APP202879 - PredaStop for feral cats

Submission Reference no: 106

Leanne Drummond
[redacted]

Submitter Type: Not specified
Source: Web Form

Overall Notes:

Clause
What is your position on the application
Position
I oppose the application
Notes
Opposition to Application by Connovation Ltd to reduce the notification distance for PAPP cat poisoning from 3km to 500m. (APP202879 PredaSTOP for Feral Cats) 1. Summary: The application to reduce the notification zone for PAPP cat poisoning from 3km to 500m should be refused, because scientific studies quoted by the applicant indicate that it would put at least 6% to over 21% of pet cats at increased risk of being poisoned, (Kikillus 2017, Metsers et al 2010) without giving their owners a chance to protect them from this unnatural and inhumane hazard. This is not acceptable in terms of animal welfare, ethics and citizen's rights. The studies referenced by the applicant do not uphold the applicant's claim that 500m is a reasonable and responsible notification zone (see 2 Further Details below). Ranging distances recorded include 700m, 1.04km, 1.19km, 1.35km, 2.29km. The studies apply to only small localized areas, most are very small samples, and most admit there is a large variation in pet cat ranges depending on location, individual, and other factors. It is not scientific to use the results of small localized studies as if they represent all of NZ. Although a smaller zone may be sufficient in some areas, any blanket rule for use across all NZ must include the known upper limits of the range – ie the 3km zone should be upheld. It is not appropriate to use average or median ranges, or to set an "acceptable" % of loss or risk to pet cats. Pet cats are not managed as a meta-population, but as individual cats per household, thus there is zero acceptable % of loss. ALL potentially affected cat owners should be informed, ie all within the 3km zone as currently set. Removal of a notification requirement for stoat poisoning is not a precedent for reducing the notification area for cat poisoning, they are very different situations. The baiting strategy for stoats will target only feral stoats, simply because there is no free-ranging population of pet stoats. However, there is indeed a free-ranging population of pet cats, and a bait designed to attract feral cats will also target and attract pet cats. A cat bait station may be able to exclude non-target species, but can not exclude non-target individuals of the same species – ie pet cats. If the applicant finds the extent of the notification area onerous, perhaps the applicant could explore more efficient ways of notifying the public. An even better solution is to restrict PAPP poisoning to stoats, as there are alternative and safer methods available to control feral cats (eg live trapping, which can allow safe release of pet cats). Commercial interests should not be put ahead of the safety of our environment, an environment which includes people and their pets. 2 Further Details on The Studies Quoted in the Application Five studies are referenced by the applicant regarding the distances ranged by pet cats. I have serious concerns about the use of these scientific studies to support the application. A closer examination of these studies shows that: - Most are based on very small samples of cats (11, 18, 21, 38, 211) - Three studies are applicable only to the localized conditions of very small areas (Morgan et al. 2009; Lilith et al 2008; Kays & De Wan 2004) and the other two represent only small portions of NZ. - Two of the studies relate to different countries with conditions very different from NZ (ie Western Australia and New York, USA). The two NZ studies with larger sample sizes (211, 38) indicate that from at least 6% to over 21% of pet cats would be put at increased risk if the applicant is allowed to reduce the notification distance to 500m. (Kikillus 2017; Metsers et al. 2010). People owning these cats in areas further than 500m away would be unknowing and therefore not able to take steps to protect their cats. Some of the studies are concerned only with reducing – not eliminating all – cat access to certain areas, and therefore an average range is appropriate to use. However, in the interests of animal welfare and citizen rights, we should be concerned with preventing the death of any pet cat by PAPP poison – therefore the "average range" is NOT appropriate, we must use the upper limit of known range, plus a bit extra for safety. There is not enough data that we can confidently say that even the existing 3km distance is enough, but we do know that pet cats do indeed travel far greater distances than 500m. (Kikillus 2017; Metsers et al. 2010) Pet cat roaming distances vary greatly from urban to rural, and depend on factors such as landscape, predation risk, human intervention etc. Thus any rule covering the use of PAPP throughout NZ must encompass ALL the known information on roaming distances. Although cats in one small area might only roam 200m, it is unscientific to extrapolate that into a blanket rule for all NZ when we already know that cats elsewhere in NZ roam 1 to 2 km and more. Critique of the Applicant's use of Specific Studies 2.1 Metsers et al, 2010 Applicant: "The size of the notification area (3km) appears to have been based on one study in which one domestic cat, out of the 38 cats in the study, moved a maximum of 2.29 km from its home (Metsers et al, 2010). In this same study the authors noted that the average movements away from home were less than 200 m for all cats." This statement hints that only 1 exceptional cat roamed more than 200m. This is not what the study showed at all. The study (at 3 sites in North Otago, Canterbury, and Otago Penninsula) recorded maximum distances (per group of cats) of 1.35 km, 2.29 km, 1.19km, 1.04km and 0.7km – all of which are greater than the 500m zone requested by the applicant. (The remaining small group of 3 cats had max distance of 0.18 km). The study does not explicitly state how many cats roamed to these distances, or the number of cats who roamed the lesser distances

from 500m to the maximum. However, a total of at least 8 cats were recorded as having the maximum home ranges, showing that at least 21% of the cats roamed to the 5 maximums stated above, PLUS an undisclosed number of lesser rangers who roamed between 500m and the maximum. In all three locations studied, the maximum distance roamed was greater than 1km. The study also showed that home ranges and distances roamed were highly variable from rural to urban, and between individual cats. 2.2 Morgan et al, 2009 Applicant: "In one of these studies domestic cats were radio tracked in a research trial in Christchurch and the maximum distance the cats moved from their homes ranged from 29 m to 276 m (Morgan et al 2009)." This study was based on a small sample of 21 domestic cats, 5 of which did not complete the study due to illness or owner moving away. It was concerned only with estimating the movement of cats into a specific wetland reserve. It admitted that most of the cats in the study lived within 200m of the wetland, "and a better understanding of the movements of cats living further away will be required…". Therefore this study cannot be extrapolated to cover all areas of NZ, and cannot even be used to represent the norm or average. 2.3 Lilith et al. 2008 Applicant: "…the longest linear movement by any cat was 300 m from its home and the authors recommended a buffer zone of 360 m to reduce incursions by domestic cats into native bush (Lilith et al. 2008)". This study was on a small sample of 18 pet cats in Armadale, Western Australia. It described numerous problems completing the study – "as a result the final study was an incomplete subset of the original design". For example, 2 free-roaming rural cats stayed uncharacteristically close to home during the study period because of bush fires. The aim of the study was not to determine the maximum range of cats, but to recommend buffer zones "to reduce incursions of pet cats into nature reserves…..our study was based on up to 25 fixes over 2 days for each cat, which might overlook occasional longer forays". In addition, conditions in Western Australia differ from NZ – so results cannot be extrapolated to represent NZ condtions. (eg predation risk, fires, etc limit cat roaming in WA) 2.4 Kays & DeWan (2004) This study was on a small sample of 11 pet cats in Albany, New York, USA, on cats who were out for only a few hours to half a day, per day, and at risk from coyote predation. The cats in this study were found to have small ranges (maximum distances not given), but the authors note that "we have a very poor understanding" of factors that may limit cat ranging distances – eg predation risk; extremely cold NY weather; landscape features; native prey abundance; cat condition and human intervention. Conditions in USA are very different from NZ (eg predation risks, weather, cat husbandry, prey types) and therefore cannot be extrapolated to represent the situation in NZ. 2.5 Pers. Comm. Heidy Kikillus, 2017 Victoria University Unpublished PHD data). Applicant: "More recent research of domestic cats in Wellington involved GPS collaring 211 cats to track their movements and found that 94% of these cats never moved more than 500m in a straight line from their homes and only 1 of the 211 study cats ever moved more than 1km…". I have not viewed this document, however, rephrasing the above, it appears that 6% of cats in the study (ie 12 to 13 cats) range further than the proposed 500m distance requested by the applicant. Thus, using this data, 6% of privately-owned pet cats in the Wellington area studied would be deliberately put at increased risk of poisoning if the applicant succeeds in reducing the notification distance to 500m. Note: I am a private citizen without any commercial interests in PAPP or it's competition. My concerns are from the point of view of animal welfare, ethics, citizen's rights, and safeguarding our environment – which includes our companion animals.

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

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