



# GETTING 2 ZERO SUBMISSION

## Draft Threat Abatement Plan for Predation by Feral Cats 2023 Consultation

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, and their caretakers, in every community in Australia.

G2Z works closely with governments, animal welfare organisations and researchers and has specific and practical knowledge on what is required to reduce the population of free-roaming cats around areas of human habitation and infrastructure.

This submission mainly focuses on **Objective 9: Reduce density of free-roaming cats around areas of human habitation and infrastructure** of the draft Threat Abatement Plan for Predation by Feral Cats 2023 (TAP). However, it also includes some feedback on other areas of the TAP, including the broader issues of managing cats. This draft plan reflects the lack of consultation with expert scientists in contemporary urban cat management. The proposed actions in the plan regarding cat curfews, mandatory desexing, caps on cat ownership and restricting ownership of cats in local government areas demonstrates a lack of understanding of the cause of the free-roaming cat problem in our cities and towns based on current Australian research. Therefore, the proposed solutions have flaws, will be more costly to enforce than other solutions detailed in our submission, and will be ineffective at protecting wildlife populations of concern, particularly in urban and peri-urban areas.

**G2Z AGREES** with **WHAT** the plan wants to achieve.

**G2Z DISAGREES** with much of the proposed **HOW** it is to be achieved.



G2Z welcomes the opportunity to engage at any level on the topic of domestic cat welfare and management.

## SUMMARY OF RECOMMENDATIONS

**Recommendation 1:** Definitions need to distinguish between domestic cats (owned, semi-owned or unowned living around areas of human habitation and infrastructure) and feral cats (living in remote areas who have no dependence on humans).

**Recommendation 2:** This plan focuses solely on feral cats (as per Recommendation 1 definitions) and the National Domestic Cat Working Group be consulted to develop a plan specifically focussing on domestic cats as per the definitions in Recommendation 1.

**Recommendation 3:** Inclusion of more effective, humane, and socially acceptable strategies that support all stakeholders, and that are already being implemented in Australia and internationally.

**Recommendation 4:** Review the proposed actions in Objective 9 for efficacy, economy and humaneness, and direct resources to the implementation of more effective actions for achievement of the plan's objectives.

**Recommendation 5:** Ensure the Threat Abatement Plan for Predation by Feral Cats highlights the need for humans to modify their behaviour for more sustainable practices that limit clearing of habitat and enable regeneration, slow climate change as well as address impacts of novel biota and introduced species.

**Recommendation 6:** Revise negative language when referring to cats.

**Recommendation 7:** Revise the Actions in 9.1 to support and encourage more research into domestic cat management strategies that involve desexing and returning the cats to their home base, where appropriate.

**Recommendation 8:** Remove mandatory desexing as a proposed cat management strategy from the TAP.



**Recommendation 9:** Remove mandatory containment as a proposed cat management strategy from the TAP.

**Recommendation 10:** Remove the proposal for the development of cat free suburbs from the TAP.

## 1. Definitions

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 kept, and sources of food<sup>1</sup>. Cats who live around humans have some degree of socialisation (even if not immediately presenting as social) and there is generally access to services such as animal shelters and veterinary clinics so these cats can be managed by reduction of populations using methods that are not available in remote areas. It is therefore 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 worked with stakeholders from 2014 to develop consistent national definitions of cats which are aligned with those in RSPCA Australia's Identifying Best Practice Domestic Cat Management in Australia 2018:

- **Domestic cats:** cats with some dependence (direct or indirect) on humans. There are three sub-categories of domestic cats – owned, semi-owned, and unowned cats.
  - 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.
  - 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.
  - 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, 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).*



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- **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.

The Australian Government Threat Abatement Plan (2015) recognised stray cats as a distinct category but domestic cats as owned cats only:

- *stray cats are those found in and around cities, towns and rural properties; they may depend on some resources provided by humans but are not owned; and*
- *domestic cats are those owned by an individual, a household, a business or corporation; most or all of their needs are supplied by their owners. If the confinement of domestic cats becomes more common, the category of a domestic cat may need to be divided to confined and unconfined cats because the potential for these two groups to impact on native fauna is different.*

Confusingly, while claiming a stray cat was not owned, this plan identified that domestic cats may have to be divided into those confined and not confined i.e., stray owned cats, which aligns with our definitions above. The 2015 plan acknowledged that:

*These categories of cats are artificial and reflect a continuum, and individuals may move from one category to another (Newsome 1991; Moodie 1995). In any given situation, the category causing the most damage to wildlife needs to be identified because management actions will depend on the type of cat causing the damage. ...The approach taken will need to be developed in consultation with the communities.*

The latest draft TAP identifies stray cats living in cities and towns as feral cats despite acknowledging that some “pet” cats roam widely and feed themselves. This leads to confusion



for management purposes and will reduce the capacity of organisations and Veterinarians to apply alternative strategies to reduce their numbers.

Determining whether cats in populated areas are owned, semi-owned or unowned is very difficult and they can easily transition between these categories at different times and circumstances<sup>ii</sup>. Even if cats appear to be unsociable in a cage trap or do not have a microchip or collar, they may be a lost owned cat. Many cats only show their normal behaviour once they are removed from a stress-inducing environment of a trap or a holding facility. All cats are individuals and have different genetic makeup and experiences that determine how they will react in any given situation. 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, social, behaviour<sup>iii</sup>.

Many owned cats are not microchipped, mainly due to lack of resources of the owner. In addition, it is common for microchip details to be not kept up to date leading to an inability to reunite the animal with its owner<sup>iv</sup>. As well, microchips may not be read through a metal cage trap<sup>v</sup> therefore 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<sup>vi</sup>. There are several supportive strategies that can be utilised to address these issues that are not currently being employed on a widespread basis.

The populations of feral cats and domestic cats are very different, and the solutions are very different. Classing semi-owned and unowned domestic cats as feral cats is inconsistent with RSPCA Australia's 2018 Best Practice Domestic Cat Management report<sup>vii</sup>.

Most free-roaming cats in urban areas are intentionally fed by compassionate well-meaning people. In fact, about 3% of Australian adults feed an average of 1.5 cats that are not their cat and have no known owner<sup>viii</sup>. Most are not desexed. They demonstrate strong bonds with the cats, even those feeding multiple cats<sup>ix</sup>.

Their bond with the cat is not different from the bond that pet owners have with pet cats<sup>x</sup> and many of these cat caregivers (semi-owners) say the cat helps them through tough times. They feed them once or twice daily and talk to the cats daily. Cat semi-ownership is more common in low socioeconomic areas where the cost of sterilization for owned and semi-owned cats is



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often unaffordable. 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. Helping cat semi-owners sterilize and adopt the cats they are caring for is a holistic, One Welfare approach which will improve the wellbeing of people, animals, and the environment. Semi-owners feeding 1 to 2 cats represent a huge pool of adopters for these cats, that 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.

Semi-owned cats are not feral cats, despite behaviours which may make them challenging to adopt without a long period of socialisation. Admitting them to a shelter or municipal pound is often a death sentence. Most are healthy or treatable, and for local government and not for profit shelter staff having few options other than euthanasia for these cats is traumatising<sup>xi</sup>.

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.

## 2. Two separate plans and the National Domestic Cat Working Group

The National Domestic Cat Management Working Group (NDCMWG) was formed to “share evidence based, best practice advice and resources for improved domestic cat management across Australia” (email invitation to participate in the NDCMWG by Dr Zoe Squires to Nell Thompson on behalf of the Office of the Threatened Species Commissioner 4/5/22) by the Office of the Threatened Species Commissioner) and to progress recommendations from the “Inquiry into the problem of feral and domestic cats in Australia 2020”. It was established to complement the objectives of the Feral Cat Taskforce, recognising the complex legislative and management landscape for domestic cats in Australia<sup>xiii</sup>.

Advice from researchers and organisation representatives with specific expertise in prevention of unwanted cats in populated areas is not reflected in the current draft TAP due to this working



group not having been consulted. Recommendations relevant to this group include developing consistent definitions of feral, stray, and domestic cats and developing and disseminating best practice domestic cat management strategies. The Terms of Reference for this group state that its focus will be guided by both the “Inquiry into the problem of feral and domestic cats in Australia” 2020 and the RSPCA Australia’s “Identifying Best Practice Domestic Cat Management in Australia” 2018.

The NDCMWG was only funded by the Office of the Threatened Species Commissioner for one meeting which was held in May 2022. A second meeting was facilitated without funding and subsequent meetings have been unfunded and have prioritised considerations for accessing funding for future meetings. The writers of the current Draft Threat Abatement Plan did not consult with this group for definitions or best practice domestic and stray cat management strategies.

The draft plan acknowledges that a “different suite of actions' will be needed to reduce the impacts of cats living around people and that actions need to be informed by social science research. It is clear that a separate plan is required to address the management of domestic cats in which input from the NDCMWG, which includes social science researchers and experts in this area, is sought.

This NDCMWG must be funded and, at the very least, enabled to be a significant contributor to the current draft TAP, before it is finalised, on both definitions and Objective 9 for effective strategies to reduce cat density in areas of human habitation and infrastructure, and subsequently to provide advice for and guidance on the implementation of Objective 9.

Our recommendation is, however, that given how drastically different domestic and feral cat management solutions are, two separate plans are required. One addressing feral cat management and one addressing domestic cat management as per definitions in Recommendation 1.

### **3. Effective, humane, and ethical actions to reduce populations of free-roaming cats around areas of human habitation and infrastructure**



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Providing sustained support for desexing, vaccination and microchipping of cats along with other support such as capture, transportation, containment and other processes, is the most effective, socially acceptable and equitable, and least harmful means of reducing cat numbers, provided it includes all categories of domestic cats i.e., owned, semi-owned and unowned<sup>xiii</sup>. Desexing not only prevents growth in cat populations, and reduces cat numbers over time, but also prevents fighting and wandering for reproductive purposes, which reduces nuisance issues and cats being impounded and killed. This in turn reduces negative impacts on the people who care about cats and those involved in the sectors tasked with these practices. In addition, trapping and killing (with or without impoundment and holding) is an extremely expensive exercise for Local Government<sup>xiv</sup>. Reallocating the limited resources to more progressive, effective, humane, and socially acceptable and equitable cat management practices is possible and advised.

Well-managed support programs by Animal Management Officers, animal welfare and sheltering organisations and community volunteers have been shown to be effective in sustainably reducing cat numbers and do so more ethically by preventing or minimising harm to people, cats, and wildlife<sup>xv</sup>.

G2Z recommends unified strategies by Local Government animal management, animal welfare and sheltering organisations, human welfare organisations, conservationists and ecologists, and communities to achieve the best outcome for people, cats, and wildlife. Working together tailoring responses to the needs of each situation and community and sharing resources from each sector will enable successful reduction in cat numbers that is sustainable and socially acceptable.

Local Government Animal Management Departments are essential contributors. Nationally and internationally, they are already moving toward community support<sup>xvi</sup> rather than punitive models, working with animal welfare and sheltering organisations and the community to find no or least harm solutions.

Some Councils are recognising the importance of adequately funding animal welfare and sheltering organisations who currently do much of the work for Councils by taking in stray and surrendered animals for the municipality into their own shelters or by managing their





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impound and holding facilities. Helping with funding to enable organisations to extend their services to prevent impoundment and reduce over-population is an important next step.

An effective strategy currently employed in the Ipswich, Queensland, community is the Cat Assistance Team (CAT). Consisting of Animal Management Officers working with animal welfare organisation staff and volunteers to find undesexed roaming cats and providing no/low cost desexing and other support services in targeted low socio-economic areas with high cat intake<sup>xvii</sup>. Urban stray cats are predominantly owned or cared for by someone (semi-owners) and have varying levels of socialisation<sup>xviii</sup>. People feed them because these cats visit or live nearby their properties or workplaces and they want to help them. Providing no/low cost desexing and free microchipping, and other support (e.g., transport) ensures that people who are willing to take ownership of unowned adult cats and kittens of stray urban cats can do so more easily.

Well-managed community desexing programs in urban/peri-urban areas where there is no immediate threat to threatened native species, further enable communities to manage cats ethically and reduce their numbers over the long term. Desexing and returning cats to caregivers provides the opportunity for guiding caregivers to manage the cats in their care to ensure they cause the least possible nuisance to the rest of the community. The caregivers can identify any newcomers and take action to trap and desex them. Assistance can be provided to develop cat safe fencing and deterrents if necessary. Many community members are environmentally aware and want to prevent unwanted cats and kittens and protect wildlife<sup>xix</sup>. Utilising their compassion and providing support is a much quicker way of managing the local cat population.

Well-managed community desexing programs in urban/peri-urban areas where there is no immediate threat to threatened native species, enable communities to manage cats ethically and reduce their numbers over the long term. In Portland, Oregon, USA, Local Government animal management, Not For Profit animal welfare and sheltering organisations and bird conservation groups work together to develop solutions appropriate for that community and environment.

<https://audubonportland.org/our-work/protect/habitat-and-wildlife/urban/cats-safe-at-home-campaign/>



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The National Desexing Network ([www.ndn.org.au](http://www.ndn.org.au)) currently supports 24 Councils, at no cost, to develop and manage [Co-operative Desexing](#) programs to facilitate more proactive, humane and socially acceptable cat management. The biggest increase in the number of local governments funding desexing subsidies has occurred where State Governments have matched funding Councils have agreed to budget for subsidised desexing for their residents.

All State and Territory Governments should contribute by matching funding that Councils invest in desexing subsidies and community support programs as an incentive to encourage these proactive initiatives. The Victorian (<https://agriculture.vic.gov.au/livestock-and-animals/animal-welfare-victoria/community-and-education/animal-welfare-fund-grants-program#h2-2>) and South Australian Governments (<https://dogandcatboard.com.au/about/achievements>) have programs working towards this. Funding costs can be shared across State and Local Government Pest Management and Animal Management Departments as these programs will assist in achieving both their respective goals.

Federal and State Government funded human social services are also recognising that the people who need human welfare support also need support for animals they care for. Animal support services should be built into human service providers' roles in partnership with Local Government and animal welfare organisations.

The Australian Government Department of Climate Change, Energy, the Environment and Water can contribute by funding the coordination of collaboration between experts and researchers in ecology, domestic animal management, conservation and animal welfare and sheltering organisations, as well as the Australian Institute of Animal Management, and both environment and animal welfare state government departments to develop understanding and cohesive effective and ethical action. Funding of the NDCMWG is a cost-effective way to provide the necessary framework for this proposal.

Veterinarians have an important role to play in intensive desexing support programs. The proposed action to contract vets to travel to rural and remote communities that lack vet services to carry out free desexing is supported by G2Z if these programs are delivered in a culturally appropriate and respectful way. In addition, desexing clinics need to be funded in all areas to enable timely, no/low cost desexing, vaccinations and microchipping. These can be facilitated



by organisations through community, shelter, or private clinics. Veterinarians need to be further encouraged to practice and promote pre-pubertal desexing (from 2- 4 months of age).

Objective 9 Actions: Maintain Public Support 9.2 needs to include actions working to restore native habitat in existing urban areas, limiting land clearing and encouraging indigenous plantings in new and expanding suburban areas. Australian studies have shown that vegetation characteristics are likely more important for species diversity than the regulation of cats<sup>xx</sup> and that habitat destruction and degradation is the critical factor affecting richness of bird species<sup>xxi</sup>.

Objective 9 Actions: Maintain Public Support 9.4 needs to include an action that involves working with, and understanding how to, help and support communities to contribute to what they value and support – protection of native wildlife AND a reduction in unwanted kittens and cats by desexing cats rather than killing them.

All stakeholders need to be aided to work collaboratively in their communities to provide direct support to reduce cat numbers whilst minimising harm to people, cats and wildlife and working to preserve threatened species.

#### 4. Revise proposed actions in Objective 9 for efficacy and best practice

The Actions in 9.1 proposes trapping (and shooting where feasible) of stray cats in populated areas by local government and community members.

Trapping is the current traditional action taken by most of the Council Animal Management and Pest Management Departments which has been done in the interests of public health and safety or conserving valued wildlife, and with a lack of knowledge of alternative effective strategies. However, there is no evidence that either of these interests are being protected, and that this traditional management strategy has any effect on the reduction of populations of free roaming cats. Trap and kill programs are ineffective in the long term, not cost-effective and unacceptable to a large proportion of people<sup>xxii</sup>.

Animal management officers responding to complaints by the trapping cats and impounding of cats, enabling community members to hire traps and impound cats, and charging pound fees before reuniting cats is ad hoc management with no evidence of reduction in cat populations. It



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does not address the source of the problem, does not support the owner/carer to comply, and does not develop trust or community support to address free-roaming cat issues more broadly.

In addition, according to Hurley and Levy (2022), “untargeted removal of cats or other litter bearing mammals leads to a destabilisation of age and dominance structures, resulting in paradoxical increase in numbers as well as potential harms and impounding, caring for and potentially euthanizing free-roaming cats also diverts resources which could be invested more proactively.”<sup>xxiii</sup>

Shooting is not an acceptable or effective method of domestic cat management anywhere in the world, as far as we are aware. Not only does this place Australia in the unique position of being the nation that shoots (potentially) pet cats, but it also encourages anti-cat sentiment and behaviours. A review of any “lost cat” or “found cat” post on social media brings up a multitude of comments (and often associated photos) from people declaring what they would do with “the” cat if found. Many of these comments refer directly to the Australian Government's stance on cats as justification for the actions proposed. We have welfare concerns about the competency of sports shooters and the risk of leaving maimed cats alive in the field. We do not support bounties because there is a high risk that pet cats will become an easy target to collect a bounty, and there does not appear to be any evidence indicating that they are an effective form of animal control.

We refer to our Recommendation 1: Definitions, and the difficulty in identifying the difference between “pet” cats and “feral” cats (as the proposed definitions in the TAP) in populated environments which will most likely lead to cats that are an important part of someone's life, being killed or injured.

Considerable harm is being done to people by impounding and killing cats. Research on management programs of free-roaming cats has assumed that individuals value wildlife but do not value free-roaming cats<sup>xxiv</sup>. This is not the case. Cat assistance teams in the community find that many people care about free-roaming cats and develop a strong bond with the cats they care for and free sterilization programs have a positive impact on the cat carers' well-being and quality of life<sup>xxv</sup>. People feeding strays bond with the cats they care for – a bond which is nearly identical to the bonds pet owners have with their cats<sup>xxvi</sup>.



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Harm to free-roaming cats has a significant impact on people's mental health and well-being, both the people who own or feed them<sup>xxvii</sup> and the people who care for these cats at pounds or shelters<sup>xxviii</sup> who struggle to manage the cats' health and welfare until they find a caring home or are killed. Impounding free-roaming cats disproportionately impacts lower income families due to numerous barriers including cost, transportation, language. People earning less than \$30 000 have been shown to be one tenth as likely to find a lost cat as those who earn more than \$50 000<sup>xxix</sup>.

## 5. Modifying human behaviour

G2Z urges a greater emphasis on promoting the modification of human actions to prevent risk to threatened species. It is well-recognised internationally and nationally that habitat loss is the greatest threat to native species<sup>xxx</sup>.

The United Nations Biodiversity Conference in December 2022 identified that:

*The biggest driver of biodiversity loss is how people use the land and sea. This includes the conversion of land covers such as forests, wetlands and other natural habitats for agricultural and urban uses. Since 1990, around 420 million hectares of forest have been lost through conversion to other land uses. Agricultural expansion continues to be the main driver of deforestation, forest degradation and forest biodiversity loss. The global food system is the primary driver of biodiversity loss, with agriculture alone being the identified threat of more than 85 per cent of the 28,000 species at risk of extinction<sup>xxxi</sup>*

*And*

*... Agriculture has altered the face of the planet more than any other human activity. We need to transform our food systems to become more sustainable and resilient in order to reverse environmental degradation, restore ecosystems and ensure food and nutritional security<sup>xxxii</sup>*

All high-level Key Threatening Processes lack a plan: land clearance, climate change and novel biota<sup>xxxiii</sup>. We need to focus on a Threat Abatement Plan for these high-level impacts by humans to be enacted with urgency as the highest priority.



The Threat Abatement Plan for Feral Cats highlights the need for humans to modify their behaviour for more sustainable practices that limit clearing of habitat and enable regeneration, slow climate change as well as address impacts of novel biota and introduced species.

## **6. Revise negative language when referring to cats**

Current language used throughout the TAP when referring to cats is negative. Animals assigned labels with negative connotations often receive less welfare consideration than valued species<sup>xxxiv</sup>. The use of the divisive language used throughout the TAP exacerbates societal divisions regarding management of cat populations. There is excessive emphasis on the utilisation of primarily lethal control methods which risks further demonizing all cats, potentially leading to instances of animal cruelty. We recommend that the conversation moves to focussing on providing information that assists with improving cat caretaking behaviours via desexing, microchipping, preventive health care and highlights the benefits of cat containment using social science-based messaging to facilitate behaviour change.

## **7. Revise the Actions in 9.1 to support and encourage more research into cat management strategies that involve desexing and returning the cats to their home base, where appropriate**

Crawford et al<sup>xxxv</sup>, referred to in the Background Document P.45, argues that there are only very limited circumstances where trap-neuter-release can be viable: when the cat population is closed (i.e. no immigration); when the desexing rate is high enough to cause population decline, and those rates can be maintained as kittens mature to breeding age; when there is sufficient funding to provide veterinary care and food to the released cats and maintain the program until the last cat has died; and when there are no cat-susceptible native species at risk from the released cats.

However similar conditions apply for trap and kill as a management method. Computer simulation modelling by Benka et al<sup>xxxvi</sup> suggest that cost-effective reduction of free roaming cat numbers requires sufficient management intensity, regardless of management approach, and greatly improves when cat abandonment is minimized. Removal yielded the fastest initial reduction in cat abundance, but trap-neuter-return was a viable and potentially more cost-



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effective approach if performed at higher intensities over a sufficient duration. Of five management scenarios that reduced the final population size by approximately 45%, the three scenarios that relied exclusively on removal were considerably more expensive than the two scenarios that relied exclusively or primarily on sterilization.

Thompson et al<sup>xxxvii</sup> note that much of the ongoing debate about Trap Euthanize (TE) and Trap Neuter Return (TNR) hinges on assumptions about the relative value of free-roaming cats to wildlife<sup>xxxviii</sup>. They believe they are the first to include the intrinsic value of free-roaming cats in their cost analysis. Previous studies that omitted the values individuals hold for free-roaming cats over-estimated the economic case for TE programs<sup>xxxix</sup>. Most previous research on the economics of management programs of free-roaming cats assumed that individuals value wildlife but did not value free-roaming cats. Under these assumptions, TE was the least cost alternative. In the second scenario, where it was assumed, cooperation only occurred under TNR, regardless of the value of cats and birds, it was the most cost-effective solution to conduct a TNR program for a 20-year planning horizon.

Regardless of method of control, a reduction in cat numbers requires allocation of resources over an extended period. In the scenario where caretaker cooperation occurred under TNR, the least cost-option for a 20-year program was TNR, and no control and TE had costs that were 1.8 and 1.6 times higher respectively. TE had the lowest population over the first 50 months. However, under cooperation, the population for TNR fell over time, and had the lowest population after 5 years, as caretakers reduced feeding levels for the group.

Obtaining cooperation from caretakers is an important part of the success of a local program and is an essential part of their modelling process. They showed that the act of reducing free-roaming cat feeding by caretakers can considerably reduce group sizes and reverse conclusions about the cost-effectiveness of TNR relative to the case of no caretaker cooperation. As population falls in this scenario, it is possible that TNR becomes more effective because the rate of TNR will remain the same and more cats will be exposed to TNR. Cooperation may be plausible since caretakers are often more likely to approve of TNR because they enjoy the company of the cats, they believe the cats help reduce rodent abundance, and they claim that neutering improves the quality of the lives of the cats<sup>xl</sup>.

Well-managed Cat Assistance Programs in populated areas rarely have to return a cat without an owner or carer<sup>xli</sup>. By offering free desexing and microchipping services for stray cats, there



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are usually people willing to care for and/or take ownership of these cats once desexed and microchipped. When a cat without an owner or carer is released, desexed and microchipped, an owner or carer is often discovered after the release, resulting in the desired cat ownership behaviour outcome, instead of killing cats, trauma for owners and carers, and loss of trust within the community.

By supporting carers of multiple cats, caregivers can be guided to feed only as much as the cats can eat in 30 min or less, keep the feeding areas clean and in the one spot at a consistent time of day to enable identification of which cats are present, note any newcomers and take action to trap and desex them to reduce numbers permanently over time<sup>xliii</sup>.

The best practice approach to managing domestic cats is to increase the proportion that are cared for in an environmentally sustainable way. There is a wealth of published research demonstrating that non-lethal management approaches based on desexing, adoption of socialised cats, and leaving unsocialised desexed strays in their home location, have led to significant reductions in urban stray cat populations, as demonstrated by international research<sup>xliiii</sup>, and pilot studies in Australia<sup>xliiv</sup>. Leaving cats in their home location helps stabilise the social structure of the stray cats in that location, preventing immigration of stray cats from surrounding areas. When a large enough proportion (about 54%) of the stray cat population is desexed, and when immigrant cats are promptly managed through adoption or desexing and return to the colony, stray cat numbers decrease by 30% over 2 years and 50% over 5 years<sup>xliv</sup>.

Additional research from overseas has demonstrated that targeted desexing of unowned urban cats' results in a substantial reduction in the intake of cats and kittens to local shelters, and reduced calls to local government relating to dead cats on streets, strongly suggesting the approach also results in a smaller unowned cat population in the community<sup>xlvi</sup>. This approach, often referred to as a Community Cat Program, is widely used by local authorities in the USA and Europe where it is often regarded as best practice, and typically receives strong community support. For example, in a Florida study where 60 cats/1,000 residents were desexed (about 54% of the stray cat population), cat admissions to the local shelter decreased from 13 to 4 cats/1,000 residents, and euthanasia decreased from 8 to 0.4 cats/1,000 residents<sup>xlvii</sup>. Other studies from the USA have reported euthanasia rates for cats dropping from over 70% to 2-5% in shelters that have implemented such programs<sup>xlviii</sup>. Many of these shelters are now well below their carrying capacity for cats, with cat housing being reallocated for other activities,





and the change is affecting the design of new shelter buildings. There is growing support for large-scale trials to confirm the efficacy of such programs in an Australian context<sup>xlix</sup>.

A small-scale trial based on desexing has already been piloted in the City of Banyule, Victoria<sup>l</sup>. This program offered free desexing, microchipping, and registration for all non-desexed cats in the targeted suburbs. Those who accept the offer to enrol the cat they are caring for complete paperwork for the microchip database and register the cat in their name with the local government. Of those who enrol a cat, 70% are semi-owners and 30% are owners. This strategy has reduced council impoundments from 1,004 cats in 2010-11 (8 cats/1,000 residents) to 141 in 2018-19 (1 cat/1,000 residents), and euthanasia from 578 to 41 cats/year (from 5 to 0.3 cats/1,000 residents). Between 2017 and 2019, the council used a targeted approach for the desexing strategy and over that 2-year period, impoundments decreased by 71% and euthanasia by 60%. It has also reduced cat-related complaints. Target areas were selected using existing information held by the council, which was used to identify cat hotspots in the local area using the addresses from which most cats surrendered to the shelter originated, and the areas where residents had expressed concerns about stray cats.

It should be noted that the implementation of mandatory desexing or mandatory confinement for cats is not an effective method to manage cats in urban areas as it does not address the underlying problem. High numbers of semi-owned and unowned cats are typically a problem in low socioeconomic areas where residents cannot afford the costs associated with desexing. When surveyed, many residents enrolling a cat in the Banyule program stated that they had been caring for and interacting with the cat daily, often multiple times each day. They described themselves as being very attached to the cat that they care for and that it gave them a reason to get up in the morning. Most residents reported that the primary reason they had not already had the cat desexed was because it was unaffordable. When they were offered desexing, microchipping, vaccination, and registration free of charge, they supported it and took on official ownership of the cat.

Further research into new methods of management of cats in urban and peri-urban areas is urgently needed. The current legislative and regulatory approaches for managing cats in urban areas, primarily using a trap-and-kill approach, has not been effective thus far<sup>li</sup>. Furthermore, statistical modelling, cost analyses and reports from Council staff, have shown that this approach is not viable for governments or local councils<sup>lii</sup>.



## 8. Remove mandatory desexing as a proposed cat management strategy from the TAP

There is no evidence that supports the efficacy of mandatory desexing legislation (MDL) as an effective cat management strategy. In fact, the three states with the highest per capita cat intake into shelters and pounds have mandated desexing<sup>liii</sup> and another study of 191,000 cats entering RSPCA shelters around Australia<sup>liv</sup> also documented no benefit of mandated desexing.

Mandatory desexing policies are not viewed as being effective in achieving an improvement in reductions of free roaming cat populations, complaints about wandering cats, reduction in intake to municipal or private animal shelters, or any other metric currently in use. There are a range of reasons why this might be the case:

- Majority of cats who are impounded do not have “owners” (as per the description of an owner in most legislation)
- Lack of support services provided alongside the implementation of the legislation to enable community members to comply with the policy i.e., low or no cost desexing services.
- MDL effectively criminalises cat caretakers that do not (or cannot) comply with the legislation.
- MDL effectively criminalises those cats that are not complying with the legislation and classifies them as stray or feral with the more frequent outcome for them being euthanasia.
- MDL (without significant support mechanisms) is not equitable or inclusive and feeds into broader social issues of equity and human rights.

G2Z supports incentive programs for desexing and identification (rather than mandatory requirements as mentioned in the Background document), but not packaged with mandatory registration. Cat management actions based on imposing legislative requirements, and fining people for unregistered, excess, or wandering cats are ineffective as they do not address the causes of stray or overpopulation of cats.



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Most people now support desexing of cats and those who can afford to desex their cats do. However, lack of resources prevents people on low incomes getting cats desexed i.e. they can't afford the large vet payment, or carriers or sometimes even a car or petrol to get their cat(s) to the vet. The strongest predictor for whether a cat in a household is desexed is family income<sup>lv</sup>. This is compounded in lower socio-economic areas where one undesexed cat in the household can lead to 5-10 cats in a year (one or two litters) further increasing the difficulty in affording the desexing of multiple cats. Desexing and microchipping a female cat can cost between \$300 to \$500 depending on whether it is pregnant or lactating (common in spring and summer), and which veterinary clinic is providing the service. Mandated desexing is a huge barrier to semi-cat owners (people feeding more or more stray cats) taking ownership of these cats, which is a key solution to the problem.

Registration is an added cost burden which is counterproductive. It often prevents people taking advantage of local government desexing programs as they are fearful of being required to pay an additional ongoing expense, which people on low incomes cannot afford. If people are feeding multiple cats, they cannot afford to register them all. The costs involved in managing a cat registration program, for local government, are prohibitive, with little to no advantage gained. Expending the same resources on a free microchipping program achieves the desired outcomes for Council, as well as the caretaker of the cat.

Instead, Australian research shows that Community Cat Programs based on free desexing of cats in areas with high numbers of free-roaming cats are very effective in reducing complaints, reducing free-roaming cats being impounded, reducing the number of healthy cats being killed and reducing council costs. In these programs most people feeding 1 to 2 stray cats will take ownership of them if the cat is desexed, microchipped and registered (if necessary) for free<sup>lvi</sup>.

## **9. Remove mandatory containment as a proposed cat management strategy from the TAP**

G2Z strongly supports containment on owner's property where possible but does not support making it mandatory. There is no evidence that supports the efficacy of mandatory containment legislation (MCL) or cat curfews, as an effective cat management strategy<sup>lvii</sup>.

Mandatory containment policies are not viewed as being effective in achieving an improvement in reduction of free roaming cat populations, complaints about wandering cats,



reduction in intake to municipal or private animal shelters, or any other metric currently in use. There are a range of reasons why this might be the case:

- Majority of cats who are impounded do not have “owners” (as per the description of an owner in most legislation) and therefore no one to contain them.
- Lack of support services provided alongside the implementation of the legislation to enable community members to comply with the policy i.e., financial, and practical support to develop cat containment infrastructure.
- MCL effectively criminalises cat caretakers that do not (or cannot) comply with the legislation.
- MCL effectively criminalises those cats that are not complying with the legislation and classifies them as stray or feral with the more frequent outcome for them being euthanasia.
- MCL (without significant support mechanisms) is not equitable or inclusive and feeds into broader social issues of equity and human rights.

Overall Councils who have implemented mandatory 24/7 containment of cats have reported an increase in cat related complaints, impoundments and euthanasia’s and have been unable to demonstrate a reduction in cats wandering at large<sup>lviii</sup>. Instead, support programs are needed to help people contain their cats. Most admissions of free-roaming cats to shelters and pounds are from low socio-economic areas. Around 5% of impounded cats are reclaimed<sup>lix</sup>. There are several reasons for this, but the primary reason is that these cats are not fully “owned” by one person. In Australia, 20% of households live on less than \$650 a week<sup>lx</sup>. Cat containment systems can cost around hundreds to thousands of dollars which low-income families cannot afford. Many cat owners live in rental accommodation with inadequate fencing, an inability to make property modifications and/or children or other residents that may not prioritise closing of doors and windows. In addition, research has found that cat owner’s perception of their ability to contain their cat is an important predictor of whether someone fully contains their cat along with valid concerns about cat mental and physical well-being in confinement<sup>lxi</sup>. Some cats are notoriously difficult to contain due to their temperament, history and physical capacities. Supporting people with various cat containment methods based on their living circumstances and proximity to cat susceptible native species, will provide a more targeted approach to prevent impacts on native wildlife and raise community awareness of the need and



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possible options<sup>lxii</sup>. Providing subsidised access to low-cost mesh, fence additions or enclosures is essential. Consideration of the introduction of building regulations to require appropriate fencing and enclosures in new builds in environmentally sensitive areas would also be helpful. These initiatives will help create a cultural change to prevent wandering, predation, and unwanted cats. In many urban areas, the culture has changed regarding keeping dogs safely enclosed and walked for daily exercise. Similarly, cultural change is needed regarding cat caretakership which cannot occur with punitive strategies only.

Cat curfews increase complaints, increase costs to councils, increase the number of cats impounded, increase exposure to adverse mental health effects (including PTSD) of staff involved in killing healthy cats and kittens, and result in no decrease in the number of free-roaming cats. This is because cat reproduction greatly exceeds the numbers of cats trapped and killed in our cities and towns.

Mandatory limits on the number of cats per household also prohibits people accessing local government subsidised desexing particularly in low socio-economic areas where people cannot afford to desex a cat they may have acquired as a stray or to help a family or friend with an unwanted litter. Councils often allow only two cats per household and therefore offer free desexing for only two cats. This means if a pregnant stray cat appears and has a litter, the kittens are kept undesexed, or given away undesexed, and the breeding continues.

Mandatory containment of cats, and limiting cat numbers per household, seem to be logical management strategies unless practical, on the ground experience working with cat caretakers is gained. In practice, it is ineffectual as sufficient support has not been provided to ensure that all residents can comply.

## **10. Remove the proposal for the development of cat free suburbs from the TAP**

This proposed cat management strategy is inequitable. As well, banning cats from suburbs has not been shown to have any beneficial effect on native mammals in adjacent bushland. Similarly, the presence of cats had no effect on the density and diversity of birds, but density of housing, distance from bushland and decreasing size of remnant bushland had a strong negative effect on bird populations<sup>lxiii</sup>.



The focus must be on progressive and innovative planning strategies when developing new suburbs that incorporate assistance for cat caretakers to contain cats wherever possible, appropriate density and design of housing, appropriate design of recreational space, appropriate design and planting strategies and overall minimisation of environmental impact.

## CONCLUSION

The methods proposed for managing cats in the vicinity of humans i.e., domestic cats (owned, semi-owned and unowned with individual cats often moving between these 3 categories), are out of touch with recent experiences with cat management programs in the community and developments in cat management and welfare in Australia and internationally.

International consensus principles for ethical wildlife control<sup>lxiv</sup> advocate for firstly altering the human practices that cause human-wildlife conflict and developing a culture of co-existence, as well as minimising animal welfare harms to the fewest numbers of animals.

An ethical approach to animal management involves supporting all stakeholders<sup>lxv</sup>, not only the native wildlife and non-pet owners, but also the cats and the people who care about them. Conservationists are seeing increasing impacts on wildlife populations and animal management; welfare and sheltering organisations are seeing the suffering of people and animals using current outdated animal management strategies<sup>lxvi</sup>. Planning together to maximise positive outcomes for people, cats and wildlife is therefore imperative for an effective, economical, ethical, and socially accepted Threat Abatement Plan.

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