

Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601
invasivespecies@dceew.gov.au

Dear Officers,

**Submission: Threat Abatement Plan (TAP) for predation by feral cats 2023
Consultation draft: September 2023**

The Urban Bushland Council WA Inc. (UBC) is pleased to present this submission in response to your invitation to address the issues of relevance to us. The UBC is the peak WA community organisation for urban bushland recognition and protection and an incorporated, not for profit organisation registered as a charity (<https://www.bushlandperth.org.au/>). We are a voluntary community association with an active membership of 90 volunteer groups (each with their own local membership from 10-165 individuals) and an additional 106 individual ‘supporter’ members – all with a common interest in conservation and protection of areas of urban bushland in WA.

UBC advocates to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our ‘Friends Groups’ and their many volunteers – from all walks of life ‘working’ to improve and maintain the health of patches of neighbourhood nature.

The Urban Bushland Council WA Inc. (UBC) welcomes the draft TAP and makes the following comments on some sections. Notably it is a very long document, with much inter-related information.

1 Summary – pages 1-3

The page 1 summary with the 6 principles for implementation are strongly supported. They provide a very good framework, and make the TAP evidence-based. All 3 pages of the Summary are strongly supported.

2 Introduction – pages 4-6

It is much appreciated that the TAP includes pet cats as they also predate on native fauna. All types of cats as variously defined as feral, pet, stray, roaming, domestic, unowned, by different authorities are included and this is fully supported. They are all the same species *Felis catus*, and all predate wildlife.

The *Background document for the threat abatement plan for predation by feral cats; Commonwealth of Australian 2023*, is strongly supported as it gives detailed key relevant information and objectives, requirements, and much more. Notably in this document, ‘cat’ refers to pet and feral cats collectively, and we strongly support this.

3 Cat definitions, ecology, distribution and abundance – pages 7-9 incl.

3.1 Cat definitions

This section is much appreciated and supported. Including all types of cats in this TAP is essential. Quote:

“In this plan, ‘cat’ is used to refer to pet and feral cats collectively, whilst the terms ‘pet cat’ and ‘feral cat’ are used to refer to those specific subsets of cats. Feral cats may be further described as those living in natural environments, and those living in or around human infrastructure or heavily modified environments.”

The call for responsible pet ownership is strongly supported. The different approaches needed for pet cats and feral cats is well explained.

3.2 and 3.3 are good explanations.

4 Cat impacts – pages 10-16 incl.

This section detailing data on the extent of predation and impacts is very important and must all be included.

We especially note – quote: *‘The predation toll from **pet cats** falls unevenly across species; small to medium-sized (ie up to ~4kg) terrestrial mammals, ground-dwelling or ground-nesting birds, and colonial reptiles are all more likely to be preyed upon by cats’.*

It is pet cats that are an issue in our urban bushland sites here in south west (SW) of WA. Thus, it is agreed that pet cat management is an important component of managing feral cats.

Lack of resources to manage feral cats adequately is a significant issue in WA.

5 Cat management – pages 17-18 incl.

This section is supported.

As described on page 17, responsible cat ownership practice with containment of pet cats on the owner’s property is much needed in urban and near urban areas and is strongly supported. This needs to be legally required and enforced in suburbs around Perth in WA.

5.1 Public support for cat management: This section is strongly supported. Raising community awareness is a key action needed.

6 Guiding principles for plan development and implementation – pages 19-21 incl.

1. Stakeholder groups with interests in cat management and welfare should be respectfully engaged.

As explained, public understanding and engagement with the issues is important.

2. Cat management should incorporate and support the management objectives and expertise of Indigenous Australians.

This is supported as explained.

3. Programs to reduce cat impacts should use actions that are justified by optimising biodiversity outcomes, overall humaneness, and the sustainability of the action(s).

The actions and priorities described are supported.

4. Cat management should occur within an evidence-based and adaptive management framework, where monitoring leads to continued improvements in knowledge and refinement of management actions.

The three points made are strongly supported.

5. Cat management should consider a broad ecological context, including the potential consequences on other feral animals, and be conducted in a manner that integrates pest control for biodiversity outcomes.

Integration of cat management with control of foxes, rabbits and rodents as described is sensible and is supported. Foxes are a pest in our urban bushland in the Perth region.

6. The priority accorded to the management of feral cats should be commensurate with the ongoing severe impacts of cat predation on much of Australia's fauna, including many threatened species, and with the magnitude of beneficial impacts likely to arise from cat control.

Strongly supported as explained.

7 Long term goal – page 22

The 30 year long term goal is: *'To reduce the impacts of cats sufficiently to ensure the long-term viability of all affected native species.'*

This goal with its objectives as described is supported.

8 Objectives, performance criteria and actions – pages 23-77

There are 9 objectives in the TAP.

The 4 'cross cutting' objectives on page 23 are strongly supported, as are the 5 other objectives.

We especially support Objective 9 as it applies to our urban bushland areas in WA:

Objective 9: *'Reduce density of feral cats and free-roaming pet cats around areas of human habitation and infrastructure.'*

Further, it is critically important that the actions and reporting under this Objective are provided with greatly increased federal Government funding, as well as greatly increased funding by the WA State Government and by respective Local Government Authorities (LGAs).

The statement on page 25 is important: *'Many actions in this threat abatement plan are rated as very high or high priority, reflecting the urgency of tackling the threat from multiple angles.'*

Notably also *'The management of cats is a complex challenge and requires coordinated and integrated actions across many fields.'*

8.1 Objective 1. Coordinate and enhance the legislative, regulatory and planning frameworks – pages 26-30 incl.

The management of cats is a complex challenge which is well set out and explains where more work is needed. We emphasise that *'enabling local governments to set bylaws (such as cat prohibition)* is much needed here in WA.

In Table 3, Objective 1 actions, Legislation regulation frameworks 1.3 is strongly supported with the item: *'Local governments improve regulatory and policy settings to reduce pet cat impacts'* – **with containment of pet cats being included as stated. The WA Cat Act needs to be amended immediately to require that pet cats are contained on their owner's property.**

8.2 Objective 2. Plan and implement cat management programs within an evidence-based framework, and use this to help maintain broad stakeholder and community support – pages 31-38 incl.

It is good that peri urban and urban areas are included in Table 4 (page 32).

There is a lot of detail under Objective 2. All the actions are important.

8.3 Objective 3. Undertake research on cat ecology and impacts to inform management undertaken across multiple objectives.

In Table 7 Objective 3 actions (pages 40-41) under 3.2 for research on cat ecology: *'Include some select native species occurring in areas near human habitation and infrastructure (cross-ref with action 9.3)'* **is strongly supported especially for such areas in our WA south west**

biodiversity hotspot. This research needs to be funded by Commonwealth and WA Governments as a priority to start immediately.

In addition under 3.3, **surveillance monitoring and reporting** of cats should also be **mandatory** for high biodiversity conservation areas such as all Bush Forever Areas (on the Swan Coastal Plain portion of the Perth Metropolitan Region).

8.4 Objective 4. Refine the use of existing tools, and develop new tools, for directly controlling feral cats, and make the tools appropriately accessible.

As stated, Eradicat baits (with 1080) are an effective tool for our SW of WA. Their use should be greatly increased in this region with associated monitoring and reporting. Much additional **funding** for the WA Department of Biodiversity Conservation and Attractions (DBCA) to do this work is needed.

The latest version of Felixer 3.2 should be widely used in SW WA, especially near urban and in/near farmlands. This needs greatly increased funding for DBCA and LGAs which should be a requirement under the TAP.

8.5 Objective 5. Prevent cats from spreading further, to islands that are currently without cats.

Supported. Prevention is better than having to control new invasions.

8.6 Objective 6. Protect the most cat-susceptible species: Remove and exclude cats from an expanded network of cat-free islands and fenced havens, and manage those havens to maintain or enhance their conservation values.

Strongly supported.

Notably islands off the WA coast are now cat free.

This includes extremely cat sensitive species of 47 mammal species, 6 bird species, and 4 reptile species. Maintaining cat free havens and islands are critical for these species. Further expansion of cat free havens as described in the targets and priorities is supported.

Greatly increased WA State government funding (for DBCA and Department of Primary Industries and Regional Development (DPIRD)) is needed for similar actions in our very large State of WA. Also increased WA funding is needed for management of threats of fire, drought and flooding to prevent feral cat spread and associated impacts.

8.7 Objective 7. Protect species with moderate to high susceptibility to cats: Suppress feral cat density in and near prioritised populations of these species. – pages 61-64 incl.

Notably, impacts may come from pet cats for some of these species.

Diversifying funding sources to help drive implementation is much needed and is supported. In WA, both LGAs and DBCA need to fund cat control and to collaborate.

As in **Actions 7.1**, very high priority sites for the south west of WA to include the numbat, quokka, and western ringtail possum are strongly supported.

The very high priority for monitoring programs as in **Actions 7.2**, are also strongly supported.

8.8 Objective 8. Reduce the burden of cat predation across all native species, with holistic management of habitat and species interactions over large areas.

Reducing introduced rabbit and rodent populations as explained is supported.

Under Actions 8.2, *'Manage fire to avoid extensive, severe fire events that simplify the structure of the ground layer over large areas'* is supported. Also, after fire, the need for post fire baiting of cats is supported. Monitoring of outcomes is necessary and is supported.

8.9 Objective 9. Reduce density of free-roaming cats around areas of human habitation and infrastructure. – pages 73-79.

This Objective is of particular interest to UBC and is strongly supported as a priority, but with an addition as follows:

Action 1.3 needs to be included again under 9.1 on page 77. Indeed, it is recommended that this be a specified regulated priority action under **Objective 9**. Notably this is supported by the *Background document* on page 46 which gives ‘Recommendations from a survey of LGAs 2021’, number one of which is:

‘Legislate to mandate responsible cat management at State/Territory level with limits to the number of pet cats, mandatory registration, identification, desexing, and containment on owner’s property (or equivalent control)’.

The Rationale for Objective 9 (on pages 73-74) explains the situation very clearly. The need for keeping pet cats contained to reduce impacts to wildlife is well explained and is strongly supported and should be legislated.

The action in Figure 7 on page 75: ‘*Consistent regulations for pet cat management across jurisdictions; and for recognising feral cats as pests*’ and also ‘*cats contained to owners properties in residential areas*’ are both much needed.

Figure 7 actions are supported.

The Performance Criteria in Table 18 (on page 76) are good.

Action 9.2 on page 77 for Local governments to improve pet cat management is strongly supported especially to require 24/7 cat containment and some cat-free suburbs near areas of high biodiversity value – such as adjacent and near Bush Forever Areas. Indeed, in all the Perth region, cat containment should be legally required.

9 Duration, cost, implementation, and evaluation of the plan – pages 80-82

It is strongly recommended that Australian Government funds **are made available** to implement key national environmental priorities.

Under 9.2, ‘Implementing and investing in the plan’ (page 80), the DCCEEW’s collaboration with other Government agencies as proposed is essential and strongly supported.

It is agreed that *‘partnerships (including financial and implementation support) with governments, nongovernment organisations, Indigenous rangers, community groups and individuals will be key to successfully delivering significant reductions in the threats posed by feral cats, and hence in the achievement of conservation benefits to many of Australia’s threatened species.’*

11 Guidance for regulators – pages 85-87

This section is much needed and is supported.

12 Continuity and adaptation – page 88

This is well explained.

Much information is in the Appendices on pages 89 – 109.

Appendix 3. A compilation of the research-focused actions under the strategic themes – pages 90-93

While this gives a very extensive list of research projects to assist cat control and monitoring etc, it is important that the focus for funding for on-ground cat control is greatly increased and that this funding is not at the expense of so much research.

Concluding Comments:

We look forward to adoption and implementation of this updated Threat Abatement Plan.

And it is essential that it is with greatly increased Australian Government funding, together with mandatory increased funding by State Governments and by Local Governments. It is essential for retention of our unique biodiversity across Australia and especially here in our South West WA biodiversity hotspot.

Yours sincerely,

Chairperson
Urban Bushland Council WA Inc

Urban Bushland Council WA Inc
City West Lotteries House
2 Delhi Street
West Perth WA 6005
ubc@bushlandperth.org.au
www.bushlandperth.org.au