

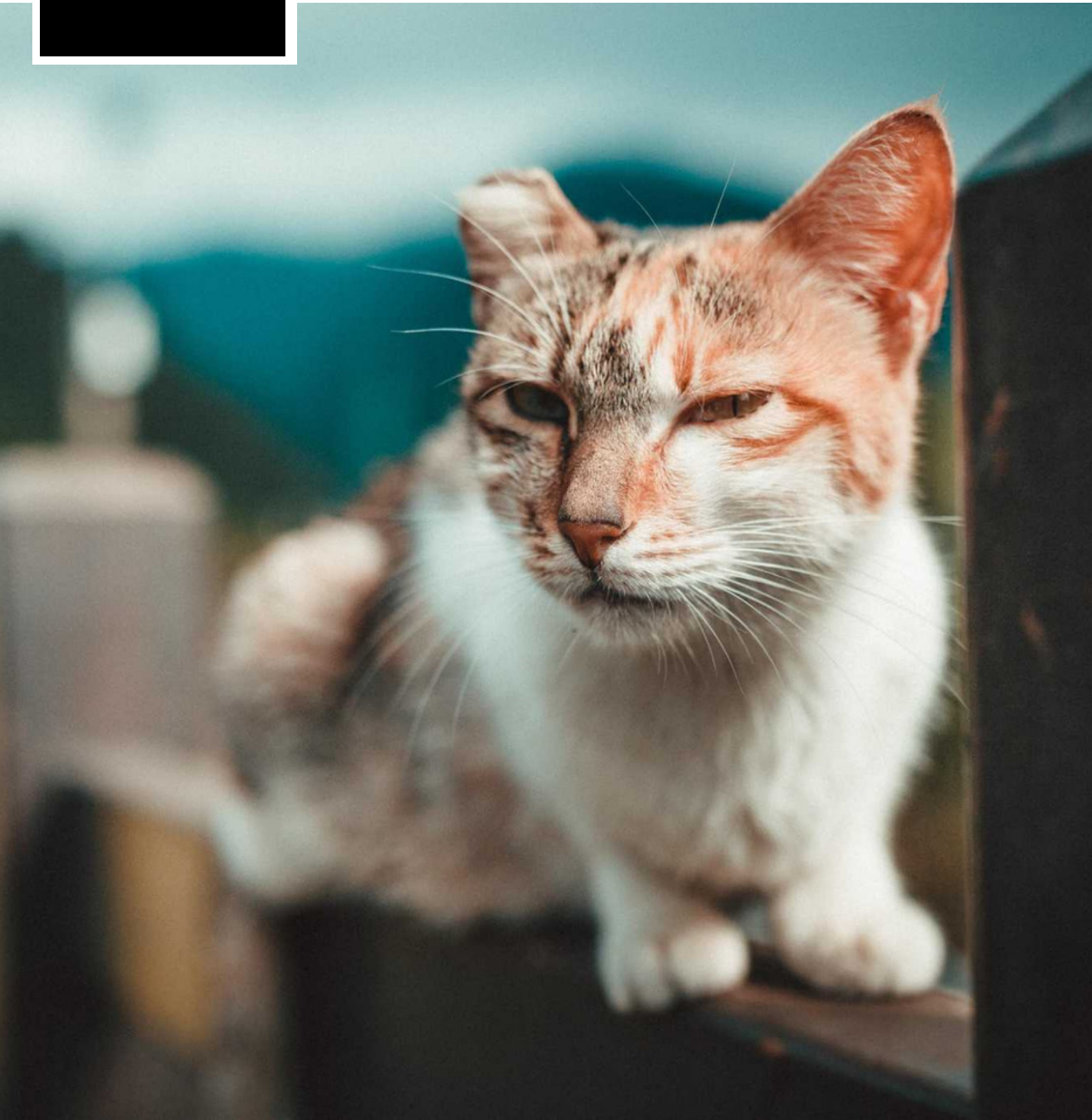


AL.ORG.AU

STANDING COMMITTEE INQUIRY INTO

THE PROBLEM OF FERAL AND DOMESTIC CATS

AN ANIMAL LIBERATION SUBMISSION



We acknowledge the
Traditional Owners of
country throughout
Australia and recognise
their continuing
connection to land, waters
and culture.

We acknowledge that this
document was written on
land stolen from and
never ceded by the
Gadigal People.

We pay our respects to
their Elders past, present
and emerging.





We don't have a duty to **speak** for the animals;
we have an obligation to be **heard** for the animals.

Matt Ball (2006)

DOCUMENT DETAILS

Animal Liberation 2020. Inquiry into the problem of feral and domestic cats. A submission by Animal Liberation to the Standing Committee on the Environment and Energy

ABOUT ANIMAL LIBERATION

Animal Liberation has worked to permanently improve the lives of all animals for over four decades. We are proud to be Australia's longest serving animal rights organisation. During this time, we have accumulated considerable experience and knowledge relating to issues of animal welfare and animal protection in this country. We have witnessed the growing popular sentiment towards the welfare of animals, combined with a diminishing level of public confidence in current attempts, legislative or otherwise, to protect animals from egregious, undue, or unnecessary harm. Our mission is to permanently improve the lives of all animals through education, action, and outreach.

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**WE NEED ANOTHER, A WISER AND PERHAPS, A MORE MYSTICAL
CONCEPT OF ANIMALS.**

**REMOTE FROM UNIVERSAL NATURE, AND LIVING BY COMPLICATED
ARTIFICE, MAN IN CIVILISATION SURVEYS THE CREATURE THROUGH
THE GLASS OF HIS KNOWLEDGE AND SEES THEREBY A FEATHER
MAGNIFIED AND THE WHOLE IMAGE IN DISTORTION.**

**WE PATRONISE THEM FOR THEIR INCOMPLETENESS, FOR THEIR
TRAGIC FATE OF HAVING TAKEN FORM SO FAR BELOW OURSELVES.
AND THEREIN, WE ERR, AND GREATLY ERR. FOR THE ANIMAL SHALL
NOT BE MEASURED BY MAN.**

**IN A WORLD OLDER AND MORE COMPLETE THAN OURS, THEY MOVE
FINISHED AND COMPLETE. GIFTED WITH EXTENSIONS OF THE
SENSES WE HAVE LOST OR NEVER ATTAINED. LIVING BY VOICES WE
WILL NEVER HEAR.**

**THEY ARE NOT BRETHREN, THEY ARE NOT UNDERLINGS; THEY ARE
OTHER NATIONS, CAUGHT WITH OURSELVES IN THE NET OF LIFE
AND TIME, FELLOW PRISONERS OF THE SPLENDOUR AND TRAVAIL OF
THE EARTH**



Standing Committee on the Environment and
Energy: Environment.Reps@aph.gov.au



I present this submission on behalf of Animal Liberation.

Animal Liberation is a non-profit animal rights organisation, operating in the field of animal justice for over four (4) decades. During this time, we have accumulated considerable experience and knowledge relating to issues of animal welfare and protection across the country. We are proud to be Australia's longest serving animal rights organisation. I am proud to work for this organisation and our ethos of interspecies equality.

Our mission is to permanently improve the lives of all animals through education, action and outreach.

I thank you for your consideration of the following submission .



Alex Vince
Campaign Director



You already know enough. So do I. It is not knowledge we lack. What is missing is the courage to understand what we know and to draw conclusions

- Sven Lindqvist, Exterminate All the Brutes (2007).

EXECUTIVE SUMMARY

ONE Animal Liberation welcomes and appreciates the opportunity to provide the following submission concerning the inquiry into feral and domestic cats in Australia.

TWO For the purposes of this submission, focus will be on aspects that we believe warrant in depth and critical attention. Particularly, the absence or the inadequacy of provisions for monitoring and/or planning control programs; the historical misuse of imprecise or unverifiable data; a distinct lack of concerted effort to support viable alternatives to these programs; and, finally, the deficiency of considerations pertaining to welfare issues in approved and/or developing control programs. To this end, focus will be upon cat management programs and the lack of attention or investigation into humane alternative control methods or techniques. A series of case studies will illustrate this.

THREE Though we do not necessarily challenge the argument that introduced species can cause detrimental impacts, we do intend to challenge the dogmatic belief that eradicating or otherwise controlling their numbers is appropriate, acceptable or productive. Rather, we promote an approach which recognises the multifaceted nature of cascading and cumulative impacts on the environment and its inhabitants.

FOUR We strongly urge the Committee to recognise the various impediments imposed by the nature of this inquiry's Terms of Reference. We believe that these unacceptably place counterproductive limitations on the scope of the submissions the Committee will subsequently receive.

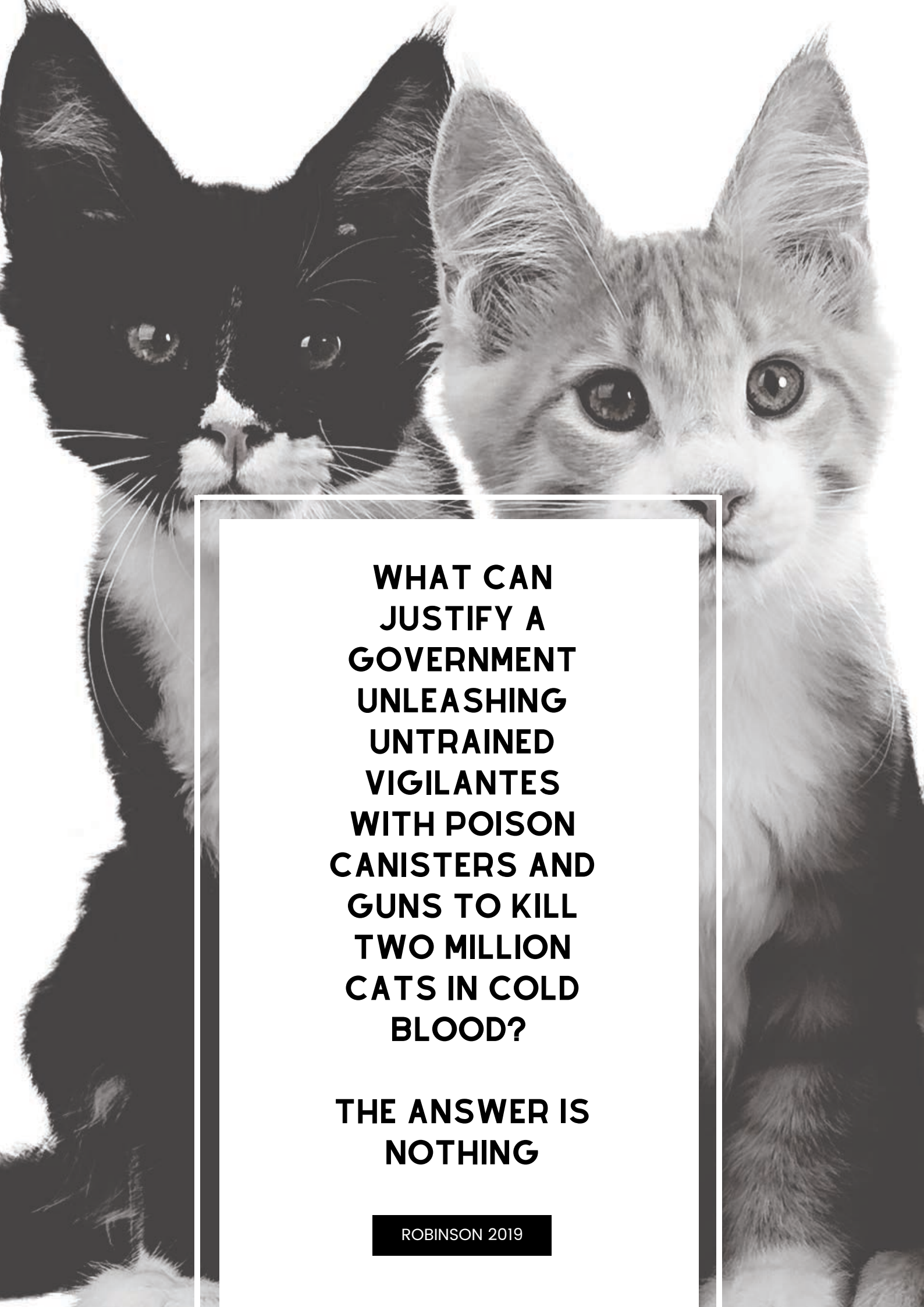
None of the **exotic invaders** that ran wild across the country brought about such **profound transformation** of the Australian environment as **beef cattle** and **merino sheep**. Their spread was accomplished in a hundred years, and in that space of time **the original bush** gave way to a landscape and environment **created very largely in the interests** of the flocks of **sheep**, the herds of **cattle** and the men and women whose **economy** depended on them

- Geoffrey Bolton, *Spoils and Spoilers: A History of Australians Shaping Their Environment* (1992).

1. INTRODUCTION

- 1.1 In 2007, an American courthouse heard a case in which an avid bird-watcher had shot and killed a cat in a preemptive attempt to prevent any potential predation on nearby birdlife (Rice 2007). In terms unthinkable in an Australian context, local media reported the crime as "felony cat murder" (Newman 2007). Unthinkable, that is, because Australia has increasingly become a nation infamous for its vast culling campaigns (Sutton and Taylor 2020). The case, and others like it, revealed the often incontrovertible controversies that are an inescapable component of any effort, State-sanctioned or otherwise, to kill some in the name of protecting others (aka: killing for conservation).
 - 1.1.1 Such a premise is the basis of one of the most enduring thought experiments in moral psychology. Namely: is it reasonable or morally acceptable to wilfully take a life in order to save or protect others from possible harm? (Epps 2015; Greene 2016). There is rarely, if ever, consensus on the answer to such a deeply emotive question (Bartels et al. 2014; Guerra-Pujol 2014). Contemporary Australian attitudes to cats are a particularly potent example of the competing politics and tangled ethics of killing for conservation (Marris 2018; Doherty et al. 2019a; Doherty et al. 2019b; Woinarski et al. 2019).
- 1.2 This submission is first and foremost concerned with the present state, scale and alleged impacts of wild or free-roaming cats (*Felis catus*) across Australia. It will endeavour to succinctly address each component of the Terms of Reference (hereafter, 'the Terms') as provided by the Committee. It will also provide further ancillary or background information in order to sufficiently frame and inform these issues, particularly as it applies to present and potential future control or management practices. It intends to provide evidence-based recommendations for practical and operational alternatives to current techniques. As per the Terms, our scope will include cats of all status (i.e., domestic, stray and feral). All references cited in this submission are catalogued according to the section in the Appendices attached.
- 1.3 The so-called "feral cat problem" is a particularly polarising issue in Australian politics. It is replete with vastly different perspectives and opinions (RSPCA Australia 2018; Woinarski et al. 2019). Some condemn them as the cause célèbre of an increasingly apocalyptic array of eco-crime, chief amongst them their alleged impacts upon other, more valuable animals, notably native wildlife (Marra and Santella 2016; Read and Moseby 2019). Many of these harbour financial or professional interests and depend upon a potent combination of rhetoric and imagery, including staged photography of taxidermied animals presented to the unbeknownst

- 1.3 public as evidence of their alleged ecological crimes (see Appendices: Part 3). Others, however, question the methods and motives behind such explanations (Lynn et al. 2019). As a result, the control or management of "feral cats" is often controversial (Slater 2007; Greenwell et al. 2019).
- 1.3.1 As local media reports explained in the so-called "felony cat murder" case, the jury failed to reach a unanimous verdict because "they could not change their votes without violating their consciences" (Rice 2007). Thus, the matter went unresolved. Such an outcome is the inevitable result of the inherently contentious interplay of understandings and beliefs about value, ethics and justifiable intervention. Yet six years and countless kilometres across the Pacific Ocean later, a 63-year-old South Australian "nature-lover" was embroiled in a startling similar case (Azzi and Davis 2016; Fewster 2016b; Woinarski et al. 2019). It would not be the first or the only instance in which a cat would be killed after being mistakenly identified as feral (Nielsen 2019).
- 1.4 The assumption at the root of the present inquiry is simple yet structurally complex. In sum, it can be succinctly summarised as follows:
- 1.4.1 **there are some animals whose very existence is a problem which must be solved.**
- 1.5 Such ideas are often introduced into popular consciousness via Government-sponsored or drafted documents and records, such as the Terms of Reference informing the present inquiry, as well as through news reports and various other media sources (Church 1996; Bekoff 2010; Kalof and Amthor 2010; Dayer et al. 2017). These sources primarily cite Government documents, thereby further disseminating and legitimising their contents. The framing of the present inquiry as an investigation into "the problem of cats across Australia is in itself problematic. This is primarily because it is an example of targeted rhetoric strategically adopted to persuade and limit the scope of legitimate consideration (Healy and Williams 2017).
- 1.5.1 It does not, for instance, allow any exploration outside the scope of its Terms of Reference. Thus, there is little opportunity to discuss the dramatic and far-reaching impacts that our species' activities have had on the natural world, species interactions have borne of this or the outcomes that these have on the issue at hand. Nor does it facilitate the broader, more inclusive, conversation that is desperately needed to account for the wide range of compounding variables that have caused it ostensibly



**WHAT CAN
JUSTIFY A
GOVERNMENT
UNLEASHING
UNTRAINED
VIGILANTES
WITH POISON
CANISTERS AND
GUNS TO KILL
TWO MILLION
CATS IN COLD
BLOOD?**

**THE ANSWER IS
NOTHING**

ROBINSON 2019

1.5.1 seeks to investigate. Thus, we hold that the present inquiry fails to provide the means to assess the structural components of the problem it claims to explore.

1.6 As such, we believe that the intended scope of the present inquiry is unacceptably narrow. We believe that this is particularly true insofar as it is based on a series of assumptions via which it precludes invited submissions from adequately addressing vitally important variables. Thus, submissions are inappropriately inhibited from sufficiently detailing the root causes for the circumstances in which many species throughout Australia currently find themselves. That is, for the problems that they are increasingly facing in an environment often irretrievably interfered with or impacted by various anthropogenic activities, including those conducted to control or manage unwanted wildlife, such as "feral" cats.

1.6.1 Critically, this includes a calculated limitation on information and data concerning the difficulties many animals are experiencing due to impacts produced by a range of cumulative interactions, both between other-than-human animals and our own species. This is particularly so for those existing in structurally novel ecosystems not previously experienced by past generations of their species (Fleming et al. 2017). Rather, it seeks information concerning the general efficacy and cost-effectiveness of current and emerging methods applied in the control or management of feral cats solely in terms of reducing their (alleged) impacts. Thus, we do not believe that the inquiry is capable of receiving the information it requires to reach a balanced and conclusive report by design. It will, instead, receive responses that further serve a reliance on traditional, ineffective and counterproductive approaches to the problem it contains in its title. Indeed, this is the problem the present inquiry actively intends not to address. Paradoxically, these are problems most often experienced by the native species the inquiry claims to be crafted to protect.

1.7 We do not, however, necessarily intend to challenge the premise that when provided an amenable environment, introduced species are capable of imposing pressures "for which there is no local precedent" (Brosnimmer 2002). This may be so. Rather, we promote practical and evidence-based policies to improve the circumstances that account for each and all of the compounding variables. Without adopting such a systems-based approach, enacting piecemeal policies borne of evidence such as that which will be compiled through responses to this inquiry will continue to fail to protect or conserve Australia's wealth of biodiversity, including native wildlife. Because most native flora and fauna of Australia has historically evolved in a largely insulated ecosystem - effectively sheltered and protected for over 38 million years from the presence of predators occurring elsewhere in the world -

1.7

structural changes such as those caused by human interference or intervention since European invasion ought to be considered synchronistically (Emerson and McCulloch 1994; Fleming et al. 2017). Indeed, one of the primary ways in which speciation occurs is through such “geographic isolation” (Lockwood et al. 2013). Not doing so constitutes an affront to Australia’s endemic species and places an unacceptable limit on the information provided to the Committee from submissions to this inquiry.



[Left] A two-week-old kitten, named "Miss Hap", hand-fed from a medicine dropper by American Marine Sergeant Frank Praytor. The kitten was cared for following the death of her mother by mortar shelling. Praytor named the kitten Miss Hap because "she was born at the wrong place at the wrong time".

Following printing in over 1,700 newspapers, Praytor received numerous marriage proposals. In 2010, Praytor wrote: "Miss Hap grew into a big girl who thought I was her father. When I left Korea, I left her in the care of another Marine. When I returned in '55, she was alive and well. At 83, I'm still saving orphans"

(Photo: Martin Riley 1953).

CASE STUDY 1

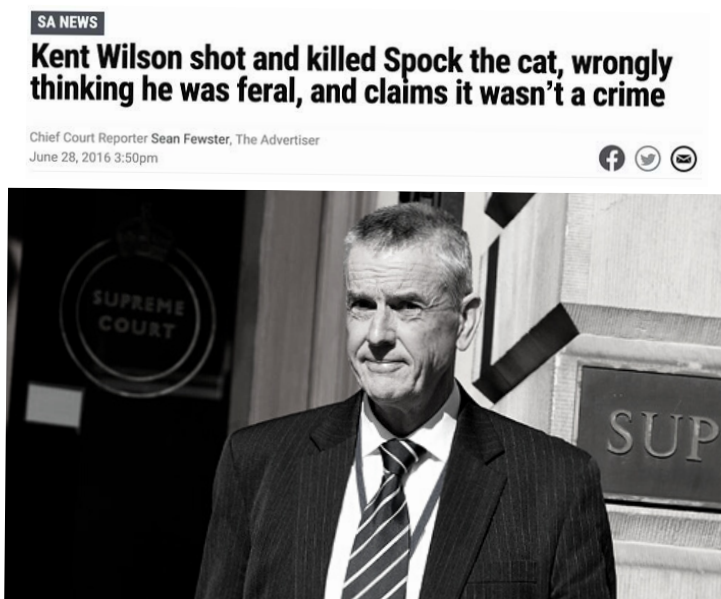
CAN "CAT MURDER" OCCUR IN AUSTRALIA?

If the adage often attributed to Gandhi is correct, the greatness of a nation and its moral progress can be judged by the way its animals are treated. Or, at the very least, it may be inferred by the manner in which it treats those who treat them poorly. Another maxim, however, may be more appropriate for the unique Australian situation: laws are like sausages, it is better not to see them being made. This is particularly so for our animal protection or animal welfare laws (Ellis 2010; Mundt 2015). In contrast to its "far-reaching intervention" in other areas, the Commonwealth is virtually silent on issues of animal welfare (White 2007). This is primarily due to constraints embedded in the constitution and the Commonwealth's corresponding small sphere of influence or responsibility for such issues (Chen 2016). As such, the States and Territories have historically held primary responsibility for animal welfare (Boom and Ellis 2009). Even these, however, are "fragmented, complex, contradictory and inconsistent" (Englefield et al. 2019). As such, there is significant latitude available in practicing and implementing State laws.

For example, consider the 2016 killing of a cat in the name of conservation referred to above. The maximum penalty for such a crime under South Australian state law could attract a maximum penalty containing a \$50,000 fine and up to four years' imprisonment. Yet, Mr. Kent Wilson, the man who shot, killed and surreptitiously buried a pet cat two years earlier pleaded with the court to remove his conviction of animal cruelty. Why? Anecdotal evidence supports the conclusion that nobody wants to witness an animal suffer. Ergo, nobody wants to be labelled an animal abuser (Richardson 2017). Indeed, the intent to cause suffering is a hallmark of Australian animal cruelty legislation. How? The accused simply believed "the animal was a feral predator" (Fewster 2016a; Gage 2016).



In deliberating, the magistrate stated that the accused was not considered “the typical” animal cruelty offender. An audit conducted into animal cruelty offences in Victoria indicated that three-quarters of offenders were male who was of an average of 39 years old, though 14% of total offenders were aged 60 years or over (Sentencing Advisory Council 2019). Similarly, the magistrate believed that a “typical example” of the crime being considered by the court involved “a person who either grossly neglects an animal or whose motive is to simply cause pain and suffering” (Azzi and Davis 2016). That is, the deliberate infliction of suffering is seen as a necessary component of cruelty. In sentencing, the magistrate accepted that the defendant “genuinely believed” the cat was “a threat to wildlife”. Further, the magistrate found the case to be an instance of “perverse irony” because the accused was facing charges of cruelty “for seeking to protect native wildlife” (Fewster 2016b).



The offender (left) received a comparatively paltry fine of \$2,000 and had the conviction of animal cruelty expunged from his record (Azzi and Davis 2016; Fewster 2016b; Gage 2016). Mr. Wilson's attorney explained that his client was “aware of, and particularly sensitive to, the dangers that feral cats pose to the environment” (Fewster 2016a). Meanwhile, the bereaved owner of the

cat expressed disappointment at the leniency of the sentencing and questioned the sympathy of the magistrate, arguing that it “sends a message to the public [...] that anyone can use the defence ‘I’m protecting native wildlife’ to avoid animal cruelty charges (Gage 2016). A victim impact statement penned by the distraught family explained that they had “struggled to come to terms” with the loss and that exhuming the body from its makeshift backyard burial site was “probably the most awful experience” they had experienced (Fewster 2016b).

A month later, the South Australian RSPCA announced a “big win for animals” in the Supreme Court, advising its followers on Facebook that Mr. Wilson had lost his appeal (RSPCA 2016). Two months later, the international animal rights organisation PETA listed Mr Wilson in their “top 10” list of “animal abusers who ‘practically got away with it’” (PETA 2016). In so doing, the group put Mr Wilson in the company of other Australian animal cruelty offenders, such as a 36-year-old Sunshine Coast man who choked a puppy and broke her hip, a duo who beat a defenceless kangaroo to death with a baseball bat, a 25-year-old Brisbane man who bit the head off a live rat and a 21-year-old Gold Coast man who decapitated a cat before scrawling a threatening message on the garage of a home in the animal's blood (Kim 2016; Lamacraft 2016; McDonald 2016; Renton 2016). The latter is a case study in the link between the abuse of animals and domestic

violence. Of these, one received community service sentencing, three avoided jail, one received mandated anger-management courses and another was granted and released on parole after serving only 10 months of a three-year jail sentence.



**ANIMAL
WELFARE HAS
BARELY RATED
A MENTION IN
THE HISTORY
OF AUSTRALIAN
VERTEBRATE
PEST CONTROL**

JONES 2003

2. BACKGROUND

GENERAL

2.1 Historically, the purpose and value derived from domesticating and keeping felines have been tied to their innate propensity to hunt and kill other small and unwanted animals, such as rodents and rabbits (Dickman 2014; Jones 2015). In this way, their abundance can be compared to other infamous intentional releases with disastrous ecological consequences (Seabrook 1991; Urban et al. 2008). Indeed, evidence suggests that their present populations stem from individuals animals kept on invading English ships where they acted as valuable “vermin controllers” (Hillier and Byrne 2016). Upon arrival on land, they likely fulfilled the same roles, either as a natural predator of unwanted rodents in fledgling pastoral colonies or as companion animals (Riley 2019).

2.1.1 Though some in human history have seen and used them for such strictly utilitarian purposes, others have revered them as divinities with rites and celestial burials (Chrulew 2006; Diesel 2008) (see photo below) Such a history has been traced as far back as the onset of early Egyptian settlements. The presence of felid remains found in various burial sites dated back to the Predynastic period (c. 6000 BC and c. 3000 BC) suggests that their presence in the most fundamental tenets of Egyptian spiritual culture was far from trivial or explicitly utilitarian (Baldwin 1975; Linseele et al. 2007; Geigl and Grange 2019). Others cite their ancient presence as companions, indicating a degree of domesticity. Indeed, contemporary studies have suggested that their companionship could stretch as far back as 9500 years with deliberate introductions taking place in over 179,000 islands (Vigne et al. 2004; Bernstein 2007; Medina et al. 2011). Yet, as the introduction above outlined, our species’ relationship with cats has not always been so positive.

CATS IN AUSTRALIA

2.2 It is now known that cats were not present in mainland Australia prior to European invasion. Nor were they likely introduced at the earliest date of invasion (c.1788). Rather, their occupancy is believed to have begun in earnest anywhere between 1824 and 1886. Though oral evidence shared by indigenous Australians suggests that their presence pre-dates foxes, there is little evidence that cats were responsible for early declines in native fauna (Gaynor 2000). Indeed, the suggestion that they were responsible for such declines is a “tenuous and unconvincing” argument (Abbott 2002). It is believed that they originally accompanied Europeans as companion animals and during the early years of colonisation they were primarily contained in population centres (Riley 2019). They continue to be valued by some in rural regions for these very

- 2.2 reasons (Denny and Dickman 2010). The removal of rodents has long been shown to cause increases in both domestic and feral cat numbers (Wodzicki 1973).

THE PROBLEMS WITH COUNTING CATS (AND WHY IT MATTERS)

- 2.3 Estimates of population size are necessary to properly plan and inform the scope, type and scale of control or management programs (Ward et al. 2020). There are, however, “severe levels of uncertainty” involved in the estimation process (Liu et al. 2011). There has historically been a “dearth of clearly defined hypotheses” and a general “lack of a broad theoretical framework” applied to understanding, predicting and acting upon impacts or threats allegedly posed by introduced species (Ricciardi 2013). Those tasked with the management of threatening processes, therefore, face significant challenges. First, decisions associated with risk management “frequently involve trade-offs” and “competing environmental, social and economic objectives” (Liu et al. 2011).

- 2.3.1 The true scale of any cat population category in Australia is controversial and fraught with inconsistencies. Independent analysis suggests that significant fluctuation of population size is produced by droughts and other environmental variables. This means any estimate is incapable of accounting for such volatilities. As such, any control or management program must be informed by data obtained on a case-by-case basis. Such efforts, however, are rarely if ever made. Rather, wholesale eradication campaigns are often initiated in spite of historical evidence that it does not, and often cannot, achieve its stated objectives (Philip 2020).

- 2.3.2 Studies suggest that anywhere between 1.4 million and 5.6 million cats are estimated to exist in natural environments, while the Australian government cites a figure of “between 2.1 and 6.3 million” (Legge et al. 2016; Department of the Environment and Energy n.d.). A further 0.7 million are estimated to exist in “highly modified environments”, such as urban areas, rubbish dumps and intensive agricultural operations (Short et al. 2013; Legge et al. 2016). Indeed, our experience as Australia’s leading animal rights organisation for over six decades has revealed a large cohort exist in and around Australian factory farms. Recent sources suggest that densities of feral cats are highest on farms with high availability of macropod or sheep carcasses (Hohnen et al. 2020). Yet, the method and manner by which population estimates are made is controversial. This is particularly so for the extravagant and highly dubious estimates made by members of parliament. This is perhaps most apparent in the claims made by MP Richard Evans (see Case Study Two below).

Though significant research and funding has been funnelled into investigating reactive control techniques perceived as threats to vulnerable wildlife, relatively little has been directed to many native species of significant conservation significance (Fleming et al. 2016). The interim report following the 2018-19 Commonwealth inquiry into “faunal extinction crisis” explained that “Australia has one of the world’s worst records”, citing the extinction of over 10 per cent of Australia’s endemic terrestrial mammalian species over the previous 200 years (Senate Environment and Communications References Committee 2019). “Modern extinctions”, defined as those to have occurred since 1500AD, account for 50 per cent of all mammal extinctions worldwide and over 10 per cent of Australia’s 273 endemic terrestrial species during this period (Ceballos et al. 2015; Woinarski et al. 2015). Globally, close to a quarter of the world’s species are classified as threatened or extinct (Fleming et al. 2015). Several of those once endemic to Australia were “ecosystem engineers” whose activities increased the breakdown of leaf litter. Their absence has been tied to cascading ecological impacts as leaf litter is a major source of combustible material connected to the spread of wildfires (Hayward et al. 2016). This is one example of many serious environmental impacts that together form the sixth mass extinction (Barnosky et al. 2011; Briggs 2017).

CASE STUDY 2

THE TOTAL ERADICATION OF ALL CATS

In November 2014, the social and political demonisation of cats reached a fever pitch. Ex-Environment Minister Greg Hunt announced that the Federal Government had earmarked over \$90 million in new funding for the eradication of feral cats across the country (Stein 2014). In an interview with ABC's Landline, Hunt claimed that "there are up to 20 million feral cats taking up to four native Australian animals a night" before hypothesising, therefore, that "over 20 billion Australian native species [are] being destroyed [by feral cats] a year" (Stein 2014). The astronomical figures cited, however, are highly contentious. This briefcase study will challenge the estimates galvanised to initiate and justify the ongoing killing of cats across Australia by revealing the deep nature of the extermination exercise.

At the time, Hunt claimed that the outstanding figure cited was found in a CSIRO review published in 2014. When the authors were approached by the ABC as part of their Fact Check series, however, they stated that the review did not include the cited statistics. One author, Professor John Woinarski of Charles Darwin University, explained that the document simply "does not give any estimate or data on the number of feral cats in Australia". Similarly, it did not provide any advice concerning "the number of individual animals killed by those cats". Fellow author, consultant biologist Dr Andrew Burbidge, stated that while the review did contain assessments broadly indicating that feral cats are a threat to native mammals, among other impacts, it did not provide any population estimates. Critically, Dr Burbidge advised that he was unaware of any study of the kind, stating that "there has been no systemic study that would allow an estimate of the number of feral cats in Australia" (ABC 2014). Where, then, did the Government obtain these figures?

It has long been acknowledged that an understanding of populations is an integral part of any predator control or management program (Doherty 2014). When the Federal Environment Department responded to the ABC's Fact Check on feral cats, ex-Threatened Species Commissioner Gregory Andrews argued that estimates placed their number across the country at "between 15 and 23 million". He wrote that "20 million" was considered "a conservative estimate". In the reply, Andrews acknowledged that he had advised Hunt that 20 million was the Department's estimate, before acknowledging that "there is no absolute figure available" and that "even if it were possible to count every cat, the number would change every day". Ultimately, Andrews argued that "the impact of feral cats is more important than their absolute number". Regarding the statistic of "over 20 million Australian native species being destroyed" annually across the country, Andrews cited the Australian Wildlife Conservancy (AWC) estimate of "between 5-30 animals each day". Using these figures, Andrews argued that "an estimate of feral cats killing more than 20 billion native animals each year is thus "a conservative one" (ABC 2014).

The arithmetic espoused by Andrews is as follows: using the AWC figure of a single cat killing (approximately) five animals per day, multiplied by the Department's "conservative population estimate" of (approximately) 15

million cats across the country, a minimum of 75 million native animals were dying daily due to predation by feral cats. Andrews concluded that “we must tackle the impact of feral cats” and provide Australians with “a better sense of the damage these predators are causing across the country” (Andrews 2014). The Commissioner’s response, however, did not alter the ABC verdict. It maintains that the estimate, of both total numbers of feral cats in Australia and the alleged impacts these have on native wildlife, is unverifiable.

Perhaps most alarmingly, such unverifiable estimates have been a key component in the government's war on feral cats. One seemingly official estimate has been traced to an anonymous article published in a New Zealand newspaper (Doherty 2014). The second citation following this anonymously penned paper claimed the existence of 18 million cats across the country (Pimental et al. 2001). The lead author of this second paper is a key proponent of invasion biology (see below). Three years later, the precursor to the Centre for Invasive Species Solutions (CISS) cited the same figure in an official report. This document has since been removed and is currently unavailable. Yet four years later, the unverified and anonymous estimate was adopted by the Federal Australian Government's threat abatement plan for predation by feral cats (Department of Environment, Water, Heritage and the Arts 2008). Shockingly, each of these documents, including one published by the Commonwealth of Australia, all rely on a single, unverifiable figure contained in an anonymous newspaper article written in New Zealand in 1996 (Doherty 2014). Since then, this estimate has been disputed (Denny and Dickman 2010).

Research reveals that the figure cited within the anonymous article was derived from a speech given by MP Richard Evans. During this speech, available via historical Hansard records, Evans prefaced his comments as follows: “What I am about to say to the House may be derided and may concern some within the community”. Evans went on: “I am calling for the total eradication of domestic and feral cats from the Australian mainland and offshore islands by the year 2020”. That is, every cat in Australia was to be killed. That Mr Evans prefaced his outlandish, and ultimately impossible, the aim of wholesale killing with such an admission is revealing. It indicated an awareness that such a plan would likely be met with widespread social disapproval. Thus, Evans needed an incentive for Australians to permit such a scorched Earth approach.

It appears as though Evans understood that the broad threat feral cats were allegedly posing to native animals would not be sufficient to attract the required political approval for such an extreme plan. If Evans was to achieve social support for the “total eradication” of all cats across the country, more incentive was needed. An exaggerated and false population estimate was produced to aid in creating the social panic necessary prior to carrying out the killing (Lynn et al. 2019).

Finally, in 2017 the Australian government's estimates were revealed as being inaccurate “by tens of millions” (Saving Pets 2017). According to the Sydney Morning Herald, “government estimates of feral cat populations have been

found to be off by millions". The study cited shaved off millions from the official estimate, making the government's infamous target to eradicate 2 million of the animals by 2020 "even more 'ambitious'" than originally imagined (Aguirre 2019). Ambitious, that is, because the revised figure cites between 2.1 and 6.3 million animals. It would, therefore, potentially kill all cats in a manner that would make Richard Evans proud.

Crucially, it follows that if the officially cited population estimates are false, then so too are the estimates of the native animals killed. Thus, the widely cited "75 million native animals" figure is open to debate. Complicating the matter further, the estimate which debunked the official figure is tied to researchers professionally associated with the fear-mongering described above. That is, the AWC "matches" contributions to the Threatened Species Recovery Hub, which is supported by Federal funding (Threatened Species Recovery Hub n.d.). The AWC's founder, Mr Atticus Fleming, has been credited with spearheading the unverifiable "75 million native animals" figure". Alarming, Mr Fleming was also a leading proponent of the 2-million 1080-laced meat baits dropped in areas impacted by the 2019-20 bushfires (Coalition of Australians Against 1080 Poison 2020).

For more information on this important component of the issue, we strongly suggest that the Committee consult the information painstakingly compiled by Saving Pets via: www.savingpets.com.au.



SECTION 2

*I need a short name for what is lacking: I call it the ecological conscience.
Ecology is the science of communities, and the ecological conscience is
therefore the ethics of community life*

Aldo Leopold, 'The ecological conscience' (1947).

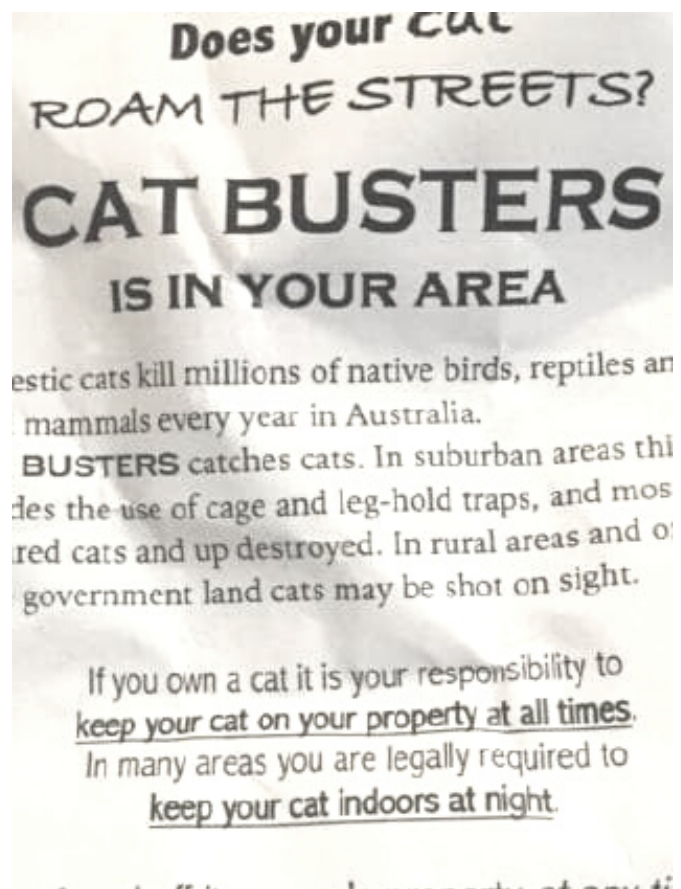
CASE STUDY 3

DECLARATION AS A "PEST" SPECIES AND WELFARE IMPLICATIONS

In 2018, the Victorian Department of Environment, Land, Water and Planning declared “the feral or wild population of the cat” in that State an “established pest animal” under its Catchment and Land Protection Act.

Community consultation undertaken by the Department found that a majority of respondents supported the declaration on the basis that feral cats were perceived to impact biodiversity and threatened species populations. Similarly, a majority indicated that protecting these natural assets were of primary importance in the context of the declaration. They were thus the chief rationale for doing so. Though the declaration was limited to control on Crown land and management programs were limited to Department or associated agency staff, a majority indicated that they would prefer the declaration to extend to all land and that private landholders or licensed hunters should be permitted to kill cats.

Animal welfare was of “particular concern to a clear majority” of respondents: 77% agreed that it was either “quite important” or “very important”. A minority of approximately <10% believed that it was “not that important” or “not at all important”. Critically, the published report outlining the results of the consultation process stressed that such concern “somewhat understate[d] the level of importance” assigned to animal welfare because an undisclosed number of respondents indicated that they were unsure if the question referred to “the welfare of feral cats, native wildlife, or both”. It is unclear whether these variables would have altered the outcome.



Others indicated that they were concerned that “poisons or leg-hold traps would be automatically allowed and used as control methods” in the wake of the declaration. Similarly, the report indicated that “many respondents were specifically concerned about cruelty to cats”. Several respondents

were noted as raising concerns that the declaration “could ‘endorse’ or provide legitimacy for cruelty to cats, whether domestic, stray or semi-owned or feral”. Though the Department did not provide specific data on this variable, this nevertheless indicates a degree of public understanding of the welfare implications inherently involved in the declaration of an animal as a member of a pest species. Similarly, there were indications that “enabling feral cats to be killed would lead to a perception that the lives of domestic cats were not valued”.

SOLVING THE PROBLEM

WHY KILLING IS SHORT-SIGHTED, INEFFECTIVE & COUNTERPRODUCTIVE

This submission has so far shown that there are documented instances in which **killing for conservation** is often embroiled in intractable controversies and complications beyond the immediate issues that they appear to refer or relate to. Often, it involves the demonisation or vilification of a target species (Chew and Carroll 2011; Kirschner 2013; McCrow-Young et al. 2015). Consider, for instance, the case study provided on pages 10-11 of this submission (i.e., the 2007 “felony cat murder” case and the 2016 South Australian example). Such crimes may not have been possible were it not for the political climate in which they occurred. That is, without the accompanying **demonisation** of **feral** cats, could these individual cats have been killed?

Would, if they were, the accused have escaped punishment under animal protection legislation? It is difficult to conceive of the social conditions required to reach this conclusion in the absence of **vilification**. As such, we believe that these examples suggest the presence of a deeper problem that goes far beyond simply their immediate appearance as examples of killing one animal to protect another from incurring potential harm. They suggest the existence of a far more complex and profound dispute concerning the assumptions at the root of this inquiry.

If there has been, as some have persuasively suggested, a general turn in the environmental sciences and ecological conservation circles that has become increasingly focused on waging both a rhetorical and a literal war on **problem** animals, the cases cited above are examples of its guerrilla attacks (Larson 2005; Hettinger 2010; Humphreys and Smith 2011; Nay and Brunson 2013; Duffy 2014; Lidström et al. 2015; Wilson et al. 2017). This is particularly true of **non-native**, **invasive** or **feral** animals (Fortwangler 2013). Indeed, the terms are often applied interchangeably (Colautti and MacIsaac 2004). Guided by studies borne of supportive academic subfields – notably **invasion biology** – and Government-approved rhetoric with dubious footing in sound science, outlandish attempts to stave off the alleged impacts of such animals have become increasingly commonplace (Johnson 2010; Subramaniam 2014; Verbrugge et al. 2016; Bunyak 2019).

We believe that it is the strategic dissemination of weaponised metaphors and terms frequently used to refer to **invasive** or **feral** animals, both of which are liberally adopted in referring to free-living cats, which ultimately enable potentially misleading ideas to be easily ingested and generally understood by the broader public (Subramaniam 2001; Chew and Laubichler 2003). Thus, it is an inherently political activity. For example, it has long been recognised that “those who control political language also control policy outcomes” (Healy and Williams 2017). As such, rhetoric is employed as a proxy and political discourse is itself increasingly being seen and understood as a theatre of conflict in which one will either win, lose or acquiesce (Flusberg et al. 2018). In the present circumstance, such a discursive battle is either won or lost. It appears that the intention is to create the conditions in which the Australian can acquiesce their innate resistance to causing or condoning unnecessary acts of **animal suffering** or **cruelty**. This is achieved by presenting the alleged victims in this context (i.e., **native** wildlife) as besieged by foreign aggressors (i.e., **non-native** or **feral** cats) (McCrow-Young et al. 2015; Bunyak 2019).

Identifying solutions

Waging war

Win the battle, win the war

SOLVING THE PROBLEM

WHY KILLING IS SHORT-SIGHTED, INEFFECTIVE & COUNTERPRODUCTIVE

Such framing is powerful. Authorities activate certain concepts to establish the belief in “a shared frame of reference” in order to trigger congruent values and subsequently, to impose a desired perspective and outcome (Arluke and Sanders 1996). Such “a shared frame of reference” may be the belief that feral cats are problems which require the imposition of solutions, perhaps “by any means necessary” (Lynn et al. 2019). Studies have consistently shown that this is a relatively simple task, especially given contemporary Western society’s general separation from most meaningful interactions with other animals (Baker 2001). It is significantly more so for those animals regarded as threats to other, more valued species.

Alarming, rhetoric has become a recognised tactic used by international agencies ostensibly in existence to guide worldwide conservation efforts (Tye 2018). There is no reason to believe that the Australian context is different. In fact, there is sufficient evidence to the contrary.

Australian policy makers have long applied incentives and sanctions to “encourage or coerce” individuals to contribute to **feral animal control** or **management** programs (Graham et al. 2018). For instance, the precursor to the Centre for Invasive Species Solutions (CISS) published a guide on “behaviourally effective communications for **invasive** animals management”. The guide operated on the premise that though the Centre had successfully developed “an impressive set of technologies and recommended best practices”, these would ultimately be unsuccessful “unless the public is sufficiently motivated and empowered to change behaviours and adopt new approaches”. Specifically, the guide advised its readers to “tailor and target messages to specific audience segments” or, if this was not possible, to “construct non-tailored messages that appeal to commonalities across segments”. Similarly, it suggested the selection of “message frames” that “match your audience” and emphasise “local and immediate consequences”. It underscored the importance of “emphasising themes like community, helping and cooperation” (Hine et al. 2015). The advice appears to have been adopted. Parks Victoria’s Chief Conservation Scientist, for example, has framed the alleged impacts of **feral** or **invasive** animals in its jurisdiction as a “shared problem” that necessitates “shared solutions” (Norman n.d.). Western Australia, meanwhile, maintains a minimum **1000** poison baiting standard to which all landholders are expected to abide by (Department of Agriculture and Food 2016).

Activating useful values

Selling the solution

SOLVING THE PROBLEM

WHY KILLING IS SHORT-SIGHTED, INEFFECTIVE & COUNTERPRODUCTIVE

It is difficult to infer anything positive about “invasions” or its agents (Ritvo 2017). Indeed, such framing has become an important tool in the ongoing “war on **invasive** species”, in which such language has been particularly pronounced concerning the **control** of cats (Larson 2005; Larson 2008; Druschke and McGreavy 2016; Marra and Santella 2016). The adoption of the same terms by media sources further complicates an objective or nuanced account of the problem. Such representations have been shown to play critical roles in the manner by which society comes to understand and act upon phenomena (Thomas and Vermilya 2019). There is anecdotal evidence that spates of apparently cat-killings-cum-vigilantism coincide with media reports on the merits of government action against “feral” cats (Animal Liberation 2019). Bunyak 2019).

Activating hate

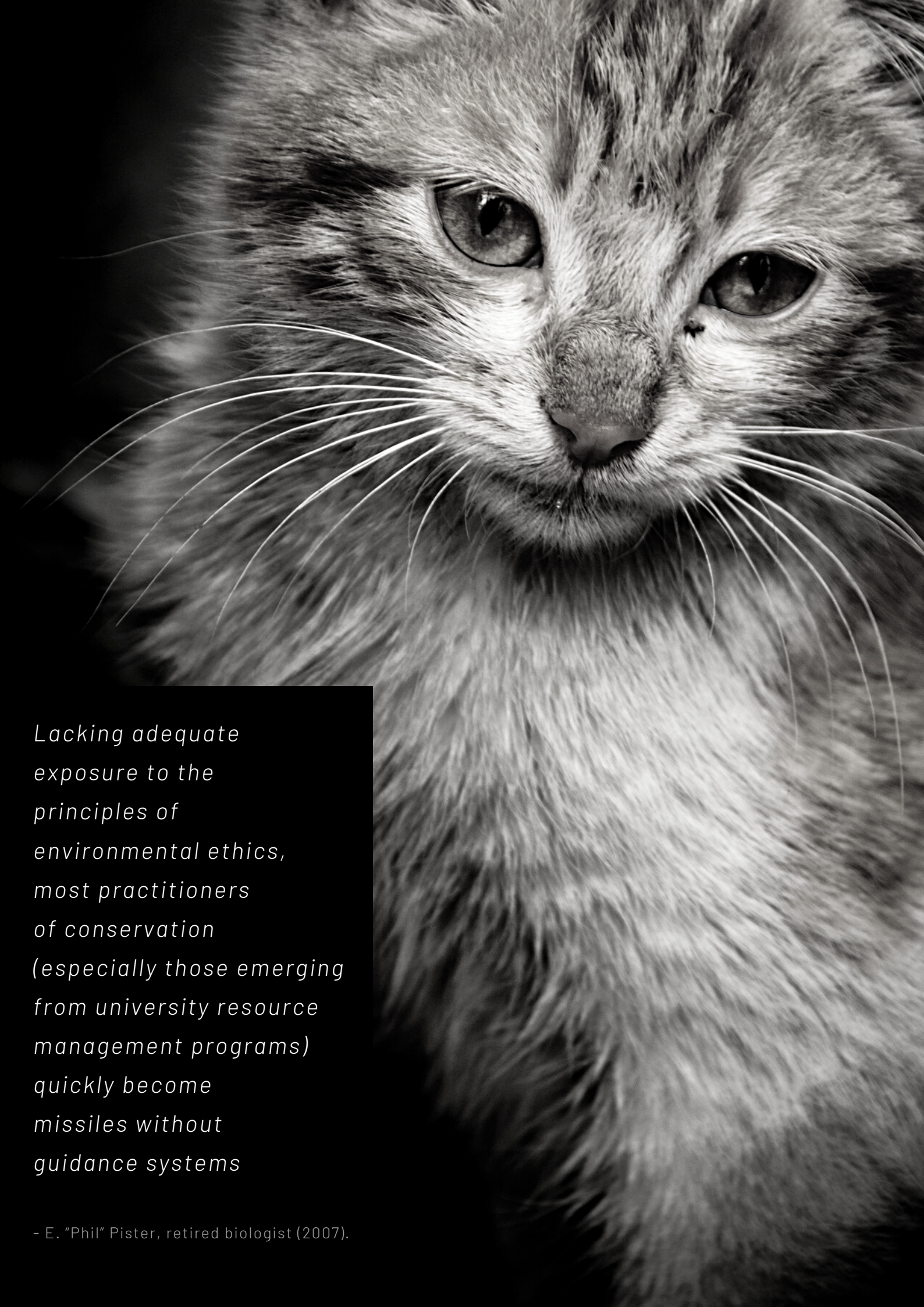
As a principle, conservation is quite clearly a valuable and increasingly important goal of environmental protection efforts (Devall and Sessions 1985). This submission does not necessarily seek to challenge this account. The evidence of its importance is strong and it is quite clear that *proactive*, rather than *reactive*, changes must be prioritised and urgently implemented. We do, however, intend to confront and challenge the validity, efficacy and acceptability of “ **killing for conservation** ” campaigns, particularly as it applies to attempts to **control** or **manage** the alleged impacts of cats across Australia (van Dooren 2011). Similarly, we consider the methods and practices currently used to be invariably reactive and inappropriate. Such an opinion is acknowledged by lobby groups led by the Invasive Species Council (ISC) who have previously stated that “spending is often reactive” (2015). This is especially true insofar as there is little serious expectation that lethal interventions will achieve the complete **eradication** of a “problem” species (Bomford and O’Brien 1995). The only successful instances where complete **eradication** has been achieved are programs carried out in relatively insulated ecosystems, such as islands, and often require the use of multiple and ongoing techniques (Orueta and Ramos 2001; Simberloff 2002; Denny and Dickman 2010; Medina et al. 2011; Nogales et al. 2013; Russell et al. 2015; Taggart et al. 2019). The general impossibility of outright **eradication** is acknowledged by Australian governmental reports (Low 2008).

Reactive answers

Control and **management** programs, then, are only temporary solutions. We do not believe that the Australian public are adequately aware of this. The ineffectiveness and counterproductivity of traditional **control** techniques are likely to lose further efficacy over time (Kinnear et al. 2016).

Indeed, “removing whole populations of **invasive** species is unlikely to prove as viable and defensible as it has in the past” (Frawley and McCalman 2014). Similarly, the techniques and methods undertaken are increasingly recognised by experts as “no longer viable” and are “flawed over the long term” (Kinnear et al. 2016). As such, broader community tolerance of patently ineffective lethal **control** operations is expected to diminish without significantly greater motivations. Such motivations may take the form of exaggerated population numbers (see [Case Study Two](#) on pages 16-18 of this submission). . The consequences of secondary impacts or “surprise effects” can be significant and threaten the proper functioning of an ecosystem (Courchamp et al. 2011). That is, control can compromise the biodiversity it is ostensibly conducted to protect. We believe that without significant structural change, these problems will amplify in the future.

Future problems



Lacking adequate exposure to the principles of environmental ethics, most practitioners of conservation (especially those emerging from university resource management programs) quickly become missiles without guidance systems

- E. "Phil" Pister, retired biologist (2007).

FOLLOW THE MONEY

IF YOU'RE NOT OUTRAGED, YOU'RE NOT PAYING ATTENTION

FINAL TWEET FROM HEATHER HEYER, ACTIVIST KILLING
DURING THE AUGUST 2017 CHARLOTTESVILLE PROTESTS

If **control** or **management** programs is conducted in the absence of sufficient knowledge, data and evidence it can be ineffective and wasteful of funding (Warburton and Norton 2009). According to the Invasive Species Council (ISC), a not-for-profit charity which solicits donations from the public, though “the public may expect” that “the worst **pests**” are those selected and **targeted** with **control** or **management** programs, in reality such programs focus instead on “new and emerging **pests**” because these are considered to “deliver the best returns on investment” (Invasive Species Council n.d.; Invasive Species Council et al. 2015). This means that operations may not necessarily be implemented to **control** or **manage** the species that the Australian public presumes that they are implemented for. Assessments of Australian attitudes to control programs have found that an “overwhelming majority” identify cats, along with rabbits, foxes and “wild dogs”, as “**pest** species” whose “**eradication**” is considered to be “the most desirable” outcome (Johnston and Marks 1997).

Information about the costs of **control** programs has been cited as among “the most fundamental of questions” concerning their practice, research and monitoring of their efficacy. Yet, it is a line of questioning that “hardly appears to have been answered” (Hone 1996). This is particularly true of Australia. Indeed, *there are currently no publicly accessible databases, reports or even estimates tabulating the per annum expenditure of such programs across the country*. State authorities have recently acknowledged that “there is no information about how much Australia spends on abatement (from government and non-government sources), nor how much is needed to properly implement abatement plans” (emphasis added) (National Parks Association of the ACT 2018). Particularly concerning is the admission that while there is “no information” about funds spent on such programs, there is also “no information” about “how much is needed”. That is, the figure that is actually spent could well be either far more or far less than what is required to achieve stated goals.

This is patently unacceptable and must be urgently investigated.

It is of vital importance that this be considered by the present inquiry. There are substantial vagaries or absences in estimates of per annum spending. As such, only those projects explicitly mentioned in private, State, Territory, agency or Federal reports can be tabulated. These, however, are contained in files or documents whose title bears no indication that such data is enclosed. An example of a funding stream is included in the following Case Study. For example, Government-sponsored estimates suggest that the cost of **control** or **management** programs “exceed \$60 million per year”, while research and development (R&D) studies into techniques is estimated to cost over a further \$20 million per year (McLeod 2004). The McLeod paper is the sole study we are aware of concerning expenditure on such programs published by the predecessor of the Centre for Invasive Species Solutions (ISS). It is over 15 years old.

FOLLOW THE MONEY

IF YOU'RE NOT OUTRAGED, YOU'RE NOT PAYING ATTENTION

The first independent and holistic quantification of Federal grants found that between 1996 and 2013 an estimated \$726 million was spent on management and research. However, by 01-02, total expenditure was \$2.3 billion. By 11-12, that figure had leapt again, up to close to \$4 billion. These substantial increases equal between \$123 and \$197 per person per year, respectively. Yet these figures were considered “most likely to be *underestimates* of the real values due to the significant constraints of the data obtainable” (Hoffman and Broadhurst 2016). That is, *close to \$4 billion per annum is spent on activities for which there is no mechanism to appraise their efficiency, effectiveness or, indeed, the true scale of the funding received.* A cursory assessment of the fiscal balance applicable to the latter financial year (11-12) reveals that federal funding of **feral animal control**, **management** and research accounts for 17% of the total deficit (Commonwealth of Australia 2013).

Activating useful values

Independent estimates for one financial year alone, however, consider the full figure to be much higher: as high as over \$3.5 billion (Hoffmann and Broadhurst 2016). There is every reason to believe that this figure increases each year, particularly if it accounts for both public and private programs, community and emergency funding. Concerning the latter, consider the 2019-20 bushfires (right). In the aftermath of the fires, the Federal Government announced a wildlife and habitat recovery package of \$50 million, a proportion of which (up to \$7 million), would be allotted to trapping, baiting and shooting feral animals. Yet in the face of the NSW Government’s “largest **feral animal control** program ever undertaken”, lobbyists complained that they needed more (Schwartz 2020). It is vital to emphasise that such significant funding is “extra” to that which had already been allocated and awarded to agencies or groups undertaking **control** or **management** programs.

Programs led by groups such as the Centre for Invasive Species Solutions (CISS), previously operating under the Invasive Species Animal Cooperative Research Centre, regularly receive “direct and in-kind funding” from Federal and State governments to the tune of millions of dollars per project (National Parks Association of the ACT 2018). In September 2018, Minister for Agriculture David Littleproud announced that the Coalition Government would contribute \$20 million to “help fund the projects” carried out by CISS to “continue the fight against **invasive pests**” (O’Keeffe 2018). In May of 2017, Mr. Littleproud’s predecessor, Deputy Prime Minister and Agriculture and Water Resources minister, Barnaby Joyce, announced a \$1 billion Landcare package, \$20 million of which would be used to create CISS (Connery 2017).



The NSW Government’s Bushfire Recovery Response document (above) contains the insert (left) showing a National Parks and Wildlife Service (NPWS) officer erecting a **1080** poison baiting sign. The Response indicates that “up to 1 million **1080** poison [baits] will be dropped over 60,000 kilometres

FOLLOW THE MONEY

IF YOU'RE NOT OUTRAGED, YOU'RE NOT PAYING ATTENTION

FINAL TWEET FROM HEATHER HEYER, ACTIVIST KILLING
DURING THE AUGUST 2017 CHARLOTTESVILLE PROTESTS



Public and private landowners also allocate “substantial resources” to **control** or **management** programs (National Land and Water Resources Audit and Invasive Animals Cooperative Research Centre 2008). The

NSW Department of Industry - Lands and Water is the agency responsible for the facilitation of land and natural resources in that state. It “develops, funds and implements **invasive** species management strategies” and “supports activities undertaken by community groups and other stakeholders”, including Community Trusts and Councils in their corresponding Local Government Area (LGA). The New South Wales 2018-2021 Invasive Species Plan was developed by the NSW Department of Primary Industries (DPI) with input from others, including Local Land Services (LLS), the NSW Office of Environment and Heritage (OEH) and the NSW Farmers Association (NFA). It does not disclose the amount of funding provided for these projects (NSW Government Department of Primary Industries 2018).

Over time, State-led agencies such as these have thus fostered ambiguity on economic outlays. It is difficult to find another complex of interests that have developed such a degree of secrecy on this scale. State audits have expressed concern about this state of affairs. The Victorian Auditor-General, for example, explained that Victorian Parks had decreased “recurrent funding” in favour of “short-term initiative funding”. Yet in so doing, the report goes on to explain that the manner by which it “allocates resources” such as these is, in fact, “complicated, lacks transparency and is not well understood by staff in parks” (Victorian Auditor-General 2010).

Meanwhile, lobby groups led by the Invasive Species Council (ISC) maintain that “any government that underspends [on “**pest control**”] is merely creating a greater cost for the future” (2015). The same organisation has previously complained that “current expenditure on **invasive** species **management** is far from sufficient”, despite admitting in the same sentence that “some of it [expenditure] is poorly directed” (Invasive Species Council 2011). Such a significant lack of publicly available information is inconsistent with the espoused ethos of these organisations, who often claim that **control** and **management** is a “shared responsibility” that should be shouldered by all Australians. This conveniently activates key Australian values, such as “mateship” and pride of our unique ecology (Woinarski et al. 2007; Dyrenfurth 2015).

WHY CURRENT CONTROL IS FAILING ALL ANIMALS

There is significant yet often overlooked evidence that the presence of some species in an ecosystem play a “disproportionately large [and] important role” in its regulation (Hale and Koprowski 2018). This is particularly so for keystone, apex or **meso-predator** species (Glen and Dickman 2014a). Globally, many of these are the same species that have historically been heavily persecuted and subsequently extirpated from their original ranges (Prugh et al. 2009). Their loss can cause or otherwise kickstart subsequent declines and “trigger a cascade of secondary extinctions”, especially if their resources (prey species) are also diminished (Eklöf and Ebenman 2006). Yet, such ecologically important species have historically borne the brunt of fever-pitch accusations as being responsible for some local or even global extinctions of highly valued **native** animals or attacks and subsequent financial losses on commercial agricultural enterprises. Many of the impacts posed by such species are cumulative and increasingly compounded by their integration with other new or emerging threats (Evans et al. 2011; Boivin et al. 2016; Doherty et al. 2016a). Other important anthropogenic disruptions include the lethal control of apex or **meso-predators** and the population vacuum that such dramatic losses and altered population dynamics cause. Declines in apex predator populations have been shown to cause “dramatic increases” of smaller predator populations and the correlated collapse of their prey populations (Nishijima et al. 2014). Such changes influence the proper functioning of an ecosystem. at the root of this inquiry.

Throughout human history, unwanted or unwelcome wildlife have been the subject of lethal intervention. As far back as the reign of Henry VII, laws and orders were made imposing the putting **pests** to death (Lovegrove 2007). This is mirrored in contemporary “minimum [1080 poison] baiting” requirements (Dahlstrom 2020). Thus, we have a long social history of attempting to perfect the practice of **killing for conservation**. In so trying, our species has taken the lives of billions of wild animals (Marris 2017). The number killed each year in Australia is unknown. No attempts to record the scale is made by authorities (Thiriet 2007). **Demonisation** has been an important component of this (Chew and Carroll 2011). In Australia, **animal welfare** has never been a primary concern of conservation legislation (White 2013). Many of these animals are killed using techniques that would be illegal on any other. Discussions of **animal cruelty**, however, rarely enter the discourse of **feral animal control**. At best, guidelines concerning the minimisation of suffering is provided. These are often in the form of Codes of Practice (COPs) or Standard Operating Procedures (SOPs), both of which may override State and Territory **animal cruelty** legislation provisions (Thiriet 2007). As such, **feral** animals - including cats - are increasingly beyond the remit of the law. It is only when an individual animal with a tie to a human, most often in the form of companionship, that the arguments underpinning **killing for conservation** begin to break down (consider the example provided in [Case Study One](#) on pages 10-11 of this submission).

CONCLUSION & RECOMMENDATIONS

ONE We do not believe that the Terms of Reference provided have been crafted in a manner in which it is possible for the Committee to obtain a sufficient amount of information that embraces or elicits advice regarding some of the most significant and structural concerns increasingly apparent in this area of conservation. For example, the Terms invite correspondence concerning the efficacy, cost-effectiveness and application of current and emerging methods and tools for the control of feral cats. Discussion of the (in-)efficacy of these practices, however, is severely limited by the caveat that the commentary sought specifically concerns *reducing the (alleged) impact of cats*. That is, it does not invite or welcome commentary on the nature, the efficacy or the appropriateness of those techniques. In so doing, it unacceptably limits the information the Committee will be provided with.

TWO Though reports as early as 1993 suggested that the Australian Government had flirted with funding the research and development (R&D) of humane alternatives to lethal control techniques, such as R&D into non-invasive contraceptive technologies, this has yet to come to any appreciable fruition (Bomford and O'Brien 1993). Similarly, the Government and its auxiliary agencies or departments have acknowledged that novel methods or "control methods of the future" will take time to develop and will require the fostering of specialist skillsets. It has also acknowledged that "it is important that research, development and extension activities, and associated funding arrangements are maintained with a long-term focus" (Invasive Plants and Animals Committee 2016). This is vital, especially considering the recognition expressed by experts that current techniques are ineffective and, in some cases, counterproductive to the stated goals of control or management operations (Bekoff and Ramp 2014; Kinnear et al. 2017). Despite this, there is little indication that such alternative methods are actively provided with the funding required to initiate their application, even at a theoretical level. Indeed, it has been shown in the present submission that the funding apparatus is as opaque as public knowledge of the techniques used to control or manage unwanted wildlife (Ramp and Bekoff 2015).

THREE Current environmental legislation favours historical conditions characterised by "the presence of particular species assemblages and habitat types" (Pettorelli et al. 2018). The presence of introduced species is therefore taken as an affront to the purity of the ecosystem. If environmental and animal protection law is to continue being implemented and overseen by State and Territory governments and their agencies, these must be guided by an ethos that seeks to minimise or remove unnecessary harm. Such harm may take the form of direct impacts upon animals or the environment. It may take the form of indirect harm insofar as efforts to control or manage unwanted wildlife pose potential threats to the very species it intends to protect. Thus, we promote an approach which follows and is informed by a core principle of "first, do no harm". Rather than being a fanciful objective guided solely by an emotive or ethical opinion, we believe that this submission contains a range of rationales that provide alternatives to the status quo treatment of unwanted or unwelcome wildlife widely regarded as problems. We accept that this does, nevertheless, require a dramatic reconfiguration of current approaches to wildlife (e-)valuation. It requires, first and foremost, a deeper understanding of species interactions and trophic networks.

FOUR Finally, we strongly believe that the result of control or management is unnecessary and unacceptable animal suffering and cruelty (Bekoff and Ramp 2014). Thus, Animal Liberation supports compassionate conservation and trophic rewilding as guiding principles informing future non-lethal restoration strategies (Ramp and Bekoff 2015; Svenning et al. 2016). We advise the Committee to consult the international consensus principles for ethical wildlife control co-authored by the Chief Science and Strategy Officer of the Australian RSPCA (Dubois et al. 2017). These principles are provided in the Appendices of this submission.



APPENDICES

The present day vertebrate pest controller [is] very handicapped! He [sic] has no Pied Piper to blow his pipes nor bishop to excommunicate pesky wildlife. Further, he [sic] is faced with an urban majority whose concept of wildlife is rooted in the belief that Bambi lives

William Fitzwater, 'Mythology of vertebrate pest control' (1990)

APPENDIX 1

A BASIC SCHEMATIC OF CAT CATEGORIES



INDOOR	INDOOR/OUTDOOR	STRAY	FERAL
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FEEDING	Controlled	Some Control	Uncontrolled	Uncontrolled
REPRODUCTION	Controlled	Some Control	Uncontrolled	Uncontrolled
MOVEMENT	Controlled	Some Control	Uncontrolled	Uncontrolled

CONTROLLED	SOME CONTROL	UNCONTROLLED
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Terms stylised in **bold** indicate inclusion elsewhere in the Glossary

Animal cruelty Animal cruelty has traditionally been adopted by **animal welfare** legislation and defined as the wilful infliction of *unnecessary harm*. Such a term is used to limit the circumstances in which a person can legally cause harm to animals (RSPCA Australia 2012). According to RSPCA Australia, this prohibition has been "interpreted too narrowly by the courts in a manner which diverges from the intended statutory objective of protecting **animal welfare**" and the inclusion of other terms, such as *unjustifiable* or *unreasonable* are "largely superfluous" in such laws (RSPCA Australia 2012; RSPCA Australia 2019). In some States, the definition includes a series of specific behaviours, such as wounding, mutilating, tormenting or terrifying an animal (Cooke 2011).

Animal rights At its core, animal rights is the belief that all animals are equal regardless of species. As such, it supports the complete abolition of exploitative or harmful activities or behaviours towards all other animals (Glasgow 2008). Speciesism is a key tenet of the animal rights theory (Singer 1975; Ryder 1989). Some have since argued that traditional animal rights theory is insufficient, particularly as it relates to **species discrimination** (Abbate and Fischer 2019). For instance, traditional animal rights theory does not contain provisions concerning cases where species membership is a relevant variable, outside those most often harmed in agricultural practices or medical experimentation (vivisection). This is particularly so in wildlife **control** or **management** contexts in which an individual's membership of a species may explain their alleged threat to others.

Animal suffering As early as the seventeenth century, the idea that engaging in the wilful harming animals, thereby causing them *unnecessary suffering*, was connected with a negative impact on the person or persons inflicting it (Arluke 2006). Historically, *animal suffering* has been primarily associated with the consumption of their body parts and the **cruelty** that such industries are dependent upon (Gruen and Jones 2015). While it is true that it is largely impossible to exist without causing others to suffer in some manner or to some degree (i.e., the harvesting of grains consumed by an ethical vegan may have caused the death of small rodents), causing the least possible harm is an achievable goal.

Animal welfare

Animal welfare is generally defined as the health, happiness and the physical and psychological wellbeing of an individual or a group of individuals. It has historically been defined as the degree to which an animal is coping in an environment (Broom 1986). Though it is predominately applied to farmed animals, it is being increasingly recognised as a necessary concept in all human-animal interaction or conflict (Harrop 1997; Jones 2003). The scientific understanding of welfare originated in the early to mid-1990s in behavioural, nutritional, physiological and veterinary departments (Mellor et al. 2009). Since, it has attracted increasing worldwide interest (Phillips 2009). It may refer to a procedure or conscious, concentrated effort to promote positive outcomes, which can in turn be assessed along a continuum ranging from “good” to “poor” (Carenzi and Verga 2009). It may also refer to a regulatory policy ostensibly crafted to promote and provide for the fundamental physical, physiological and psychological wellbeing of an animal or a group of animals. It is simultaneously theoretical and practical.

Companion / domestic

According to the definition given in the Threat Abatement Plan (TAP) and the AVAs policy on cat management, a domestic or companion cat are those who are “owned by an individual, a household, a business or corporation” and have “most of their needs” met by these (AVA 2016).

Control

Control generally refers to actions taken to eliminate or diminish a target species population (see **target species** below). It is primarily achieved via lethal techniques, such as **1080** poison baiting. Many of these techniques have exhibited significant reductions in efficacy over time, for example through bait-resistance. Studies are increasingly indicating that lethal control programs are ineffective, often cruel, and counterproductive (Kinnear et al. 2016).

Ecocide

Ecocide is a term that refers to actions “undertaken with the intention of disrupting or destroying, in whole or in part, a human ecosystem”. It includes the use of chemicals (Broszimmer 2002). Some have suggested adding ecocide to the list of international crimes (Gray 1996).

Eradication

Eradication refers to the intensive, time-limited process designed to entirely remove a **target species** from an ecosystem or area. *Eradication* is only considered complete when the rate of population removal exceeds the rate of its increase, immigration is zero and all reproductive animals are considered at risk. Though it is often viewed as “an attractive alternative to continuing control” it is rarely, if ever, achieved (Bomford and O’Brien 1995). Thus, it is considered to be neither feasible nor cost-effective for most species and situations.

Feral

According to the definition given in the Threat Abatement Plan (TAP) and the AVAs policy on cat management, a **feral** cat is one who lives and reproduces in the wild, survives through hunting or scavenging and has “none of their needs [...] satisfied intentionally by humans” (AVA 2016). Others have defined a **feral** animal as those who have “escaped from domestication and become wild”, though this is somewhat similar to definitions given of stray (Witmer et al. 2005). *Feralisation* or *de-domestication* are terms used to describe “the reverse process of domestication” and only occur in assemblies of animals (Décorey 2019).

Humane / inhumane The principle of humane treatment is well established. It has become increasingly influential. Its primary principle is the minimisation of pain and **animal suffering**, particularly pain inflicted for human purposes (Giroux and Saucier-Bouffard 2018). It is a subjective term (Dagg 2008). The notion that "a fully human being is a humane being, feeling compassion for the suffering of others" is key (Cafaro 2013).

Introduced species Introduced species is a relatively neutral term used to describe species found outside their natural range (Shine 2007). The orthodox view argues for their euphemistic removal or **control**. Others have convincingly argued that such animals "should not be identified as damaging species, species introduced by humans or species originating from some other geographical location". Indeed, some become naturalised as **native** over time (Hettinger 2001).

Invasion biology Invasion biology, also referred to as invasion ecology, formally began as an academic discipline in the late 1950s (Reichard and White 2003; Davis 2011). It developed out of a variety of other subjects, including agriculture, forestry, entomology, zoology, botany and pathology (Davis 2006). It has since been critiqued as a "psuedoscience" often unsupported by empirical evidence (Calver 2004; Warren et al. 2017; Sagoff 2019). A key problem is a distinct lack of cohesion in definitional concepts, including the concept of **invasive** species itself, leading researchers to conclude that "only a fraction" of species labelled as such could be so classified "according to a unified framework" (Pereyra 2016). As critics have stated, concern with the discipline is "not a merely semantic issue because **invasive** a strong and value-laden term that is used to guide environmental agendas" (Pereyra 2016).

Invasive species Biologically, invasive species are those that establish beyond their natural range (Ricciardi 2013). While **native** species may also become "invasive" insofar as they are transferred outside their natural range, these often encounter controversy that **non-native** species do not; consider, for example, the killing of kangaroos or brumbies. Species labelled with these terms may also be considered an aesthetic atrocity or, simply, a nuisance.

Management Management is a broad term used to describe a range of techniques implemented in order to improve ecological or commercial outcomes, such as **native** species reintroduction or greater protection of livestock operations. It often refers to lethal **control** measure, such as baiting with sodium (mono-)fluoroacetate or **1080** poison.

Meso-predator(s) and mesopredator release Meso-predators are those species who are smaller than apex predators. They are middle-rank predators existing between apex predators and lower order potential predators. Meso-predator release refers to the process following the loss of apex predators. In Australia, meso-predators include cats and foxes. Meso-predator release may lead to local extinctions of prey species, such as native Australian mammals.

Native(s)

Native is a controversial term that has a long history. The core sense of the term refers to those “born to the land”. While the term became associated with colonialism and pejorative beliefs about a native human population, **invasion biology** has reversed this epithet (Ashcroft et al. 2000). In a manner congruent with the core values of **animal rights**, Animal Liberation believes that all animals must be treated equally regardless of genetic postcode.

Non-target species

Non-target species are those that are not intended for **control** or **management**, particularly those that are unintentionally killed during control programs or operations. These species may be **domestic** animals, such as companion dogs, or **native** species, particularly carnivorous marsupials and birds of prey.

Pest species

Species that conflict with human interests are often labelled pests. They are often regarded as causing more harm than good, usually to a valued resource. They may be considered “destructive, a nuisance, smelly, noisy, out of place or simply not wanted” and are often associated with significant costs to agricultural operations or biodiversity damage, particularly in terms of threats to **native** wildlife (Braysher 1993; Olsen 1998).

Sodium (mono-)fluoroacetate (1080 poison)

Sodium (mono-)fluoroacetate, more commonly referred to as “1080”, is a compound used to kill unwanted or unwelcome wildlife (i.e., **target** animals considered to be **pest** species, **non-native** or **invasive**). It does not occur naturally and can only be produced synthetically. A similar compound, potassium fluoroacetate, is found in a limited range of flora species as an anti-herbivore metabolite. It is **inhumane** and causes significant **animal suffering** (Sherley 2007).

Species discrimination

Species discrimination refers to the process wherein distinctions are drawn among species on the basis of a trait they either possess or lack. It is an extension of the concept of “wrongful discrimination” in which “the classification of any species as **invasive** constitutes wrongful discrimination” (Hellman 2008; Abbate and Fischer 2019). It is a recent development that extends beyond the concept of **speciesism** initially expounded by Singer and the ethics or principles of the traditional **animal rights** movement. Though it allows for permissible discrimination in certain circumstances, it is particularly concerned with “decisions about who lives and who dies” as a result of wrongful species discrimination (Abbate and Fischer 2019).

Speciesism

Speciesism is a term initially coined by Richard Ryder in 1970 and has since been adopted by the **animal rights** movement. It refers to discrimination on the basis of species alone and describes the belief that humans are entitled to treat other animals in a manner that would be unacceptable to our own species (Ryder 1989; Singer 1996). Though Singer critiqued the term, believing that attempts to improve conditions for animals are “based on quite conventional ways of thinking about the status of animals,” Singer has been the most prominent academic associated with the **animal rights** movement and speciesism (Grant 2006; Franklin 2005).

Target species

Target species are those who are the objective victims of **control** or **management** operations. The term implies the existence of **non-target** animals, or those who are killed in the course of such an operation. Such animals are routinely regarded as collateral damage.

Unwanted or unwelcome wildlife

An example of neutral terminology adopted to refer to **introduced** species perceived to be a threat to agricultural operations or native Australian fauna (agri-ecosystems). This choice reframes the definition provided by Olsen (1998) that “**pest**” animals may be “destructive, a nuisance, smelly, noisy, out of place or *simply not wanted*” (emphasis added).

7 PRINCIPLES OF ETHICAL WILDLIFE MANAGEMENT

- ONE** Where practical, modify human practices
- TWO** Provide evidence-based and scientific justification(s)
- THREE** Set clear and achievable outcomes and objectives
- FOUR** Cause the least harm possible
- FIVE** Consider community values
- SIX** Provide long-term solutions, not temporary and reactive answers
- SEVEN** Be informed by specific data about specific situations

Dubois et al. (2017)

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