

Enquiries: Jane O'Malley
Our Ref: 0121_2017_0920



21 September 2017

Department of Agriculture and Food
Locked Bag 4
BENTLEY DELIVERY CENTRE, WA 6983

Dear Sir/Madam,

Support for Declaration of the Feral Cat as a Declared Pest in Western Australia

The Peel-Harvey Catchment Council (PHCC) is the regional body responsible for the Peel-Harvey Natural Resource Management (NRM) Region. The following comments are provided within the context of our mission statement : 'as environmental stewards we will encourage and enable effective catchment management to create a healthier natural environment in the Peel-Harvey by building community education and capacity, influencing and leading critical thought and environmental pride, and exemplifying and implementing best practice'.

As a community NRM organisation we have participated in feral control projects in the past, as we are acutely aware of the impacts feral cats have on our native wildlife (Woinarski et al. 2014), which has been well documented in a number scientific studies across the Country and internationally. We are also supportive of the Australian Government's Threatened Species Strategy (2015), and have worked with the Threatened Species Commissioner to undertake projects that support the objectives of this strategy, including the target to cull 2 million feral cats by 2020.

Currently the single biggest barrier to increased feral cat control in Western Australia is due to the legal murkiness associated with the fact feral cats are not listed as a declared pest under the *Biosecurity and Agriculture Management (BAM) Act (2007)*. This is because Section 24 of the Animal Welfare Act (2002) provides a defense against a charge of animal cruelty for the killing of pests, which are defined as 'an animal set out in a BAM Act list' (animals declared under section 12 or section 22 of the BAM Act).

Therefore appropriate recognition of feral cats as a declared pest in the BAM Act would provide certainty and legal protections for feral cat control activities, and reduce the legal risk for landholders or environmental/agricultural organisations and agencies who are participating in these projects.

In addition the declaration of feral cats under the BAM Act will allow for additional resources to be provided to control feral cats, as well as allow Recognised Biosecurity Groups to participate in feral cat control activities. It will also allow for a more coordinated approach to tackling the issue, and help influence landscape scale management of feral cats.

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*We acknowledge the Noongar people as Traditional Custodians
of this land and pay our respects to all Elders past and present*

The PHCC is of the opinion that the declaration of feral cats under the BAM Act is essential to facilitate and provide the resources necessary for Western Australia to effectively play its part in controlling feral cats across the country. It will also help to protect the rights of individuals and volunteer community groups who are trying to do the right thing in respect to removing feral cats from the environment.

Below are our response against each of the criteria that will be reviewed to assess whether feral cats will be declared pests under the BAM Act:

Criterion 1: Identifiable:

- Feral cats are easily identifiable in the environment. While they resemble typical domestic cats in color, size and shape, they demonstrate unique behavior such as aggression towards people, which enables them to be identified.

Criterion 2: Presence in Western Australia:

- Feral cats occupy almost every available habitat across WA (Commonwealth of Australia, 2015), and are widespread across the Peel-Harvey catchment. Evidence shows that numbers tend to be greater in areas where abundant food is available, such as within and adjacent to landfill facilities.

Criterion 3: Potential for adverse effects:

- Feral cats are implicated in the extinction of a number of native Australian species, and consume millions of native birds, mammals and reptiles every day (Woinarski et al. 2017). They are also responsible for endangering the survival of a number of species across Australia, including a number of threatened species within the Peel-Harvey Catchment (Woinarski et al. 2014). Feral cats transport diseases, including the potentially harmful toxoplasmosis, which can have a significant impact to agricultural stock, and is also a potential human health hazard (Dubey 2009).

Criterion 4: Potential for establishment or spread or increase in numbers

- Feral cats already occupy 99% of Australia, including many offshore islands (Invasive Animals CRC 2011). They are able to rapidly increase in numbers and further establish populations as food abundance becomes available (Denny 2010). With increasing human populations, the increase in waste and vermin associated with the spread of people across the landscape and the dumping of domestic cats, it can be expected that, without increased support to manage feral cats, we will experience an increase in feral cat numbers.

Criterion 5: Subject to current or planned regulatory activities

- It is understood the only regulation or legislation that applies to cats is the Cat Act (2011), which enforces proper cat ownership to help prevent the increase in kitten dumping and

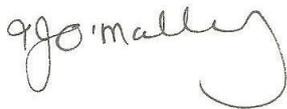
unwanted cat pregnancies. This legislation is generally enforced by local governments, and doesn't provide regulatory support to controlling feral cats.

- Currently there are feral cat control efforts occurring across Western Australia, primarily by and with support of the seven (7) NRM Regions across the state and the Department of Biodiversity, Conservation and Attractions (DBCA). The PHCC is currently participating in a project in collaboration with the DBCA and local government to help landowners undertake feral cat control on private landholdings around the Dryandra Woodland. This work complements the feral predator control activities that are being undertaken within Dryandra Woodland to help protect populations of threatened mammal species, including the Numbat and Woylie. The inclusion of feral cats as a declared species to the BAM Act will support additional activities around feral cat control, and provide justification for targeting feral cats through government funding.

As such the PHCC would like to iterate strong support for feral cats to be listed as a declared pest under the BAM Act.

Should you require further information, please do not hesitate to contact Jane O'Malley on (08) 6369 8800 or email admin@peel-harvey.org.au.

Yours sincerely



Jane O'Malley
Chief Executive Officer

References:

Buxton D., Maley, SW., Wright, SE., Rodger, S., Bartley, P., & Innes, EA., (2007). *Toxoplasma gondii* and ovine toxoplasmosis: new aspects of an old story. *Veterinary Parasitology* 149(1-2): 25-8

Commonwealth of Australia (2015). *Background document for the Threat abatement plan for predation by feral cats*. Department of the Environment. Canberra.

Denny E. A., Dickman, C. R., (2010). 'Review of cat ecology and management strategies in Australia.' (Invasive Animals CRC: Canberra.). 84.

Dubey, JP. 2009. *Toxoplasmosis in sheep – the last 20 years*. *Veterinary Parasitology*, Issue 163, Number 1–2, pp. 1–14.

Invasive Animals CRC (2011). Feral cat (*Felis catus*) (pp. 2) www.pestsmart.org.au/pest-animal-species/feral-cat/.

Woinarski J. C. Z., Burbidge A. A. & Harrison P. (2014) *The action plan for Australian mammals 2012*. CSIRO Publishing, Melbourne.

Woinarski J. C. Z, Murphya B.P., Legge S.M., Garnetta S.T., Lawesc M.J., Comerd S., Dickmane C.R., Dohertyf T.S., Edwards G., Nankivellh A., Patoni D., Palmerj R., Woolleya L.A. (2017) *How many birds are killed by cats in Australia?* *Biological Conservation Journal*. Volume 214: 76-87.