

## **Submission from the Cat Protection Society of NSW Inc to the Natural Resources Commission's Pest Animal Management Review draft report**

The Cat Protection Society of NSW Inc ("Cat Protection") welcomes the opportunity to provide a submission on this draft report.

The draft report is an enormous document that draws on several different areas of government legislation and policy and makes many recommendations. It is of concern that many proposals would be enacted by regulation, which means they would simply be tabled rather than debated in Parliament.

As an animal protection charity, Cat Protection is naturally concerned with animal welfare generally. One of our guiding principles is that every animal deserves to be treated humanely and with respect for their sentience.

We have long advocated for socially and environmentally responsible pet ownership, which protects native animals at the same time as supporting the benefits of the human-animal bond. Cats have been the companions of people for some 10,000 years and this unique relationship should be honoured.

Our key concerns with the draft report are:

- "Animal welfare" is not defined nor very much considered in the draft report. Likewise the term "humane" is neither defined nor much used. Ethics are not mentioned. This is very disturbing for a draft report that is largely about unquestionably sentient animals
- A fundamental issue for the purposes of the draft report and its recommendations is what is (or will be) the precise definition of a 'feral' cat. Whether they are pampered indoor-only, lap cats; family pet moggies; hungry, scared lost cats; stray colony cats foraging for scraps at the local fast food outlet; or truly wild cats dependent on absolutely no human being and who are rarely if ever seen – all these cats are the same species. The issue of definition is therefore critical and will require its own consultation to prevent unintended consequences. It is noted that at page 79 of the draft report, there is reference to management of 'stray' and 'feral' cats. A stray cat may simply be an owned, loved but lost cat. This crossover starts to descend into dangerous territory for cats – and cat owners
- Over-reaching: while most of the recommendations regarding responsible pet ownership are consistent with policy recommendations made and/or supported by Cat Protection in previous animal welfare inquiries (such as desexing all cats by four months unless the cat is owned by a registered breeder) this area of the draft report might be considered to be outside its terms of reference. Companion animal care and management resides within the portfolio of Local Government and local councils already have powers

under existing legislation to promote wildlife protection and to regulate cat ownership

- A one-size-fits-all approach that assumes “culling” feral cats – by whatever means – will achieve something of benefit for the environment (because it is assumed that there is some intrinsic benefit to be gained from every dead cat). Culls can lead to bigger and healthier populations of the targeted animal, or might lead to increased populations of the prey upon which the targeted animal fed, which might be a non-native species. Leading research from Australian ecologists Lazenby, Mooney and Dickman (*Wildlife Research* 2014; 41: 407-420) showed that “Contrary to expectation, the relative abundance and activity of feral cats increased in the cull-sites”. Cat numbers fell when culling ceased. The study shows that sport-shooting of cats would escalate feral cat numbers and should not be considered in a threat abatement plan
- The use of ‘recreational’ shooters is not supported – as above, random killing/culling (whether ‘humane’ or not) is not scientifically supported. If a particular area/ecosystem is to be targeted with a scientifically valid and properly resourced management program (with clear and justified goals, and a commitment to monitoring and evaluation) then that program should be professionally led, managed and operated and not subject to the varying motivations and competencies of non-professionals
- There is little to be gained and much harm that will be caused by labelling cats a “pest”. Negative labelling of an animal deliberately devalues the animal and creates a culture that is permissive of violence and cruelty towards that animal. This concern is dealt with in further detail below
- Owing to the volume of changes proposed and the number of stakeholders involved, we would support further staged consultation.

We note the position statement of Sentient, The Veterinary Institute for Animal Ethics, which states, inter alia, that “The aim of any cat population control program should be to prioritise the welfare of cats; reduce the impact of cats on native wildlife; and minimise cats’ disturbance to human populations; minimise the risk to non-target species; and be effective in the long-term. *There is as yet no scientific consensus on the most humane and effective form of population control for stray and feral cats in urban and rural environments ...*” [emphasis added].

We also note the ethical and scientific issues considered by Dr Andrea Harvey, BVSc, DSAM (Feline), Diplomate ECVIM-CA, ANZCVS (Associate), MRCVS Registered Veterinary Specialist, PhD Scholar, Centre for Compassionate Conservation, University of Technology Sydney, in her article: “The debate about feral cats” published in the Centre for Veterinary Education’s Control & Therapy Series, December 2015, Issue 281.

In particular, we return to our objection to the use of the term “pest”. Dr Harvey questions the differential treatment of individually identified animals versus unknown animals of the same species (citing the example of the global response to the killing of Cecil the lion). She goes on to say: “When it comes to naming animals, the prejudice goes even further in the division between owned and unowned animals. Typically, animals that society has chosen to consider undesirable are grouped together with a negatively biased name such as ‘pest’, ‘feral’, ‘invasive’, ‘introduced’

etc. These terms do little more than further exacerbate the prejudices against them, and it is clearly not an ethical way of distinguishing between species, or between members of the same species. Similarly, 'feral' cats are usually illustrated as a growling hissing cat, suggesting they are nasty and aggressive when, as feline vets, we know that this body language simply represents a highly anxious cat that feels threatened. All of this results in the connotation that feral cats are 'bad' and helps society to justify killing them."

Respectful consideration of all living creatures is imperative to building a humane and kind society. There can be respectful consideration, even when it is considered that a particular animal or group of animals is harmful to a particular ecosystem.

Cat Protection does not suggest that cats belong in all environments. Cat Protection accepts that there are habitats where cats cause harm. We also know that cats provide enormous health, economic and social benefits to people.

It is unhelpful to give any animals binary distinctions of 'good' or 'bad'. It is, moreover, dangerous to do so, as it invites disrespect of the animals labelled as 'bad' and establishes a culture where that animal's sentience does not matter. It is a truism that not all disrespect leads to violence but most certainly all violence begins with disrespect.

As a charity caring for cats, we are supported by a wonderfully caring, kind and responsible community. We are also regularly confronted by some people's deep-seated hatred for cats. Their jokes about cruelty and their threats of violence are frequently self-justified by the claim that "cats are killers" and that "they deserve it". When we have taken in battered and broken tiny feline victims of human violence, we don't know what the person who committed that violence said, but we do know they had no respect for cats.

We cannot overstate the importance of language and imagery in promoting ethical and humane behavior – or conversely, its power to create a culture that is permissive of cruelty and inhumanity. We object most strongly to the labelling cats as pests.

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