

APP202879 - PredaStop for feral cats

Submission Reference no: 95

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Submitter Type: Not specified

Source: Web Form

Overall Notes:

Clause

What is your position on the application

Position

I oppose the application

Notes

SEE ATTACHED

Clause

All submissions are taken into account by the decision makers. In addition, please indicate whether or not you also wish to speak at a hearing if one is held.

Position

No I do not wish to speak about my submission at the hearing

Notes

SEE ATTACHED

**EPA SUBMISSION
APPLICATION APP202879
PredaSTOP ON BEHALF OF CONNOVATION LTD**

**PRESENTED BY ROBERT (BOB) JAMES KERRIDGE
ANIMAL WELFARIST
AS A PRIVATE SUBMISSION, ALSO ON BEHALF OF
THE COMMUNITY CAT COALITION INCORPORATED.
REFERENCE # 95**

1.0 BACKGROUND

Connovation Ltd have applied to the Environmental Protection Authority in respect of its product PredaSTOP, a product marketed by them as a bait to eradicate cats (and stoats). The product contains an active ingredient para-aminopropiophenone (referred to as 'PAPP'), as bait for the intended target animals. Their application seeks to replace the current regulation, which requires them to provide notice of the proposed use of the product to occupiers and owners of land, dwellings or buildings within 3 km of any intended bait station site, to reduce the required notification to 500 m, claiming the cost and difficulties in notifying 'thousands' of occupiers within a 3 km radius as significant.

The writer and the Community Cat Coalition oppose this application on a number of grounds as detailed below:

2.0 TARGETTED ANIMALS

2.1 FERAL CATS – LEGAL DEFINITION AND TERRITORY –

The applicant has advised that the targeted animal is limited to 'feral' cats, and is not intended to include other categories of cats including 'stray' or 'companion cats'. These are the three legally recognised categories of cats (*please refer to the Code of Welfare for Cats as approved by the Minister of Primary Industries - MPI*).

It should be noted that it is an incorrect common practice for people to include stray cats with feral cats when describing 'pests' needing eradication as a convenient means of including a wider range of cats.

'Biologically, feral and stray cat populations are distinct. Feral cat populations have no dependence on humans and they avoid human contact. In contrast stray cats are a sub-set of the companion cat population. They remain dependent on humans to a greater or lesser degree and seek out/do not avoid human habitation' (Dr Dennis Turner).

For this reason, as the target is 'feral' cats alone, who do not live in areas of habitation, it is illogical to seek to reduce the notification area to 500 m which reduces the area to urban and semi-urban, clearly more likely to be areas of human habitation where feral cats are known not to reside.

2.2 THE DANGER TO 'COMPANION' AND 'STRAY' CATS –

The applicant indicates that with the reduction of the notification area down to a 500 m radius is that 'the only risk that would change is the risk to domestic cats, which Connovation considers will remain negligible'. Although the word 'negligible' uses the EPA framework for determining risk it does mean that risk does exist which, from an animal welfare perspective, is unacceptable.

It should be noted that Companion and Stray cats are protected species under the Animal Welfare Act and accordingly those rendering pain and suffering to them run the risk of prosecution. Such action could occur as the result of the slow death (over 2 hours) of these cats following ingestion of PredaSTOP. Additionally there is the traumatic human loss of treasured owned and semi-owned animals to consider, which is not a risk we can morally contemplate taking even if that risk is considered negligible..

The applicant again reiterates that PredaSTOP is 'not intended to be used in areas of habitation due to the potential risk to companion animals. 'Our use of 'feral cat' does not include stray cats and only refers to cats that have no relationship or dependence on humans'.

Accordingly we would recommend that the use of this product be limited only to defined areas where the targeted feral cats exist, and be prohibited from use in areas of human habitation containing companion and stray cats protected under the Animal Welfare Act where prosecution proceedings could result.

2.3 FALSE CLAIMS AS A REASON TO KILL FOR CONSERVATION -

The applicant, in their justification to target feral cats, incorrectly make the sweeping claim that 'feral cats are significant predators of native wildlife', and further compound that claim on sales literature and website reference as follows: 'It is estimated that feral cats kill up to 100 million birds in New Zealand per year many, of which are Native species.

This statement is clearly false and misleading and is quoted as a reason to purchase the applicant's product. Assuming New Zealand has a population of 100 million birds, or more, to suggest that cats are totally responsible for killing that number annually is fanciful to say the least. Not only would we run out of birds but the statement ignores bird's greatest predators namely rats, stoats and possums, (and sadly humans).

Such claims are unfortunately typical in the Conservation area and need to be challenged. However in addition in this case they are used to encourage the purchase of a product and, being clearly false, can be challenged under the Fair Trading Act. Under that Act you cannot 'make false or unsubstantiated claims that have no grounds to back them up'.

As a result it is our recommendation that Connovation Ltd be advised by the Environmental Protection Authority to refrain from using this false and misleading information to avoid the risk of being challenged under the Fair Trading Act.

2.4 POISONING THE NEW ZEALAND ENVIRONMENT –

Although this paragraph does not relate directly to this specific application, I feel this communication accords me the opportunity to express my concerns, on which I feel very deeply, directly to you as the protectors of the environment, and the approval of the use of tools to undertake that task.

Where it is acknowledged that our environment is unique, and indeed worthy of our protection, we have a dismal reputation for the use of weaponry to destroy those things of nature we humans have labelled as being undesirable, often to the great detriment of other things of real value. The extensive use of Sodium Fluoroacetate, (1080), which your organisation monitors, is a classic example that astounds the world, of all that is undesirable as a means of preserving our environment.

'Whatever metaphysical position is adopted and whatever place is given to the human species, man has no right to destroy a species of plant or animal on the pretext that it is useless', wrote Jean Dorst, French Ornithologist. That is not conservation as it should be. Arian Wallach, Fellow Darwin University, put it this way: 'The aim of conservation is not to generate an ever increasing (dead) body count, but to guide human behaviours to enable the rest of the Earth's species to flourish'.

Since the advent of Predator Free New Zealand, the Morgan Foundation, the self-appointed National Cat Management Strategy Group, and others, there has been an alarming growth of antagonism towards cats on the assumption, as expressed by the applicant in these proceedings, that they are 'significant predators of native wildlife', and all based on unsubstantiated 'evidence'. The subsequent call is reflected in the strategic goals and outcomes of the NCMMSG that there be 'no stray and no feral cats in New Zealand' ... in other words they all need to be eliminated.

In this application we are asked to endorse the use of PAPP as a deadly bait for cats which, on moral grounds, I cannot possibly personally accede to.

