GETTING 2 ZERO SUBMISSION

Biosecurity in Queensland: a review of the prohibited and restricted matter lists

Getting to Zero (G2Z) is a national program providing free, remote and onsite, consulting and support services for local government, not-for-profit organisations and community groups to improve outcomes for lost/stray and homeless animals in every community in Australia.

G2Z welcomes the opportunity to engage and advocate at all levels on topics relevant to or inclusive of companion animal management.

We appreciate the opportunity to contribute to this vital discussion and welcome the chance to provide further insights on the recommendations detailed below.

G2Z supports evidence-based, collaborative solutions for lasting improvements in companion animal welfare and management.

We recommend that the Queensland Government work towards the development of root cause solutions rather than implement legislative changes that will only serve to act on the symptoms of the cat management issue as a whole.

Recommendations

1. ***Align definitions of cat classifications with current understanding of how cats live:*** *Domestic cats (*Felis catus*) should not be treated solely as "prohibited" or "restricted" matter under the Biosecurity framework. The current classification of cats as a singular species disregards the critical distinction between feral and domestic (owned, semi-owned, or unowned) cats.*

2. ***Exclude domestic cats from pest classification****: Implementation of humane and ethical reduction strategies of free roaming cat populations around human environments are a more effective solution to biosecurity risks.*

3. ***Continued monitoring of zoonotic pathogens relevant to domestic cats:*** *Regular and ongoing monitoring of zoonotic pathogens relevant to domestic cats (e.g.,* Toxoplasma gondii*) is vital. Effective management of cat-related disease risk depends on reducing uncontrolled breeding, not on broad pest designation.*

Australia and cats

The unique reproductive capacity of cats, with sexual maturity attained as early as 16 weeks old, coupled with the potential for multiple litters, underscores the profound challenge of addressing the surplus of homeless and abandoned kittens compared to puppies (Chua et al., 2023). This dynamic intricately influences the proportion of cats that can be rehomed.

Additionally, the phenomenon of free-roaming, undesexed urban cats—whether owned, semi-owned, or unowned—serves to compound the issue, contributing to feral cat populations. It is imperative to acknowledge that the complexities surrounding cat breeding issues are markedly distinct from those concerning dogs.

The expectations being placed on Local Government, not for profit and community-based animal rescue and welfare organisations regarding cat management are growing rapidly.

There is increasing pressure to manage domestic cats differently to how they have been managed historically, and in other jurisdictions around Australia. Contemporary society places immense value on evidence-based strategies that are humane, economical, and effective.

International Best Practice and industry trends

Nationally and internationally, Governments are moving toward prioritising community support over enforcement-centric animal management (National Animal Care & Control Association, 2021; Human Animal Support Services, 2024; Wheeler, 2023 conference presentation; Goode and Tonks, 2023 conference presentation), working with animal welfare and sheltering organisations and the community to find no or least harm solutions to the long-term challenge of managing domestic cats.

Some Australian Councils are recognising the importance of adequately funding animal welfare and sheltering organisations to better enable them to continue to do a significant portion of companion animal management work, either alongside Councils by taking in stray and surrendered animals for the municipality into their own shelters, or by providing management services for council impound and holding facilities. Currently however, this funding is tied to numbers of animals taken into care, limiting the ability of these organisations to take a more proactive approach. Helping with funding to enable companion animal sheltering and rehoming organisations to extend their services to intake prevention and proactively reducing reproduction of companion animals in the community through desexing programs is an important next step.

Animal management is a human issue and therefore a social issue. Hawes (Hawes et al., 2022) states that “Achieving positive and sustained change on many of today’s most pressing social issues calls for an increasingly complex understanding of social-ecological

systems and the mechanisms that contribute to the resilience of a community." This is certainly true when looking at the interface between animal management, animal welfare, environmental protection, community welfare and policy development. Traditional policy development is often characterised by a singular-issue orientation and can tend to overlook the intricate interdependencies among challenges. Globally, the approach to companion animal management and welfare is evolving into a framework that operationalises One Health and One Welfare concepts while critically addressing underlying factors (Tarazona et al., 2020).

Central to this transformative approach is the development of policies centered around humanity, cultural sensitivity, equity, environmental stewardship, diversity competence, and social justice. It is evident that punitive approaches are yielding to proactive support-based models in animal management practices (Wolf et al., 2022). The interconnectedness of the issues within the realm of animal management underscores the imperative of adopting innovative and holistic approaches for achieving transformative outcomes. It is with this perspective that we advocate for a fresh and collaborative problem-solving model to yield outcomes distinct from historical courses of action.

Cats in society

The management of cats in the community is necessarily complex due to a multitude of factors related to the cats themselves, the environments they live in, and the people they live alongside. Cats predate on native and other wildlife to varying degrees depending on many factors - their individual characteristics (e.g., age, personality), where they live, how they are cared for by humans, and sources of food (Dickman and Newsome, 2015). Accessibility of resources, services such as animal shelters and veterinary clinics, and

methods to manage cat populations varies according to location, with more options typically available in urban than remote areas. Additionally, division of cat management responsibilities between levels of government is based on human-centric factors, such as population density and land ownership, resulting in disjointed and sometimes conflicting cat management practices occurring across the landscape.

Urban stray cats are predominantly owned or cared for by someone (semi-owners or cat caretakers) and have varying levels of socialisation. People feed them because these cats visit or live nearby their properties or workplaces and they want to help them (Ma et el., 2023). Approximately 3% of Australian adults feed an average of 1.5 cats that are not their cat and have no known owner (Rand et el., 2019). While these cats are rarely desexed or microchipped, the people caring for them demonstrate strong bonds with these cats comparable to those between owners and owned cats, even when one person is feeding multiple cats they do not own (Crawford et al.,2023; Scotney et al.,2023; Neal & Wolf 2023; Zito et el.,2015). Crawford and colleagues (2023) found that many of these cat caregivers (semi-owners) reported the cat helps them through tough times. Caregivers feed the cats once or twice daily and talk to the cats daily. Harm to free-roaming cats has a significant impact on the mental health and well-being of the people who own or feed them (Scotney et al., 2023)

Cats who live around humans have some degree of socialisation, even if contact is indirect and they appear unsocialised if trapped, thus determining whether cats in populated areas are owned, semi-owned or unowned is difficult (Slater et al., 2013). Cats can also easily transition between these categories at different times and under differing circumstances (Slater et al., 2010). All cats are individuals and have different genetic makeup and experiences that determine how they will react in any given situation. Even if cats appear to be unsocialised in a cage trap or do not have a microchip or collar, they

may be a lost owned cat or a free living cat with a bonded human caregiver that would take ownership if given the opportunity (Crawford et al., 2023). According to Slater (2013), many cats only show their normal behaviour once they are removed from a stress-inducing environment of a trap or a holding facility. When trapped, even socialised cats often display unsociable behaviour due to the stressful experience and environment. It is common that once settled in a less stressful environment they display very different, more sociable, behaviour. The difficulty in identifying cats 'adoptable' cats using traditional sheltering approaches, along with multiple other factors, strongly impacts cat outcomes once they enter the shelter system (Kilgour & Flockhart, 2022).

Identification of owned cats through visible identification or microchipping is also not reliable. Many owned cats are not microchipped (Rand et al., 2023) and it is common for microchip details to be not kept up to date leading to an inability to reunite the animal with its owner (Goodwin et al., 2017). As well, microchips may not be read through a metal cage trap (Lord et al., 2008); if best practice procedures are not being followed by the trapper, the trapped cat may not even have the opportunity to be scanned before it is killed. Many owners do not put a collar on their cat for fear of injury (Lord et al., 2010). Through our work with Local Governments across Australia, G2Z can confirm that supportive strategies that can be utilised to address challenges related to identifying the ownership status and sociability of trapped cats are not currently being employed on a widespread basis.

Ma and colleagues (2023), found that cat semi-ownership is more common in low socioeconomic areas where the cost of sterilisation for owned and semi-owned cats is often unaffordable for cat caretakers. Cat semi-owners have very similar characteristics to cat owners in the same area, and cat semi-owners often also own one or more cats.

Semi-owners feeding 1 to 2 cats represent a huge pool of adopters for these cats, who are often poorly socialised and would otherwise be at high risk of euthanasia. By providing free desexing, microchipping and (if necessary) registration for these cats, many semi-owners can be converted to owners. Helping cat semi-owners to have their cats desexed, microchipped and to adopt the cats they are caring for is a holistic, One Welfare approach which will improve the wellbeing of people, animals and the environment, as well as increase public support for cat management initiatives.

Semi-owned cats are not feral cats, despite displaying behaviours which may make them challenging to adopt into pet homes without a long period of socialisation. Admitting them to a shelter or municipal pound is often a death sentence (RSPCA Australia, 2022). Most are healthy or treatable (i.e. reasonably healthy, reasonably well-adjusted pets over the age of eight weeks or dogs and cats who are able to be rehabilitated if given the care typically provided to pets by reasonable and caring pet owners/guardians in the community (Maddies Fund)), and for Local Government and Not For Profit shelter staff having few options other than euthanasia for these cats, constant intake and euthanasia of semi-owned cats is traumatising (Rollin, 2011; Scotney et el., 2015; Andrukonis and Protopopova, 2020). Veterinary personnel that have to euthanase these cats are at particular risk of moral injury and psychological distress (Scotney, McLaughlin and Keates, 2015). Recent changes to Australian Work Health and Safety Regulations clarifying employer responsibilities to provide psychologically safe work environments, and increasing accountability for those who do not appropriately control for psychosocial and psychological injuries (https://www.apsc.gov.au/initiatives-and-programs/aps-professional-streams/aps-hr-professional-stream/aps-hr-professional-news/psychosocial-safety), will likely impact the long term sustainability of broadscale

trap and kill approaches to managing domestic cats, due to their known strongly negative impact on the health and welfare of staff performing these tasks.

Recommendation 1. Align definitions of cat classifications with current understanding of how cats live

G2Z recommends that domestic cats (*Felis catus*) not be treated solely as "prohibited" or "restricted" matter under the Biosecurity framework. The current classification of cats as a singular species disregards the critical distinction between *feral* and *domestic (owned, semi-owned, or unowned)* cats.

Feral cats live independently of humans and reproduce in the wild.

Domestic cats rely directly or indirectly on humans for food and shelter.

This distinction is widely recognised in the *RSPCA's Best Practice Domestic Cat Management Report (2018)* and *Australian Government Threat Abatement Plan (2015)*. Treating all cats under a single "biosecurity" category is inconsistent with contemporary understanding and risks undermining humane, effective management strategies.

The ecological niches filled by feral cats and domestic cats are very different. Feral cats live independently of humans in remote areas and management methods can be mostly decided without regard to impacts on humans living in these areas. Domestic cats live with and alongside humans who care for and are bonded to them (Zito et al., 2015), so management measures for these cats must consider the impacts of humans on the methods chosen, and of the method chosen on the humans affected. Classing semi-owned and unowned domestic cats as feral cats, ignores the significant differences between the environments in which these cats exist and is inconsistent with RSPCA's 2018 Best Practice

Domestic Cat Management report (Identifying best practice domestic cat management in Australia – May 2018).

To effectively manage cats who fulfil different ecological niches across the spectrum of human population density and involvement, it is essential that we identify and classify these different groups of animals and apply specific strategies to reduce their numbers while achieving community, animal welfare, and ecological goals.

G2Z has worked with stakeholders from 2014 to develop consistent national definitions of cats (https://www.g2z.org.au/national-cat-action-plan.html) which align with those in RSPCA Australia's 'Identifying Best Practice Domestic Cat Management in Australia' (RSPCA Australia, 2018). These are:

- **Domestic cats**: cats with some dependence (direct or indirect) on humans. The three sub-categories of domestic cats are:
    i. **Owned** – these cats are identified with and cared for by a specific person and are directly depending on humans. They are usually sociable although sociability varies.
    ii. **Semi-owned** – these cats are fed or provided with other care by people who do not consider they own them. They are of varying sociability with many socialised to humans and may be associated with one or more households.
    iii. **Unowned** – these cats are indirectly dependent on humans with some having casual and temporary interactions with humans. They are of varying sociability, including some who are unsocialised to humans.
- **Feral cats** are unowned, unsocialised, have no relationship with or dependence on humans, and live and reproduce in the wild (e.g. in forests, grasslands, deserts). *This*

definition is aligned with feral cat definitions in the Australian Government Threat Abatement Plan (2015).

- **Stray cats** are cats who wander (straying refers to the activity of wandering away, not an ownership status). Stray cats may be:

    i. responsibly owned and temporarily escape from their property (e.g. a gate or door left open),
    ii. casually owned and wander from their property regularly,
    iii. semi-owned (e.g. cats making regular visits to one or more households which do not own them, but who may be currently owned, or lost or abandoned).
    iv. born to previously owned cats and live in colonies, directly or indirectly being fed by humans.

Cats who live near people all need to be defined as domestic cats who may move along the cat continuum from being owned, semi-owned or unowned. Domestic cat management requires different strategies from feral cat management due to the resources available, cat and human behaviour and social implications for cat management strategies. Many community members, organisations and Veterinarians are willing to help with humane, sustainable and effective management solutions to prevent further breeding and reduce numbers, provided support services, such as access to low/no cost desexing, vaccination and microchipping, are available for those who need it.

Recommendation 2: Exclude domestic cats from pest classification and implement humane and ethical reduction strategies of free roaming cat populations around human environments

While feral cats have measurable ecological impacts, domestic cats—particularly those in urban and peri-urban environments—provide significant social amenity and public health benefits. Managing these populations under a pest framework may have negative consequences for:

- Human wellbeing and community cohesion (Scotney et al., 2023);
- The mental health of animal management professionals required to conduct lethal control;
- The effectiveness of population management programs, where punitive measures alienate community cooperation.

Therefore, G2Z recommends that Biosecurity Queensland adopt a differentiated regulatory approach:

- Maintain *feral cats* as restricted or prohibited matter for remote, ecologically sensitive areas.
- Exclude *domestic cats* (owned, semi-owned, and unowned urban cats) from pest classification and manage through Local Government animal management frameworks.

Notably, feral cats are not the cause of complaints relating to nuisance behaviours which is the reason most cats are trapped in urban areas. The home range of a pet cat is reported to be a median of 0.5 hectare during the day and 1 hectare at night. (Roetman,

2017) and 75% of lost pet cats are found within a 500 m radius of their point of escape (Huang, 2018).

G2Z supports effective, humane and ethical actions to reduce populations of free-roaming cats around areas of human habitation and infrastructure.

G2Z recommends that well-managed, well-funded supportive programs including targeted free cat desexing, replace 'trap and kill' as the default foundation of all domestic cat management.

G2Z suggests that alternatives to trapping and removal of adult cats, especially those with whom a community member has an existing bond, be avoided at all costs. Alternatives may include suspension or removal of fines for non-compliance with existing mandatory requirements for cat owners (e.g. desexing).

While reducing free-roaming cat populations is essential, language and inclusivity matter. Many community members caring for cats do not see themselves as "owners." Legislation and messaging must support participation rather than alienate these caretakers. Cat management frameworks should remain adaptable, acknowledging that some people and cats will not fully conform to regulations.

Management of domestic cats on Crown land near human habitation should align with practices in residential areas. Local Government Animal Management (AM) teams and those working on Crown land must coordinate to ensure consistent, humane outcomes.

G2Z recommends unified strategies across local government, welfare and shelter organisations, human welfare agencies, ecologists, and community stakeholders.

Collaborative, evidence-based approaches build community "buy-in," prevent duplication of effort, and achieve better outcomes for people, cats, and wildlife.

Well-managed, community-based desexing programs—delivered collaboratively by AM officers, welfare groups, and volunteers—consistently achieve sustainable population reduction in both Australian and international contexts (Swarbrick & Rand 2018; Rand et al., 2019; Spehar & Wolf 2019; Kreisler et al., 2019; Spehar & Wolf 2020). Successful strategies combine free or low-cost desexing, vaccination, and microchipping with support for transport, containment, and rehoming. These approaches are socially equitable and effective when all cat categories (owned, semi-owned, unowned) are included (Crawford et al., 2023).

Desexing also reduces fighting and roaming, key causes of nuisance complaints that lead to trapping and euthanasia. Reducing lethal control protects community wellbeing and reduces occupational stress among AM staff.

Trapping and killing cats is costly and unsustainable (Rand et al., 2019). Microtargeted desexing—focusing on high-intake areas—achieves faster, cheaper, and more humane results. Redirecting limited local government resources to progressive, community-based programs is both practical and evidence-driven.

Examples from Australia and overseas demonstrate that humane cat management is most effective in urban and peri-urban areas where native wildlife is not immediately threatened. In Portland, Oregon, councils, welfare, and conservation organisations collaborate successfully to promote "Cats Safe at Home" principles.

Cat management must avoid “one-size-fits-all” approaches. Cats and their human relationships do not align neatly with land ownership boundaries; therefore, integrated management across private and public lands is vital.

Although most Australians support cat desexing, low-income households face financial barriers—veterinary costs ($300–$500 per female cat), transport, and equipment (Chu et al., 2009). Mandated desexing can further discourage semi-owners from taking ownership of community cats, despite this being a key pathway to responsible management.

Evidence shows that targeted desexing programs centred on supportive community engagement are the most effective long-term strategy. Australian and international examples demonstrate that collaborative, humane interventions lead to measurable reductions in cat numbers and improved community relations.

Successful Australian models include:

- City of Banyule (VIC): 66% reduction in cat intake and >5× drop in euthanasia through targeted free desexing.
- Ipswich Community Cat Program (QLD): 30–50% reduction in council cat intakes within one year.
- RSPCA NSW “Keeping Cats Safe at Home”: Council partnerships enabling microtargeted desexing and rapid reduction of free-living cat populations.

Key learnings from these programs include:

- Recruitment and trust-building with community caretakers are critical (Cotterell et al., 2024; Rand, 2023). Enforcement should be a last resort after barriers to compliance are removed.

- Microtargeting of high-intake or high-breeding areas achieves the greatest reproductive control (Ma, AIAM Webinar, 2022).
- Additional mandatory ownership requirements deter caretakers from formal ownership and reduce program participation (Cotterell et al., 2024).
- Collaboration between AM teams, volunteer rescues, and social service organisations extends program reach and effectiveness (Cotterell et al., 2024).
- Monitoring and evaluation are essential. Councils should record detailed data on cat intakes, desexing, microchipping, caretaker participation, complaints, trap usage, and animal outcomes to assess impact.

Targeted desexing programs typically require 1–2 years to show significant intake reduction, with participation increasing over time as community trust grows (Australian Pet Welfare Foundation FAQs, 2023). Early participants often include less socialised adult cats that may still require humane trapping (Personal Communication, Cotterell 2024). Finally, field officers must recognise that many residents in target areas have had negative experiences with authorities. Clear communication of program goals, mutual respect, and visible community benefits are vital for engagement and long-term success.

In urban areas restricted matter (unowned cats) cannot reliably distinguished from owned cats that are wandering or lost with no identification. Cats under 3 months of age are not required to be identified and microchips can migrate or fail to be detected. Some pet cats are not microchipped – this is higher in low socioeconomic areas and in cats under 2 years. An Australian survey reported that 28% of pet cats were not microchipped (Elliott 2019), despite microchipping being mandated in all states and territories of Australia except Northern Territory. In a 2012 survey of cats without microchips, most were under 2 years (Johnson 2014).

Collars are not mandatory and only some cats wear a collar. In Australia, only 53% of owners are reported to use collars for their cats (Calver et al., 2013). The first and second most common reason owners reported for not using a collar anymore were the removal of the collar by the cat itself (22%) and the collar getting lost (21%). Lord et al. (2010). Owners who lost their cat reported that in only 31% (Weiss et al., 2012) or 22% (Huang et al., 2018) of cases, their cat wore a collar at the time it went missing.

Behaviour of a cat towards humans removed from its familiar humans and environment cannot be used to differentiate an owned cat from a restricted matter (unowned) cat in urban and peri-urban environments. Behaviour to unfamiliar people to assess sociability to humans has not been shown to provide any scientifically validated way of assessing cat ownership status. It can take 3 days to more than 2 weeks to accurately assess sociability to unfamiliar people and in new environments (Slater 2013, Jacobsen 2022, Rochlitz 1998, Kessler 1997, Ellis 2014, DiGangi 2022, Kerr 2018). Furthermore, pet cats in a stressful environment can show more aggression to humans than a truly feral cat (Slater 2013).

Recommendation 3: Continued monitoring of zoonotic pathogens relevant to domestic cats

G2Z encourages continued monitoring of zoonotic pathogens relevant to domestic cats (e.g., Toxoplasma gondii). Regulation should prioritise education, prevention, and community desexing initiatives rather than punitive restrictions. Effective management of cat-related disease risk depends on reducing uncontrolled breeding, not on broad pest designation.

The current definition is a barrier to improving biosecurity in urban areas and on farms, mining sites, and indigenous communities where cats are living in proximity to humans.

In urban areas, most unidentified free-roaming cats are semi-owned cats, that is, stray cats fed by compassionate people who do not perceive they own the cat, and a proportion are unidentified owned cats (potentially as much as 20-30%) and they cannot be managed in a way shown to decrease biosecurity risks.

Desexing and microchipping programs (Community Cat Programs) have been shown to decrease the number of free-roaming cats, decrease cat-related complaints, impoundments, and humane killing but under the Act are illegal for semi-owned cats and it is also illegal for semi-owners to take ownership.

Therefore, the classification of cats living around where people live or frequent under the Act is a barrier to reducing disease risk to pets, humans, and wildlife.

The classification of unowned cats around farm buildings as restricted matter that cannot be fed, moved (e.g. for desexing or adoption) creates a substantial barrier to reducing the risk of zoonotic diseases such as toxoplasmosis and sarcocystis and to protecting wildlife. Cats have lived on Australian farms since settlement by Europeans and are valued for controlling rodents. However, unmanaged cats create significant risks, including disease transmission, poor animal welfare, and psychological stress for farmers associated with lethal management. In contrast, allowing responsible management through desexing, feeding, basic healthcare would reduce these harms while aligning with farmer values and food safety standards. Of note, desexing cats on piggeries has been shown to significantly

decrease *T gondii* titres in pigs within 12 months, whereas rodent control did not (Eppink et al 2021).

Conclusion

The Queensland Biosecurity Act should be amended so that restricted matter pertaining to *Felis catus* be reworded to state that Feral cats are **Category 3, 4 and 6 Restricted Matter** and feral cats are defined as cats which live and reproduce away from human habitation, without food or shelter provided by people.

A cat trapped more than 1-2km from where humans live or work has a higher likelihood of being feral and lower likelihood of being domestic. Using location rather than ID and behaviour towards humans to distinguish between domestic and feral cats provides clarity, consistency, and practical management outcomes consistent with the intent of the Biosecurity Act 2014.