

The Australian Veterinary Association Limited

ABN 63 008 522 852



Unit 40, 6 Herbert Street St Leonards NSW 2065

Telephone: (02) 9431 5000 Facsimile: (02) 9437 9068

Email: members@ava.com.au Website: www.ava.com.au

18 December 2015

The Manager
Natural Environment
Environment and Planning Directorate
GPO Box 158
CANBERRA ACT 2601

environment@act.gov.au

Dear Ms Tracy

RE: Proposed changes to the ACT pest animals declaration

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 8500 members come from all fields within the veterinary profession. We are responding to your invitation to provide comment on new and amended provisions proposed for the ACT pest animals declaration.

Specific comments relating to Cats

The AVA is opposed to the proposed changes to declare cats not owned by people as pest animals. If a cat is unowned this is not sufficient grounds to declare the cat a pest.

Many unowned cats or cats without microchips, are in fact socialised to humans and can and should be, rehomed as pets. Any unowned or un-microchipped cats must first be given an opportunity to be behaviourally and physically assessed by the RSPCA and/or registered veterinarians for their suitability for rehoming. If after this formal process, a cat is deemed unsuitable for rehoming due to physical and/or behavioural issues that compromise their welfare, then a registered veterinarian may consider humane euthanasia. This process must be a requirement under the relevant legislation.

Furthermore, some cats that appear to be unowned or are un-microchipped may actually have an owner and there must be a requirement under the relevant legislation to enable sufficient time for the cat to be reclaimed by their owner. If after this time the cat has not been reclaimed then they must be formally assessed for rehoming as described directly above.

The proposal document currently does not define what 'unowned' refers to and the AVA seeks clarification regarding this aspect.

In conclusion, being unowned must not be used as a basis for cat pest declaration. This is inappropriate and unacceptable as many unowned cats and kittens are re-homable as pets and must be given the opportunity to be rehomed.

General comments on proposed changes

Any control programs must be humane. Humane programs do not cause pain, suffering or distress to target or non-target animals. Humane lethal methods should only be considered where there is no non-lethal, humane alternative available. The use of recreational hunters must not be permitted in any control programs. Any program should be subject to public consultation, ethics approval and ongoing review with regular public reporting.

We thank you for the opportunity to provide comment on these proposed changes. Please do not hesitate to contact us should you require further information.

Kind regards

Melanie Zetter

on behalf of the AVA ACT Division

Australian Veterinary Association
AMA House
42 Macquarie St
KINGSTON ACT 2600
02 6273 0064