

# Draft Tasmanian Cat Management Plan

Submission Template

April 2016



# 1. Introduction

## About the submission template

This template has been prepared to assist you to provide feedback to the *Draft Tasmanian Cat Management Plan* (the “Plan”). It is intended to be used in conjunction with the *Tasmanian Cat Management Plan - Background Paper*, which provides background to the management and impacts of cats in Tasmania and supports the objectives and recommendations of the Plan.

The template lists the questions, based on the Plan’s seven objectives and provides response boxes so you can comment on each question. At the end of the template, space is provided for respondents to provide any other comments.

## How to fill in the template

In response boxes containing ‘Click here to enter text’, click on the text and start typing. The box will expand as you type.

You don’t have to answer all questions. You may answer as many or as few of the questions as you wish.

## How to submit

Submissions must be made in writing and be received by 30 June 2016 either:

by email to [catmanagementplan@dpiwwe.tas.gov.au](mailto:catmanagementplan@dpiwwe.tas.gov.au) or

by post to:

Draft Tasmanian Cat Management Plan  
Biosecurity Tasmania,  
DPIPWE  
GPO Box 44  
HOBART TAS 7001

## Once submitted

If you submit feedback via email, an acknowledgement of receipt will be sent by return email. Please provide your postal address on the following page, if you wish to receive an acknowledgement of receipt by post.

All submissions will be made available for public viewing on DPIWWE’s website unless a specific request is made in writing for confidentiality at time of submission (However, see below on the *Right to Information Act 2009*).

### ***The Right to Information Act 2009 and confidentiality***

By law, information provided to the Government may be provided to an applicant under the provisions of the *Right to Information Act 2009* (RTI). If you have indicated that you wish all or part of your submission to be confidential, the statement that details your reasons will be taken into account in determining whether or not to release the information in the event of an RTI application for assessed disclosure.

No personal information other than the name of individual submitters will be disclosed.

All submissions will be considered by the project team when reporting to the Minister for Primary Industries and Water and in the development of recommendations for the Minister.

### Further Information

Additional documents related to the Tasmanian Cat Management Plan can also be found on the webpage [www.dpipwe.tas.gov.au/catmanagementplan](http://www.dpipwe.tas.gov.au/catmanagementplan), including:

- Summary of the Plan (4 pages), and
- A Background Paper, including detail on the evidence base behind the proposals in the Plan (44 pages).

Links to other information on cat management can also be found on the web page.

## Your details

### NAME:

Gillian Basnett is the contact person for the below

### ORGANISATION:

(if responding on behalf of the organisation)

Statewide Community Cat Eradication Taskforce (SCCET) consisting of representatives from the following:

- Tamar Natural Resource Management (Tamar NRM)
- Tasmanian Farmers and Graziers Association
- Landcare Tasmania
- Field Hunting and Conservation Tasmania Inc.
- Upper Meander Catchment Group
- Veterinarian
- Community

### POSITION IN ORGANISATION:

(if responding on behalf of the organisation)

Program Coordinator

### POSTAL ADDRESS:

Address Line 1:

PO Box 396

Address Line 2:

[Click here to enter text.](#)

Town:

Launceston

State:

TAS

Postcode:

7250

## 2. Consultation

**QUESTION 1: Does the Draft Tasmanian Cat Management Plan and its supporting Background Paper adequately address the issue of managing domestic, stray and feral cats in Tasmania, particularly in relation to roles and responsibilities, breeding of cats, cat-borne diseases, environmental, agricultural and human health impacts and existing legislation.**

**Answer:**

The Statewide Community Cat Eradication Taskforce (SCCET) would like to thank DPIPW for the opportunity to comment on the Draft Tasmanian Cat Management Plan (hereon called the Plan). We acknowledge the time and effort already spent engaging with stakeholders and developing the Plan. We would also like to express our understanding of the importance of a strategic, effective, coordinated, resourced, statewide management plan which fully engages all the stakeholders, including the community.

SCCET is a community driven group established in response to the participating organisations and community concern about negative impacts of cats in Tasmania, and Australia more broadly, and lack of coordinated, resourced, effectively legislated cat management in the state. Participants in the group have extensive experience in cat management, research, policy, community engagement and education. Members are also part of organisations that gain continued feedback on issues such as cat management and eradication from the broader community.

SCCET would like to fully support the legislative amendments made in 4.6. *Objective 6* that:

- 1) Provide for new and improved domestic cat provisions – desexing (including amendment of age), compulsory microchipping and containment of cats, removing option of a Care Agreement, limit cats numbers per house (although we feel the maximum should be 2-3);
- 2) Removal of 1000m distance from a residence for trapping; and
- 3) Amendments to the Act covering administration.

Although there are definite improvements made within the Plan and proposed changes to the Cat Management Act (hereon called the Act), SCCET does not believe that it adequately addresses the issue of managing cats in Tasmania nor that the objectives and actions, as they are now, will result in the desired outcomes outlined in the Plan. We have outlined some general concerns with the Plan below and gone into more detail with each objective in relevant sections.

**Overall comments**

- 1) Eradication, although difficult at this time with current resources and techniques, should never the less be the long term goal of the Cat Management Act and the Plan. This should be reflected throughout the document. If, as stated in Objective 5, cat eradication is planned for high conservation and agricultural areas, it should be feasible to have eradication as a goal elsewhere in Tasmania. All our engagement with the community on this topic has indicated eradication should be the long term goal. We are continually developing new techniques, which in conjunction with current programs, can be used with the goal of eradication rather than just control in mind. Without aiming for eradication, we are unlikely to get anywhere near control as we are prone to miss important opportunities and resources.

2) Reference and a role for community, volunteer, NRM and NGO groups are lacking within the Objectives and Actions of the Plan. This is not consistent with the introduction, the federal Threat Abatement Plan for Predation by Feral Cats nor with communications distributed by DPIPW and the State Government. All these categories are completely absent from the Stakeholder Categories outlined in Table 1. There needs to be two additional categories in Table 1:

- a. 9. Community and volunteers groups and
- b. 10. NRMs and NGOs.

These stakeholders then need to be included in all the following Objectives and Actions in the Plan.

- 3) Performance Indicators are lacking in substance, initial baselines, costings and defined benchmarks. The wording is vague and unlikely to determine whether actions have been successful in meeting the long term objectives of the Plan. All the Performance Indicators need to be redone to provide figures and costings before it can be determined whether they are adequate.
- 4) All the actions within the plan will require investment/resourcing. There is nowhere in the Plan that discusses estimated costs or where the resources are expected to come from. This needs to be added into the Plan.
- 5) The Action tables "By Whom" columns frequently exclude community for example: "4.2.8 Training and education is provided for landowners and community in the humane and effective methods of controlling feral cats" does not include Land owners and managers in the by whom column. Action tables, in general, need to be amended to include all sections of the community.
- 6) It is not true that substantial gaps exist in our knowledge of the role and impacts of cats in the landscape. Extensive studies have been undertaken and published on the role and impacts of cats throughout Australia and Tasmania. This information needs to be utilised rather than spending money on duplicating studies/results that already exist. Nor should this idea of a "lack of research" be used to postpone management actions.
- 7) Tasmania should work with other states and the Federal Government to establish a National Cat Management Taskforce along with maintaining a national centre for invasive species research such as CSIRO or Invasive Species CRC to ensure best practice management programs are easily shared and there is coordination of cat eradication across Australia.

### **Objective and Scope (Section 2)**

The objectives need to be prioritised and amended to reflect the goal or eradication of cats and the input from the community. We suggest the following:

Objective 1: Eradication of feral and stray cats from all areas of Tasmania.

Objective 2: Increase community awareness, engagement and involvement.

Objective 3: Encourage responsible ownership of pet cats.

Objective 4: Undertake and enforce legislative amendments to facilitate and support other objectives.

Objective 5: Develop and implement a strategic and coordinated statewide cat management program involving all stakeholders that links with a national Cat Eradication Taskforce.

Objective 6: Identify and implement roles and responsibilities of community and land managers regarding cat management.

Objective 7: Identify and implement roles and responsibilities of Local, State and Federal Governments regarding cat management.

Objective 8: Promoting best practice techniques to guide the planning, management and control of stray and feral cats.

Objective 9: Improving the knowledge, and its dissemination, about feral cats and control techniques to better inform management.

**Question 2): Will the actions proposed in Objective 1 of the Plan lead to greater levels of responsible ownership of pet cats amongst the community? Proposals in Objective 6, regarding legislative amendments, are expected to also contribute to this objective.**

**Answer:**

Performance indicators need to have more detail, including benchmarks and costings to ensure effectiveness. At the moment there are no figures included in the Performance Indicators meaning we have not real goals to meet or benchmarks that we have started from. Therefore, how do we know if we have effectively achieved objectives and actions and how much it will cost? This is the case for all the objectives.

Having awareness of requirements is a first step but does not necessarily result in compliance, especially initially. Legislation and enforcement needs to be included here, as well as who is responsible and how it is going to be resourced. It is important that cat registration be included in the changes to the Act so that there is a central database of cat owners, numbers, areas or ownership, etc. This will also provide an effective means of distributing information on the responsibilities of cat owners.

**Suggested Changes to the Action Table:**

4.1.1 Include community, NGO's and NRM's in the By Whom column. All materials developed need to meet certain statewide standards.

4.1.2 Remove "where necessary" from the sentence. Add NRM and NGO groups to the By Whom column.

4.1.4 By-laws should be developed state-wide rather than by individual councils to remove confusion within the community of obligations between council areas as well as standardise requirements across the state.

**Question 3): Objective 2 of the Plan focuses on promoting best practice techniques to guide the planning, management and control of stray and feral cats. Do you believe the proposed actions can achieve this?**

**Answer:**

The "desired outcomes" outlined in the Plan for this objective are the "effective, efficient and humane control techniques are developed and implemented". This will not be achieved without the extensive input and action from the community and supporting groups such as NRMs and NGOs. They therefore need to be included in all aspects of the Action Table.

This objective will also not be reached without the implementation of cat management facilities throughout the state. Just developing a code of practice is not enough. They need to be easily accessible to members of the community who are carrying out management actions, particularly those who do not fit into the category of primary producers who can euthanize cats they catch. Funding to develop and run these facilities is required and should not be solely the responsibility of local councils, the RSPCA or other relevant organisation.

The coordinated, cross land-tenure frameworks is important for achieving cat eradication. Although important, monitoring and further research requirements should not be used as an excuse to delay cat management programs.

**Suggested Changes:**

As stated above Performance Indicators need to be better defined and costed.

Remove "reducing or" from Performance Indicator 1.

Remove Performance Indicator 4 as this contradicts with the federal Threat Abatement Plan.

**Action Table:**

Community and Volunteer Groups and NRM and NGOs need to be included in all aspects of the Action Table.

4.2.1 This needs to include the resourcing and development of local cat management facilities not just a code of practice. This should not solely rely on local councils providing the funding but will most likely need to be resourced from the State and even Federal monies.

4.2.5 Change wording to "Effective and efficient alternatives to trapping and shooting where all innovative methods and techniques are promoted to land owners and managers where appropriate." Include land owners and managers in the By Whom column.

4.2.8 Change wording to "Training and education is provided for landowners and community in the humane and effective methods of controlling feral cats and on their rights and responsibilities regarding cat management activities".

**Question 4): The actions in Objective 3 are aimed at increasing community awareness and involvement. Do you think the proposed actions are likely to achieve the aim of this objective?**

**Answer:**

The "Desired Outcome" stated in the Plan is not just to raise awareness of the community but also how they can help manage impacts of cats. At present, the Performance Indicators and Actions do not provide any detail in how the community will be engaged, compensated and/or coordinated in the management of cats (particularly feral and stray cats). It does provide some detail on increasing peoples understanding of cat owners on how they can be more responsible.

Discussions all the members of SCCET have had with community members is that people are willing to undertake cat management activities, they just need to understand what they legally can and can't do, best practice trapping techniques, have easy to access cat management facilities if they can't kill the cats themselves and be reimbursed for their costs. These aspects need to be included in order to achieve the aim of this objective.

For example, hunters and fishers are very conscious of the environment and the impact feral species, particularly cats, have on our native wildlife. Hunters in particular, due to their use of

firearms, are an important tool for control of feral cats. Quite clearly these groups, more than most sections of the community because of the outdoor activities, see the damage these predators do. Currently a number of hunting clubs are undertaking trapping programs. More hunters and hunting clubs that SCCET has had contact with wish to be involved in a useful and meaningful way with eradicating cats from Tasmania. They just need clear guidelines on what they can do, permits they need and reimbursement for their costs.

**Suggested Changes:**

As stated above, Performance Indicators need to be better defined and costed.

Ensure Community and Volunteer Groups and NRMs and NGOs are included in all the Actions.

4.3.1 Add in human health to the second dot point.

4.3.1 There needs to be standards for the education materials to ensure that the correct information is reaching the community.

4.3.2 Change to "Investigate and implement opportunities to provide training to community and volunteers groups involved in managing feral, stray and unwanted cats."

**Question 5): Objective 4 recognises there are gaps in our knowledge about feral cats and aims to improve our understanding of the behavior and interactions of feral cats to better inform management. Do you agree that the proposed actions can achieve this?**

**Answer:**

It is not true the depth of knowledge of the role cats play in the Tasmanian environment is not strong. Extensive studies have been undertaken and published on the role and impacts of cats throughout Australia and Tasmania. Many of the Australian studies provide data and information that will directly relate the Tasmanian situation and therefore allow for very accurate assumptions to be made on the role cats play in the Australian Environment. This information needs to be collated, distributed, converted to easy to understand language and utilised rather than spending money on duplicating studies/results that already exist. A quick search come up with the following examples of what is available (this list is by no means exhaustive):

1. Lazenby, B. (2012). Do feral cats affect small animals? : A case study from the forests of southern Tasmania. PhD Thesis.
2. Lazenby, B.T., Mooney, N.J. an Dickman, C.R. (2015). Effects of low-level culling of feral cats in open populations: a case study from the forests of southern Tasmania. *Wildlife Research* **41**(5) pages 407-420.
3. DPIPWE (2009). 'Tasmanian Community Forest Agreement Research into Alternatives to 1080, Newsletter 17.' (Department of Primary Industries, Parks, Water and Environment: Hobart.)
4. DPIPWE (2008). 'Cat Management in Tasmania: Taking the Initiative.' (Department of Primary Industries, Parks, Water and Environment: Hobart.)
5. Bettiol, S. S. (2000). Diseases of the eastern barred bandicoot (*Perameles gunnii*) with special reference to toxoplasmosis and the marsupial immune system. Ph.D. Thesis, University of Tasmania, Hobart.
6. Milstein, T. C., and Goldsmid, J. M. (1997). Parasites of feral cats from southern Tasmania and their potential significance. *Australian Veterinary Journal* **75**, 218–219.



7. Fancourt, B.A. and Jackson, R.B. (2014). Regional seroprevalence of *Toxoplasma gondii* antibodies in feral and stray cats (*Felis catus*) from Tasmania. *Australian Journal of Zoology* 62(4) 272-283.
8. Fancourt BA, Hawkins CE, Cameron EZ, Jones ME, Nicol SC (2015) Devil Declines and Catastrophic Cascades: Is Mesopredator Release of Feral Cats Inhibiting Recovery of the Eastern Quoll? *PLoS ONE* 10(3):

This does not mean there is not a role for further research especially in areas such as new cat control techniques or the current PhD project looking at the use of the newly developed Felixer Spray Grooming trap in areas where there are Spotted-tailed Quolls which can only be run in Tasmania. Nor does it mean there is not an important role for monitoring projects to determine effectiveness of control programs. However, this "lack of knowledge" should not be used to stop cat management activities from being undertaken now.

#### **Suggested Changes:**

The "Desired Outcome" needs to include "current and new research/knowledge be collated and disseminated in understandable and useable formats to all stakeholders". There is no point in undertaking a lot of research if land managers and those involved in cat management activities do not have access to it.

As stated above, Performance Indicators need to be better defined and costed.

Add Community and Volunteer Groups and NRM's and NGOs to all actions.

As a lot of these actions have already been researched and developed, the first action needs to be the collation and dissemination of research already undertaken so that future projects can be targeted to the areas needed, rather than duplication of what we already know.

4.4.2 Monitoring projects should be targeted to determine if control programs are successful. They need to be easy to use so that anyone can undertake them with minimal resources.

4.4.3 Development of ALL new methods of control need to be encouraged, supported, developed and trialled not just non-lethal methods which are very limited. Non-lethal control methods must not include releasing cats back into the environment.

**Question 6): A strong focus of the Plan is to put in place actions that will minimise impacts of cats in areas of high conservation value and agricultural assets. Do you think the actions in Objective 5 can successfully achieve this?**

#### **Answer:**

Members of SCCET strongly advocate for the eradication of cats from all of Tasmania as the long term goal of the Plan, not just their control in high conservation value and agricultural areas. If it is believed that cat eradication can be undertaken in high conservation value areas, which are usually difficult to access, then it is feasible to assume eradication can be achieved in other areas as well. We agree that some regions will need to be prioritised for immediate action, but that eradication of cats from Tasmania needs to be the overall goal. As such, we feel this section needs to be re-written to address this outcome.

We support the idea that "community-led action has a clear role in ensuring this objective is achieved". However, this is not reflected in the Action table. Community and Volunteer groups and NRM's and NGO's need to be included in all actions in the table.

As stated above, Performance Indicators need to be better defined and costed.

4.5.3. The action states Local Governments, landholders and managers are involved in this action but they are not in the By Whom column. Add these and Community and Volunteer Groups, NRM's and NGO's.

**Question 7): Objective 6 proposes a number of amendments to the *Cat Management Act*, including introducing new measures. Do you agree with these amendments and do you believe they will lead to greater levels of responsible cat ownership in Tasmania?**

**Answer:**

The majority of the amendments proposed in this objective will lead to greater levels of responsible cat ownership in Tasmania.

SCCET strongly endorses:

- The compulsory desexing of cats including the amendment of the maximum age at which cats should be desexed to four months.
- Compulsory microchipping.
- Removal of the option for a Care Agreement.
- Confining cats to premises.
- Limiting number of cats at a property without a permit (although we believe the number should be a maximum of 2-3).
- Removal of proximity to residence requirements for trapping.
- Improving arrangements for registered cat breeders.
- The amendments to the Act covering administration components.

**Changes**

- Compulsory registration of cats needs to be included in the amendments. This will provide some funds to Local Councils, will allow for better control of numbers, desexing, microchipping, etc, will centralise a database on cats and also provide an invaluable education opportunity for cat owners.
- "Primary Production" needs to be defined. It needs to include a land size rather than just people who are managing sheep. This will allow for better cat management actions within our agricultural sector.
- What is "Prescribed Land"?
- People who are managing for conservation, including those without conservation covenants, need to be able to trap, seize and humanely destroy cats on their land.
- It is imperative that cat management facilities be developed, not just a code of practice, within all Local Government areas. If there is a provision for people to trap cats, which is important, there also needs to be a means of disposal if they are not allowed to humanely destroy the cats in situ, as is the case for people who are not "primary producers".
- As stated above, Performance Indicators need to be better defined and costed. For example, what is "acceptable timeframes", how much community support is enough?

4.6.1 There needs to be a timeframe for this, including the release of the next draft or final Plan and Act, not just the commencement of the amendment process.

4.6.2 Community and Volunteer groups and NRM's and NGO's need to be included in the "By Whom" column.

4.6.3 How is this to be resourced? There needs to be an increase in resources to councils and agencies responsible for compliance to ensure that it can be undertaken.

4.6.4 These by-laws need to be statewide not just left to the Local Councils to develop. There needs to be uniform legislation across councils to remove any confusion. How is this to be resourced? There needs to be an increase in resources to councils and agencies responsible for compliance to ensure that it can be undertaken.

**Question 8): Both State and Local Government have a role to play in cat management, however, under existing arrangements, those roles and responsibility are not clearly defined. Objective 7 seeks to ensure that both levels of government work together to clearly establish their responsibilities. What do you believe are the roles and responsibilities that each of the two different levels of Government have?**

**Answer:**

The need for clarification of responsibilities is important for effective cat management within Tasmania. It is also vital that Local, State and Federal governments work together on this issue.

There also needs to be clarity of where the resourcing is going to come from. How much is in the budget from the State and Federal Governments for this. Responsibility cannot be placed solely on Local Councils.

4.7.1 and 4.7.2 need to include promoting and disseminating the outcomes of these actions to everyone.

**Question 9): Are there actions or recommendations that you believe are missing from any of the objectives in the Plan?**

**Answer:**

**Objectives**

The objectives need to be prioritised and amended to reflect the goal or eradication of cats and the input from the community. These will then need to have Actions allocated from them, many of which can come out of the current Plan some will need to be added. We suggest the following amended Objectives:

Objective 1: Eradication of feral and stray cats from all areas of Tasmania.  
Objective 2: Increase community awareness, engagement and involvement.  
Objective 3: Encourage responsible ownership of pet cats.  
Objective 4: Undertake and enforce legislative amendments to facilitate and support other objectives.  
Objective 5: Develop and implement a strategic and coordinated statewide cat management program involving all stakeholders that links with a national Cat Eradication Taskforce.  
Objective 6: Identify and implement roles and responsibilities of community and land managers regarding cat management.  
Objective 7: Identify and implement roles and responsibilities of Local, State and Federal Governments regarding cat management.  
Objective 8: Promoting best practice techniques to guide the planning, management and control of stray and feral cats.  
Objective 9: Improving the knowledge, and its dissemination, about feral cats and control techniques to better informed management.

## Other Comments?

### Answer:

#### 1. Introduction

Paragraph 4 – In our experience, once the community becomes educated on the negative impacts of feral cats, the polarised views and emotion around cat control dissipates. We suggest removing the final sentence regarding polarised views.

Paragraph 5 – The first two sentences recognises the vital role of community in the management strategy but they are not provided for in the rest of the plan. The community must be engaged and participate in all of the Objectives and Actions of the Plan.

- As stated above, eradication needs to be the long term goal of this plan despite the difficulties with resources and techniques. There are new techniques currently available which would make the eradication of cats possible, such as feline viruses and the "Felixier" grooming spray traps when combined with current management practices. We therefore recommend that the sentences be changed to "The Plan also recognises that Tasmania has a self-sustaining feral cat population but with community engagement and participation, and support from all three levels of Government, it is possible to have eradication of feral cats from the environment as a long term goal."

Paragraph 6 – It is not true that substantial gaps exist in our knowledge of the role and impacts of cats in the landscape. Extensive studies have been undertaken and published on the role and impacts of cats throughout Australia and Tasmania. This information needs to be utilised rather than spending money on duplicating studies/results that already exist.

#### 3.2 Managing Environmental Impacts of Cats

As per above, the long term goal should be eradication of cats from Tasmania not just islands and fenced predator proof reserves. The second paragraph needs to be reworded to reflect this.

SCCET is concerned that fenced (predator proof) reserves will be seen as a high priority solution to cat management within Tasmania. While suitable in some situations, fenced reserves are expensive, time consuming to maintain and without suitable reserves outside of the fenced area to release species they can become overcrowded resulting in the need for culling or sterilisation techniques. It is important that fenced reserves are not seen as removing the very important need for strategic cat management and eradication in the broader landscape.

### **3.3 Managing the Impacts of Cats on Agriculture**

The reduction in ecosystem services brought about by cats reducing biodiversity and environmental health needs to be included as an impact on agriculture and human health. There is a trickledown effect of the impact of cats which is often forgotten. For example, predation on birds, small mammals and lizards can reduce the amount of pest control these animals often provide to landholders; or the removal of digging animals such as bandicoots can result in lower water infiltration rates, aeration of the soil and turnover of leaf litter.

### **3.6 Guidelines for More Effective Decision-Making**

This is too broad to be meaningful.

- Who decides what are "clear and achievable outcomes"?
- What is meant by "formal criteria"? Who determines these criteria?
- There needs to be transparent and open tender processes in project development and funding allocations.
- Stakeholder assessment is needed and the community needs to be involved in this process.

**Thank you for taking the time to comment on the Tasmanian Cat Management Plan and related documents.**