



Office: 90 Gap Road, Alice Springs NT
Mail: PO Box 2796 Alice Springs 0870 NT
Web: www.alec.org.au
Phone: 08 89522497

Comments Draft Threat Abatement Plan - Predation by Feral Cats

11 December, 2023

Comments submitted via e-mail to: invasivespecies@dcceew.gov.au

To whom it may concern,

Thank you for the opportunity to submit comments on Threat Abatement Plan for Predation by Feral Cats

Context

ALEC supports updating the Threat Abatement Plan for Predation by Feral Cats. In arid lands, like much of Australia, cats are a very significant threat to biodiversity.

However, we raise a number of significant qualifications and comments. These comments are informed by the general views that:

1. Control of any species should be humane.
2. We need to be working towards more resilient ecosystems that do not favour cat predation.
3. Aboriginal and Torres strait Islander peoples have strong views in regards to lethal controls, in particular killing dingoes.
4. Responsibility and control of implementation needs to be by organisations with a statutory responsibility to act in the public interest, in order for the public to have confidence that their views have been properly considered.

In making these comments we support and emphasise the following commentary in the TAP:

*4.1.3 The threat of cat predation is moderated or compounded by other factors, including co-occurring threats. Abundant populations of introduced rabbits *Oryctolagus cuniculus* and introduced or native rodents (especially house mouse *Mus musculus*) support higher densities of feral cats, which can result in higher predation pressure on native species. The risks to native animals from these 'inflated' cat populations can be acute when sudden reductions in primary productivity (e.g., a return to dry conditions after prolonged rainfall) cause rabbit or rodent populations to crash, forcing cats to*

switch to alternative prey species. Changes to the fire regime or to grazing pressure that simplify the structural complexity of the ground layer may worsen the predation risk to ground-dwelling animals, partly because cats are drawn to hunt in, or along the edges, of recently burnt areas; and because the success of hunting attempts by cats increases in open areas.

4.5 Indigenous Cultural values

Many groups did not support direct lethal control, considering it ineffective with the tools available to them, or too risky for non-target species (e.g., poison baits can be consumed by many other animals, including dingoes), or that killing an animal without eating it was 'wasteful'. Many groups noted that lethal control requires funding, equipment, regulatory approvals, information, or training that are challenging to acquire. Instead, many groups preferred a whole-of-ecosystem management approach for controlling cats. For example, managing fire was cited as a way of reducing the predation impacts from cats.

Page 17 Cat predation/impacts can be mitigated indirectly by:

- Reducing introduced rabbit and rodent populations.*
- Allowing dingo populations to persist or re-establish.*
- Managing fire and grazing to maintain a complex ground vegetation layer (to reduce cat hunting success).*

Comments

Our comments are organised as follows:

- A. Comments on the principles underpinning the TAP
- B. Specific comments
 1. Enhanced ecosystem resilience should be a focus
 2. The plan needs to look more widely at other decisions making processes which increase vulnerability to cat predation
 3. Native animals, including dingoes should not be collateral non-target species
 4. The Wild Dog Action plan on page 66 and anywhere else should be removed
 5. 1080 baiting is ethically fraught and should not be used
 6. Concerns around governance and delivery arrangements - delivery of the plan, including coordination and oversight needs to be delivered within the Federal Government and not outsourced
 7. KPIs should be focused upon impact in reducing risk posed by cats to threatened species and not either the number of cats killed / or efforts made to kill cats.

Discussion

A. COMMENTS ON THE PRINCIPLES

This threat abatement plan has been developed, and should be implemented, in accordance with the following principles:

- 1) Stakeholder groups with interests in cat management and welfare should be respectfully engaged.
- 2) The management of feral cats should incorporate and support the management objectives and expertise of Indigenous Australians.

Too weak - Indigenous Australians should have a decision making role

- 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).

We support sustainability and humaneness being considerations, terms like “optimising” and “overall” are code for a consequentialist ethics - this would not be acceptable in human populations and neither should it be in dealing with the environment.

A process for ethical approval of cat management that considers matters such as rights and expectations under customary law needs to be established.

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

The development of RD&E strategies and funding plans should be developed within the Federal Government and not outsourced.

Quality of research and education by the Federal government and partners in the plan must be closely monitored.

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

“Consider” in “consider a broad ecological context” is too weak. Cat management must be done as part of the overall management and risks to non-target species assessed prior to cat management (both feral and native animals). This needs to include ethics advice. Management needs to be made by government and not delegated to private companies / charities / trusts / organisations who do not have a statutory decision making role. This is critical given there are multiple views and significant public concerns about the use of pesticides. Many of those concerned e.g. Indigenous Australians, are not afforded decision making roles.

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.

Broadly agree but note that the severe impacts of cat predation cannot be separated from the vulnerability of fauna to predation, which is also a function of ecosystem and population health. In arid lands both:

1. The cascading effects caused by the loss or removal of dingoes from Australian landscapes; and

2. The threat to ecosystems and threatened species from buffel grass invasion;

Need to be addressed via standalone KeyThreatening Processes and standalone TAPs to reduce vulnerability of fauna to predation.

B. SPECIFIC COMMENTS

1. Enhanced ecosystem resilience should be a focus

There are incredible opportunities via whole-of-ecosystem approaches, drawing upon first Nations know-how and direction. The severe impacts of cat predation cannot be separated by vulnerability of fauna to predation which is also a function of ecosystem and population health. Accordingly we:

1a. generally support and emphasise the importance of the performance criteria on page 28:

“Planning Frameworks are enhanced and coordinated

All new threat abatement plans for pest species that interact with cats, and recovery plans and conservation advices for newly listed threatened species affected by cat predation (or cat-borne disease), show explicit linkages to this threat abatement plan, and their priority management actions are coordinated with the actions described in this plan. “

Existing threat abatement plans and advices for all species and processes that interact with cats should be updated to ensure their priority management actions are coordinated with the action described in this plan.

1b. Following on from 1a. We highlight that in the arid lands the following key threats must be listed as stand alone key threatening processes under the EPBC Act and threat abatement plans must be developed. This is critical to reduce vulnerability of fauna to cat predation and improve ecosystem health:

1. The cascading effects caused by the loss or removal of dingoes from Australian landscapes (including the opportunities to reduce cat predation by restoring healthy dingo populations); and
2. The threat to ecosystems and threatened species from buffel grass invasion (currently listed in the weaker category 'novel biota and their impact on biodiversity' with no dedicated TAP)

1c. We are concerned that whilst this TAP emphasises the importance of healthy ecosystems the subsequent chapters are largely focused on killing cats and creating safe havens. It does not sufficiently emphasise and suggest investment in the importance of restoring healthy ecosystems to mitigate cat numbers and predation.

2. The plan needs to look more widely at other decision making processes which are increasing vulnerability to cat predation.

We are concerned the TAP does not sufficiently tackle the underlying causes of cat predation which are bolstered by other decision making processes. In particular:

- management of pastoral lands - decisions to kill dingoes, overgrazing, the proliferation of artificial water points, degradation of waterholes and poor fire management regimes; and,
 - National failure to act on the causes of climate change
- are creating conditions for cats to thrive and species to be vulnerable to their predation.

3. Dingoes should not be collateral non target species

Killing dingoes as non-target species which can be expected with the lethal control of cats via baiting programs conflicts with the statement from the inaugural *National First Nations Dingo Forum*, which called for recognition of the dingo as a native species deserving legislative protection from lethal control.¹It declares,

“We do not, and have never, approved the killing of dingoes. Killing dingoes is killing family. We demand an immediate stop to this ‘management’ across Australia.”

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<https://lsj.com.au/articles/calls-to-stop-lethal-control-of-dingoes/#:~:text=The%20resulting%20statement%2C%20the%20national,'management'%20across%20Australia.%E2%80%9D>

This statement should be heeded. Not only in Indigenous Protected Areas, but under all land tenures, recognising in particular that decisions on pastoral lands (often under coexisting Native Title) to kill dingoes are benefitting cats.

4. The *National Wild Dog Action Plan* on page 66 and anywhere else should be removed.

This is a toxic and misleading document that does not embody the principles of listening to First Nations' concerns, nor sufficiently recognise the function of dingoes in healthy ecosystems as described in this draft TAP. Furthermore the *National Wild Dog Action Plan* is a non statutory document and it does not accord with the principles of ecological sustainable development recognised in the EPBC Act.

5. Lethal control via baiting programs, especially 1080 is ethically fraught.

ALEC promotes an ethics of care, inhumane controls do not fit with this. The TAP must establish an ethics committee and ethical principles, with wide ranging responsibilities.

6. Concerns around governance and delivery arrangements

We are concerned that private organisations, in particular Invasive Animals Ltd (The Centre for Invasive Species Solutions - CISS) are setting Australian government policy and communication approaches to the public.

The most recent Feral Cat Taskforce communique is an example:

Gillian Basnett, the National Feral Cat and Fox Coordinator, let Taskforce members know a new website is being developed as a dedicated platform for landholders and managers to access information on feral cat management, and a series of webinar forums on aspects of feral cat management were conducted earlier this year and are available at www.youtube.com/c/centreforinvasivespeciesolutions.

Given the concerns of indigenous Australians and many people all seeking ethical, efficient and effective approaches, and democracy, and the variety of views on these matters, we do not agree that either public interest decisions regarding cat management or communications should be delegated to private organisations and employed coordinators.

This is not an abstract and theoretical concern. In the Northern Territory both evidence and the concerns of Indigenous and environmental stakeholders have been bypassed in promoting the baiting of dingoes using 1080 baits under the guise of the *National Wild Dog Action Plan*, despite local evidence that baiting with 1080 does not reduce calf mortality in the NT, and that dingoes, not wild domestic dogs or hybrids are, the targets of such programs².

² <https://michaelwest.com.au/has-australias-dingo-management-gone-to-the-dogs/>

For the public to have confidence in implementation of this TAP, the National Cat Coordinator must be a public servant, employed by the DCCEEW. Governance structures, including the ethics committee we proposed convened to implement the TAP need to be established under the EPBC Act. These need to be formally answerable to the Department and the Minister under legislation, not contractual arrangements.

7. KPIs should be focused upon impact in reducing the risk posed by cats to threatened species and not either the number of cats killed/ or efforts made to kill cats.

We acknowledge there are a broad range of KPIs presented however we emphasise these need to be focused on efficacy, which is overall health of the populations and ecosystems to be protected, not the number of cats killed.

Thank you for your consideration.

Kind regards,

A handwritten signature in black ink, appearing to be 'AT', with a long horizontal stroke extending to the right.

Adrian Tomlinson,

Chief Executive Officer