

APP202879 - PredaStop for feral cats

Submission Reference no: 118

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Submitter Type: Not specified

Source: Email

Overall Notes:

Clause

What is your position on the application

Position

I oppose the application

Notes

I believe the studies referred to in the application are not sufficiently robust and this leads to scientific and technical uncertainty about the management of adverse effects from this change. While it is difficult to say with certainty as the studies referred to are not readily available to the general public, with one exception they all appear to be very small scale studies and it is not apparent that they have studied behaviour in rural or semi-rural settings. As someone who works in IT I cannot accept that it is not feasible to notify all residents within 3km of a planned operation. It should be trivial to identify the affected households using GIS software and then generate a list of households to contact. I also wish to add my support for the points raised in the attached analysis of the weakness of the studies that has been prepared by Daphne Carvalho.

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

Yes I wish to speak about my submission at the hearing

Notes

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

I oppose the application to change the notification requirement from 3 km to 500 m based on the following points:

1. Adverse Side Effects

There is a risk of that by reducing the notification area for the use of PredaSTOP control of feral cats that domestic cats will be exposed to the poison if they venture further than 500 m away from home.

2. Risk of Occurrence of Exposure of Domestic Cats to PredaSTOP

It is impossible to quantify how high this risk is based on the articles used to support the changing of the notification area from 3 km to 500 m. Only one sample size is reasonably large, one too small, and there is no mention of sample size in the rest of the studies. The articles referenced do not provide any assurance that there is no risk to reducing the distance for notification from 3 km to 500 m.

3. Likelihood of Side Effects and the Scale

If domestic cats wander further than 500 m away from their home in a straight line, and households are not notified that there is use of PredaSTOP in the area, then there is a high likelihood that domestic cats will be exposed to PredaSTOP and will likely consume it and die. The scale of this happening is dependent on how often domestic cats wander further than 500 m away from home in a straight line. The articles referenced are not significant enough in their results to say with confidence that no domestic cats will be exposed to PredaSTOP

4. Confidence Interval in Studies Referenced

Unless Connovation can prove with certainty (95% or 99% confidence interval) that domestic cats do not wander further than 500 m away from home, they should not be allowed to change the notification rules.

5. Managing Adverse Effects

Without substantial quantifiable statistics on how far domestic cats wander away from home, it is difficult to state that there is a low risk of domestic cats being exposed to PredaSTOP. Therefore to manage the adverse effects of domestic cats being exposed to PredaSTOP, and to err on the side of caution, the notification distance should remain at 3 km. Unless there is substantive evidence that cats do not wander further than 500 m from their homes, the notification distance should remain at 3 km.

6. Uncertainty on the Scope of the Information Provided

i. Section 63A Paragraph 5 (a):

“do everything reasonably practicable on its part to consult with all persons who, in its opinion, may be affected by the reassessment; and”

- I do not believe that the EPA has done enough to consult with all landowners, households and residents, who may be affected by this reassessment. The only place I have seen this is on Neighbourly. I've not seen anything referring to this potential change of approval conditions for this product. I do not think that I am an outlier in this instance and must assume that many people similar to myself have also not seen this notification.

- ii. Section 63A Paragraph 6 (b) -

“The Authority may approve or decline an application for reassessment under this section as it considers appropriate after taking into account—

 - (a) all the effects associated with the reassessment; and
 - (b) the best international practices and standards for the safe management of hazardous substances.”
 - With reference to paragraph (b) – exactly what are the best international practices and standards for the safe management of feral cat bait? No details are supplied or referenced.

- iii. Item 17 of Connovation’s application states:

“Connovation considers that the size of the notification area, at 3 km, was derived from a study that indicated a maximum travel distance of 2.29 km for one of the cats in the study. It notes that the average distance travelled by all cats in the study was less than 200 m away from home. Citing a number of published, peer-reviewed articles relating to the distances domestic cats roam from their homes, Connovation concluded that a 500 m notification distance will be sufficient to protect domestic cats.”

 - What are the details of the published, peer-reviewed articles relating to the distances domestic cats roam from their homes? Are these quantitative, statistically-sound, evidence-based studies?
 - One study had a sample size of 38 cats. Small sample sizes do not provide an accurate reflection of the target population. Any outlier figures in a small sample will distort the average.
 - Another study had 211 cats. Were these cats sampled from a diverse area covering urban, semi-rural to rural areas? Do cats have different roaming patterns over different areas and terrain?
 - Is there any chance that in some of these studies, some cats were sampled repeatedly and the sample was not a sample of unique individual cats.

- iv. Item 15 of Connovation’s application states:

“Connovation has applied for a reassessment of the notification requirements for feral cat control operations. Its application says that these requirements constrain its ability to undertake feral cat control operations because of difficulties in notifying of landowners and occupiers within 3 km of control operations. It notes that the 3 km requirement in some cases means notifying thousands of households.”

 - What are the difficulties encountered with notifying landowners and occupier within a 3 km radius of control operations? With modern technologies involving the use of: Social media, mobile phones, radio ads, email, websites, etc., it should be easier and cheaper than ever to keep the public abreast of the use of PredaSTOP.