



SUBMISSION

11 December 2023

Department of Climate Change, Energy, the Environment and Water
John Gorton Building
King Edward Terrace
PARKES ACT 2600
By Email: invasivespecies@dcceew.gov.au

Dear Secretariat

Re: Draft Threat Abatement Plan for Predation of Feral Cats

Livestock SA is the peak industry organisation for South Australia's red meat and wool industries. There are over 5,200 sheep producers and more than 2,700 beef cattle producers in the state. With a membership of over 3,500 sheep, beef cattle and goat production businesses, we work to secure a strong and sustainable livestock sector in South Australia.

South Australia's \$4.3 billion livestock industry is a key economic contributor to the state which supports 21,000 South Australian jobs across the red meat and wool industries.

Livestock SA is a member of four national peak industry councils: Sheep Producers Australia, WoolProducers Australia, Cattle Australia and Goat Industry Council of Australia. Livestock SA is also a member of Primary Producers SA (PPSA) and through PPSA and the Peak Councils, the organisation is an indirect member of the National Farmers' Federation.

Livestock SA welcomes the opportunity to provide a submission to the Draft Threat Abatement Plan for Predation of Feral Cats (TAP), which is important to our members.

Impacts of Feral Cats on Livestock

The South Australian Sheep Industry Blueprint 2030 outlines the strategic vision for the South Australian sheep industry. The impacts of feral cats on sheep in South Australia limit the ability to achieve this vision, affecting targets such as delivering one additional lamb per ewe lifetime through the spread of diseases such as Toxoplasmosis, which can lead to abortions in ewes¹. As a host for parasites *Toxoplasma gondii* and *Sarcosyctsis*, cats cost the Australian livestock industry approximately \$11.7 million annually².

¹ The South Australian Sheep Industry Blueprint 2030 (<https://livestocksa.org.au/industry-development/industry-blueprints>)

² Legge, S., Taggart, P.L., Dickman, C.R., Read, J.L. and Woinarski, J.C.Z (2020) Cat-dependent diseases cost Australia AU\$6 billion per year through impacts on human health and livestock production, *Wildlife Research* 47 (8), 731-746

The impacts of *Toxoplasma gondii* and *Sarcosyctsis* can vary between regions. For example, areas such as Kangaroo Island in South Australia are considerably affected. On average, *Toxoplasma gondii* accounts for 17 per cent of all sheep abortions on Kangaroo Island, resulting in over 62,000 unborn lamb losses each year and an associated industry cost of approximately \$10 million a year². South Australia is also impacted more severely than other states by *Sarcosyctsis*, which costs the sheep meat industry approximately \$2 million a year, with South Australia carrying most of the cost at \$1.2 million a year².

Management of feral and domestic cats is important to the South Australian livestock industry. The updated TAP is an opportunity for collaborative management of feral cats to benefit Australian threatened species and agriculture.

Responses to the objectives outlined in the consultation draft are provided below. Where objectives are not included, there is no further comment.

Objective 1 – Coordinate and enhance the legislative, regulatory and planning frameworks

Feral cats are a concern in every state and territory; however, legislation to manage feral cats differs between jurisdictions. Consistency across jurisdictions would improve cat management and resourcing is needed to adequately manage feral cat impacts. Livestock SA supports legislative alignment across governments.

Action 1.7 in the plan proposes the consideration of a ‘biodiversity certificate’ for landholders who undertake cat control at sites of high biodiversity value. South Australian livestock producers are custodians of over 50 per cent of the state’s landmass. Producers already undertake significant work to manage feral cat populations on their properties and this work should be acknowledged. Producers also face increasing accreditation and reporting requirements and participation in any biodiversity certification system should be a voluntary and efficient process, which aligns with other relevant biodiversity credentials.

Recommendation

Livestock producers and industry are extensively consulted in further consideration and potential development of a ‘biodiversity certificate’ system and any such scheme is voluntary and aligned with other biodiversity and biosecurity obligations and schemes.

Objective 2 – Plan and implement cat management programs within an evidence-based framework, and use this to help maintain broad stakeholder and community support

Livestock SA supports the use of an evidence-based approach to developing cat management programs and broad stakeholder engagement, including with livestock producers.

We support action 2.1 (the prioritisation of cat-free islands) and support ongoing work on Kangaroo Island to eradicate feral cats. Kangaroo Island landholders, including livestock producers, are heavily involved in this work and their cooperation is crucial to making the program successful. Through the SA Sheep Industry Fund, producers contributed \$200,000 towards on-farm evaluation of a vaccine to prevent *Toxoplasma gondii* reproductive loss in sheep.

As already stated, landholders are significantly impacted by cats including feral and pet cats. We support objective 2.6 to prioritise areas for managing cats living near human infrastructure including farms.

We support objective 2.7 (to maintain the national Feral Cat Taskforce); however, note that the taskforce does not include any representation from primary producers. As managers of land where feral cats are often found, the taskforce would benefit from primary producer representation.

Recommendation

Include representation from primary producers and the livestock industry on the national Feral Cat Taskforce to allow enhance its decision-making and the effective management of feral cats.

Objective 2.8 (to create a 'practitioner resources and network') is supported, but again consider primary producer representation would enhance the network of practitioners.

We support objective 2.15 to engage and communicate with the broader public and different stakeholder groups. However, while the National Farmers' Federation and Meat & Livestock Australia are listed as part of this objective, State Farming Organisations should also be included as they are more connected to the grass roots and will be key to helping disseminate information and engage with producers on cat management at a state and local level.

Objective 3 – Undertake research on cat ecology and impacts to inform management undertaken across multiple objectives

Objective 3 (performance criteria) includes the documentation of the prevalence of toxoplasmosis and other diseases in cats and native species across Australia. Diseases carried by cats have significant impacts on the livestock industry with regions such as Kangaroo Island severely impacted. Understanding the prevalence of these diseases in livestock, cats and native species will help livestock producers understand the impacts of cats in their regions and add to the body of knowledge on the impacts of feral cats.

Action 3.5 (undertake fundamental research on cat ecology to inform the design and implementation of existing control options) includes describing interactions with other predators, such as dingoes, and the ability of feral cats to coexist with native predators. Livestock SA considers that this research must also consider the impacts on livestock producers in areas with wild dogs and dingoes. Stock losses from wild dogs and dingoes in these regions can be significant and they can also spread diseases to livestock,³ with producers facing significant financial losses. For example in 2018, 20,000 sheep were killed by wild dogs in South Australia, resulting in a loss of \$4 million to livestock producers⁴.

Producers can suffer mental health impacts associated with stock losses. Producers report emotional impacts of wild dog attacks such as anxiety, stress and sleeplessness⁵, anger and frustration and impacts on relationships at personal, business and community levels⁶. These factors must be considered when interactions with other predators for the management of cats are considered.

The South Australian Sheep Industry Blueprint targets include the eradication of wild dogs from inside the dog fence¹, and Livestock SA does not support allowing dingoes in this area, even for the

³ Jenkins, D.J., Urwin, N.A.R., Williams, T.M., Mitchell, K.L., Lievaart, J.L. and Armua-Fernandez (2014) *International Journal for Parasitology: Parasites and Wildlife* (3), 75-78

⁴ Government of South Australian media release (2023): [https://www.premier.sa.gov.au/media-releases/news-items/wild-dog-management-in-south-australia-to-get-\\$2.9-million-funding-boost](https://www.premier.sa.gov.au/media-releases/news-items/wild-dog-management-in-south-australia-to-get-$2.9-million-funding-boost)

⁵ Government of South Australia (2023), South Australian Wild Dog Management Strategy

⁶ Ecker, S (2016) Constantly chasing dogs: assessing landholder stress from wild dog attacks on livestock using quantitative and qualitative methods, *Australasian Journal of Environmental Management* (24), 16-30

control of feral cats. The negative impacts of wild dogs inside the dog fence on the sheep industry and producers will not outweigh any positives of cat control if they did occur.

Recommendation

Research into the interactions and coexistence of feral cats with other predators, such as dingoes, must also consider the considerable financial and mental health impacts on livestock producers that these other predators cause. Livestock SA does not support any changes to the policy for wild dog eradication inside the dog fence or wild dogs being permitted inside the dog fence for feral cat control.

Objective 8 – Reduce the burden of cat predation across all native species, with holistic management of habitat and species interactions over large areas

Livestock SA has serious concerns regarding Action 8.5 (mesopredator control by dingoes), to consider dingo management to control feral cat populations. Financial impacts to the livestock industry of managing dingoes are significant, costing an estimated \$64 million to \$111 million annually in control costs⁷. There are also the reported effects of the impacts of dingoes on livestock production, including the spread of diseases such as hydatids and reduced ability of livestock producers to run livestock in areas with higher dingo numbers, impacting producers and regional communities³.

Introducing dingoes into areas with livestock to control cats will exacerbate these effects. It will result in more injured livestock and welfare concerns, higher stock losses, increased disease spread, and add to the increasing pressures already faced by livestock producers. This may be an acceptable proposal if there was evidence to suggest that dingoes can effectively control and reduce cat numbers and impacts while not having an impact on livestock; however, recent research has highlighted that is not the case.

Previous research demonstrating that dingoes can control the impacts of feral cats has since been proven to be unreliable, with only a handful of studies found to be capable of correctly and robustly assessing the evidence of dingoes as a cat control method⁸. Of these studies, it was found that there was no evidence of suppression of mesopredators, such as feral cats by dingoes⁶. Therefore, it is currently unacceptable to use this method, especially considering the significant impacts of dingoes on livestock.

Livestock SA notes that under Action 8.5, there is the suggestion to conduct research to better understand this control method, using a robust experimental framework and engagement with industry, including state farming organisations. We consider that engagement with producers and landholders will be critical in accurately understanding the impacts of dingoes on livestock and the costs and benefits of allowing them in areas to control cats.

However, the scientific evidence does not currently provide any indication that dingoes can control cats, and much more robust scientifically valid research is needed to prove if this is a viable solution. Until that research is complete, it must not be considered due to the negative impacts of dingoes that will be exacerbated without any benefits to feral cat control.

⁷ (NSW Natural Resources Commission, Cost of Pest Animals in NSW and Australia 2013-14).

⁸ Castle, G., Kennedy, M.S and Allen, B.L (2023) Stuck in the mud: Persistent failure of ‘the science’ to provide reliable information on the ecological roles of Australian dingoes, *Biological Conservation* (285)

Recommendation

Livestock SA does not support any change in policy which reintroduces or increases dingoes within the South Australian dog fence and exclusion zone.

Objective 9 – Reduce density of free-roaming cats around areas of human habitation and infrastructure

Livestock SA supports the objective to reduce free-roaming cats around areas of human habitation, including on farms. We support Action 9.1 (Local governments improve feral cat management) to disseminate information on the impacts on cats in a range of areas, including livestock production. To ensure this information is accurate and well represents these impacts, livestock producers and industry must be included in the development of these materials. Materials should also be developed to target producers, people living in rural areas and small landholders to help improve education on the impacts of feral and free-roaming cats.

We support Action 9.3 to improve the evidence base of biodiversity impacts of feral cats and monitor cat-borne pathogens and diseases in wild animals. However, we suggest expanding this monitoring to include diseases that can impact both native animals and livestock, such as Toxoplasmosis to provide a clearer picture of the prevalence of the disease.

We support Action 9.5 to work with the farming industry for support for cat control using a One Health approach. Cats have wide-ranging impacts and collaborations across sectors to reduce these impacts including through support for livestock producers, will ensure the most efficient and effective cat management. Ongoing consultation and inclusion of livestock producers, including state farming organisations will be important to help improve the understanding of the impacts on the livestock industry and foster collaboration to control and reduce feral cats.

Recommendation

Primary producers and the livestock industry are included in consultations about cat control and the development of communication materials to producers and landholders on the impacts of feral cats.

Feral cats impact livestock health, welfare, production and as a result, producer health and well-being. They detrimentally affect our native species and natural landscapes.

Effective collaboration between sectors, including with producers, working to reduce the impacts of feral cats is therefore important to help ensure all viewpoints are well represented in the development of scientifically valid plans and tools to reduce their damage as much as possible.

Please contact the Livestock SA office on (08) 8297 2299 or via email at admin@livestocksa.org.au if you would like to discuss this submission further.

Yours sincerely

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