 1780s.** Today they significantly contribute to the ongoing decline of over 123 threatened native species, as well as numerous non-threatened species.<sup>9</sup>
- Killing animals is not the only significant impact of pet cats on wildlife. When cats prowl and hunt in an area, wildlife must spend more time hiding or escaping.
- Documented cases of localised extinctions and reduced populations caused by cats both owned and feral include: a Feather-tailed Glider population in south-eastern New South Wales; a skink population in a Perth suburb; and an Olive Legless Lizard population in Canberra. In Mandurah, Western Australia, the disturbance and hunting of just one pet cat and one stray cat caused the total breeding failure of a colony of more than 100 pairs of Fairy Terns.

Total pet cat population:	3.8 million
Percentage of households with pet cats:	27%
Size of animals cats can kill:	up to 4 kg
Percentage of pet cats that roam:	71%
Mean home range of a pet cat:	2 hectares (about the size of two playing fields)
Average density of pet cats in Australian suburbs:	39 to 70 per km <sup>2</sup>
Average number of animals (mammals, birds and reptiles) killed per roaming cat per year:	186
Number of all mammals, birds and reptiles killed by pet cats per year:	390 million
Number of native mammals, birds, reptiles killed by pet cats per year:	241 million

Table 1. Fast facts about pet cats in Australia, Science for Saving Species Research findings factsheet Project 7.4. *Threatened Species Recovery Hub*.

A closer look at cats in the Victorian context the impact of feral and owned cats are impacting a wide range of wildlife and ecosystems, including our Critically Endangered Leadbeater's Possum that has been found in the stomach entrails of feral cats and is being predated by cats in nest boxes needed for the species exists.<sup>10</sup>

Feral cats are a threat to some of Victoria's other critically endangered native wildlife, such as the Mountain-pygmy Possum, Helmeted Honeyeater, Orange-bellied Parrot and Plains Wanderer.<sup>11</sup>

<sup>9</sup> Science for Saving Species Research findings factsheet Project 7.4. The impact of pet cats on Australian wildlife, Threatened Species Recovery Hub See [here](#)

<sup>10</sup> McComb Leo B., Lentini Pia E., Harley Dan K. P., Lumsden Lindy F., Antrobus Joanne S., Eyre Arabella C., Briscoe Natalie J. (2019) Feral cat predation on Leadbeater's possum (*Gymnobelideus leadbeateri*) and observations of arboreal hunting at nest boxes. *Australian Mammalogy* 41, 262-265. <https://doi.org/10.1071/AM1801>

<sup>11</sup> Media Release: Feral Cats Declared As A Pest Animal In Victoria, 26 July 2018. Premier of Victoria

Feral cats extend across most of Victoria, including some offshore islands such as French Island. They inhabit almost all ecosystem types from deserts, forests, rainforest, coastlines, woodlands, grasslands and urban/peri-urban environments.<sup>12</sup>

Cats can persist during periods of ecosystem stress, such as bushfires, windstorms, and droughts, thereby exacerbating the pressure on native wildlife through heightened predation.

The VCMS must raise the need to eradicate cats from areas of high conservation value such as species recovering after bushfire and storms, wildlife in low numbers, wildlife preyed on by cats (such as Lowland Leadbeater's Possum) and land with conservation-based land tenures such as national parks and conservation reserves.

Although dated, the Recovery Plan for Threatening process *Predation of native wildlife by the cat, Felis catus* highlights the impact on Victorian wildlife stating the following:

*At the time of writing there are 27 species of wildlife in Victoria that have been listed or recommended for listing under the Flora and Fauna Guarantee Act 1988, and for which the issue of Cat predation or 'introduced predators' has been identified as a threat. These include 14 bird, 11 mammal and 2 reptile species.*

This list has increased as the listed species on the FFG Act now total over 2,000 species.

We must strive to reduce the number of feral cats across the whole state not just 'manage feral cat populations and impacts'.

Such unfocused wording and misplaced priorities are driving the destruction and extinction of wildlife across Victoria, primarily due to the devastating impacts of cats. Moreover, this failure to effectively communicate the severity of the issue to the Victorian community underscores the urgent need to address the significant threat posed by both owned and feral cats to our state's local wildlife and ecosystems.

It is imperative that we undertake a comprehensive reduction of feral cat populations across Victoria to mitigate their devastating impact, and where feasible, pursue their complete eradication from affected areas.

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<sup>12</sup> Biosecurity Cat (feral or wild), Agriculture Victoria (12 Dec 2023)  
<https://agriculture.vic.gov.au/biosecurity/pest-animals/priority-pest-animals/cat-feral-or-wild>



Cat predated a Critically Endangered Leadbeater's Possum, Victoria state emblem.  
*Image: Melbourne University/Holly Bennett (2018)*

## Building a better future for endangered wildlife

In July 2018, the Andrews Labor Government declared feral cats as an established pest animal on public land under the *Catchment and Land Protection Act 1994*.

This declaration enables public land managers to control feral cats on land they manage. However, the declaration does not include private land, meaning farmers and other private landholders including those managing land for biodiversity conservation cannot control feral cats. The declaration applies to areas of Crown land managed by the Department of Environment, Land, Water and Planning, Parks Victoria, Phillip Island Nature Parks, and Victoria's four Alpine Resorts<sup>13</sup>.



A feral or owned cat predated a Little Penguin (*Eudyptula minor*)  
*Image: Helen Achurch, supplied by the Centre for Invasive Species Solutions*

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<sup>13</sup> Media Release: Feral Cats Declared As A Pest Animal In Victoria, 26 July 2018. Premier of Victoria

During the consultation period for declaring feral cats a pest on public land, over 1,000 submissions were received, with more than 75% of survey respondents supporting the declaration of feral cats as established pest animals<sup>14</sup>.

The declaration of the feral cat as an established pest on public land has helped remove some legal barriers to undertaking efficient and strategic feral cat control on specified Crown land. This was a good step forward for cat management in Victoria.

Yet Victoria lags behind the rest of the country with an illogical ban on the use of sodium fluoroacetate (1080) to control feral cats<sup>15</sup>. This leaves land managers with slow and more expensive control techniques such as trapping, soft claw trapping and shooting, all with questionable welfare outcomes compared to the use of 1080.

1080 is allowed for the use on foxes, wild dogs, rabbit and feral pigs, as well as the native Dingo.

The thwarting of the use of 1080 to control feral cats leaves land managers and scientists unable to access all the tools available to control feral cats to perplexing and makes little sense with the scale of the impact feral cats have on native wildlife.

The illogical and inconsistent ban on 1080 use for feral cats is inhibiting the use of groundbreaking Felixer traps in Victoria, even on islands such as French Islands and Phillip Island that are trying to eradicate feral cats to protect small mammals such as Eastern Barred Bandicoots that were all but exterminated from mainland Australia by cats and foxes.

A future Victorian Feral Cat Management Code of Practice and Victorian Cat Management Strategy must allow for the use of Felixer traps with PaPP and 1080 on public land to control feral cats.

These tools are successfully used (Felixer Traps and 1080) for targeting foxes, with an extremely low chance of impacting domestic dogs. Dog owners are held to a higher level of control over their animals than cat owners. Dog owners face higher fines and diminished social acceptance when their pets stray into parks, habitats of native wildlife, or roam onto private property, such as people's backyards.

We can no longer overlook the responsibilities of cat owners whose pets freely roam public and private areas, spreading disease and preying on vulnerable and endangered wildlife. Ownership of a cat must entail greater accountability, given the significant harm they cause to both wildlife and human health. Tolerating double standards is no longer an option; they're devastating our wildlife populations.

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<sup>14</sup> The Feral Cat Declaration. Information Sheet, The State of Victoria Department of Environment, Land, Water and Planning (2018)

<sup>15</sup> PAPP bait for feral cat control, Agriculture Victoria, <https://agriculture.vic.gov.au/farm-management/chemicals/requirements-for-using-1080-and-PAPP-animal-bait/papp-bait-for-feral-cat-control#h2-3>



## Further information on the Felixer grooming trap

*The Threat abatement plan for predation by feral cats*<sup>16</sup> lists other cat control tools, including devices exploiting cat grooming habits, as a very high priority. This tool now exists due to the development of the Felixer trap.

The Felixer was developed by Thylation in conjunction with conservation groups and government grants<sup>17</sup> and are used across most of the country to control feral cats and foxes.

The developers of the Felixer traps explain how the trap works:

*Felixers use rangefinder sensors to distinguish target cats and foxes from non-target wildlife and humans, and spray targets with a measured dose of toxic 1080 gel. The solar-powered Felixer which can hold 20 sealed cartridges, resets automatically after firing. Felixers photograph all animals detected (including non-targets that are not fired upon) and can be programmed to play a variety of audio lures to attract feral cats and foxes.*<sup>18</sup>

Cats can be hesitant to take laid baits or enter cat traps, whilst ground shooting can be expensive and not achieve full control of a feral cat population.

The traps use the cat's instinct to groom itself to lick the bait off its coat, as cats don't regularly take baits like foxes and feral pigs do. The use of this trap avoids impact of bait use on other species such as Dingo and pets.

The use of 1080 to control feral cats meets the model code of practice for the humane control of feral cats<sup>19</sup> and the Felixer Cartridge (1080) has been approved for use by Australian Pesticides and Veterinary Medicines Authority.<sup>20</sup>

This presentation by John Read from Thylation discusses the development and use of Felixer Grooming traps for feral cat management: <https://www.youtube.com/watch?v=Zlnte8bju3w>

The presentation lays out the best uses of Felixer traps, how they are used in the field to best reduce feral cat numbers and welfare concerns.<sup>21</sup>

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<sup>16</sup> Threat abatement plan for predation by feral cats (2015). Department of the Environment

<sup>17</sup>Thylation, 2020. Felixer feral cat grooming traps – under development. Information used with permission from <https://thylation.com/felixer-faqs/>. PestSmart website. <https://pestsmart.org.au/toolkit-resource/felixer-feral-cat-grooming-traps-under-development> accessed 27-03-2024

<sup>18</sup> Felixer FAQs, Thylation. <https://thylation.com/felixer-faqs/>

<sup>19</sup> Trudy Sharp, 2012. Model code of practice for the humane control of feral cats. Code of Practice. PestSmart website. <https://pestsmart.org.au/toolkit-resource/code-of-practice-feral-cats> accessed 27-03-2024

<sup>20</sup> APVMA PubCRIS database search, Felixer Cartridge (1080)-  
[https://portal.apvma.gov.au/pubcris?p\\_auth=t8lZmqWE&p\\_p\\_id=pubcrisportlet\\_WAR\\_pubcrisportlet&p\\_p\\_lifecycle=1&p\\_p\\_state=normal&p\\_p\\_mode=view&p\\_p\\_col\\_id=column-1&p\\_p\\_col\\_pos=2&p\\_p\\_col\\_count=4&pubcrisportlet\\_WAR\\_pubcrisportlet\\_id=89542&pubcrisportlet\\_WAR\\_pubcrisportlet\\_javax.portlet.action=viewProduct&fbclid=IwAR2XQBY7VRb7uUq4-wthvZMPC3J8Wt5-cqd\\_rt618NhhIDBemawxNZF3dbg](https://portal.apvma.gov.au/pubcris?p_auth=t8lZmqWE&p_p_id=pubcrisportlet_WAR_pubcrisportlet&p_p_lifecycle=1&p_p_state=normal&p_p_mode=view&p_p_col_id=column-1&p_p_col_pos=2&p_p_col_count=4&pubcrisportlet_WAR_pubcrisportlet_id=89542&pubcrisportlet_WAR_pubcrisportlet_javax.portlet.action=viewProduct&fbclid=IwAR2XQBY7VRb7uUq4-wthvZMPC3J8Wt5-cqd_rt618NhhIDBemawxNZF3dbg)

<sup>21</sup> Felixer Grooming traps by John Read, Thylation, Centre for Invasive Species Solutions Youtube page, <https://www.youtube.com/watch?v=Zlnte8bju3w>

## Cat curfews, compliance and a bad idea

Victoria in the past has been a leader in cat management and wildlife protection. Some of the first cat curfews and laws were established in Victoria by the now defunct Shire of Sherbrooke, and later the City of Hamilton. These laws were built after extensive community consultation through the mid-1980s leading to local law changes in the early 1990s<sup>22</sup>.

According to the draft VCMS document, over half (42) of Victoria's 79 councils have introduced cat curfew local laws, and another 16 are considering introducing them.<sup>23</sup>

Reliance solely on local government to ensure compliance of local laws to protect wildlife and human health, that are meant to be protected under state and federal law, is both unsuitable and unrealistic for meaningful and long-term outcomes.

We urgently require state-enforced laws mandating cat owners to contain their pets within their property boundaries at all times. Owning a cat must be acknowledged as a duty to both the welfare of the animal and the preservation of local wildlife and ecosystems, rather than a mere entitlement.

We require owners of wildlife species or restricted dog breeds to hold a licence or registration and meet requirements to own and keep the animal species or breed. This makes very clear that the animals' owners have legal obligations and responsibilities to keep their animal contained and controlled on their own property at all times.

This can be done under its own legislation or can be incorporated into the following existing legislation:

- *Catchment and Land Protection Act 1994* as a controlled species requiring a licence to own.
- *Domestic Animals Act 1994* such as under Part 4—Regulation of domestic animal businesses and related matters and could reflect the section Part 3A—Register of dangerous, menacing and restricted breed dogs. **Cats are a menacing species to local wildlife and spread harmful diseases to humans, wildlife and livestock.**

The technique referred to as trap-neuter-return was briefly touched on, but this failed idea must be condemned and ruled out by this document. The trap-neuter-return has no scientific legitimacy and does not reduce the harm on wildlife.<sup>24</sup>

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<sup>22</sup> Pergl G (1994) The Sherbrooke cat law: does it work? Urban Animal Management Conference Proceedings 1994 Canberra pp. 183–187. Australian Veterinary Association Ltd, NSW. (Viewed 28/1/2013) [http://www.aiam.com.au/resources/files/proceedings/canberra1994/PUB\\_Pro94\\_GarriquePergl.pdf](http://www.aiam.com.au/resources/files/proceedings/canberra1994/PUB_Pro94_GarriquePergl.pdf)

<sup>23</sup> Victorian Cat Management Strategy

Consultation draft. The State of Victoria Department of Energy, Environment and Climate Action, January 2024.

<sup>24</sup> Trap, Neuter, Release. American Bird Conservancy <https://abcbirds.org/program/cats-indoors/trap-neuter-release/>