

# APP202879 - PredaStop for feral cats

## Submission Reference no: 81

Rochelle Ferguson, **Companion Animal Veterinarians branch of the New Zealand Veterinary Association (Rochelle Ferguson)**

32 Prospect Terrace

Johnsonville

Wellington

New Zealand

Ph: 021504763

rochelle.ferguson@vets.org.nz

**Submitter Type:** Not specified

**Source:** Email

### Overall Notes:

#### Clause

What is your position on the application

#### Position

I oppose the application

#### Notes

#### 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

If further clarification on our position is needed.



# Companion Animal Veterinarians

branch of the New Zealand Veterinary Association

E [cav@vets.org.nz](mailto:cav@vets.org.nz) | W [www.cas.nzva.org.nz](http://www.cas.nzva.org.nz)

The Companion Animal Veterinarians accept the need to control feral cats to protect environmental values and wildlife, however this must be undertaken in such manner that minimises the welfare impacts on non-target animals. The application from PredaStop manufacturer, Conover to reduce the notification area from 3km to 500m when using PredaStop for feral cat control is opposed based on the following:

**1. Published research recommends an exclusion zone of at least 2.4km should be used.**

Feral cat control should be undertaken using the most current science and guidelines available to ensure the use of best practice methodology. Practitioners responsible for implementing feral cat management need to have an understanding of the animal welfare impacts of available methods, and be competent to implement strategies using best practice. The research cited by the applicants (1) found wide inter-cat variability in the distances that they covered. To use the average of 200m does not account for the cats that travelled longer distances. While the proposal states that only one cat was found to have travelled 2.3 km, they omit to mention that there were other cats in the study who also travelled in excess of 1 km. It is also important to note that the study highlighted that distances travelled are unpredictable and reflect the landscape where they are measured. It is possible that in other landscapes the distances travelled may be even further than that measured in this study.

In relation to the 200m average distance calculated in the study, the researchers concluded that even though this was small, the large inter-cat variation in ranging behaviour means that effectively to exclude domestic cats, exclusion zones would need to be wide. The recommendation made in the study was for these to be at least 2.4 km wide. To disregard the conclusion of one of the few published studies on cat movements conducted in New Zealand conditions, and instead use the average distances from the results section of the study does not adhere to the use of best practice methodology.

**2. PredaStop is licensed for use in feral cats and stoats. Feral cats are not generally found close to human habitation. If used in accordance with**

**its registered purpose, there should be minimal costs associated with 3 kilometre notification requirements.**

Feral cats are defined by the Department of Conservation as a cat that has none of its needs provided for by humans (2). While feral cats can be found in most terrestrial habitats, they generally do not live around areas of human habitation. When poisoning feral cats, it would be unlikely that this would be undertaken in a densely populated area. The requirement to notify those that live in a 3km radius therefore should not be onerous or provide sufficient burden to prevent its use.

Concerns are held that if PredaStop is being used in populated areas, it will be targeting stray cats rather than feral cats. Live capture traps is the preferred technique for cat control in urban/residential areas (3).

**3. Owned cats are valued family members and best practice methods of pest control should be employed to protect their welfare.**

83% of cat owners consider their pet to be a valuable member of their family (4). In addition to this, they also have intrinsic value as complex and sentient beings. This has been formally recognised in New Zealand where the Animal Welfare Act was amended in 2015 to formally acknowledge the sentience of animals. Because of the extrinsic and intrinsic value that cats hold in New Zealand society, it is incumbent on those employing actions that put owned cats lives at risk, that best practice methods are employed to mitigate those risks. Based on current scientific evidence, this would require that the three kilometre notification area remain in force.

**4. Ensuring risks are mitigated for non target animals is paramount in ensuring communities support environmental protection**

While an antidote exists, it is not routinely stocked by veterinarians and the limited timeframe in which it must be administered makes recovery from a poisoning event unlikely. Prevention is key to protecting valued owned cats. Any cat deaths resulting from PredaStop are likely to polarise community attitudes to important environmental protection work and be detrimental to its long term success.