

# APP202879 - PredaStop for feral cats

Submission Reference no: 108

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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

The reasons for making my submissions are • I am opposed to the proposal to reduce the notification area for the use of PredaSTOP from three kilometre to only 500 metres. Indeed, the research in the application clearly states that many domestic cats range over areas smaller than five hectares (page 7) which is an area up to approximately 50,000 metres – or approximately 50km!! • 500 metres is a very small area, particularly for cats outside of metropolitan areas, and in my view, there are significant risks presented by this proposal to people’s pet cats – not to mention danger and harm to other animals and humans (especially given that the warnings associated with this product including: fatal if swallowed, causes damage to organs; should be kept out of reach of children; dust, fume and vapours should not be breathed and “avoid release to environment”. • Relying on research based solely within the metropolitan area, such as that set out in the application ignores the reality that in densely populated areas – such as Wellington and Christchurch – cats have smaller roaming areas than cats in less densely populated areas. Especially in a context where the research quoted fails to identify any author affiliations or conflicts of interest, and one of the main pieces of research relied on is unpublished and therefore the accuracy of summary cannot be tested, and there is no mention of caveats around its findings or methodology limitations). • I grew up in a small town New Zealand, and my cat often roamed over areas of larger than 500 metres. I can safely say that, given the damage that humans have done to the environment, that no cat of mine has ever caught a Kiwi – or in fact any of the birds listed on the Department of Conservation’s list: <https://www.doc.govt.nz/nature/conservation-status/threatened-birds/>. That is because in most places of New Zealand, these birds no longer exist – we human’s have done our best to destroy their habitat and breeding areas. Killing cats is therefore an example of shutting the stable gate after the horse has bolted. • Even many cats within Wellington and Christchurch have larger roaming areas – my neighbour’s cat for example regularly joins her for her daily walk – well over 500 metres. He is also an excellent ratter (much to her dismay) but I appreciate his work to keep the rat population down – especially given the rat explosion: <http://www.newshub.co.nz/home/new-zealand/2018/04/prepare-for-rat-plague-as-numbers-explode-across-new-zealand.html>. Is this really a good time for taking action which ultimately will result in increased numbers of rat? • Moreover, there are other, non-lethal options that should be considered first to reduce the feral cat population. I think EPA should be supporting these options first – such as: o trapping, fixing and release, which help keeps the numbers down (thus reducing feral colony problems) while also enabling some cats to be domesticated. o supporting councils and animal protection groups by offering cheap and low-cost fixing opportunities for pets o supporting stronger sanctions towards those who abuse and abandon animals – including those who catnap their neighbours’ pets and purposely abandon them in the bush area (unfortunately this occurs and some people take delight in perpetrating such a cruel and horrible act). • If the manufacturer of PredaSTOP really cared about the environment as it claims it does, it would be doing more to prevent the feral cat problem in the first place rather than contributing to the campaign of ‘cat hate’ by this proposal. Moreover, its very safety material indicates that “may be harmful to aquatic life”, has “potential for harm to non-target terrestrial vertebrates” and that exposure is meant to be avoided to non-target species including “birds”. • My cats are not large travellers but the fact they could die in such a horrible way, so close to my house, terrifies me. Acting as if simply telling people “to keep their cats inside overnight” will solve the issues of the cruel killing of domestic cats ignores the fact that this poison does not dissipate overnight, and thus will still be “released in the environment” for breathing in of “dust, fume and vapours” – and ignores the fact that this poison is dangerous to the very birds that it is meant to be saving. I wish for the EPA to make the following decisions: • Agree to maintain the notifiable area for using PredaSTOP at 3km and place stronger controls over its use to prevent harm to domestic cats. Indeed, I would ask that EPA considers increasing the notifiable area. • Restrict the use of PredaSTOP until other, non-lethal solutions have been tried, in conjunction with recognised animal rescue organisations within the area • Require the manufacturer of PredaSTOP to support said animal rescue organisations in the capture and release programme and by supporting cheap/low cost animal fixing initiatives • Place additional controls and restrictions over the use of PredaSTOP to ensure that its use does not harm the very birds that it is meant to be saving, nor endanger aquatic life.

### 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**

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**The submitter have elected to withhold their personal details from publication.**