



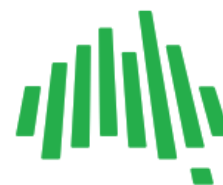
National Farmers' Federation

Submission to the Inquiry into the problem of feral and domestic cats in Australia

4 August 2020

NFF Member Organisations





The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

Statistics on Australian Agriculture

Australian agriculture makes an important contribution to Australia's social, economic and environmental fabric.

Social >

There are approximately 88,000 farm businesses in Australia, 99 per cent of which are wholly Australian owned and operated.

Economic >

In 2018-19, the agricultural sector, at farm-gate, contributed 1.9 per cent to Australia's total Gross Domestic Product (GDP). The gross value of Australian farm production in 2018-19 is estimated to have reached \$62.2 billion.

Workplace >

The agriculture, forestry and fishing sector employs approximately 318,600 people, including full time (239,100) and part time employees (79,500).

Seasonal conditions affect the sector's capacity to employ. Permanent employment is the main form of employment in the sector, but more than 26 per cent of the employed workforce is casual.

Environmental >

Australian farmers are environmental stewards, owning, managing and caring for 51 per cent of Australia's land mass. Farmers are at the frontline of delivering environmental outcomes on behalf of the Australian community, with 7.4 million hectares of agricultural land set aside by Australian farmers purely for conservation/protection purposes.

In 1989, the National Farmers' Federation together with the Australian Conservation Foundation was pivotal in ensuring that the emerging Landcare movement became a national programme with bipartisan support.

Response to Terms of Reference

b. the impact of feral and domestic cats including on native wildlife and habitats;

Impact on native wildlife and habitats

Invasive species, including feral cats, pose the biggest extinction threat to Australian wildlife. According to the Intergovernmental Science-Policy Platform for Biodiversity and Ecosystem Services (IPBES), while the threat of ‘invasive alien species’ rank fifth as the most significant cause of global biodiversity decline, it is the highest in Australia¹.

Research into the impact of feral cats has highlighted the following:

- cats have been the primary contributors to about two-thirds of mammal extinctions in Australia since European settlement. Cats have also been the primary contributor to the extinction of Australian birds that are restricted to islands; and
- Feral cats are known to threaten 123 species listed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)². 82 per cent of listed species under the EPBC Act are affected by invasive species.

The impact of feral cats on Australian biodiversity is also well-established. There is strong evidence that feral cats have significant, and at times catastrophic, impacts on native wildlife and habitats such that these threatened species can only persist in exclusion-fenced areas.

The Threatened Species Recovery Hub provides a useful factsheet on the impact of cats in Australia³, finding that cats in Australia eat more than 2 billion reptiles, birds and mammals each year. The Australian Wildlife Conservancy (AWC) also estimated that feral cats number approximately 4 million and can consume 2000 individuals per minute or more than 1 million birds, more than 1 million reptiles and more than 1 million mammals in Australia every day.

Impact on livestock

Feral cats pose a significant threat to domestic livestock through the transferral of infectious diseases. Diseases such as Toxoplasmosis and Sarcocystis have a significant economic impact on the Australian livestock industry, impacting the health, survival, and productivity of livestock and the quality of livestock products.

Toxoplasmosis, a disease resulting from *Toxoplasma gondii* parasite passed through a definitive host (such as cats), is a serious disease with the ability to impact the health of native animals, livestock, and humans⁴. Both feral and domestic cats can harbour this disease, which is easily transferred to an intermediate host by the consumption of infectious oocysts in cat faeces, most commonly while grazing or eating infected feeds. The sheep industry carries the brunt of the impact of toxoplasmosis. An outbreak of toxoplasmosis within a sheep herd can have

¹ <https://theconversation.com/invasive-species-are-australias-number-one-extinction-threat-116809>

² <https://www.publish.csiro.au/pc/pdf/PC18024>

³ https://www.nespthreatenedspecies.edu.au/1.1.2%20cat%20impacts%20findings%20factsheet_V7.pdf

⁴ <http://www.flockandherd.net.au/sheep/reader/toxoplasmosis.html>

significant implications for the production of the herd. If infected while pregnant, toxoplasmosis can cause early or late abortion in sheep, or the birth of a small, weak and non-viable lamb.

Additionally, toxoplasmosis poses a significant risk to humans. The consumption of raw or undercooked meat infected with the *T. gondii* parasite will infect humans. While commonly asymptomatic, the disease can have more severe consequences such as congenital birth defects, eye disease, or potentially fatal toxoplasmic encephalitis in immunocompromised individuals. With a 2019 study finding a probability of 43% of Australian supermarket lamb mincemeat contaminated with *T. gondii*, there should be a promotion of general awareness through the community⁵.

The financial losses of a toxoplasmosis outbreak in livestock are hard to measure. It is difficult to identify the cause of early abortion in sheep as blood samples are required to diagnose. Still, it has been estimated that in South Australia alone, the cost of Toxoplasmosis to the sheep industry was up to \$70 million per year with, sheep producers losing approximately 13 per cent of their flock to the disease⁶.

The sheep industry is also affected by *Sarcocystis* - parasitic cysts found in the muscle of infected sheep - contracted through the ingestion of oocysts in cat faeces found on pasture. *Sarcocystis* causes financial losses to producers during processing since infected carcasses need to be either trimmed or condemned. The impact of *Sarcocystis* has been estimated to cost the Australian sheep industry approximately \$5 million per year⁷.

While diseases transmitted by feral cats do have a significant impact on the sheep industry, they are also a high-risk vector for a variety of exotic diseases, including rabies, that could seriously threaten livestock, wildlife and human health in the event of an outbreak⁸. When discussing biosecurity risk management, it is critical to consider all possible pathways for an outbreak to occur.

c. the effectiveness of current legislative and regulatory approaches;

Controlling feral cats demands a nationally coordinated and consistent response. There are several direct and indirect legislative and regulatory mechanisms that support feral pest control. Nationally, the EPBC Act is the primary mechanism under which threatened species are afforded legal protection. Under the Act, feral cats can be and have been identified as a 'key threatening process' which allows for the development of 'Threat Abatement Plans' (TAPs). TAPs provide for research, management and other actions to reduce the impact of the listed key threatening process on native species and ecological communities and is a sound framework to guide action and mobilise resources.

However, states and territories are responsible for implementing this Plan, and the interaction between Commonwealth and state legislation and regulations affect the capacity to coordinate and effect sound management. Similar to the

⁵ <https://onlinelibrary.wiley.com/doi/full/10.1111/1753-6405.12955>

⁶ <https://www.abc.net.au/news/rural/2017-02-07/toxoplasmosis-costs-south-australian-sheep-producers/8245676>

⁷ <https://animalhealthaustralia.com.au/wp-content/uploads/NSHMP-Sarcocystis.pdf>

⁸ <https://agriculture.vic.gov.au/biosecurity/pest-animals/priority-pest-animals/cat-feral-or-wild>

Commonwealth, most states have legislative provisions to declare and control feral pests, including cats. Some are considered under biosecurity legislation as well as natural resource management legislation. Like the Commonwealth, states have similar mechanisms to recognise the need for urgent action to address feral cats. However, legislation between governments is not necessarily consistent. The feral cat TAP in 2015 recommended governments to agree to consistent legislation that identifies feral cats as a pest, has requirements for control and identifies control techniques that may be used. This has not occurred.

The NFF notes that the recent interim report of the second statutory review of the EPBC Act found that the Act: was not fit for purpose to address current or future environmental challenges; was incredibly complex, inefficient, unclear and duplicative; and there was a lack of resources.

In particular, they noted that ‘Coordinated national action to address key threats—such as feral animals—are ad hoc, rather than a key national priority’. The interim report has recommended the development of ‘strategic national plans’ for nationally pervasive issues including feral animal management which should guide national response and enable action. The national plans intend to support consistent action towards feral pest management or inform activities in areas where there is no plan. The NFF supports the principle for a strategic national plan for feral cat control provided there is a commitment to funding. The plans should be embedded into legislation to ensure there is consistent action.

The NFF also notes that the greatest impact of feral cats is in rural, remote and regional Australia where has been proven demonstrably inefficient by the *Independent review of interactions between the EPBC Act and the agriculture sector*⁹ led by Dr Wendy Craik.

The NFF believes that measures to improve Commonwealth environmental legislation should be informed by findings and other recommendations from the statutory EPBC Act review (which also considered the Craik review). The interim report maps a sound pathway to improve environmental outcomes and should improve the capacity to manage feral pests.

Moreover, whatever the instrument, the NFF wants to see action on ground.

Serious investment in cat management/eradication programs is likely to have a more positive effect on endangered fauna than many of the habitat protection regimes currently applied by the EPBC Act. While maintaining the habitat is an important goal, preventing species destruction through predation is also critical.

The NFF suggests that feral pests may well be considered in non-statutory regional plans proposed in the Craik review. Non-statutory plans can provide direction on what can be achieved for matters of national environmental significance, offering opportunities for collaborative objective-setting among different sectors of the community and enhanced consideration of cumulative impacts.

d. the effectiveness of Commonwealth action and cooperation with states and territories on this issue, including progress made under the Threat Abatement

⁹<https://www.environment.gov.au/system/files/resources/0bb50a4d-b273-4a31-8fdb-dcde90edef3e/files/review-interactions-epbc-act-agriculture-final-report.pdf>

Plan, national framework and national declaration relating to feral and domestic cats in Australia;

Governments have underestimated the impact of feral cats on the broader environment. While legislative changes should be informed by the statutory review of the EPBC Act, effective implementation of the Act is crucial.

Ongoing management, mitigation and suppression is the most cost-effective strategy to control feral cats, complemented by public awareness and education. The 2015 release of Australia's first Threatened Species Strategy identified tackling feral cats as the top action area¹⁰. The strategy's action plan, which is consistent with the 2015 feral cat Threat Abatement Plan, focuses on delivering targets that will improve outcomes for Australia's environment. While the Threatened Species Strategy has made progress over the last four years, including the formation of a national feral cat taskforce, the final formal report is to be released early 2021, and there are still significant shortcomings, specifically in the commitment to resourcing the implementation of the TAP.

Resourcing of pest animal control activities by NRM regions and state governments are now almost universally set by pest strategies that use the 'SA Pest Animal Risk Management Guide'¹¹ framework. The design of the framework inherently and consistently deprioritises action against feral cats as they are widespread and do not provide value for money, and have relatively little impact on landholders compared to, for example, foxes. As this occurs at multiple levels of government, this means that there is typically a lack of funding or inconsistent funding to support control.

The Government must continue to work towards and beyond its ambitious targets made in its Threatened Species Strategy.

e. the efficacy (in terms of reducing the impact of cats), cost effectiveness and use of current and emerging methods and tools for controlling feral cats, including baiting, the establishment of feral cat-free areas using conservation fencing, gene drive technology;

Successful management of established and endemic invasive species requires strategic, long-term, coordinated and collaborative approaches. The NFF's biosecurity policy seeks commitment from governments and industry to ongoing investment and collaboration in research, development, extension and adoption to inform best practice and innovative approaches to manage invasive species¹² such as feral cats. New research into control tools incorporating gene technology, immunocontraceptives and biological control has the potential to complement existing control tools and to be effective long-term solutions to controlling feral cats. Research into these new tools should be prioritised. Priority should also be given to the ongoing development and registration of new feral cat baits and toxins (and delivery mechanisms) that can be readily and safely used by land managers. The NFF notes many of these actions are reflected in the feral cat TAP.

¹⁰<http://www.environment.gov.au/system/files/resources/51b0e2d4-50ae-49b5-8317-081c6afb3117/files/ts-strategy.pdf>

¹¹https://pir.sa.gov.au/_data/assets/pdf_file/0017/254222/SA_pest_animal_risk_assessment_guide_Sept2010.pdf

¹² https://nff.org.au/wp-content/uploads/2020/05/FINAL-NFF-biosecurity-policy-statement_May-2020.pdf

The National Environmental Science Program (NESP) is the body for research to prioritise significant long-term environmental challenges. The Craik review identified research priorities specific to the EPBC Act that could be funded through the NESP.

Long-term solutions require properly coordinated research and development programs that have secure funding arrangements. The NFF believes the Threatened Species Recovery Hub, funded through the National Environmental Science Program, has been useful in providing a long-term commitment to research.

In the short- to medium- term, all feasible options should be explored to promote feral control activities. These include trapping, bounties and cat eradication drives, particularly in areas where they are presenting a heightened risk to threatened species, for example, after bushfires or in drought affected areas.

Members have found that bounties provided an additional option with which to incentivise the destruction of feral pests while providing an additional revenue stream. These include the Victorian fox and wild dog bounty program, and the Queensland local council-lead cat, dog and pig bounties.

Resourcing awareness and education campaigns to support landholders and community members to better manage feral cats and/or mitigate their impacts is also a fundamental component of the overall control strategy.

The NFF notes that control efforts could benefit from a system like a certification scheme to report pest and animal control in a standardised way so farmers can be remunerated or incentivised for management activities on their farmland. Natural accounting frameworks or similar have inbuilt mechanisms to standardise reporting and would provide a mechanism for landholders to inform decision making. The NFF is currently leading the Australian Farm Biodiversity Certification Scheme Trial¹³, as part of the Government's Agricultural Stewardship Package.

The scheme will analyse, evaluate and develop a trial system of verification/certification for agricultural biodiversity and sustainability. The project will run from December 2019 until mid-2022 and will be delivered in three phases. Given the diversity of industries and differing priorities, a consultative approach is being adopted in all phases. It will also aid in informing the federal government on the most effective capital, market-based incentive and market access approaches.

However, the NFF notes that, for farmers activities to be effective, it needs to be coordination across tenures.

h. the interaction between domestic cat ownership and the feral cat problem, and best practice approaches to the keeping of domestic cats in this regard.

Domestic cats can present a threat to Australian wildlife if not properly managed. Whilst they provide a significant social benefit, they also have the capacity to predate on wildlife, spread disease, breed with feral cats or to become feral. The NFF recommends the following requirements for domestic cats be applied nationally:

¹³ <https://nff.org.au/programs/australian-farm-biodiversity-certification-scheme-trial>

- consistent requirement across all states and territories that domestic cats be compulsorily de-sexed, and consistent enforced.
- penalties for dumping cats need to be considerably greater than the cost of microchipping and de-sexing;
- consistent approach to microchipping that recorded in a database; and
- consistent approach across jurisdictions that owners have obligations to keep cats indoors or within a containment area on their premises at all times.

Recommendations:

- 1. Governments recognise that cats are the greatest threat to Australian wildlife and must be a higher priority for all governments.**
- 2. Governments commit to long-term resourcing and implementing the Threat Abatement Plan/Threatened species strategy.**
- 3. Governments to commit to feral cat TAP action to re-investigate diseases and other potential biocontrol agents, biotechnology and immunocontraceptive options for cats, and commence research on promising options. Undertake social research on promising options to gauge community support.**
- 4. Governments to commit to feral cat TAP action to continue research into the scale, efficiency, cost-effectiveness, sustainability and risks of feral cat control options**
- 5. Governments commit to long-term funding for awareness and education.**