

**Submission
No 132**

INQUIRY INTO POUNDS IN NEW SOUTH WALES

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Inquiry into pounds in New South Wales

Australian Pet Welfare Foundation (APWF) submission
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Inquiry into pounds in New South Wales

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Executive summary

Thank you for the opportunity to provide evidence-based feedback on the **Inquiry into pounds in New South Wales**. Cats present the most significant and longstanding management issue for NSW pounds. Unlike dogs, cat intake has remained relatively stable across NSW over the past decade. Euthanasia rates for cats are substantially higher than for dogs in NSW pounds, 9% of dogs are euthanased versus **32% of cats and kittens euthanased** on average across NSW pounds – most of the cats and kittens euthanased are healthy and young. **1 in every 3 cats entering NSW pounds are euthanased** which is unacceptably high and preventable. Of further concern, a recent Australian publication reported that the worst quartile of councils with intakes of >50 cats in NSW had estimated **euthanasia rates from 67% to 100%**. NSW councils operating their own pounds kill on average **46% of impounded cats and kittens**. Euthanasing healthy animals has profoundly negative mental health impacts on staff tasked with the killing. Impacts include depression, perpetrator-induced traumatic stress, substance abuse and increased risk of suicide. Community members also suffer significant adverse psychological impacts when the stray cats they have been feeding and have a strong emotional bond with, are killed by authorities.

Most cats entering pounds are classed as stray cats (80% to 90%) and most come from low socio-economic areas. **At least 50% of cats entering NSW pounds are kittens less than 6 months of age**. Very few cats are reclaimed by an owner, only 6% versus 50% of dogs in NSW pounds. Dogs entering pounds are nearly all owned dogs. For cats, three types of domestic cats enter pounds including 1) Owned cats 2) Semi-owned cats (intentionally fed by people who do not perceive they own the cat – called semi-owners) and 3) unowned cats which are rare (obtain food from humans unintentionally such as from food waste bins). **Semi-owned stray cats are a significant contributor to pound intake**. Feral cats never enter pounds, are not the subject of nuisance complaints and are never found or trapped where people live. Misclassifying domestic cats as feral cats prevents a resolution to the stray cat issue. Domestic cats should be excluded from the legal definition of feral cats to ensure effective programs can be implemented.

The current approach to stray cats in NSW has failed to reduce the overall number of stray cats over the decades it has been applied by Councils. The current reactive approach includes *Trap/adopt or kill* (where cats not adopted or reclaimed are killed), *Trap/kill* or *Kill* programs. These approaches are ineffective because they result in low-level *ad hoc* culling, insufficient to override the high cat reproductive rate, immigration of new cats into the area and increased survival of juveniles; and they stimulate reproduction in the remaining cats in the area and the population quickly replenishes. None of these approaches are evidence-based or effective at reducing stray cats overtime because they do not address the underlying cause of the problem, which is a lack of reproductive control of stray cats. **Attempts to kill and adopt our way out of the stray cat problem have failed.**

A fundamental change in stray cat management is urgently needed in NSW.

Evidence shows that **preventive strategies aimed at decreasing intake are more effective at reducing costs and euthanasia than strategies focused on increasing adoptions**. Therefore, increasing funding for strategies that reduce intake – i.e., **Community Cat Programs (CCPs)**, is strongly recommended, as recognised by the **NSW Rehoming Review 2022**.

Community Cat Programs involve high-intensity free desexing, microchipping and registration of owned, semi-owned and unowned cats targeted to areas of high cat intake and complaints. CCPs are proven to be very effective at reducing stray cat numbers, pound intake and euthanasia, complaints and **costs**. CCPs are also very effective at assisting semi-owners to desex and adopt the stray cat they are feeding and continue to feed and care for their cat, **significantly reducing the number of unwanted kittens born**. Semi-owners represent a large pool of potential cat adopters, particularly for shy and timid cats, and are integral to resolving the stray cat issue and associated high intake and high euthanasia rates of cats in pounds and shelters. **Community Cat Programs proactively manage stray cats in the community** keeping cats with their owners, and because they are **non-lethal** they do not cause devastating mental health impacts to staff or community members, consistent with a **One Welfare approach** which optimises the well-being of people, animals and their environment.

Keeping pets with owners is cost-effective for pounds because **the biggest cost driver in the pound and rehoming system is the cost for holding an animal in a facility.** Therefore, strategies which prevent impoundment such as **'Pets for Life'** strategies where cat and dog owners are supported to keep their pet instead of surrendering to a pound or shelter, are also highly recommended, in addition to Community Cat Programs. These strategies will reduce pound intake, euthanasia and costs. **Pets for Life** strategies should include funding to help disadvantaged pet owners keep their pets by assisting with veterinary costs, registration, pet identification, secure dog fencing to prevent straying, pet food and advice on resolving or managing problematic behaviours.

Additionally, pets should be returned to identified owners and reasonable payment plans for any impoundment fines and fees (where needed) should be organised, instead of continuing to hold the animal after the owner is identified. The current punishment-approach of requiring an owner to pay a fine or fee before returning the pet to the owner should be avoided to help reduce euthanasia of healthy and treatable pets and costs to council. Based on the evidence, the current reactive punishment-based model of domestic animal management should be replaced with a proactive support-based model to reduce costs.

The Australian Pet Welfare Foundation (APWF) provides a number of **evidence-based solutions** in our submission to improve outcomes in NSW pounds and reduce costs to benefit councils, animals, people and the environment.

Australian Pet Welfare Foundation

The Australian Pet Welfare Foundation (APWF) is a peak research body and advocate for pet welfare in Australia. As a not-for-profit organisation, APWF uses science-based research to enhance community well-being and improve the health and welfare of animals and people. APWF specialises in evidence-based solutions to prevent euthanasia of healthy companion animals in shelters and pounds and the associated mental health damage to staff and community residents, and ensure all adoptable animals find a home. We share research knowledge with the community, shelters and pounds, state and local governments and veterinarians to create change and save animal and human lives.

APWF is led by Chief Scientist Dr. Jacquie Rand, Emeritus Professor of Companion Animal Health at The University of Queensland (UQ) and a registered specialist veterinarian in small animal internal medicine. She has worked extensively in shelter research over the last 16 years, including collaborative studies with the RSPCA, Animal Welfare League and local governments. While at UQ Dr Rand taught Urban Animal Management and since 2013 has co-authored 21 peer-reviewed articles on urban animal management including management of semi-owned and unowned cats.

Recommendations

Recommendation 1

As recommended by the NSW Rehoming Review (2022), the NSW Government should establish an ongoing funding arrangement for **Community Cat Programs** (high-intensity free desexing, microchipping and registration of owned, semi-owned and unowned cats targeted to areas of high cat impoundments or cat-related calls), which councils can apply to and could be run in partnership with the RSPCA or a similar experienced body, or private veterinary practices. Evidence-based Community Cat Programs reduce stray cat numbers and cat intake and euthanasia of healthy and treatable cats and kittens in pounds.

This would be targeted to councils with the highest cat intakes. Councils would need to show that they can target the areas with the highest problems and to report on outcomes. The expected cost of a program that would reduce cat euthanasia by one third is \$2 million per year on average, initially run over a five-year period. Councils would benefit financially from this through reduced pound intakes. However, rather than seeking co-funding from councils, this cost saving would allow councils to redirect resources into increasing adoption rates for remaining animals, reduce animals unclaimed at the pound because of costs, and to implement strategies to reduce intake such as microchipping programs and programs to assist people to keep their pets, rather than surrender them.

Recommendation 2

Implement evidence-based solutions in addition to Community Cat Programs which prevent euthanasia of healthy and treatable animals in NSW pounds and the associated profoundly negative mental health impacts on staff and community members. Please see evidence-based solutions detailed throughout this submission.

Recommendation 3

Domestic cats (owned, semi-owned and unowned) should be excluded from the legal definition of feral cats in legislation and regulation. Feral cats should be defined as having no relationship with or dependence on humans (neither direct nor indirect), surviving by hunting or scavenging for food (not fed intentionally or unintentionally by humans), and living and reproducing in the wild (e.g., forests, woodlands, grasslands, deserts).

Recommendation 4

Legislation and regulation should be amended to allow cats to be registered and identified via microchip to an “organisation” rather than only to an individual person.

Recommendation 5

Legislation and regulation should be amended to remove registration fees for cats and annual permit fees for undesexed cats.

Recommendation 6

Legislation and regulation should be amended to prohibit deeming domestic cats that are trapped around where people live or frequent or are admitted to pounds, shelters or similar facilities as being ‘feral’. Cats trapped in response to nuisance complaints or those entering pounds should clearly be defined as domestic cats, regardless of their behaviour.

Recommendation 7

In the annual NSW Pound Data Reports for cats, the reason for euthanasia currently classified as 'feral/infant' should be split into 'infant', and 'feral' replaced with "behaviour". That is, 'Infant' and 'Behaviour' should replace the current combined 'Feral/infant' reason for euthanasia category. 'Feral' should not be used as a reason for euthanasia or as a cat classification category on admission because 'feral cats' do not enter council pounds or shelters.

Recommendation 8

It is recommended that only the following categories should be used as reasons for euthanasia in NSW pounds and annual NSW Pound Data Reports:

- **Behaviour** (this includes poorly socialised and other behaviours that make them unsuitable for rehoming),
- **Health** (includes medical and surgical conditions, and geriatric cats in poor health). Old age per se is not a reason for euthanasia, only if in poor health,
- **Infant** (less than 400 grams or unweaned),
- **Owner requested euthanasia**,
- **Overcapacity** (shelter or pound facility is full).

Recommendation 9

Legislation and regulation should be amended to prohibit deeming domestic cats that are in traps or entering pounds, shelters or similar facilities as being 'less socialised' 'unsocialised' 'feral' or 'unsuitable for adoption' based on fear behaviours exhibited prior to habituation, and prior to providing the cat with reasonable habituation time (based on science) in a non-stressful environment.

Recommendation 10

All cats and dogs (and other species) entering pounds (or similar facilities) should receive a veterinary health assessment by a registered veterinarian to rule out any physical health conditions which may affect behaviour such as for e.g., a painful physical condition.

Recommendation 11

Legislation and regulation should require cats be given sufficient habituation time (at least 8 days) in a non-stressful environment before behavioural assessment begins. Based on science, the average time for cats to habituate is 5 days to 5 weeks and ranges from a minimum of 3 days to 5 weeks or longer to habituate. Euthanasing cats based on behaviour before sufficient habituation time has been provided in a non-stressful environment and continuous multiple behavioural assessments made, should be prohibited in legislation and regulation.

Recommendation 12

Euthanasing cats based on WHS reasons should be prohibited in legislation and regulation. Cats do not present a WHS concern when staff are trained and proper equipment is used. Proper equipment enables staff to avoid direct handling of any cat (including cats that are exhibiting fear behaviours – for e.g., hissing, growling, striking or hiding).

Recommendation 13

Alternative rehoming avenues should be used for less socialised healthy or treatable cats where these cats are not adopted, such as 'Working cat' rehoming and Return-to-Field (RTF), to reduce euthanasia of healthy and treatable animals and associated severe negative mental health impacts on pound and veterinary staff and community members caring for stray cats.

Recommendation 14

Behavioural assessment of animals in pounds should be continuous and occur on multiple occasions (i.e., not a one-off behaviour assessment).

Recommendation 15

The number of animal complaints by species and type should be recorded by councils and reported in the annual published NSW Pound Data Reports.

Recommendation 16

Councils accept species other than cats and dogs, such as livestock species. All species and their outcomes should be recorded by councils and publicly reported in the annual NSW Pound Data Reports.

Recommendation 17

Reporting of rescue group data should be mandatory. Data should be separated into species, age, source (council transfer in, shelter transfer in, stray from general public, owner surrender or other), outcome and reasons for euthanasia (as per recommendation 8).

Recommendation 18

The NSW Pound Data Reports should continue to be made publicly available each year.

Recommendation 19

Legislation and regulation should be amended to enable Return-To-Field (RTF) for healthy or treatable cats (desexed and microchipped).

Recommendation 20

Legislation and regulation should continue to prohibit mandatory cat containment (night and 24/7 mandatory cat containment) because it increases cat intake and euthanasia in pounds without reducing stray cats overtime.

Recommendation 21

A fundamental change in stray cat management is urgently needed in NSW. The current ineffective and reactive approaches to stray cat management routinely used by councils and shelters including *Trap/adopt or kill*, *Trap/kill* and *Kill* programs should be prohibited in legislation and regulation and replaced with evidence-based solutions including Community Cat Programs and Pets for Life Programs.

Recommendation 22

Cat feeding bans should be prohibited in legislation and regulation and replaced with effective solutions including Community Cat Programs.

Recommendation 23

Government implement a **'Veticare'** system which would provide accessible veterinary care to disadvantaged pet owners. This would reduce pound intake, assist many low-income families and seniors and also help to protect veterinarians and pound staff from the adverse mental health impacts of financial euthanasia due to clients who cannot afford veterinary care for their pet.

Recommendation 24

Training for local government Animal Management Officers (AMOs) should be implemented with a focus on strategies to reduce intake and euthanasia, including science-based behavioural assessments utilising material developed by veterinary psychiatrists. As per NSW Rehoming Review recommendation of training programs for behaviour assessment for council staff supported by NSW OLG, which could include financial support and coordination.

Recommendation 25

Review the *NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments (1996)* to ensure it reflects contemporary animal welfare science standards and community expectations. Independent registered veterinarians with relevant species expertise and animal welfare organisations should have membership on the working group reviewing and developing a new enforceable code to cover all species entering NSW pounds.

Recommendation 26

Consideration should be given to developing three separate enforceable codes for pounds and shelters, boarding facilities and veterinary clinics as these operations have different functions.

Recommendation 27

In legislation and regulation and in the relevant enforceable Code, the minimum legal requirement for euthanasia and method of euthanasia should be as follows: *Euthanasia must only be performed by a registered veterinarian using barbiturate overdose (which may be in combination with sedation and analgesia).*

Recommendation 28

The current punishment-orientated domestic animal management model should be replaced with a support-based model consistent with the One Welfare concept which optimises the well-being of people, animals and their social and physical environment. Support-based strategies prevent impoundment and reduce council costs for e.g., assisting owners to build dog fencing, providing free pet identification, returning pets to identified owners and organising reasonable payment plans (where needed) instead of continuing to hold the animal after the owner is identified. Please see support-based strategies for reducing intake and euthanasia in pounds detailed throughout this submission.

Recommendation 29

Implement **'Pets for Life'** concept strategies where dog and cat owners and stray cat semi-owners are supported to keep their pet or stray cat (versus relinquishment), which is a cost-effective. This should include funding for programs to help disadvantaged pet owners to keep pets with their families by assisting with veterinary costs, registration costs, and fencing.

Recommendation 30

For protection of veterinarians and their staff, veterinary practices should be encouraged to provide discounts for strategies aligned with One Welfare (desexing and microchipping). Veterinary practices should avoid exposing their staff to euthanasia of healthy and treatable animals and should not facilitate euthanasia of healthy and treatable animals by providing discounts to councils for volume of animals received.

Recommendation 31

Legislation and regulation to prohibit 'No pets' clauses in tenancy agreements in the same way it is illegal to discriminate against tenants with children, to ensure pet friendly rental accommodation matches demand across Australia.

Recommendation 32

Consent for pets on a case-by-case basis is a form of discrimination and should be prohibited in legislation and regulation.

Recommendation 33

Where there is legislation that landlords cannot refuse pets, prospective tenants should not have to declare that they have a pet. Having to declare a pet in a rental application (such as the NSW standard form raised in the latest NSW government Have your say on improving rental laws), allows landlords and rental agencies to discriminate against prospective tenants with pets. The proposed standard form (application where tenants declare they have a pet) should not be implemented in NSW.

Recommendation 34

Rental accommodation discrimination based on dog size and breed is not based on scientific evidence and should be prohibited in legislation and regulation.

Recommendation 35

If a landlord wants to refuse a pet for any reason they should be required to go to the Tribunal. The NSW creation of a list of reasons a landlord can reject a tenant with a pet as raised in the latest NSW government Have your say on improving rental laws, should not be implemented in NSW.

Recommendation 36

The Tribunal should not be able to give the landlord the *ongoing* right to say no to animals at the property, as raised in the NSW government Have your say on improving rental laws.

Recommendation 37

The landlord should not be permitted to put any conditions on keeping a pet in a rental property as raised in the NSW government Have your say on improving rental laws, for example, requiring pets to be kept outside.

Recommendation 38

The recommended approach to tenants and pets is as follows: Subject to the law, an individual should be free to choose to keep a companion animal and an individual who chooses to keep a companion animal should be liable for any costs or losses that arise from their keeping the animal.

Recommendation 39

Funding to promote Bed-time feeding of cats which is a highly effective way for cat owners to keep pet cats safely inside at night voluntarily (but mandatory cat containment should be rejected because it increases cat intake and euthanasia in pounds without reducing stray cats overtime).

TERMS OF REFERENCE

1(a) resourcing challenges affecting New South Wales pounds, including the adequacy of funding given towards the operation of pounds by local and state governments

Background

Cats present the most significant and longstanding management issue for NSW pounds. While dog intake into NSW pounds has significantly reduced over the past decade, cat intake has remained relatively stable across NSW. Stray dogs entering NSW pounds are owned dogs that have either escaped or were not contained on their property securely and wandered off their owner's property. For cats entering NSW pounds, some are escaped or uncontained owned cats.

Unlike dogs in Australia, some stray cats are semi-owned (cats intentionally fed by people who do not perceive they own the cat). A very small proportion of cats are also unowned cats (obtain food from humans unintentionally such as from food waste bins). Because most cats entering shelters and pounds are not microchipped or wearing a collar (Lancaster 2015), it is difficult to distinguish between owned, semi-owned and unowned domestic cats. However, Australian research suggests that most stray cats are owned or semi-owned cats (Rand 2023). Given the extremely low cat reclaim rates across Australia (only 6% of impounded cats were reclaimed by an owner in NSW in 2021-2022) it is likely that the majority of cats entering NSW pounds are semi-owned stray cats and kittens and unidentified outdoor owned cats.

Most cats entering Australian pounds are stray cats (80% to 90% of cats entering shelters or pounds are classed as stray cats). Cats entering NSW pounds are more likely to come from low socio-economic areas and to be kittens. **At least 50% of cats entering NSW pounds are kittens less than 6 months of age** (Alberthsen 2016). Very few cats are returned to owners, with most either being adopted or euthanased. Euthanasia rates for cats are substantially higher than for dogs in NSW (approximately 9% of dogs are euthanased versus 32% of cats euthanased).

Of note, a recent publication reported that the worst quartile of councils with intakes of >50 cats in New South Wales had estimated euthanasia rates from 67% to 100% (Chua 2023). Across NSW, councils operating their own pounds kill on average 46% of impounded cats and kittens. Because many councils in regional areas and some in major cities have contracts with private veterinary practices to treat and euthanase animals, this exposes many pound and veterinary staff to severe negative mental health impacts associated with euthanasing many healthy cats and kittens, often repeatedly. Dogs have much higher reclaim rates (approximately 50% of dogs are reclaimed by their owners versus 6% of cats being reclaimed by an owner).

Current approach to cat management in NSW is not effective

The current approach to the management of free-roaming stray cats includes *Trap/adopt or kill* where cats entering pounds that are not adopted or reclaimed by their owner are euthanased, *Trap/Kill* where cats are trapped and then killed or in some cases, *Kill programs*, where domestic stray cats are killed (and injured) by shooting (for e.g., Port of Newcastle NSW).

The current approach to stray cats has failed to reduce the number of free-roaming stray cats in NSW over the decades it has been applied by councils and shelters in NSW. Municipal councils traditionally respond to calls relating to nuisance cats by providing a trap cage or actively trapping the cats and euthanizing large numbers of healthy cats. This causes profoundly negative mental health impacts on some pound staff tasked with killing healthy cats and young kittens, often repeatedly.

The current approach to stray cats used by most councils and animal shelters does not reduce the overall stray cat population overtime because it results in low-level *ad hoc* culling, insufficient to override the high cat reproductive rate, immigration of new cats into the area and increased survival of juveniles (Lazenby 2015, Boone 2019, Miller 2014, Tan 2017, RSPCA Australia 2018). The result is an ineffective repetitive cycle of trapping, impounding and killing healthy cats and kittens, followed by new cats and kittens being trapped, impounded and killed, but without reducing the overall number of stray cats in the area as the population quickly replenishes to original levels (NSW Animal Seizures Pound Data Reports, Hughes 2002, Boone 2019).

This *ad hoc* low level killing in council pounds and shelters is essentially equivalent to sustainably farming cats, and harvesting cats and kittens, because the breeding population is maintained (Lazenby 2015, Miller 2014, Boone 2019).

The current reactive approach in NSW is a failure because it does not address the underlying cause of the free-roaming stray cat problem i.e., lack of reproductive control (overpopulation). The current outdated approach is not evidence-based and also not aligned with a One Welfare approach to managing domestic cats, which encompasses policies and procedures to optimise the well-being of humans, animals and their environment (Chua 2023).

A fundamental change in stray cat management is urgently needed in NSW.

Cost-effective solution to reduce stray cats, pound intake and euthanasia

To effectively reduce the number of free-roaming cats in a council area, a proactive strategy which prevents reproduction is needed i.e., Community Cat Programs, which are based on high intensity free desexing, microchipping and registration for all cats in areas of high cat intake, euthanasia or nuisance complaints to councils. Reducing the number of free-roaming stray cats in the surrounding area will reduce cat intake into the pound, significantly reducing overall costs to councils. Reducing cat intake is a far more cost-effective approach for councils compared to impounding cats.

Prevention is key

Reducing intake significantly reduces euthanasia rates of healthy cats and kittens because the higher the intake, the greater the number of cats euthanased (Kreisler 2022, NSW Pound Data Reports). Reducing euthanasia has an additional cost-benefit for councils because research shows that employee turnover rates are positively related to euthanasia rate, and that euthanasing healthy animals is related to increased personnel turnover (Rogelberg 2007).

Reducing intake has a greater impact on reducing euthanasia and costs than strategies aimed at increasing adoptions

Studies have found a strong correlation between the numbers of cats admitted and numbers euthanased (Kreisler 2022). In US shelters and municipal facilities between 1970 and 1995 reduced cat admissions accounted almost entirely for decreases in cats euthanased (Marsh 2010). There are also substantial costs to municipalities and welfare agencies for admission and care of cats until they are rehomed or euthanased. For example, the Animal Welfare League in South Australia estimated the cost of shelter care to be \$245/cat/per week, and when additional costs of preventive and veterinary care were included, the average cost to rehome a cat after one week of care was \$750 (AWL SA).

Additionally, at least 50% of cat owners acquire their cats for free without meaning to become a cat owner – this reflects cat overpopulation and market saturation of cats (RSPCA NSW 2023 *pers comm*). The number of cats and kittens that can be adopted is very limited and reaches a saturation point where there are many more cats and kittens needing a home than there are available homes for them. In other words, strategies which focus on increasing adoptions have limited capacity to reduce euthanasia and will not significantly reduce the cat euthanasia rate in NSW pounds – proactive preventative strategies are needed i.e., preventing kittens from being born which significantly reduces stray cat numbers and consequently significantly reduces cat intake and euthanasia in pounds.

Given that strategies aimed at decreasing intake are more effective at reducing costs and euthanasia than strategies that focus on increasing adoptions, increasing resourcing of strategies that reduce intake – i.e., Community Cat Programs, is strongly recommended (NSW Rehoming Review 2022, Kreisler 2022). Please see **Costs and funding arrangements** section below.

Community Cat Programs

Community Cat Programs are proven to be very effective at reducing cat and kitten intake into pounds (and reducing overall costs, cat nuisance complaints and euthanasia). Community Cat Programs involve high-intensity free desexing, microchipping and registration of owned, semi-owned and unowned cats, targeted to areas with high cat intake and cat complaints (these areas are typically the low socio-economic areas) (Chua 2023). Because a significant proportion of cats and kittens entering NSW pounds are semi-owned stray cats, to be effective, desexing strategies must target both owned and semi-owned cats.

In Australia, research shows that 3-20% of adults feed a stray cat they do not perceive they own (known as semi-owners) (Tan 2017). **Semi-owners represent a large pool of potential stray cat adopters in NSW**, however, because semi-owners are typically from low-income areas, they often need assistance to desex, microchip and register their cat, with whom they have a very strong emotional bond (Scotney 2023). Cost is the main barrier to desexing not lack of education or knowledge about the benefits of desexing (APWF 2021). The strongest predictor of whether a cat is desexed is household income (Chu 2009).

Semi-owners are an integral part of resolving the longstanding stray cat issue in Australia. Semi-owners will only engage if management programs are humane and non-lethal (RSPCA NSW *pers comm*). Australian research shows that the majority of the community support non-lethal approaches to stray cat (Rand 2019).

Community Cat programs are non-lethal and are very effective at assisting semi-owners to adopt, desex and microchip the stray cat they are feeding (and they will continue to feed and care for their cat). This significantly reduces the number of stray kittens born (and the number of free-roaming stray cats in the area). This in turn significantly reduces cat intake, especially of timid and shy cats, and reduces euthanasia in pounds and shelters. This minimises exposure of staff to the severe negative mental health impacts of killing healthy and treatable cats and kittens, and reduces impact on community residents caring for stray cats because their cats are less likely to be impounded and killed. Reducing the number of free-roaming cats with Community Cat Programs also reduces issues associated with free-roaming cats such as potential wildlife predation and nuisance complaints.

Australian Community Cat Programs

Banyule City Council Community Cat Program

In Banyule City Council (Melbourne, Victoria) in the third year after implementing a high-intensity free desexing program (a community cat program) targeted to where cat-related calls and impoundments were occurring in Banyule (typically the low socio-economic areas):

- impoundments decreased by 61%
- euthanasia decreased by 74%
- cat-related calls decreased by 64% (from 11 to 4 cat calls/1000 residents)

Since 2013, Banyule has spent \$60,000 on its free desexing program and saved \$397,500 on cat impoundment costs alone (Cotterell 2021, Banyule City Council 2020, NSW Rehoming Review 2022).

RSPCA NSW Community Cat Program

There has been a reduction in intake of 31% in first year and 46% in the second year for Greenacre in Canterbury-Bankstown after desexing of 8 cats/1000 through the RSPCA Keeping Cats Safe at Home program (NSW Rehoming Review 2022).

After one year of targeted free cat desexing through the RSPCA NSW *Keeping Cats Safe at Home* program, cat nuisance complaints reduced dramatically in Campbelltown (-56%), City of Parramatta (-49%), Shoalhaven (-56%) and Weddin Shire (-66%) council areas. The reduction in cat nuisance complaints reflects a reduction in stray cats in the target area (RSPCA 2023 *pers comm*).

Australian Pet Welfare Foundation (APWF) Community Cat Program

In Ipswich Queensland, over 2000 cats have been desexed in a targeted Community Cat program. Targeted suburbs had intake to shelters reduce by 35% to 55% over 2 years, while remaining unchanged in comparison suburbs.

Costs and funding arrangements (Taken from NSW Rehoming Review 2022)

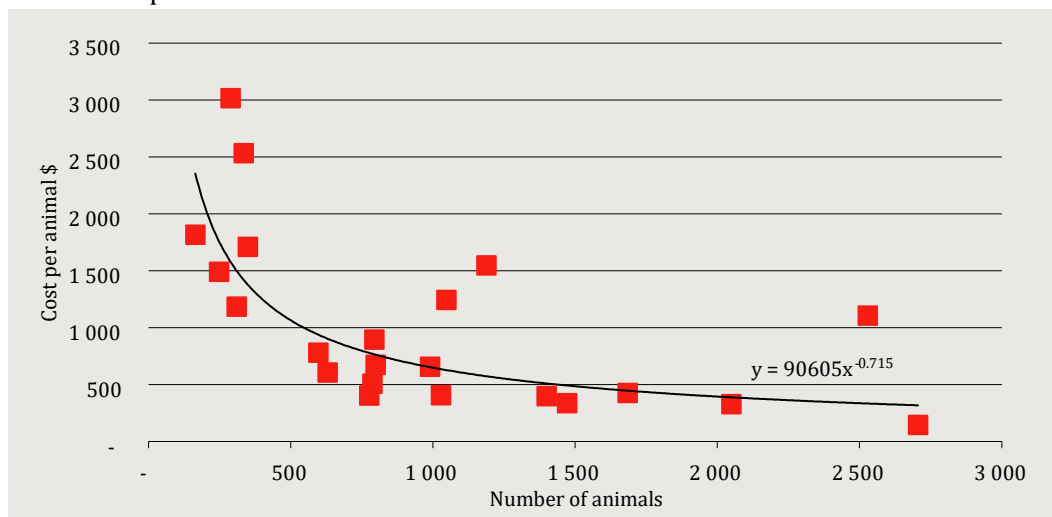
Overall costs and funding

The total cost of companion animal management in NSW for all LGAs is estimated to be approximately \$43m annually. This covers only the costs to councils and includes costs to pounds, animal management officers and programs. There are additional costs to rehoming organisations and animal welfare organisations. Each local government is responsible for companion animal management within their jurisdiction. Their responsibilities relating to companion animals include seizing, holding, euthanising, selling or otherwise transferring ownership of the animals under care. Councils can elect to run their own pound, engage a contractor to run their pound operations or enlist the companion animal management services of another LGA.

Across the sample of council impounding data, lower costs per animal for pound services as the number of animals per pound increases is observed (see chart 2.6). Total costs for companion animal management comprise of fixed and variable costs. Key drivers of fixed costs are the animal holding facility and staff costs. Construction of an animal holding facility can be highly capital intensive, for example see the new animal holding facility for Blacktown City Council, which is estimated to cost \$30m with space for 135 dogs and 230 cats. Staff costs are also a significant contributor to fixed costs, for example Liverpool City Council incurs \$850 000 annually on 6 full time equivalent employees and Wagga Wagga Council incurs \$313 000 on total staff costs annually.

Variable costs are driven by the number of days an animal stays within care as well as any medical treatments the animal requires. Animals require food and supervision as well as in some cases medication and behavioural training to increase their prospects for rehoming.

2.6 Cost per animal and number of animals



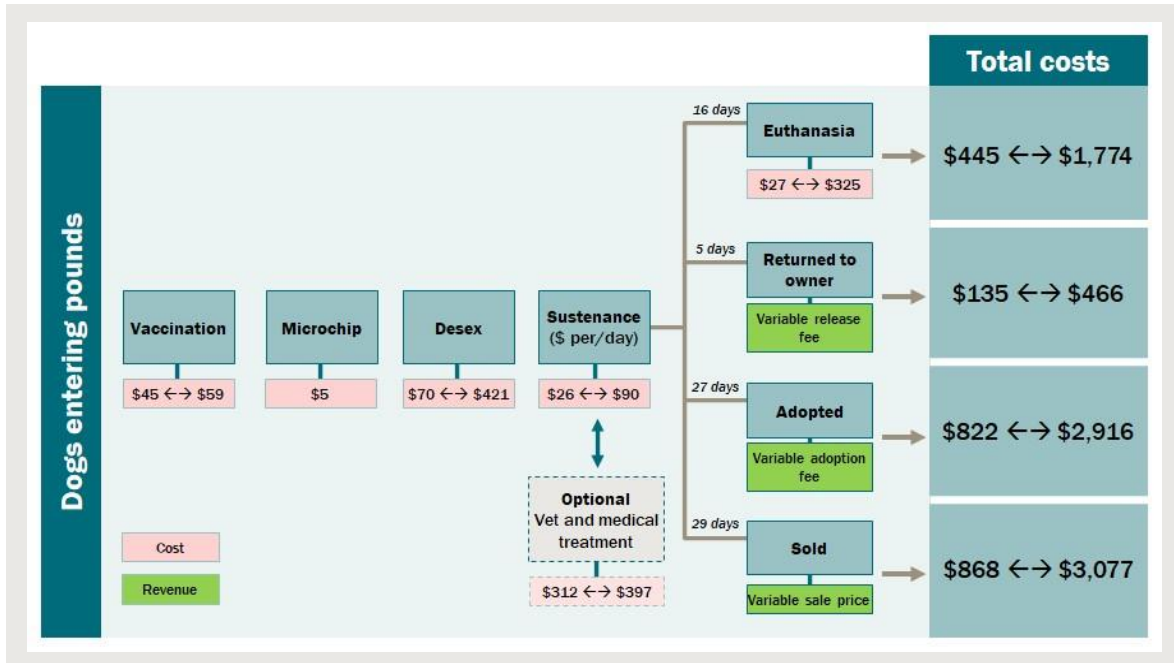
Note: Estimation based on a sample of pound data for 22 councils
Data source: CIE, Council annual reports

Rehoming organisations alleviate the cost burden to councils through accepting animals from them or through the public directly. In the financial year ended 2020, 10 329 animals were received across 58 accredited rehoming organisations. On average, animals were in care for 63 days. Of these animals, 9 720 were rehomed, 12 escaped, 187 were euthanised and 363 were transferred to another rehoming organisation or died in care. If we assume the holding costs are the same as for the Animal Welfare League, which averages \$11 per day for an animal, the total costs of holding these animals is \$7.2 million. This estimation is not reflective of the full cost, due to operations of the rehoming organisations being supported by volunteers and donations.

Cost drivers

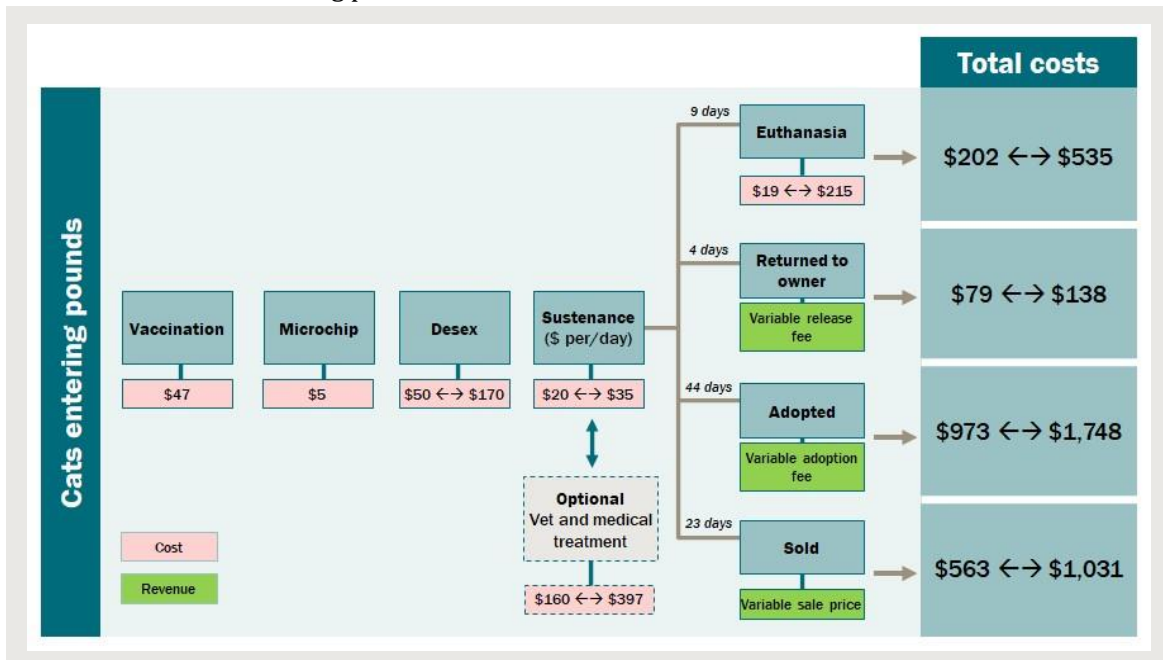
When animals enter the pound system, they incur various costs during their time under care and additionally in preparation for adoption or sale. Animals held under care of the pound require at a minimum a shelter space as well as food and water. In some cases the animal will require medical treatments or assessments to prevent the spread of disease. Animals that will be adopted or sold are required to be microchipped and, in most cases, will be vaccinated and desexed by the pound. If the animal is declared as menacing or dangerous or is severely injured, it will be euthanised either at the pound or a vet. Chart 2.7 and 2.8 shows the range of costs that could be incurred based on the outcome for each cat and dog entering the pound. **The least financial cost is typically where an animal can be returned to its owner.** Costs for euthanising an animal are higher than this and depend on how long an animal is held. Costs for adoption and sale of an animal are substantially higher because of a longer period held in a pound and other activities such as desexing and microchipping.

2.7 Costs of dogs entering pounds



Data source: CIE, stakeholder consultations feedback, council pound reports provided for selected councils to CIE.

2.8 Costs of cats entering pounds



Data source: CIE, stakeholder consultations feedback, council pound reports provided for selected councils to CIE.

Holding costs

The biggest cost driver in the pound and rehoming system is the cost for holding an animal in an animal care facility. Councils charge a daily fee that ranges between \$26 and \$90 for a dog and \$20 and \$35 for a cat. This fee is intended to cover direct costs such as food and medical treatments, as well as indirect overheads such as supervision, administration and holding pen costs. It was consistently reported in consultation that the fee does not cover the actual costs of holding an animal, therefore we expect the cost could be greater than the fee charged. As the number of days an animal is kept at a holding facility can range between 4 and 44 (see table 2.9), the holding cost can quickly escalate to be the major cost of animals in the pound system.

2.9 Average days kept within a holding facility by outcome

Outcome	Average days kept
	Days
Adopted	43.6
Transferred	24.6
Sold	23.1
Euthanised	9.1
Released	3.9

Note: A transferred animal can be moved to a rehoming organisation or another pound

Source: CIE, stakeholder consultations feedback, council pound reports provided for selected councils to CIE.

Table 2.10 shows the total cost and sustenance cost based on outcomes. The sustenance cost is the major cost for all outcomes.

2.10 Share of total care costs attributable to holding costs

Outcome	Average total cost	Average sustenance cost
	\$	\$
Adopted	1361	1 200
Euthanised	368	252
Released	108	108
Sold	797	636
Transferred	837	675

Source: CIE, stakeholder consultations feedback, council pound reports provided for selected councils to CIE.

The NSW Rehoming Review 2022 found that strategies which prevent intake are most cost-effective for NSW pounds.

Recommendation 1

As recommended by the NSW Rehoming Review (2022), the NSW Government should establish an ongoing funding arrangement for **Community Cat Programs** (high-intensity free desexing, microchipping and registration of owned, semi-owned and unowned cats targeted to areas of high cat impoundments or cat-related calls) which councils can apply to and could be run in partnership with the RSPCA or a similar experienced body, or private veterinary practices. Evidence-based Community Cat Programs reduce stray cat numbers and cat intake and euthanasia of healthy and treatable cats and kittens in pounds.

This would be targeted to councils with the highest cat intakes. Councils would need to show that they can target the areas with the highest problems and to report on outcomes. The expected cost of a program that would reduce cat euthanasia by one third is \$2 million per year on average, initially run over a five-year period. Councils would benefit financially from this through reduced pound intakes. However, rather than seeking co-funding from councils, this cost saving would allow councils to redirect resources into increasing adoption rates for remaining animals, reduce animals unclaimed at the pound because of costs, and to implement strategies to reduce intake such as microchipping programs and programs to assist people to keep their pets, rather than surrender them.

(b) the adequacy of pound buildings and facilities in New South Wales

In many pounds, cats and dogs are kept in inhumane conditions in small cages and housed individually with no to minimal enrichment which is shown to worsen behaviour over time, making them less adoptable. Cats and dogs are recognised as social species and many animals in pounds and shelters have improved welfare when housed in compatible pairs or groups (there may be some exceptions where individuals should be singly housed).

The NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments (1996) should be reviewed to reflect contemporary animal welfare science and community expectations. The reviewed Code should include enforceable animal welfare standards which ensure adequate housing space and social interaction appropriate for the species and individual animal. Please see Terms of reference (d) for more details.

(c) welfare challenges facing animals in pounds across New South Wales, including the provision of housing, bedding, feeding, exercise, enrichment, veterinary treatment, vaccination and desexing

- Please see recommendations under Terms of reference 1 (d) for the *NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments (1996)* below.

(d) the adequacy of the laws, regulations and codes governing New South Wales pounds, including the Companion Animals Act 1998 (NSW) and the NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments (1996), as well as the adequacy of the current enforcement and compliance regime

Current legislative and regulatory frameworks are major barriers to implementing strategies which will significantly reduce intake and euthanasia of healthy and treatable animals in NSW pounds, particularly cats.

These areas include:

1. Legal definition of cats
2. Microchipping of cats
3. Registration fees for cats
4. Cat behavioural assessment and habituation time
5. Return-to-Field (RTF) for cats
6. Rapid behavioural assessment by a veterinary psychiatrist or expert with postgraduate qualifications in dog behaviour of dogs involved in injuring people or other animals. Those that do not pose a risk to the community should be housed in more humane conditions, including foster care while awaiting the court hearing.

Legal definition of cats

To reduce stray cat numbers and pound intake and euthanasia, it is critical that Domestic cats (owned, semi-owned and unowned) are excluded from the legal definition of feral cats.

Feral cats should be defined as having no relationship with or dependence on humans (neither direct nor indirect), surviving by hunting or scavenging for food, and living and reproducing in the wild (e.g., forests, woodlands, grasslands, deserts). Please see Terms of reference (f) and (e) for details.

Microchipping of cats

Microchipping and registering cats to an organisation rather than to an individual only should be legally permitted (such as for multi-cat situations or working cats at factories, farms etc).

Registration fees for cats

Removal of registration fees for cats is critically important. Registration costs of \$65 per cat plus a \$80 fee if the cat was desexed when older than 4 months - even if it was acquired when it was older (the annual permit fee for non-desexed cats) – these registration fees are prohibitive and should be abolished, at least for 5 years and reassessed after that time.

These registration fees are a major barrier to people adopting the stray cats they are feeding and caring for. These registration fees are also a barrier to low-income people getting their cat desexed and microchipped. Costs of managing cats by councils, including costs of euthanasing 32% of impounded cats, exceed the income from registration fees by approximately 7 times, not including administrative costs for the registration system. Therefore, these registration fees should be abolished at least for 5 years and reassessed after that time, because they are perpetuating the cycle of kittens being born to die in pounds.

Cat behavioural assessment and habituation time

Deeming domestic cats that are in traps or entering pounds, shelters or similar facilities as being 'feral', 'less socialised' or 'unsuitable for adoption' based on fear behaviours (e.g., hissing, growling, striking or hiding) exhibited *prior to habituation*, and prior to providing the cat with reasonable habituation time (based on science) in a non-stressful environment is **scientifically invalid and inhumane, and should be legally prohibited**. Please see Terms of reference (g) the role and challenges of behavioural assessments in New South Wales pounds.

Return-to-Field (RTF) for cats

Return-to-Field (RTF) programs are another highly effective way to manage healthy stray cats admitted to shelters, pounds and private practices providing pound services and reduce euthanasia, particularly for cats that are less socialized which are at high risk of euthanasia or a long length of stay before they are adopted. If the cat is in good body condition and healthy, then someone either owns the cat or a semi-owner is feeding and caring for the cat. These cats are desexed, microchipped (initially to an organisation until the owner or carer is located) and then returned to where they were found (Spehar 2018, Spehar 2019). Research shows that cats are 13 times more likely to return to owners by means other than a visit to a shelter (Lord 2009).

The NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments (1996)

The NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments (1996) is 27 years old and should be reviewed to ensure it reflects contemporary animal welfare standards based on science and community expectations. Independent registered veterinarians with relevant species expertise and animal welfare organisations should have membership on the working group reviewing and developing a new code. Any new code should be enforceable. Detailed enforceable animal welfare standards should be developed for cats and dogs.

Euthanasia

In the current *NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments (1996)* some clauses are written with a 'should' rather than a 'must'. For example, the Code currently states:

6.5 Euthanasia

6.5.3 Euthanasia should only be performed by a veterinarian.

Given the significant animal welfare risks associated with killing an animal, and recent incidences in NSW where animal's suffered severe physical pain and injury as a result of Council attempting to kill a group of stray cats being cared for community members in Newcastle (NSW) using non-veterinarians and shooting which is an unacceptable method of killing cats (Scotney 2023), this section should be amended to a 'must' as follows:

Euthanasia

*Euthanasia **must** only be performed by a registered veterinarian using barbiturate overdose (which may be in combination with sedation and analgesia).*

Legislation and regulation should also be amended to ensure that: *Euthanasia **must** only be performed by a registered veterinarian using barbiturate overdose (which may be in combination with sedation and analgesia).*

Species other than cats and dogs

Councils accept species other than cats and dogs such as livestock species. It is important that all species are protected by enforceable animal welfare standards in the Code. General enforceable animal welfare standards should be included in the revised Code to cover species less commonly impounded and include the following elements to ensure every animal's physical, behavioural, mental, emotional and social needs are met: drinking water, nutrition, adequate housing space, hygiene, daily physical exercise, ability to express natural behaviours, environmental enrichment, social interaction with humans and con-specifics (where appropriate), opportunities to have positive experiences, transport, handling and veterinary care.

Boarding establishments, council pounds and veterinary hospitals have different functions and consideration should be given to developing new enforceable Codes for the different contexts.

Adequacy of the current enforcement and compliance regime

Current approaches to domestic animal management are reactive, punishment-oriented and costly. Shifting from punishment-oriented approaches to proactive support-based models of domestic animal management is highly recommended to reduce impoundments (pound intake) and euthanasia, and costs to councils (Hawes 2020, Scotney 2023, Rand 2023).

Dogs

Stray dogs in urban areas are typically owned dogs that have either escaped or were not being contained on the owner's property, and most originate from low socio-economic areas indicating that cost barriers and a lack of resources are important contributing factors leading to more stray dogs. Therefore, to reduce the number of stray dogs and related issues including impoundment costs, field services should be assistive rather than punitive, particularly in areas with large numbers of stray dogs.

Support-based strategies to reduce stray dog admissions and euthanasia include assisting owners with secure dog fencing and to increase pet dog identification and desexing rates with free microchipping, registration and desexing programs targeted to areas of high stray dog impoundments and complaints. Straying dogs should be released to owners as soon as possible, and payment plans should be negotiated for impoundment fees and registration fines, rather than continuing to hold the animal after the owner has been located. Increasing the proportion of pet dogs that are identified with identity tags, collars and microchips facilitates local residents and neighbours as well as veterinarians returning stray dogs directly back to their neighbours, and authorities returning stray dogs back to their owners without impounding.

Cost is a barrier to constructing and maintaining containment systems such as dog fencing, and a lack of secure dog fencing contributes to dogs straying, particularly in low socioeconomic areas. Assisting dog owners with building or repairing dog fencing, particularly for dog owners with recurrent stray dog impoundments, and for households in areas of high stray dog intake, proactively reduces stray dog admissions and euthanasia in pounds. Volunteer groups could be engaged to assist residents with fencing.

Cats

For cats, most cats entering pounds are classed as “strays”. They are either owned unidentified cats or semi-owned cats being fed by compassionate people (Alberthsen 2016, Zito 2016). The majority of cats entering pounds are likely semi-owned stray cats. The current approach to stray cats includes *Trap/adopt or kill*, *Trap/kill* or less commonly *Kill* (shooting). This reactive punishment-based approach is not evidence-based and has failed over the decades it has been applied in NSW to reduce the number of stray cats (homeless cats).

The evidence-based solution to stray cats is to proactively manage these cats in the community via targeted desexing with Community Cat programs (as recommended by the NSW Rehoming Review 2022). The majority of stray cats are semi-owned and being fed and cared for by compassionate caregivers (semi-owners) or owned cats that are unidentified and undesexed. Semi-owners are a significant pool of cat adopters however they need assistance to desex, microchip and register their stray cats. This support-based strategy is effective at reducing stray cats (and associated issues such as potential nuisance behaviours or potential wildlife predation), and is consistent with the One Welfare concept which optimises the well-being of people, animals and their social and physical environment (Chua 2023).

Impounded cats with an identified owner

Support-based strategies for impounded cats with an identified owner include releasing owned cats to owners as soon as possible, and reasonable payment plans should be negotiated for impoundment fees and registration fines (where needed), rather than using the current punishment-orientated approach which involves continuing to hold the cat until payment of fines and registration, even after the owner has been located (Rand 2023).

The current punishment-approach of requiring an owner to pay a fine or fee before returning the cat to the owner should be avoided to help reduce euthanasia of healthy and treatable cats and kittens and costs to council.

(e) factors influencing the number of animals ending up in New South Wales pounds, and strategies for reducing these numbers

Factors influencing pound intake

General

- Most dogs and cats entering shelters and pounds are classed as “stray”. “Stray” dogs are generally escaped owned dogs, and for low-income people they cannot afford the impoundment fees and fines to reclaim their dog and so they are left at the pound/shelter.
- For cats, most cats entering shelters and pounds are also “strays”, but they are either owned unidentified cats or cats being fed by semi-owners – people who have compassion for a stray cat and feed it on a regular basis (Alberthsen 2016, Zito 2016). The majority are likely semi-owned stray cats.
- 60–80% of dogs and cats entering animal welfare shelters, and 80–100% entering municipal facilities (pounds) in Australia are classed as strays (Rand 2023).
- Current reactive approaches to stray cat management (Trap/adopt or kill or Trap/kill or Kill (shooting) are ineffective at reducing stray cat numbers and result in high cat intake and euthanasia.
- The punishment-orientated approach to cat and dog management also increases pound intake (and costs to councils).
- The cost-of-living crisis and concurrent rental crisis are exacerbating factors contributing to pound intake and likely increasing pound intake.

Stray dogs entering pounds

- Nearly all dogs impounded by municipal authorities (council pound) have strayed off the owner’s property. Research shows that the highest dog intakes into shelters and municipal pounds are from low socio-economic areas.
- Low socioeconomic status of owners increases the likelihood their dog will stray, be surrendered or be unclaimed because it reflects less household resources. Resource limitations may also inhibit a household’s ability to provide for certain dog-related needs.
- For example, dog owners with fewer socioeconomic resources may be unable to afford secure dog fencing, or they may be tenants in rental properties who generally have less discretion about how dogs are housed compared to homeowners, or their rental properties may have poor fencing. Dog owners who are tenants also have limited housing choices due to the scarcity of rental properties that allow pets, which can be misperceived as a property risk (Rand 2023).

Dog surrender/relinquishment by owner to pound

- The most frequently cited reasons for surrender include dog behaviour (especially aggression and escaping), accommodation problems, and owner health and personal issues.
- Other reasons for dog surrenders include financial inability to care for the dog (e.g., owner cannot afford food, veterinary care) – exacerbated by the cost-of-living crisis and having unwanted litters of puppies and having ‘too many’ animals.
- Similarly (Hemy 2017) found that adult dogs were most commonly surrendered due to changes in owner's circumstances (29%), behavioural problems (22%) and as unwanted animals (20%), whereas puppies were most commonly surrendered as unwanted animals (69%) (most due to overpopulation), and due to financial constraints (20%).
- Cost is the main barrier to desexing, not lack of knowledge or education about desexing (APWF 2021, Rand 2021). The cost-of-living crisis will likely reduce desexing rates and contribute to increased surrenders of unwanted litters of puppies (surrendered because of Overpopulation - there were ‘too many’/unwanted litters).
- In Australia, the lack of rental accommodation allowing pets, or highly restrictive rental policies governing breed and size of dog, is one of the most common reasons people surrender animals, and accounts for 20 to 28% of dog surrenders in Australia. In Australia, although 31% of the population lived in rented accommodation within the census periods of 2010–2011 and 2013–2014, only 4% of advertised rentals allowed pets (Chua 2017, Hazel 2018).
- This issue is exacerbated by the current cost-of-living crisis and further compounded by the concurrent rental crisis in Australia.

Stray cats entering pounds

- Current approaches to stray cat management (*Trap/adopt or kill* or *Trap/kill* or *Kill* programs (shooting)) are ineffective at reducing stray cat numbers and result in high cat intake and euthanasia.
- This reactive punishment-orientated approach to stray cat management also increases pound intake.
- For cat semi-owners the cost of desexing and feeding stray cats is an issue and they are more likely to reside in low-income areas. Therefore, the cost-of-living crisis will likely reduce stray cat desexing leading to increased intake of stray cats and kittens into shelters and pounds.
- This is compounded by an increased number of councils (in Victoria) introducing ineffective mandatory containment of cats - which has further increased stray cat and kitten intake into shelters and increased euthanasia and costs to councils.
- Semi-owned cats should be proactively managed via desexing in the community (assisting semi-owners to desex and adopt their stray cat) rather than managing stray cats reactively which is not effective and results in high cat and kitten intake and euthanasia.

Cat surrender/relinquishment by owner to pound

- Owner-surrender (relinquishment) constitutes a minority of cat admission to shelters.
- For cats, most relinquishments are due to owner-related reasons. Only a small number are surrendered for reasons related to the animal, such as behaviour, health, and age.
- The most commonly cited owner-related reason for the surrender of a cat to for e.g., RSPCA shelters, is for accommodation-related reasons such as rental properties not allowing pets. The cost-of-living crisis will be exacerbating this issue as pet owners are forced to move into more affordable housing which is further compounded by the concurrent rental crisis in Australia.
- Many surrendered kittens are surrendered for simply being in excess (own litter, too many cats, unwanted). This, and the fact that more than half of admissions are kittens less than 6 months old, indicates that, despite attempts to promote desexing of owned cats, over-breeding is still a causal factor behind shelter admissions (Alberthsen 2016).
- Cost is the main barrier to desexing, not lack of knowledge or education about desexing (APWF 2021, Rand 2021). Therefore, the cost-of-living crisis will be exacerbating this financial aspect, likely reducing desexing rates and increasing surrender of owned kittens to shelters (surrendered because of Overpopulation - there were 'too many'/unwanted litters).
- **The strongest predictor of whether a cat is desexed is household income (Chu 2009).**

Evidence-based solutions to reduce intake (and euthanasia of healthy and treatable animals) in NSW pounds

General strategies

1. Government implement a '**Veticare**' system which would provide accessible veterinary care to disadvantaged pet owners. This would reduce pound intake, assist many low-income families, and also help to protect veterinarians and pound staff from the adverse mental health impacts of financial euthanasia due to clients who cannot afford veterinary care for their pet.
2. Provision of affordable **pet-friendly rental accommodation** sufficient to meet the demand across Australia. Legislation against 'no pets' clauses. Please see **Appendix 1**: Australian Pet Welfare submission - Improving NSW rental laws Have your say consultation.
3. Applying the '**Pets For Life**' concept strategies where dog and cat owners and stray cat semi-owners are supported to keep their pet or stray cat (versus relinquishment), which is a cost-effective strategy to implement. This should harness the capacity of other not-for-profits in the community and include funding for programs to help disadvantaged pet owners keep pets with their families by assisting with veterinary costs, registration, impoundment fines and fees, pet food, fencing and advice on resolving or managing problematic behaviours.

Please see: <https://humanepro.org/page/tools-bring-pets-life-your-community> and <https://humanepro.org/programs/pets-for-life>

4. A “**One Welfare**” approach to domestic animal management, particularly urban stray cat management is urgently needed in Australia. **One Welfare** aims is to optimise and balance the well-being of people, animals and their social and physical environment.
5. Shifting from punishment-oriented approaches to **support-based models of domestic animal management** (Hawes 2020).
6. To reduce euthanasia of healthy and treatable cats and kittens, **PREVENTION IS KEY** including:
 - **Targeted desexing of owned, semi-owned and unowned stray cats (Community Cat Programs as recommended by the NSW Rehoming Review report 2022)** is an essential strategy to significantly reduce the number of stray cats and kittens and subsequently reduce intake into shelters, pounds, private practices providing pound services and rescue groups. Reducing intake will significantly reduce euthanasia of healthy and treatable cats and kittens (Kreisler 2022).
 - By significantly reducing euthanasia of healthy and treatable cats and kittens, **Community Cat Programs** will significantly reduce devastating mental health impacts on vets and attrition.
7. Online training for local government Animal Management Officers (AMOs) with a focus on strategies to reduce intake and euthanasia, including science-based behavioural assessments utilising material developed by veterinary psychiatrists.
 - a. As per rehoming review training programs for behaviour assessment for council staff supported by NSW OLG, which could include financial support and coordination.

Cats

1) Community Cat Programs

- Cost is the main barrier to desexing, therefore proactive **Community Cat Programs** based on high-intensity free desexing, microchipping and registration of owned, semi-owned and unowned stray cats targeted to areas of high cat intake and complaints (typically disadvantaged low-income areas) are recommended to significantly reduce the number of stray cats and kittens and intake into shelters and pounds, private practices and rescue groups. These programs are very effective at assisting stray cat semi-owners to desex, microchip and adopt the stray cats they are feeding (turning undesexed semi-owned stray cats into desexed pet cats).
- Proactive **Community Cat Programs** are preventative and scientifically proven to reduce the number of stray cats and unwanted kitten litters in targeted areas - thereby reducing intake and euthanasia of healthy cats and kitten and associated mental damage to veterinary staff and stray cat semi-owners.
- Earlier this year, the NSW government announced \$8.3 million in funding for community cat programs and facilities. Please refer to the NSW Rehoming Review Report: <https://www.olg.nsw.gov.au/councils/responsible-pet-ownership/rehoming-practices-review/>

- **Banyule Council in Victoria** set up a free Community Cat program to desex, microchip and register owned and semi-owned stray cats, with a focus on suburbs with high cat-related calls. In just three years, the council reduced impoundments by 61% and cats killed by 74%. In contrast, after Yarra Ranges Council implemented mandatory containment, in 2017, there was a 68% increase in impoundments and 18% increase in euthanasia in the third year. Over 8 years of the Banyule program, euthanasia decreased to 0.2 cats/1000 residents compared to an average of 2 cats/1000 residents for NSW (Chua 2023)
- **At least 50% of cats entering pounds and shelters are kittens less than six months old.** The strongest predictor of whether a cat is desexed is household income (Chu 2009). These figures highlight why Community Cat Programs are urgently needed in NSW and across Australia (Alberthsen 2016).
- Most semi-owners and stray cats are found in disadvantaged low socio-economic areas (Rand 2023).
- Registration costs of \$65 per cat plus a \$80 fee if the cat was desexed when older than 4 months - even if it was acquired when it was older- are prohibitive. These are a barrier to people caring for stray cats to adopt these cats and a barrier to low -income people getting their cat desexed and microchipped. Costs of managing cats by councils, including costs of euthanasing 46% of impounded cats in councils that operate their own pound, exceed the income from registration fees by approximately 7 times, not including administrative costs for the registration system. **Therefore, these registration fees should be abolished for cats because they are perpetuating the cycle of kittens being born to die.**

2) Multi-cat situations

- **The relevant Act and Regulation should be amended to allow cats to be registered and identified via microchip to an “organisation” rather than only to an individual person.**
- This is critical in order to reduce euthanasia rates as scientific evidence shows that desexing semi-owned stray cats and returning them to their home where they continue to be fed and cared for by cat caregivers will reduce stray cat numbers in that area. This in turn reduces cat and kitten intake into shelters/pounds/private veterinary practices and rescue groups, and reduces euthanasia of healthy and treatable cats and kittens by veterinarians, as well as reducing nuisance issues associated with undesexed cats in the community.
- In situations where a semi-owner is feeding 1-2 stray cats, they will often be willing to put their individual contact details on the cat’s microchip record and registration and take full ownership, provided microchipping, desexing and registration is free.
- **For multi-cat situations** (often inappropriately referred to as colonies) in urban areas or on rural properties around farm buildings, it is usually not financially feasible for the semi-owner (feeding the cats) or farmer to pay registration fees for 6 to 30 or more cats. In these situations, the semi-owner or farmer will continue to feed and care for the cats but an organisation (welfare agency, rescue group or farm business) should be allowed to be registered without a charge as the owner or secondary contact on the council and microchip records, to enable these cats to be desexed and effectively reduce stray cat numbers in that area, reduce intake and prevent euthanasia of healthy and treatable cats and kittens by veterinarians. Ear-tipping is recommended to enable cats to be readily identified as desexed.

3) Working cats

- Organisations should rehome less socialised cats to ‘working cat’ homes where these cats cannot be adopted as traditional pets or returned to their semi-owners after being desexed. **Working cats** (also called ‘**Barn cats**’) are often placed in farming properties, barns, grain sheds, industrial businesses or other types of businesses where they are fed and cared for by designated cat caregivers and operate as rodent control. Please note that just the presence of cats (and their smell) can deter rodents from an area.
- This type of adoption increases rehoming avenues for less socialised cats and reduces euthanasia of healthy and treatable cats by veterinarians. Registration for cats should be abolished but while still required, should be free for “working cats”.

4) Return-to-Field (RTF) strategy

- **Return-to-Field (RTF) programs** are another highly effective way to manage healthy stray cats admitted to shelters, pounds and private practices providing pound services and reduce euthanasia, particularly for cats that are less socialized which are at high risk of euthanasia or a long length of stay before they are adopted. If the cat is in good body condition and healthy, then someone either owns the cat or a semi-owner is feeding and caring for the cat. These cats are desexed, microchipped (initially to an organisation until the owner or carer is located) and then returned to where they were found.
- Research shows that cats are 13 times more likely to return to owners by means other than a visit to a shelter (Lord 2009).
- This is an effective way to ensure that free-roaming owned cats and semi-owned stray cats find their way home given that reclaim rates are very low for unidentified animals in shelters and pounds and private practices providing pound services. RTF is undertaken extensively and successfully in the US (Spehar & Wolf 2019, Kreisler 2022). **Legislation needs to be amended to allow this to occur.**

5) Reject and prohibit the current approach to stray cats – *Trap/adopt or kill, Trap/kill or Kill programs*

- **Reject the current approach to free-roaming stray cats** which includes *Trap/adopt or kill, Trap/kill or Kill* programs which have been used routinely by Councils and shelters in Australia for decades and have failed to reduce the number of free-roaming stray cats in NSW (NSW Pound Data Reports).
- The current approach by Councils and shelters results in high euthanasia rates and has a very high socio-economic cost (Chua 2023) including causing profoundly negative mental health impacts to veterinarians and pound staff and contributing to high staff attrition. On average, councils operating their own facilities are killing 46% of impounded cats and kittens in NSW. The worst quartile of councils with intakes of >50 cats in New South Wales had estimated euthanasia rates from 67% to 100% (Chua 2023).

6) Reject and prohibit cat feeding bans

- Cat feeding bans are not effective. There are no published reports of any council effectively reducing stray cat numbers using feeding bans. Feeding bans are not effective at reducing stray cat numbers because they do not target the underlying cause i.e., lack of reproductive control. In addition, people feed stray cats out of compassion which is impossible to stop. Feeding bans are also difficult and costly to enforce.
- Cat feeding bans are a major barrier to resolution of the stray cat issue because in order to reduce stray cat numbers, cat semi-owners (people feeding stray cats) need to be positively engaged and assisted to desex and adopt their stray cat. Feeding bans prevent engagement with cat semi-owners and erode trust thereby preventing implementation of effective strategies (ie., Community Cat Programs) which will reduce stray cat numbers.

7) Reject and continue to prohibit Mandatory cat containment

- **Reject mandatory cat containment (mandatory night and 24/7 curfews)** which has detrimental effects including increasing cat intake and euthanasia of healthy and treatable cats and kittens (and negative mental health impacts on vets) and is ineffective at reducing free-roaming stray cat numbers in both the short and long term (Rand 2023, RSPCA Australia 2018).
Please see: <https://petwelfare.org.au/2022/08/31/australian-pet-welfare-foundation-position-statement-on-cat-containment/>
- Containment of pet cats to their owners' properties should be strongly encouraged where cats' physical and mental needs can be met and it is feasible for the owner from a financial perspective and is allowed by the landlord.
- **But mandatory containment should be rejected** because it increases intake and euthanasia of healthy and treatable cats in pounds and it creates a barrier to stray cat semi-owners taking ownership of the stray cat they are feeding. Mandatory containment will not protect native wildlife, the commonly cited justification, because it does not measurably reduce the number of free-roaming cats.

8) Bedtime feeding of cats

- Bedtime feeding of cats is recommended as a highly effective way for cat owners to keep pet cats safely inside at night, especially difficult to contain "door-dasher" cats, and has minimal to no additional cost. Cats are fed inside with half their daily food in the morning, and half just before the owner goes to bed (securing the cat indoors before the evening meal is fed).
- This method of night containment should be promoted to residents because it is very effective for protecting threatened and endangered species susceptible to potential cat predation - most of which are nocturnal mammals.

9) Impounded owned cat strategies

- Impounded cats with an identified owner should be released to owners as soon as possible, and reasonable payment plans should be negotiated for impoundment fees and registration fines (where needed), rather than continuing to hold the cat until payment of fines and registration, even after the owner has been located (Rand 2023).
- Requiring an owner to pay a fine or fee before returning the cat to the owner should be avoided to help reduce euthanasia of healthy and treatable cats and kittens in pounds and prevent negative mental health impacts on staff and owners associated with euthanasia,
- Increasing pet-friendly accommodation is an important strategy to reduce pound intake. Actions including banning 'no pets' clauses in tenancy legislation and regulation and ensuring tenants do not have to declare they have a pet as this leads to potential discrimination and greatly disadvantages pet owners in the rental market.
- However, if tenants are required declare a pet, then there should be a requirement for the landlord to go to the tribunal for permission to reject a pet for any reason. Some pet owners will live in their car or be homeless on the street, therefore the lack of pet-friendly accommodation is a major human welfare problem. Please see **Appendix 1: Australian Pet Welfare submission - Improving NSW rental laws Have your say consultation.**
- The recommended approach is: Subject to the law, an individual should be free to choose to keep a companion animal and an individual who chooses to keep a companion animal should be liable for any costs or losses that arise from their keeping the animal.
- Additional strategies to keep pet cats with their owners include funding assistance for veterinary health care costs, temporary boarding of pets during times of personal crises and pet food banks.

10) Legal definition of cats

- To effectively reduce the number of free-roaming cats, cat intake and euthanasia, and negative mental impacts on staff in NSW pounds associated with euthanasia, it is critically important to accurately distinguish between **domestic cats** and **feral cats**.
- Misclassifying domestic cats as feral cats is actively preventing a resolution to the free-roaming stray cat problem in Australia.
- The definitions utilised by Australia's leading national animal welfare organisation, the Royal Society for Prevention of Cruelty to Animals (RSPCA), the Commonwealth Government and some state governments including Victoria is recommended, with cats categorized based on how and where they live.
- All Australian jurisdictions should define all cats with some dependence on people (direct or indirect) living in the vicinity of where people live, as **domestic cats**.
- Cats that have no relationship with or dependence on humans, that live and reproduce in the wild (i.e., do not live where people live) should be defined as **feral cats** (in accordance with RSPCA Australia, Commonwealth government and Victoria state government definitions).

- **Domestic cats should be excluded from the legal definition of feral cats.** This will enable the implementation of effective domestic cat management strategies supported by the community, which reduce euthanasia, and negative mental health impacts on veterinarians.
- Cat management strategies should recognise three subcategories of **domestic cats** including:
 1. **Owned cats** – these cats are identified with and cared for by a specific person and are directly dependent on humans. They are usually sociable, although sociability varies. These cats are also called pet cats.
 2. **Semi-owned cats** – these cats are directly dependent on humans and are intentionally fed by people who do not consider they own them. These cats are of varying sociability and are sometimes called stray cats. They live in and around cities, towns and buildings on farming properties.
 3. **Unowned cats** – these cats are indirectly dependent on humans and receive food from people unintentionally, such as via food waste bins. These cats are of varying sociability and are sometimes called stray cats.
- **Feral cats** have no relationship with or dependence on humans (neither direct nor indirect), survive by hunting or scavenging for food, and live and reproduce in the wild (e.g., forests, woodlands, grasslands, deserts).

Feral cats do not live in the vicinity of where people live and they do not receive food from humans intentionally (direct feeding) or unintentionally (e.g., from food waste bins). Feral cats are completely unsocialised to humans and have none of their needs fulfilled by humans. **Feral cats** are not found or trapped in the vicinity of where people live, *they are not the subject of nuisance complaints* and they do not enter Australian council pounds or animal shelters (RSPCA Australia Annual Statistics).

- The term 'feral' should not be used as a cat definition category on intake, or as a reason for euthanasia in council pounds or shelters given that 'feral cats' do not enter council pounds or shelters.
- Feral cats do not enter Australian council pounds or animal shelters. RSPCA Australia does not use 'feral cat' as a cat classification category for cats on admission or as a reason for euthanasia in RSPCA shelters or council pound service facilities which recognises that feral cats do not enter shelters or council pound service facilities (RSPCA Annual statistics 2022).
- Feral cats are not managed by local government councils or their animal management officers (AMOs). Feral cats are managed by different authorities such as National Parks and Wildlife Service (NPWS), Local Land Services (LLS) or the Department of Environment. Feral cats managed by these authorities are typically shot, either while free-roaming or caught in a trap cage or leg-hold trap, or they are poisoned, and are not brought into council pounds or shelters by council AMOs or the general public.
- **Behaviour should never be used to label or classify a cat feral.** It is unscientific and constitutes misuse of behaviour testing. **Cats should be classed as feral based on how and where they live.** Pet cats can respond with more fearful behaviours in a trap cage than a truly feral cat.

Dogs

- **Support-based strategies** to assist dog owners to prevent their dog from straying are particularly important in locations of high stray dog intake which are typically low socioeconomic areas. Given that 98% of dog owners supported containing dogs on their property, education about the importance of containment is not likely an effective use of resources, and other methods are indicated (Rand 2023).
- **Support-based strategies** include assisting owners with secure dog fencing and pet dog identification and desexing rates with free microchipping and desexing programs targeted to areas of high stray dog impoundments and complaints (low-income areas) (Rand 2023).
- Straying dogs should be released to owners as soon as possible, and reasonable payment plans should be negotiated for impoundment fees and registration fines (where needed), rather than continuing to hold the animal after the owner has been located (Rand 2023). Requiring an owner to pay a fine or fee before returning the dog to the owner should be avoided to help reduce euthanasia of healthy and treatable dogs in pounds and prevent negative mental health impacts on staff and owners associated with euthanasia.
- Increasing the proportion of pet dogs that are identified with identity tags, collars and microchips facilitates local residents and neighbours as well as veterinarians returning stray dogs directly back to their neighbours, and authorities returning stray dogs back to their owners without impounding.
- Cost is a barrier to constructing and maintaining containment systems such as dog fencing, and a lack of secure dog fencing contributes to dogs straying, particularly in low socioeconomic areas. Assisting dog owners with building or repairing dog fencing, particularly for dog owners with recurrent stray dog impoundments, and for households in areas of high stray dog intake, proactively reduces stray dog admissions and euthanasia.
- Strategies that reduce owner-surrendered pound intake and euthanasia include free desexing and microchipping programs targeted to locations contributing to high intake to reduce unwanted puppies being born and surrendered.
- Other strategies include free behaviour counselling services, funding assistance with veterinary health care costs, temporary boarding of pets during times of personal crises, food banks, training classes, and public education campaigns. These are components of 'Pets for Life programs'.
- Like for cats and other animals, increasing **pet-friendly accommodation** is an important strategy to reduce pound intake. Actions including banning 'no pets' clauses in tenancy legislation and regulation and ensuring tenants do not have to declare they have a pet as this leads to potential discrimination and greatly disadvantages pet owners in the rental market. However, if tenants are required to declare a pet, then there should be a requirement for the landlord to go to the tribunal for permission to reject a pet for any reason. Some pet owners will live in their car or be homeless on the street therefore the lack of pet-friendly accommodation is a major human welfare problem.
- **The recommended approach is:** Subject to the law, an individual should be free to choose to keep a companion animal and an individual who chooses to keep a companion animal should be liable for any costs or losses that arise from their keeping the animal. Please see **Appendix 1:** Australian Pet Welfare submission - Improving NSW rental laws Have your say consultation.

(f) euthanasia rates and practices in New South Wales pounds, including the adequacy of reporting of euthanasia rates and other statistics

High cat and kitten euthanasia rates in NSW pounds

Euthanasia rates for cats are substantially higher than for dogs in NSW pounds. Approximately 9% of dogs are euthanased versus 32% of cats euthanased (NSW Seizure Pound data statistics 2021-2022). This high cat euthanasia rate is preventable. Evidence shows that reducing cat intake has a far greater impact on reducing euthanasia and costs than strategies aimed at increasing adoption (Kreisler 2022)). Therefore, prevention is the key to reducing cat euthanasia rates. Implementation of evidence-based solutions including proactive Community Cat Programs which reduce stray cat numbers thereby reducing cat intake and preventing euthanasia of healthy cats and kittens are urgently needed in NSW.

Reporting of euthanasia rates and other statistics

Prohibition on use of the term 'feral' cat in NSW pound statistics

For annual information reporting to the Office of Local Government, it is recommended that the NSW Government make the following revisions:

1. The reason for euthanasia currently classified as 'feral/infant' should be split into 'infant' and 'feral' replaced with "behaviour" as a reason for euthanasia.

So 'Infant' and 'Behaviour' replaces the current combined 'Feral/infant' category which is inaccurate because feral cats do not enter pounds or shelters. Misclassifying domestic cats as feral cats prevents effective solutions to resolve the longstanding stray cat issue. It is also extremely unhelpful when trying to assess the effectiveness of strategies overtime to combine adult and kitten data, therefore these categories should be separated.

2. Only the following categories should be used as reasons for euthanasia:
 - **Behaviour** (this includes poorly socialised and other behaviours that make them unsuitable for rehoming),
 - **Health** (includes medical and surgical conditions, and geriatric cats in poor health). Old age per se is not a reason for euthanasia, only if in poor health,
 - **Infant** (less than 400 grams or unweaned),
 - **Owner requested euthanasia**,
 - **Overcapacity** (shelter or pound facility is full).

It is critical to delete the term 'feral' because feral cats do not enter NSW council pounds or shelters. Feral should not be used in any reporting of euthanasia rates or statistics from NSW pounds, shelters or veterinary clinics with pound contracts. Please see RSPCA Australia Annual Statistics and Animal Outcomes which do not include feral as a classification for any cat entering RSPCA shelters or RSPCA facilities providing pound services. In addition, RSPCA Australia does not use 'feral' as a reason for euthanasia. Please refer to this link: <https://www.rspca.org.au/what-we-do/our-role-caring-animals/annual-statistics>

Legal definition of cats

- To effectively reduce the number of stray cats and therefore reduce cat intake and euthanasia and associated negative mental impacts on staff in NSW pounds, it is essential to accurately distinguish between **domestic cats** and **feral cats**.
- Misclassifying **domestic cats** as **feral cats** is actively preventing a resolution to the free-roaming stray cat problem in NSW and broader Australia.
- The definitions utilised by Australia's leading national animal welfare organisation, the Royal Society for Prevention of Cruelty to Animals (RSPCA), the Commonwealth Government and some state governments including Victoria is recommended, with cats categorised based on how and where they live.
- All Australian jurisdictions should define all cats with some dependence on people (direct or indirect) living in the vicinity of where people live, as **domestic cats**.
- Cats that have no relationship with or dependence on humans, that live and reproduce in the wild (i.e., do not live where people live) should be defined as **feral cats** (in accordance with RSPCA Australia, Commonwealth government and Victoria state government definitions).
- **Domestic cats should be excluded from the legal definition of feral cats.** This will enable the implementation of domestic cat management strategies which effectively reduce stray cat numbers, with support from the community.
- Cat management strategies should recognise three subcategories of **domestic cats** including:
 1. **Owned cats** – these cats are identified with and cared for by a specific person and are directly dependent on humans. They are usually sociable, although sociability varies. These cats are also called pet cats.
 2. **Semi-owned cats** – these cats are directly dependent on humans and are intentionally fed by people who do not consider they own them. These cats are of varying sociability and are sometimes called stray cats. They live in and around cities, towns and buildings on farming properties.
 3. **Unowned cats** – these cats are indirectly dependent on humans and receive food from people unintentionally such as via food waste bins. These cats are of varying sociability and are sometimes called stray cats. They live in and around cities, towns and buildings on farming properties.
- **Feral cats** have no relationship with or dependence on humans (neither direct nor indirect), survive by hunting or scavenging for food, and live and reproduce in the wild (e.g., forests, woodlands, grasslands, deserts).

Feral cats do not live in the vicinity of where people live and they do not receive food from humans intentionally (direct feeding) or unintentionally (e.g., from food waste bins). Feral cats are completely unsocialised to humans and have none of their needs fulfilled by humans.

- **Feral cats** are not found or trapped in the vicinity of where people live.
 - **Feral cats** are not the subject of nuisance complaints.
 - **Feral cats** do not enter Australian council pounds or animal shelters or facilities providing council pound services (RSPCA Australia Annual Statistics).
 - **Behaviour is not a valid test of whether a cat is feral or domestic.** Feral cats should be classified on how and where they live.
- The term 'feral' should not be used as a cat definition category on intake, or as a reason for euthanasia in council pounds or shelters given that 'feral cats' do not enter council pounds or shelters.
 - RSPCA Australia does not use 'feral cat' as a cat classification category for cats on admission or as a reason for euthanasia in RSPCA shelters or council pound service facilities which recognises that feral cats do not enter shelters or council pound service facilities (RSPCA Annual statistics 2022).
 - Feral cats are not managed by local government councils or their animal management officers (AMOs). Feral cats are managed by different authorities such as National Parks and Wildlife Service (NPWS), Local Land Services (LLS) or the Department of Environment. Feral cats managed by these authorities are typically shot, either while free-roaming or caught in a trap cage or leg-hold trap, or they are poisoned, and are not brought into council pounds or shelters by council AMOs or the general public.
 - **Behaviour should never be used to label or classify a cat as 'feral'.**

Reporting animal complaints

Animal complaints by species and type of complaint for example, cat nuisance complaints, should be recorded, publicly reported and examined as this data is important (along with data showing areas of high cat intake) to identify areas to target and micro-target for Community Cat Programs. Formally capturing this data is also a useful as a way of measuring the effectiveness of programs overtime (in addition to cat intake, euthanasia rates, staff turnover rate and cost savings). For example, a reduction in cat nuisance complaints after implementing a Community Cat Program reflects a reduction in the number of stray cats in the target area and indicates that the Program is being targeted accurately and at sufficient intensity.

Species other than cats and dogs

Councils accept species other than cats and dogs, such as livestock species. It is important that all species and their outcomes are captured in the data and publicly reported in the **annual NSW Pound data reports**.

The NSW Pound Data Reports

The NSW Pound Data Reports should continue to be made publicly available each year (Available here: <https://www.olg.nsw.gov.au/public/dogs-cats/responsible-pet-ownership/pound-and-dog-attack-statistics/>)

Mandatory reporting of rescue group data

Mandatory reporting of rescue group data should be implemented. Data should be separated into species, age, source (council transfer in, stray from general public, owner surrender or other), and outcome. This data should cover all species involved.

Method of euthanasia

In 2020, a group of semi-owned stray cats being cared for by a group of dedicated caregivers (semi-owners) were inhumanely killed by authorities at the Port of Newcastle in NSW. The caregivers for this group of semi-owned stray cats were not aware of the planned cull. The method of killing was by shooting and this resulted in multiple cats being severely injured and caused significant pain and suffering to the animals involved. The psychological devastation to the caregivers is documented in the recent publication:

- Scotney, R.; Rand, J.; Rohlf, V.; Hayward, A.; Bennett, P. The Impact of Lethal, Enforcement-Centred Cat Management on Human Wellbeing: Exploring Lived Experiences of Cat Carers Affected by Cat Culling at the Port of Newcastle. *Animals* 2023, 13, 271.

Shooting is an unacceptable method of killing domestic cats living in the community (including owned, semi-owned and unowned cats). APWF understands that a dog and puppies were also shot by a regional NSW council recently. Shooting is also an unacceptable method for killing all other species of companion animals and should be legally prohibited.

Where euthanasia is warranted on animal welfare grounds (i.e., it is cruel to keep the animal alive due to an untreatable physical condition such as terminal cancer or catastrophic traumatic injury as determined by a registered veterinarian) then the following enforceable standard should apply:

Euthanasia must only be performed by a registered veterinarian using barbiturate overdose (which may be in combination with sedation and analgesia).

(g) the role and challenges of behavioural assessments in New South Wales pounds

Cat behavioural assessment in NSW pounds

APWF understands that currently some cats entering NSW pounds are wrongly deemed feral, less socialised/unsocialised or unsuitable for adoption in the trap cage or on entry to the pound (or similar facility) if they display fear behaviours such as hissing, growling or striking, and are immediately euthanased. This approach fails to recognise basic animal behaviour; is inaccurate and inhumane, and should be legally prohibited.

Cats entering pounds or similar facilities (such as animal shelters or private veterinary clinics) must be given sufficient time to habituate in a non-stressful environment prior to behavioural assessment, regardless of whether the cat displays fear behaviours (e.g., hissing, growling, striking or hiding) prior to habituation¹ occurring.

Providing sufficient habituation time (based on science) in a non-stressful environment will significantly reduce the number of healthy and treatable cats euthanased for behaviour in NSW pounds.

1. **Habituation** is the cessation or decrease in a response to a stimulus that is the result of repeated exposure to the stimulus (Overall 2013).

*In this context **Habituation** is the cessation or decrease in the cat's fear response to the unfamiliar environment (e.g., pound) that is the result of repeated exposure to the unfamiliar environment (pound) over time.*

Background

When cats in a trap cage or entering pounds (or similar facilities) exhibit behaviours such as hissing, growling, striking or hiding, this represents a normal fear response to an unfamiliar environment. This does not mean the cat is a feral cat, a less socialised cat or a cat that is unsuitable for adoption (Overall 2013).

Cats trapped in the vicinity of where people live, and cats associated with nuisance complaints or entering Australian council pounds, shelters, private veterinary practices, rescue groups or similar facilities are all **domestic cats (owned, semi-owned or unowned)**, they are not feral cats (RSPCA Australia 2018, Australian Government 2015, Victorian State Government 2020, RSPCA Australia Annual statistics 2022).

Deeming domestic cats that are in traps or entering pounds, shelters, private vet clinics or similar facilities as being 'feral', 'less socialised' or 'unsuitable for adoption' based on fear behaviours exhibited prior to habituation is scientifically invalid and inhumane, and should be legally prohibited.

It is critical to note that: Behaviour is not a valid test to differentiate between domestic and feral cats and should never be used to determine a cat is feral.

Cats who live in the vicinity of where people live or frequent are domestic cats. Cats that are the cause of nuisance complaints are domestic cats. Feral cats live and reproduce in the wild remote from humans and are not associated with nuisance complaints and never enter shelters or council pounds. **How and where a cat lives determines whether it is feral or domestic.**

Outcome decisions

Outcome decisions based on behavioural characteristics must be deferred to allow the cat sufficient time to habituate to the unfamiliar environment (e.g., pound), given the likelihood that these cats will experience high levels of fear in a trap cage or unfamiliar environment, and that different behaviours will be observed *after* habituation has occurred.

It is not scientifically possible for a veterinarian, animal behaviourist or any other person, regardless of their training or experience, to immediately assess the behavioural characteristics, suitability for adoption or socialisation level of a cat in a trap cage or on entry to a pound, with any accuracy.

This is because **based on veterinary behavioural science, it is only possible to make accurate behaviour assessments after the cat has habituated to the unfamiliar environment**, and this requires a time period and the provision of an appropriately calm and comfortable non-stressful environment for the cat.

Veterinary health assessment by registered veterinarian

All cats entering pounds (or similar facilities) must receive a veterinary health assessment by a registered veterinarian to rule out any physical health conditions which may affect behaviour such as for e.g., a painful physical condition or thyroid condition. All cats of appropriate age should be vaccinated with core vaccines on entry to the pound or shelter to reduce disease outbreaks.

Habituation time for cats

Habituation time can vary between individual cats. **Scientific studies show that the average time for cats to habituate to a shelter-like environment is five days to five weeks** (Di Gangi 2022) and ranges from a minimum of 3 days to five weeks or longer to habituate (Rochlitz 1998, Kessler 1997, Ellis 2014, DiGangi 2022, Jacobsen 2022, Slater 2013, Kerr 2018).

Cats should be given multiple behaviour assessments gradually over time to increase their opportunities to display socialised behaviours (Slater 2013). That is, assessment should be continuous – assessment should not be one-off behaviour assessment.

Any timid or less socialised cats should be managed using humane behavioural modification programs and where appropriate moved to a more suitable environment such as **foster care** where behavioural modification programs can continue and the cat is given more time to habituate (Kerr 2018).

After provision of sufficient habituation time (according to the science) in an appropriate environment, some cats may still be very timid. Where a cat cannot be adopted as a pet or returned to their original location to be fed and cared for by cat caregivers (semi-owners) after desexing, organisations should use alternative rehoming avenues for very timid or less socialised cats such as adoption as **'Working cats'**. **Return-to-field is another option that should be legalised.**

WHS aspects

Some councils and pound operators indicated during the rehoming Review (2022) that 'holding feral cats for longer was a risk to staff (disease and WHS) and other animals (disease)'. These comments are not accurate.

Cats do not present a WHS concern when staff are trained and proper equipment is used. Proper equipment enables staff to avoid direct handling of any cat. Many well-socialised pet cats present

similar WHS issues when they are fearful (e.g., hissing, growling, striking and hiding), which are also adequately addressed with proper training and equipment.

Proper equipment for handling fearful cats is not expensive to purchase and there are many training videos demonstrating proper use of equipment such as on the Neighborhood cats website:

<https://www.neighborhoodcats.org/>

Most zoonotic diseases require close contact with the cat and therefore appropriate handling of a cat that is exhibiting fearful behaviours (e.g., hissing, growling, striking or hiding) (i.e., avoiding direct contact with the cat using proper equipment) will not result in close contact. Close contact is more likely with very well-socialised friendly cats, and therefore the risk of transmission of common zoonotic diseases like ringworm is more likely with these cats, than cats that staff cannot touch.

Providing cats with sufficient time to habituate in a non-stressful environment would substantially lower the number of healthy cats killed in NSW pounds.

Dog behavioural assessment in NSW pounds

- All dogs need time to habituate in non-stressful environment.
 - Pounds and shelters can result in behaviours associated with stress.
 - Behavioural assessment should be continuous – i.e., assessment should not be a one-off behaviour assessment.
 - Dogs that are obviously stressed by the pound environment should be moved to foster care for more accurate assessment of adoptability and a veterinary psychiatrist or postgraduate with training/qualifications in dog behaviour consulted on dogs prior to consideration of euthanasia for behaviour.
 - All dogs entering pounds (or similar facilities) must receive a veterinary health assessment by a registered veterinarian to rule out any physical health conditions which may affect behaviour such as for e.g., a painful physical condition.
1. Who is an expert who can assess a dog involved in an alleged attack?
 - To understand what motivates a dog to be aggressive requires more than experience training dogs. Aggressive behaviour can be motivated by many things from the dog's health, its developmental experiences and the situation in which it was involved. Assessing an animal's physical health is the responsibility of veterinarians, assessing mental health is the responsibility of the veterinarians, specifically veterinary psychiatrists. Understanding how health affects behaviour falls under the expertise of the veterinarian. One veterinary psychiatrist, who frequently serves as an expert witness, observed an assessment of a dog in NSW by a very experienced trainer who did not touch the dog or mention its obviously painful gait and lack of exercise tolerance. Chronic pain affects an animal's mental health and well-being, resulting in many being irritable.
 - The developmental experiences of the dog can also affect its mental health and the strategy it uses to navigate through social situations. Again, these are things studied in detail by veterinary psychiatrists.
- The assessment of these dogs should be done by veterinary psychiatrists or postgraduate with training/qualifications in dog behaviour as they are uniquely qualified to understand how normal dogs develop, how this is affected by genetics and deficits in their natal and early life environments, how psychopathology presents in dogs and how to diagnose it. The veterinary psychiatrist or postgraduate with training/qualifications in dog behaviour is also uniquely qualified to provide management advice to minimise the risk of further incidents.

2. Scope of the investigation for dogs who have caused injury to humans or other animals
 - In many cases, the brief of evidence does not provide information about the dog's body language preceding the alleged incidents. Many times the witness accounts start at the aggressive behaviour or just before, and there is no evidence of any questions to try to elucidate the body language of the dog preceding the events. When the incidents involve 2 or more dogs, there is generally not good descriptions of the body language of the dogs. In some cases, the preceding behaviour indicates that the aggressive incident was initiated by the other dog. When the incident involves a person, it may be obvious that the dog reacted to aggressive behaviour by the person.
 - Unfortunately, there does not seem to be efforts made to gather all the information important to understanding how incidents unfold. Again, the veterinary psychiatrist or postgraduate with training/qualifications in dog behaviour is trained to ask about behaviour preceding aggressive interactions and to interpret the behaviour.
3. Removal of the process from the courts
 - For many cases, the Dangerous Dog laws do not result in justice and repatriation for victims commensurate with the injuries experienced in the incident. In some cases the punishment does not fit the crime. For many cases, suitable solutions could be found at a local level. This would allow more rapid resolution of cases and management plans to be put in place. Where the injuries are minor, an investigation at the local council level involving a veterinary psychiatrist or postgraduate with training/qualifications in dog behaviour would allow understanding of the causes of incidents, suitable risk management strategies to be put in place with follow up to check for compliance. This avoids lengthy, and costly, impoundment of the dog which results in poor welfare for many dogs.
4. Having an advocate for the impounded dog who is independent.
 - Where dogs are impounded they need to have an independent advocate whose role is to oversee the dogs' welfare. APWF understands that some councils use access to the dog as a lever to force owner compliance. This is often at the cost of the well-being of the dog and damaging to the bond they have with owners.
 - Many impounded dogs are seen as "Dangerous" and are handled with protected contact despite not showing any aggressive behaviour. Dogs may have had their health and physical and mental well-being compromised by these handling procedures. These dogs may not have anyone to check on them and advocate for their well-being.
 - This advocate should be a veterinarian who is independent from the place of impoundment, the Council and the owners.

(h) the relationship between New South Wales pounds and animal rescue organisations

Animal rescue organisations should receive funding to cover the costs of preventative care and veterinary care for the rescue animals they are rehoming or, councils should be required to ensure animals have received preventative care and veterinary care prior to transfer to the animal rescue organisation.

Cats and dogs should be desexed, microchipped and registered prior to transfer to the animal rescue organisation or, the animal rescue organisation should receive funding to desex, microchip and register the cats and dogs they are rehoming.

(i) the challenges associated with the number of homeless cats living in New South Wales for both pounds and animal rescue organisations, and strategies for addressing this issue

The vast majority of homeless cats are semi-owned stray cats being fed by compassionate community members (semi-owners). Most homeless cats are found in low socio-economic areas (Chua 2023).

Prevention is the key to effectively reducing the number of homeless cats. **Community Cat Programs** are proven to reduce the number of free-roaming stray cats (and homeless cats). These proactive programs are very effective at assisting semi-owners to adopt, desex and microchip the stray cat they are feeding. This significantly reduces the number of stray kittens born and reduces the number of homeless cats in the area.

Semi-owners represent a large pool of potential stray cat adopters, but they need financial assistance to desex, microchip and register their stray cats as they are typically from low-income areas. Proactively managing semi-owned stray cats (homeless cats) in the community via desexing is effective at reducing homeless cat numbers and is the most cost-effective approach for councils (Banyule City Council 2020, Cotterell 2021). Unlike the current reactive approach to homeless cats which is very costly, not effective at reducing homeless cats, and has profoundly negative mental health impacts on staff and community members caring for homeless cats.

Banyule City Council (Melbourne, Victoria)

In Banyule City Council (Melbourne, Victoria) in the third year after implementing a high-intensity free desexing program (a community cat program) targeted to where cat-related calls and impoundments were occurring in Banyule (typically the low socio-economic areas):

- impoundments decreased by 61%
- euthanasia decreased by 74%
- cat-related calls decreased by 64% (from 11 to 4 cat calls/1000 residents)

Since 2013, Banyule has spent \$60,000 on its free desexing program and saved \$397,500 on cat impoundment costs alone (Cotterell 2021, Banyule City Council 2020).

RSPCA NSW Community Cat Program

There has been a reduction in intake of 31% in the first year and 46% in the second year for Greenacre in Canterbury-Bankstown after desexing of 8 cats/1000 through the RSPCA Keeping Cats Safe at Home program (NSW Rehoming Review 2022).

After one year of targeted free cat desexing through the RSPCA NSW *Keeping Cats Safe at Home* program, cat nuisance complaints reduced dramatically in Campbelltown (-56%), City of Parramatta (-49%), Shoalhaven (-56%) and Weddin Shire (-66%) council areas. The reduction in cat nuisance complaints reflects a reduction in stray cats in the target area (RSPCA 2023 *pers comm*).

(j) strategies for improving the treatment, care and outcomes for animals in New South Wales Pounds

- To improve outcomes for animals, evidence-based solutions which prevent animal intake into NSW Pounds such as **Community Cat Programs, Pets for Life strategies** and facilitating return of animals to their owners before impounding are recommended. Euthanasia is positively correlated with intake therefore reducing intake reduces euthanasia (Kreisler 2022, NSW Pound Data reports, Marsh 2010). In addition, where an animal is impounded and an owner subsequently identified, the animal should be returned to their owner and reasonable payment plans for any fines or fees organised (where needed), instead of continuing to hold the animal after the owner has been identified, to improve outcomes for animals (reduce euthanasia) and reduce costs.
- *Reviewing the NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments (1996)* to ensure it reflects contemporary animal welfare science standards and community expectations will improve the treatment and care of animals in NSW pounds. Please see Terms of reference (d) (f) (g) and (k).
- Both cats and dogs should be vaccinated with core vaccines on entry to the pound facility. And other species should receive core vaccines on entry where appropriate based on veterinary advice.
- Pounds should desex cats and dogs prior to their rehoming or fund cat and dog desexing.
- Strategies which increase adoptions will reduce euthanasia of healthy or treatable animals (please see below).

Strategies to increase Adoptions of Dogs and Cats

While reducing intake (preventing impoundments) and returning impounded animals back to their owners as soon as possible are most effective at reducing costs and euthanasia of healthy or treatable animals, **strategies which increase adoptions** are also important to reduce euthanasia rates and improve outcomes in NSW pounds (Chua 2023, Weiss 2009):

- Innovative paid advertising to increase shelter adoptions
- Partnerships with retail businesses for offsite adoptions.
- Expanding foster network. The foster care system benefits older or timid and shy cats that are at increased risk of euthanasia, and kittens requiring bottle feeding. It benefits dogs which are not coping well with the shelter environment, or are expected to have a long pound stay, for example, waiting for a neglect or cruelty case to be dealt with in the legal system. In addition, foster carers have networks and community contacts where they can promote adoption of the animals they are caring for, thereby increasing adoptions.
- Strategies to fast-track adoptions, simplifying the adoption process, off-site adoptions including allowing foster carers to adopt directly from their home, rather than returning the cat to the pound or shelter for the adoption process.
- Adoption promotions for e.g., one-day adoption events and free-adoption drives. There is no evidence that free-adoption results in worse animal outcomes than paid adoption and studies have shown that adopters' attachment to their pets does not differ whether they paid or had the adoption fee waived.

(k) any other related matter

1) Euthanasia of healthy and treatable animals is associated with severe negative mental health impacts on pound, shelter and veterinary staff. This is a major underlying cause of staff attrition and the veterinarian shortage in NSW.

In Australia, councils either operate their own pound or they have contracts with animal shelters or private veterinary clinics (many councils in regional areas and some in major cities have contracts with private veterinary practices to treat and euthanase animals). Due to the high cat euthanasia rate, this results in many staff in these veterinary practices, animal shelters and pounds suffering severe negative mental health impacts associated with killing healthy and treatable cats and dogs. Some councils also refer people with stray cats directly to private veterinary practices.

Euthanasia of healthy or treatable animals (also called convenience euthanasia, objectionable euthanasia or financial euthanasia) represents a frequent ethical dilemma encountered by pound, shelter and veterinary staff, and is a significant occupational stressor (Connelly 2022, Hilton 2023, Rollin 2011, Andrukonis 2020, Hoy-Gerlach 2021).

Recent research estimates that approximately 50,000 mostly healthy or treatable cats and kittens were euthanased in Australia annually in council pounds, shelters and rescue groups (Chua 2023). The total number of healthy cats and kittens euthanased annually across Australia would be higher as this estimate does not include private veterinary practices that were not providing council pound services and yet still euthanased healthy and treatable cats and kittens. The NSW Rehoming Review (2022) recommended Community Cat Programs as an evidence-based solution to significantly reduce euthanasia of healthy and treatable stray cats and kittens which represent a large proportion of the convenience euthanasia.

Euthanasia of healthy or treatable animals is well-documented as causing moral distress in pound, shelter and veterinary staff undertaking the euthanasia. Moral distress has been found to be a significant contributing factor in veterinarian burnout, intention to leave one's position and psychological distress (Kogan 2023). Research also shows that employee turnover rates are positively related to euthanasia rate and that making euthanasia decisions on the basis of factors other than health reasons (e.g., euthanasing healthy kittens and puppies because they are considered to require too much care) is related to increased personnel turnover (Rogelberg 2007).

Veterinarians and staff working in pounds and shelters suffer profound negative mental health impacts when required to kill healthy and treatable animals. These impacts include trauma (perpetrator-induced traumatic stress), depression, substance abuse, and increased suicide risk (Andrukonis 2020, Baran 2009, Whiting 2011, Reeve 2006, Rohlf and Bennett 2005, Tiesman 2015, Cooney 2023). Research shows the suicide rate of Australian veterinarians is four times higher than the general population (Jones-Fairnie 2008). Research also shows that Australian veterinarians have higher rates of depression, stress, and burnout than the general population (Hatch 2011, Hilton 2023). In a large US study, the major occupation with the highest workplace suicide rate was Protective Service Occupations including animal control workers (Tiesman 2015).

Moral distress can be defined as the powerlessness, anger, and guilt that veterinarians and pound and shelter staff experience when they are unable to work according to their own ethical standards (such as euthanasing an animal that is healthy or has a treatable condition) (Kogan 2023). This is not surprising given that most veterinarians and animal shelter workers enter the field to save or care for animals. Yet veterinarians and animal shelter workers are often called upon to kill healthy or treatable animals (Rollins 2011). Most veterinarians consider euthanasia of a healthy animal to conflict with their role as patient advocate (Cooney 2023).

The relationship between euthanasia of healthy and treatable animals by veterinarians and pound and shelter staff, and moral distress and negative mental health impacts is well-documented (AVA 2022, Kogan 2023, Kipperman 2017, Rollin 2011, Hatch 2011, Andrukonis 2020, Rogelberg 2007).

Preventing euthanasia of healthy and treatable animals is a key solution to reduce occupational stress, severe negative mental health impacts and staff turnover in NSW pounds and workplaces providing pound services.

Moral distress and severe negative mental health impacts associated with euthanasing healthy and treatable animals leads to burnout and subsequent attrition of veterinarians from clinical practice and is a major underlying cause of the current veterinarian shortage crisis in NSW (Kogan 2023, AVA 2022).

Reducing the number of free-roaming stray cats with Community Cat Programs based on high-intensity free desexing, microchipping and registration of owned, semi-owned and unowned cats targeted to areas of high impoundments or cat-related calls to councils, is aligned with the One Welfare philosophy (Chua 2023) and will have multiple benefits including:

- Reducing costs
- Reducing issues associated with free-roaming cats such as potential nuisance complaints and potential wildlife predation
- Reducing intake into NSW pounds and pound contracted shelters and private veterinary clinics.
- Reducing intake reduces the number of healthy and treatable cats and kittens killed because cat euthanasia is positively correlated with cat intake (Kreisler 2022, NSW seizures and pound data)
- Preventing severe negative mental health impacts on staff and staff attrition

Importantly, reducing euthanasia of healthy and treatable animal is a key solution to address the critical veterinarian shortage in NSW because euthanasia of healthy and treatable animals is identified as a major cause of veterinarian attrition from clinical practice, leading to the shortage.

This evidence emphasises the urgent need to implement evidence-based solutions such as Community Cat Programs which are effective at reducing the number of stray cats (and associated issues such as nuisance complaints) and do not cause mental health impacts on staff. Unlike the current outdated approach to domestic cat management which has failed to reduce stray cat numbers over decades and has extremely adverse community impacts.

2) Euthanasia of healthy and treatable animals is associated with severe negative mental health impacts on community members caring for stray cats

Cat semi-owners (also known as cat caregivers) are common with 3-20% of adults in Australia feeding a stray cat they do not perceive they own. Most cats entering pound facilities and shelters are strays (80-90%) are strays and the remaining 10-20% are largely owner surrendered cats.

Semi-owned cats are a substantial contributor to the 80% to 90% of stray cats entering pounds and shelters (Tan 2017).

Published research demonstrates very strong bonds between semi-owners and their stray cats, and positive psychological impacts on semi-owners from this unique human-animal bond (HAB), similar to the positive well-being impacts owners derive from companionship with their pet cats (Zito 2015, Centonze and Levy 2002; Khor 2018, Scotney 2023, Finkler and Terkel 2011). For example, caregivers state they are “attached” to the stray cat they are feeding and that feeding the stray cat makes them “feel good” and provides ‘emotional satisfaction, companionship, feelings of contentment, self-esteem and a sense of responsibility’. Caregivers also state that “People who are important to me would approve of me feeding a stray cat” and “Feeding a stray cat is the right thing to do”. They also sometimes refer to the cats like their children, needing care and protection.

These findings suggest that feeding stray cats can have substantial meaning and value in people’s lives, which is why caregivers are traumatised and suffer profound negative mental health impacts when their cats are killed by authorities, including post-traumatic stress (Scotney 2023).

A recently published Australian peer-reviewed study found very strong bonds between cat semi-owners and the stray cats they were feeding, and devastating psychological trauma when authorities killed and severely injured their cats using shooting as the method of killing at the Port of Newcastle in NSW in 2020 (attached). These caregivers were not aware of the impending killing program.

- Scotney, R.; Rand, J.; Rohlf, V.; Hayward, A.; Bennett, P. The Impact of Lethal, Enforcement-Centred Cat Management on Human Wellbeing: Exploring Lived Experiences of Cat Carers Affected by Cat Culling at the Port of Newcastle. *Animals* 2023, 13, 271.

The cat caregivers from the Port of Newcastle where the inhumane shooting of stray cats occurred were interviewed for the study by Scotney et al. (2023) and their comments included:

“ . . . **they’re basically the same as a pet cat** that you’d have at home. **They have names.** They have personalities. They have their little traits that they each individually have . . . **The bonds that we have with them are just as strong as the bonds as my own cats that live in my house . . . we think of them as our cats.**”

“ . . . **the most beautiful pets anyone’s ever had.** It says a lot about the label they get. **To have these bonds, it’s like having a million children at your feet.** We name them all. **They all have their names and they’re just so special—so, so special, you know. It is, it’s like having your own child.**”

“ . . . I always felt like **I needed a purpose in life,** but I never really felt like I found it till I found the Breakwall cats. **I feel it’s my one time in my life that I’ve made a difference**”

Caregivers also made the following comments when their cats were killed:

“ . . . we just felt absolutely grief stricken. I cried like I’d lost all of my pets my whole life a million times over, because I didn’t know exactly who had gone, who was left injured.”

“Horrific. Months and months and still today of horrific nightmares”

“I had a favourite called (Nala) and she was one of the ones that got killed . . . There’s people that really, really had such strong feelings for these animals . . . They are very loved.”

“They’re not feral. They’re pets waiting to go home, they really are.”

These comments reflect the strong bonds caregivers have with the stray cats they feed, and demonstrates the short- and long-term psychological trauma and devastation that occurs when their cats are killed and injured.

This research emphasises the urgent need for Community Cat Programs across NSW which are effective at reducing stray cat numbers and associated issues such as nuisance complaints whilst maintaining the well-being of cat caregivers in the community. Community Cat programs do not cause negative mental health impacts because they are non-lethal and keep stray cats with their caregivers. Community Cat programs are critical for animal and human well-being consistent with One Welfare philosophy, and will significantly reduce cat intake and euthanasia in NSW pounds. Unlike the current outdated and inhumane approach to domestic cat management which is not effective at reducing stray cats overtime and has profoundly negative mental health impacts on community members.

3) Tenants with pets - legislation and regulation

- Please see **Appendix 1**: Australian Pet Welfare submission - Improving NSW rental laws Have your say consultation.

4) Retaining current NSW legislation and regulation to continue NSW prohibition on mandatory cat containment

Mandatory cat containment should continue to be prohibited in NSW

Current NSW Legislation and regulation does not permit councils to enforce mandatory cat containment (night-time or 24/7 mandatory containment). NSW legislation and regulation should continue to prohibit mandatory cat containment in NSW.

Background

Mandatory cat containment is generally proposed because of a belief that it will reduce free-roaming stray cats and associated issues such as potential nuisance complaints or potential wildlife predation, and protect cats from potential harm. While it seems logical and compelling that mandatory cat containment would reduce the number of free-roaming stray cats and associated issues, this assumption is not supported by the evidence.

RSPCA Australia *Identifying Best Practice Domestic Cat Management in Australia* 2018 report:

“Overall, councils with cat containment regulations have not been able to demonstrate any measurable reduction in cat complaints or cats wandering at large following the introduction of the regulations”.

The Australian Pet Welfare Foundation (APWF) strongly encourages inside containment of cats at night, and where possible, contained to the owner’s property during the day in a comfortable environment which meets the cat’s physical and mental needs. However, the APWF is strongly opposed to *mandatory* cat containment (night curfews and 24/7) because it leads to increased cat nuisance complaints, increased cat impoundments, increased healthy cat and kitten euthanasia, increased costs and enforcement difficulties for local governments, increased mental health damage to pound and veterinary staff and community residents caused by euthanasing healthy cats and kittens, and no reduction in the overall number of wandering cats.

Banyule Council in Victoria set up a free Community Cat program to desex, microchip and register owned and semi-owned stray cats, with a focus on suburbs with high cat-related calls. In just three years, the council reduced impoundments by 61% and cats killed by 74%.

In contrast, after **Yarra Ranges Council** (Vic) implemented mandatory containment, there was a 68% increase in impoundments, 143% increase in cat nuisance complaints and an 18% increase in euthanasia in the third year. Over 8 years of the Banyule program, euthanasia decreased to 0.2 cats/1000 residents compared to an average of 2 cats/1000 residents for NSW (Chua 2023).

Data from **Casey council** (Vic), show impoundments remain higher than baseline, and considerably higher than the population increase 20 years after introducing mandatory 24/7 cat containment, demonstrating that mandatory containment is not an effective cat management strategy to reduce the number of wandering cats in the short or long term.

Mandatory cat containment is ineffective

Mandatory cat containment has been proven to be an ineffective strategy; a failure at reducing free-roaming cats in the short and long term, both in Australia and internationally.

Mandatory cat containment is not an effective strategy to reduce wandering cats because most wandering cats are strays with no owner to contain them.

Even for cats with an owner, containment is sometimes not achievable due to factors such as housing limitations (e.g., rental properties), lack of financial resources and concerns about the welfare of confined cats.

Mandatory cat containment actively prevents resolution of the longstanding free-roaming stray cat issue because it creates a major barrier to cat semi-owners adopting the stray cat they are feeding.

Mandatory containment will not protect native wildlife from potential predation by cats, the commonly cited justification, because it does not measurably reduce the number of free-roaming cats overtime.

Please contact the Australian Pet Welfare Foundation (APWF) if you would like to discuss these important issues further.

Thank you.

Yours sincerely,

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Appendix 1

Improving NSW rental laws consultation

Australian Pet Welfare Foundation (APWF) submission

11 August 2023



The Australian Pet Welfare Foundation

The Australian Pet Welfare Foundation (APWF) is a peak research body and advocate for pet welfare in Australia. As a not-for-profit organisation, APWF uses science-based research to enhance community well-being and improve the health and welfare of animals and people. APWF specialises in evidence-based solutions to prevent euthanasia of healthy companion animals in shelters and pounds and the associated mental health damage to staff and community residents, and ensure all adoptable animals find a home. We share research knowledge with the community, shelters and pounds, state and local governments and veterinarians to create change and save animal and human lives.

APWF is led by Chief Scientist Dr. Jacquie Rand, Emeritus Professor of Companion Animal Health at The University of Queensland (UQ) and a registered specialist veterinarian in small animal internal medicine. She has worked extensively in shelter research over the last 16 years, including collaborative studies with the RSPCA, Animal Welfare League and local governments. While at UQ Dr Rand taught Urban Animal Management and since 2013 has co-authored 21 peer-reviewed articles on urban animal management including management of semi-owned and unowned cats.

Improving NSW rental laws consultation

Thank you for the opportunity to provide feedback on the **Improving NSW rental laws** consultation. The Australian Pet Welfare Foundation (APWF) is strongly opposed to current NSW tenancy law which allows for blanket ‘no pets’ clauses, such that landlords can refuse requests to have a pet for any reason, or no reason at all. The Australian Pet Welfare Foundation strongly advocates that “no-pets” clauses in tenancy agreements should be banned in NSW and across Australia.

In relation to this NSW consultation, APWF is strongly opposed to the proposed standard form (application where tenants declare they have a pet). Having to declare a pet in a rental application, allows landlords and rental agencies to discriminate against prospective tenants with pets. This system will not make it easier for tenants with pets to find accommodation.

In addition, APWF is strongly opposed to the proposed creation of a list of reasons a landlord can reject a tenant with a pet, which will also not make it easier for tenants with pets to find accommodation.

In APWF’s view, if a landlord wants to refuse a pet for any reason they should be required to go to the Tribunal. In addition, the Tribunal should not be able to give the landlord the ongoing right to say no to animals at the property and the landlord should not be permitted to put any conditions on keeping a pet in a rental property.

APWF strongly recommends the following approach to tenants with pets as outlined by the Tenants’ Union of New South Wales: Subject to the law, an individual should be free to choose to keep a companion animal and an individual who chooses to keep a companion animal should be liable for any costs or losses that arise from their keeping the animal. This sensible approach would help to ensure sufficient pet-friendly accommodation is available, whilst also protecting the landlord and their property. This recommended approach is in the interests of animal welfare and the community, including landlords, and would represent evidence-based legislative change. We provide scientific evidence below which supports this claim.

Background

Pet ownership rates are high in Australia with a recent pet ownership boom during the Covid-19 pandemic. In Australia, 69% of households now own a pet, which is an increase from 61% just two years ago. Pets provide well-recognised significant physical, mental and economic benefits to people through pet companionship (AMA 2021).

Historically, the proportion of rental properties allowing pets is extremely low in Australia (Hazel 2018). The inclusion of “no pets” in tenancy agreements clauses is based on the myth that pet owners cause more property damage than non-pet owners. This myth is not supported by scientific research. The general lack of pet friendly rental accommodation in Australia has been exacerbated by the current rental crisis and further compounded by the cost-of-living crisis. Many pet owners have been forced to move into more affordable housing but unable to find accommodation that accepts their pets.

In the current worsening rental crisis, where rental prices continue to skyrocket and state laws allow landlords to advertise rental properties with ‘no pets’ clauses, even fewer properties are available for renters with pets who face major discrimination in a highly competitive and tight rental market (Mascarenhas 2023). New data shows renters with pets are most vulnerable with some being forced

to relinquish/surrender their beloved family pet due to a lack of pet friendly accommodation, causing severe psychological distress to pet owners. Unfortunately, pet relinquishment can lead to the euthanasia of healthy and treatable pets. Other pet owners will choose to be homeless and live in their car or on the street rather than surrender their beloved pet.

Euthanasia of healthy or treatable animals (also called financial euthanasia) can occur due to financial or housing constraints where an owner is unable to provide housing for their pet or other care such as food or veterinary care. The current cost-of-living crisis and concurrent rental crisis have likely increased financial euthanasia of pets. This type of euthanasia causes severe psychological distress to pet owners and veterinarians who are tasked with undertaking the euthanasia.

Recently, both Victoria and Queensland legislated that landlords will no longer be allowed to refuse pets in rental properties without a reason deemed valid by the state government. Legislation and regulation prohibiting “no pets” clauses in tenancy agreements is urgently needed across all Australian states and territories to reduce significant community and council costs, and the unnecessary euthanasia of thousands of healthy pets each year.

Recommendations

Recommendation 1: Legislation and regulation to prohibit ‘No pets’ clauses in tenancy agreements in the same way it is illegal to discriminate against tenants with children, to ensure pet friendly rental accommodation matches demand across Australia.

Recommendation 2: Consent for pets on a case-by-case basis is a form of discrimination and should be prohibited in legislation and regulation.

Recommendation 3: Where there is legislation that landlords cannot refuse pets, prospective tenants should not have to declare that they have a pet. Having to declare a pet in a rental application (such as the proposed standard form), allows landlords and rental agencies to discriminate against prospective tenants with pets. The proposed standard form (application where tenants declare they have a pet) should not be implemented.

Recommendation 4: Rental accommodation discrimination based on dog size and breed is not based on scientific evidence and should be prohibited in legislation and regulation.

Recommendation 5: Applying the ‘Pets For Life’ concept strategies where owners are supported to keep their pets (versus relinquishment).

Recommendation 6: Legislation and regulation to *prohibit* introduction of mandatory cat containment/curfews (night containment and 24/7 mandatory containment).

Recommendation 7: If a landlord wants to refuse a pet for any reason they should be required to go to the Tribunal. The proposed creation of a list of reasons a landlord can reject a tenant with a pet should not be implemented.

Recommendation 8: The Tribunal should not be able to give the landlord the ongoing right to say no to animals at the property.

Recommendation 9: The landlord should not be permitted to put any conditions on keeping a pet in a rental property.

Recommendation 10: Subject to the law, an individual should be free to choose to keep a companion animal and an individual who chooses to keep a companion animal should be liable for any costs or losses that arise from their keeping the animal.

Key points

1. Banning “no pets” clauses in tenancy agreements will reduce surrender of pets to shelters and pounds.

- In Australia, the lack of rental accommodation allowing pets, or highly restrictive rental policies governing breed and size of dog, is one of the most common reasons people surrender pets to pounds or shelters (Chua 2023).
- Lack of rental accommodation allowing pets accounts for 20 to 28% of all dog surrenders to shelters, and 36% of cat surrenders (Marston 2004; Alberthsen 2014, Alberthsen 2016), which represents a significant proportion of surrenders.
- Although 33% of Australians live in rented accommodation (ABS 2016), only 4% of advertised rentals specifically allow pets, making it almost impossible for pet-owning tenants to find a home (Danaher 2016). This situation is exacerbated by the current cost-of-living crisis rental crisis in Australia.
- Research led by Emeritus Professor Jacquie Rand, Executive Director and Chief Scientist from the Australian Pet Welfare Foundation shows that **approximately 10,000- 15,000 dogs and cats are euthanased in Australia each year because their owners could not find suitable rental accommodation** (Alberthsen 2014, Chua 2013, Rand 2015).
- This unnecessary and preventable euthanasia causes life-threatening adverse **mental health impacts on animal shelter and council pound staff involved in the euthanasia**, and results in unnecessary costs to municipalities and tax payers.
- Australian shelter and veterinary staff are often required kill large numbers of healthy cats and kittens, often repeatedly resulting in a significant human cost.
- Veterinarians and other staff suffer devastating mental health impacts when required to kill healthy or treatable animals repeatedly. **These impacts include trauma (perpetrator-induced traumatic stress), depression, substance abuse, and increased suicide risk** (Andrukonis 2020, Baran 2009, Whiting 2011, Reeve 2006, Tiesman 2015, Cooney 2023).
- Euthanasia of healthy or treatable animals is a significant occupational stressor and is well-documented as causing moral distress in veterinarians. Moral distress has been found to be a significant contributing factor in clinician burnout, intention to leave one’s position and psychological distress (Kogan 2023).
- Research shows the suicide rate of Australian veterinarians is four times higher than the general population (Jones-Fairnie 2008) and twice.
- Research also shows that Australian veterinarians have higher rates of depression, stress, and burnout than the general population (Hatch 2011, Hilton 2023)
- The relationship between euthanasia of healthy or treatable animals by veterinarians and moral distress, negative mental health impacts, burnout and subsequent attrition is well-documented (AVA 2022, Kogan 2023, Kipperman 2017, Rollin 2011, Hatch 2011). Australia is currently experiencing a critical veterinarian shortage and euthanasia of healthy and treatable animals is a major underlying cause of the shortage (AVA 2022).
- Research also shows that employee turnover rates are positively related to euthanasia rate and that making euthanasia decisions on the basis of factors other than behaviour and health reasons (for example, euthanasing healthy kittens, puppies and wildlife because they

are considered to require too much care or because the pet owner cannot afford vet treatment) is related to increased personnel turnover (Rogelberg 2007).

- Preventing euthanasia of healthy and treatable animals is a key solution to reduce occupational stress, negative mental health impacts, burnout and attrition in veterinary clinical practice, and a key solution to addressing the vet shortage.
- Banning “no-pets” clauses in tenancy agreements would allow more pet owners to obtain rental accommodation, thus reducing the number of dogs and cats surrendered to shelters and pounds. This would reduce the number of cats and dogs unnecessarily euthanased and save animal and people’s lives.
- With the large percentage of the Australian public that own a pet, “no-pets” clauses adversely affect a very substantial proportion of renters.
- Given the close bond people have with their pets, with 88% saying they regard their pet as a family member (Franklin, 2006; Power 2015), “no-pets” clauses cause unnecessary distress to people seeking rental accommodation.

2. Community costs associated with “no pets” clauses

- The Animal Welfare League in South Australia estimates the cost of shelter care to be \$245/dog per week, and when additional costs of preventive and veterinary care are included, the average cost to rehome a dog after one week of care is \$1056 (AWL, 2016).
- The estimated cost for municipal councils of admitting, rehoming or euthanasing a dog, ranges from \$250 to in excess of \$1000, and this cost may increase when external pound service providers are used (Darebin & Moreland City Council, 2015).
- Based on the average minimum cost of care in a pound or a shelter of \$1,000 for a dog and \$500 for a cat until it is adopted or euthanased, this results in more than an estimated \$20.8 million in unnecessary and preventable costs to municipalities and animal welfare agencies across Australia annually, as a result of “no-pets” clauses in tenancy agreements. These funds could be better spent on other community programs.
- Reducing intake into shelters and pounds is the most effective way to reduce euthanasia and costs to the community. In a US study, 98% of the decrease in euthanasia in shelters and pounds was accounted for by the decrease in intake (Marsh, 2010, Kreisler 2022). Therefore, it behoves governments to focus more on decreasing intake of animals into shelters and pounds, given this reduces both operational costs and euthanasia and devastating mental health impacts on staff and community residents.
- Critically, ‘Not pet clauses’ act as a major barrier to cat semi-owners taking full ownership of the stray cat they are feeding – the key solution to resolving the free-roaming cat issue (Rand 2023)
- In addition, “no-pets” clauses in tenancy agreements means that fewer homes are available to adopt pets from shelters and pounds, further contributing to unnecessary and preventable pet euthanasia. The NSW Rehoming Practices Review (2022) noted that Lack of housing is both a barrier to having a pet and a reason why people surrender their pets to pounds and other organisations.

3. Lack of evidence that pet-owning tenants are more detrimental to landlords' properties than non-pet owners

- Many landlords have a preconceived notion that pet owners cause more property damage than non-owners (Carlisle-Frank et al, 2005), and conclude that pet owners will be a financial burden. However, research conducted in USA demonstrates that pet owners stay twice as long, pay more rent and are no more likely to cause damage than non-pet owners. In contrast, renters with children cause an average of \$150 more damage per unit per year (Carlisle-Frank et al, 2005), yet in New South Wales, it is illegal to discriminate against tenants with children.
- The findings in USA are consistent with the experiences of First National in Australia. Stewart Bunn, a First National spokesperson stated that 'what we observe is that pet owners generally sign longer leases and pay more rent' (Quelch, 2015).
- According to Animal Medicines Australia (AMA 2022), better understanding the many benefits of responsible pet ownership may work to ameliorate some of these challenges. Indeed, some research suggests that being pet friendly can increase property value by 10% and rental income by 30%. In some Australian jurisdictions, body corporate rules may still sometimes preclude pet ownership without any consideration of the appropriateness of some pets to higher density living.
- The inclusion of "no pets" in tenancy agreements clauses is based on the myth that pet owners cause more property damage than non-pet owners. This myth is not supported by research

In summary, there is no evidence to support the notion that pet owners are a greater risk to cause property damage than non-pet owners, and there are many potential benefits from engaging with a high demand and financially rewarding pet-owning tenant's market including less vacancy time and less costs for advertising (Carlisle-Frank et al, 2005).

4. Community and health benefits

- Pet ownership in the community has well-documented physical, psychological and social benefits for individuals and the community as a whole (RSPCA, 2015, Franklin 2006, Power 2013, 2015). Pet ownership decreases loneliness and stress amongst elderly pet owners (Keil, 1998), improves community neighbourhood interactions and relations (Power, 2013), and enhances the sense of community (Wood et al, 2007).
- Pet ownership also results in health benefits to the community.
 - For example, total health care savings associated with pet ownership were estimated at \$1.813 billion or 5% of Australia's total health expenditure in 1999 (Headey, 1999).
 - Pet owners have reduced doctors' visits and reduced use of medication for high blood pressure, high cholesterol, sleeping difficulties, and heart problems (Headey, 1999). "No-pet" clauses means many renters miss out on the health benefits of pet ownership.
 - Banning "no pets" clauses in tenancy agreements is an important strategy to reduce significant community and council costs, and unnecessary euthanasia of healthy pets.

5. “No-pets” clauses in tenancy agreements are a cause of human homelessness

- Lack of pet-friendly accommodation increases human homelessness, as people on a low income have in some cases chosen to live on the street or in their car, rather than surrender their pet (Danaher, 2016). Being forced to choose between a beloved pet and having a home also has detrimental impacts on physical health and emotional well-being.

6. Tenant liability

The Australian Pet Welfare Foundation supports the approach presented by the Tenants’ Union of New South Wales in a similar submission to the NSW Government, that ‘companion animal ownership is fundamentally a matter of personal responsibility’. Subject to the law, ‘an individual should be free to choose to keep a companion animal and an individual who chooses to keep a companion animal should be liable for any costs or losses that arise from their keeping the animal’ (Tenants Union of New South Wales, 2016, McCarroll, 2016).

7. ‘Pets For Life’ concept

The ‘**Pets For Life**’ concept involves strategies where owners are supported to keep their pets (versus relinquishment). Please see: <https://humanepro.org/page/tools-bring-pets-life-your-community> and <https://humanepro.org/programs/pets-for-life>

Conclusion

In light of the substantial costs to municipalities and animal welfare agencies for managing surrendered pets as a result of “no-pets” clauses, the loss of individual and community health benefits of pet ownership, and the devastating mental health impacts to pet owners and veterinary staff, governments should legislate against “no-pets” clauses, in the same way it is illegal to discriminate against tenants with children. Consent for pets on a case-by-case basis is also a form of discrimination and should be banned, as should discrimination based on dog size and breed because this is not based on scientific evidence.

Please contact the Australian Pet Welfare Foundation (APWF) if you would like to discuss these important issues further.

Thank you.

Yours sincerely,

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