SPCA Submission

4 December 2025

Predator Free 2050 Strategy Review

This version has had minor revisions from the original submitted for the consultation in June 2025.

Executive Summary

- SPCA acknowledges controlling populations of non-native wild animals may be necessary to protect native wild animals. These efforts should be conducted with the utmost concern for the welfare of the targeted species.
- SPCA acknowledges that human activities have led to many problems associated with wild animals considered pests in New Zealand. Our organisation advocates that people should assess and modify their behaviour as a first step in comprehensive pest management.
- SPCA advocates for humane cat management of all cats as part of managing feral cats under Predator Free 2050. There is potential that the overpopulation of companion and stray cats could contribute to feral cat populations, which undermines the goals of reducing or eradicating feral cats.
- SPCA recognises the impact of cat predation and spread of disease on New Zealand's native animals. SPCA advocates for more funding to better understand the important questions about toxoplasmosis.
- SPCA advocates for funding to support research that measures the impacts of feral cat management on other non-native species, native species, and ecosystems.
- SPCA advocates that funding for research into more humane population control methods is prioritised for those species covered by the Predator Free 2050 Strategy.
- SPCA advocates that wild animal management under the Predator Free 2050 Strategy maintains social license through ongoing engagement with diverse groups that support conservation and cat welfare.
- SPCA advocates for adequate high-level resourcing and financing for comprehensive, long-term programmes under the Predator Free 2050 Strategy. SPCA is concerned about the implications of aiming to eradicate animals such as feral cats given the widespread popularity of companion cats and presence of stray cats in New Zealand and the potential for this to be an ongoing source of feral cats.
- SPCA advocates that efforts to control wild animal populations are informed by specifics of the situation to justify actions. SPCA is concerned that designating animals as pests can lead to inhumane treatment.

Contents

Introduction

The following submission is made on behalf of The Royal New Zealand Society for the Prevention of Cruelty to Animals (trading as SPCA).

SPCA is the preeminent animal welfare and advocacy organisation in New Zealand. The Society has been in existence for over 150 years with a supporter base representing more than 100,000 New Zealanders across the nation.

The organisation includes 28 Animal Welfare Centres across New Zealand and approximately 60 inspectors appointed under the Animal Welfare Act 1999.

SPCA welcomes the opportunity to submit on the consultation for the Predator Free 2050 Strategy Review.

Submission

Protecting biodiversity is important for the health and welfare of native wild animals. SPCA acknowledges that controlling populations of non-native wild animals, including introduced predators, may be necessary to protect native wild animals. These efforts should be conducted with the utmost concern for the welfare of all animals.

For this submission, we provide our organisation's views on managing wild animals as part of the Predator Free 2050 Strategy. SPCA advocates that wild animal management be guided by an ethical framework and considers the following questions (Dubois et al., 2017):

- Can the problem be mitigated by changing human behaviour?
- Are the harms serious enough to warrant wildlife control?
- Is the desired outcome clear and achievable, and will it be monitored?
- Does the proposed method carry the least animal welfare cost and to the fewest animals?
- Have community values been considered alongside scientific, technical, and practical information?
- Is the control action part of a systematic, long-term management programme?
- Are the decisions warranted by the specifics of the situation rather than negative labels applied to the animals?

For the remainder of this submission, we address each of these points as they relate to the Predator Free 2050 Strategy Review and emphasise points related to feral cats due to the growing interest in feral cat management in New Zealand and the links to domestic cats.

Can the problem be mitigated by changing human behaviour?

SPCA acknowledges that human activities have led to many problems associated with animals considered pests in New Zealand. Our organisation advocates that people should assess and modify their behaviour as a first step in comprehensive pest management. Species included in the Predator Free 2050 Strategy include animals living in urban and rural spaces where people unwittingly contribute to the proliferation of their populations. Steps such as proper management of rubbish and compost can reduce food resources for wild animals. Additionally, taking responsibility to ensure animals such as rodents are not stowaways when visiting pest-free islands can help reduce reinvasion. SPCA also considers it important to emphasise that people can change their behaviour by taking active steps to protect biodiversity through activities such as planting native plants and creating habitat for native wildlife on their properties.

Feral cats

SPCA advocates for humane cat management of all cats as part of managing feral cats under the Predator Free 2050 strategy. We assert that feral cat management will be more effective and acceptable when viewed as part of a broader management strategy to reduce the negative impacts of all types of cats in New Zealand. Companion, stray, and feral cats are subpopulations of a broader metapopulation of cats (this is discussed later in the document). Promoting cat management across all types of cats is needed because one subpopulation can contribute to another (see Glen et al., 2023; McDonald & Hodgson, 2021; Miller et al., 2014). Feral cats are those that do not live amongst humans, nor rely on people for their needs (Companion Code of Welfare: Companion Cats, 2018). However, there is potential that the overpopulation of companion and stray cats could contribute to feral cat populations, which undermines the goals of reducing or eradicating feral cats. SPCA is concerned that focusing on feral cat eradication may overpromise what is achievable in New Zealand given the extent to which people have companion cats and stray cats live in communities. Therefore, efforts to control feral cats need to also promote desexing and microchipping of companion and stray cats to help reduce future contributions to feral cat populations (see McDonald et al., 2023).

SPCA is concerned with how feral cats are distinguished from stray cats and companion cats under pest management efforts. Microchipping and microchip registration can help distinguish companion and managed stray cats (those cats that are provided care from people) from feral cats. However, the most current national-level statistics indicate that approximately one quarter of owners still have not microchipped their cats (Companion Animals New Zealand, 2024). We urge all involved in managing cats to consider the reality that cats living in remote areas may be lost or abandoned companion cats and that it is worthwhile to check for a microchip on any cat that is trapped, regardless of their behaviour.

SPCA advocates for all companion cats to be microchipped and have their microchip registered on the New Zealand Companion Animal Register. Most companion cats in New Zealand roam from their property (Companion Animals New Zealand, 2020), and companion cat home ranges in New Zealand can vary depending on location but have been reported as 1.2 km for urban cats and 2.4 km for rural cats (Metsers et al., 2010).

Know the Difference - Companion, Stray & Feral Cats

There are three types of cats in New Zealand - companion, stray, and feral. The difference between these types of cats is based on where they live and their relationship with people.

General

SPCA advocates for funding to promote best practice in humanely managing wild animals. Educating both the public and professional user should include integrated pest management strategies such as changing human behaviour first and better management of food sources and habitat for targeted animals as integral components of reducing wild animal populations (Dubois et al., 2017; Parsons et al., 2017; Quinn et al., 2019).

Private landowners and groups play an important role in carrying out the goals of Predator Free 2050. Many of the activities such as trapping and killing predators must be carried out in coordination with property owners or inhabitants. Community engagement efforts to protect biodiversity should include education and advocacy for humanely controlling and eradicating targeted species. Many New Zealanders who support efforts to protect native animals and habitats are also concerned about the welfare of animals targeted for population control (Goldson et al., 2015), indicating opportunities to strengthen community engagement by promoting activities that align with public concerns and values. For example, educating landowners on more humane trapping and killing of animals may create a more sustainable effort if landowners are concerned about reducing the suffering of targeted and non-targeted animals on their property.

Are the harms serious enough to warrant wildlife control?

SPCA values the lives of all animals and recognises that they are all equally deserving of protection from experiencing pain or distress. SPCA also acknowledges that it is sometimes necessary to manage populations of animals for a variety of reasons, including protecting our native plants and wildlife.

SPCA recognises the current and emerging research on the negative impacts of animals such as rats, mustelids, possums, hedgehogs, and mice on New Zealand biodiversity (Monks et al. 2024; Norbury et al. 2023; Nottingham et al., 2019; Russell et al., 2015; Watts et al. 2022). SPCA also recognises the interactions of these species, and the challenges this presents in focusing on some and not others in wild animal management. SPCA supports ongoing funding for research to better understand the impacts of introduced species on native biodiversity, the relationships between these species, and the impacts of targeting one species in complex ecosystems.

Feral cats

SPCA recognises the impact of cat predation on New Zealand's native animals. Feral cats are generalist predators that predominantly prey on rats and rabbits (Gillies & van Heezik, 2021; Nottingham et al., 2024), but also prey upon native bats, birds, reptiles, insects, and amphibians (Glen et al., 2023; Harper, 2010; Massaro & Blair, 2003; Mills et al., 2018; Tocher, 2006). Feral cats impact native animals across diverse habitats including dense forests, braided riverbeds, alpine areas, and rural environments (Gillies & Clout, 2003; Gordon et al., 2010; Kemp et al., 2023; Norbury & Heyward, 2008).

SPCA recognises the role of cats in spreading toxoplasmosis, which causes disease and death in native New Zealand wildlife (and humans and pastoral animals). Cats are the only definitive host of the protozoa *T. gondii*, responsible for causing the disease, toxoplasmosis (Dubey et al., 2009; Stelzer et al., 2019). *T. gondii* infection is a known cause of death for Hector's and Māui dolphins (Roberts et al., 2019;

Roe et al., 2013). *T. gondii* has been implicated in the death of at least one New Zealand sea lion (Roe et al., 2016) and is a potential factor for reproductive failure in New Zealand sea lions (Michael et al., 2016). Toxoplasmosis causing or contributing to death in native New Zealand birds is not common (Roberts et al., 2021), however, it has been determined as the cause of death in kererū, North Island kiwi, and North Island kākā (Howe et al., 2014), paradise shelduck, and red-crowned kākāriki (Hunter & Alley, 2014).

SPCA advocates for more funding to better understand the important questions about toxoplasmosis including background reference values to inform cat management and the impacts of managing cats on reducing transmission to native wildlife and farmed animals (Niebuhr & Norbury, 2020).

Reducing the transmission of toxoplasmosis to native wildlife may have extended benefits for sheep and goats, which are seriously impacted by infection leading to illness and abortion. In New Zealand, between 85 % to 61 % were positive for T. gondii depending on the titre concentration (Dempster et al., 2011).

Is the desired outcome clear and achievable, and will it be monitored?

SPCA recognises the different views about whether the outcomes of Predator Free 2050 are clear, achievable, and monitored. The welfare of predators is considered secondary to ecological goals when protecting biodiversity, however, uncertainties about the benefits for native animals call into question whether killing predators is worth doing (Doherty & Ritchie, 2017; Warburton & Norton, 2009). Lethal management of animals are ethically problematic when they do not reach intended goals, cause worse outcomes, or are carried out with inhumane methods (Doherty & Ritchie, 2017). When outcomes are ambiguous, they run the risk of not fulfilling goals (Lyver et al., 2017). In cases where animals are targeted for eradication, unclear outcomes can lead to the means of eradication becoming the overall goal (Parkes, 2009). Critiques of Predator Free 2050 note that predator eradication has become the measured outcome and usurped the goal of improving biodiversity (King, 2023; Linklater & Steer, 2018). Critics of Predator Free 2050 argue a focus on eradicating single species is misguided as a conservation strategy because it fails to consider the whole ecosystem (Linklater & Steer, 2018). Unintended consequences of lethal means to control specific predators can work to the advantage of other uncontrolled predator species by reducing competition for resources and promoting migrations of predators to new areas (Doherty et al., 2017; Pech & Maitland, 2016). The methods used for predator control are also not always target-specific and the effects of Predator Free 2050 on ecosystems and other predators and herbivores will be complex, with negative outcomes likely in terms of conservation (Leathwick & Byrom, 2023; Linklater & Steer, 2018). Concerns have also been expressed that current technology will not support the achievement of Predator Free 2050 (Innes et al., 2023; Murphy et al., 2019).

It is not our goal here to deliberate on these critical views. However, we are concerned that the critiques of Predator Free 2050 have the potential to apply to other species such as feral cats, mice, and hedgehogs. SPCA advocates for funding to support research that measures the impacts of introduced predator management on other non-native species, native species, and ecosystems. Predator management will benefit from a multi-species approach, especially when predators are placing downward pressure on other important predators such as rats and stoats (see Glen et al., 2023).

Does the proposed method carry the least animal welfare cost and to the fewest animals?

SPCA advocates that funding for research into more humane population control methods is prioritised for those species covered by the Predator Free 2050 strategy. Predators are lethally controlled most commonly through poisoning, trapping, and shooting. Lethal management methods should only be used when there is no effective non-lethal, humane alternative.

Improving live-capture trapping

Live capture traps are used to first trap an animal (either in a leg-hold trap or in a cage) until a person intervenes by either releasing or killing the animal. Leg-hold traps have metal jaws that are designed to clamp onto an animal's leg after stepping on a plate that releases the trap mechanism. Live capture traps are baited to lure an animal into a cage, and the cage door shuts after the animal has stepped on a treadle that releases the trap mechanism.

Animals caught in traps likely experience negative welfare impacts (Cowan & Brown, 2012). An animal caught in a live capture trap may experience physical or mental distress from injury, including self-injury (Iossa et al., 2007). Protecting an animal from environmental conditions can minimise the negative welfare impacts of live capture trapping (Beausoleil et al., 2022). Live capture traps should be set where a trapped animal is protected from environmental conditions such as hot or cold temperatures, rain, snow, or wind. Traps used in colder temperatures should have nesting material to help an animal thermoregulate. Traps used in warmer weather should be placed out of direct sunlight and be checked before the heat of the day to help ensure the animal does not experience heat stress (British Columbia Society for the Prevention of Cruelty to Animals, 2022).

A person setting out a live animal trap has obligations under the Animal Welfare Act for how frequently the trap must be checked and attending to a trapped animal.

Remote sensors can alert an operator when an animal has been captured and reduce the time an animal spends in the trap (Iossa et al., 2007; Ministry for Primary Industries, 2020). SPCA advocates for live capture trap operators to use remote-sensing technologies of captures to reduce the amount of time an animal spends in the trap. Operators should visit a live capture trap more frequently than is required by law, depending upon the species targeted, the likelihood of catching a non-targeted animal, exposure to thermal extremes or inclement weather, the trap used, and its location.

An animal captured live with the intention of killing should be humanely killed as soon as possible by a competent person (Department of Conservation, 2024; National Pest Control Agencies, 2015b). It is an offence under the Animal Welfare Act to wilfully and recklessly ill-treat wild animals or animals in a wild state, which includes animals included in Predator Free 2050 and other animals such as feral cats, mice, and hedgehogs. It is an offence under the Animal Welfare Act to kill an animal by drowning. Drowning is not a humane death (American Veterinary Medical Association, 2020; Beausoleil & Mellor, 2015). Drowning results in a fast and persistent decrease of oxygen in the blood, ingestion of liquid in the airways, acidosis, and elevated levels of carbon dioxide in the blood; all these symptoms an animal experiences while conscious (Beausoleil & Mellor, 2015; McEwen & Gerdin, 2016). Drowning leads to severe 'air hunger' which is considered the most unpleasant affective state associated with breathlessness (Beausoleil & Mellor, 2015).

Leg-hold traps

The types of leg-hold traps permitted for use and the location in which these traps can be used are restricted through the Animal Welfare Act 1999 and the Animal Welfare (Leg-hold Traps) Order 2007.

SPCA opposes the use of leg-hold traps because of the welfare harms they cause to trapped animals and because they are indiscriminate in how they catch animals. Leg-hold traps consistently rank lower as an humane method compared to other methods of control for many species including feral cats (PestSmart, 2018, February 1). Leg-hold traps for possums have been evaluated as causing moderate to extremely negative welfare impacts because of the injury caused by these traps and psychological effects such as anxiety, pain, fear, or distress caused over the duration the animal is caught (Landcare Research, 2010).

Snares and traps with noose-killing mechanisms

SPCA opposes the use of snares (e.g., free running, free running with fixed stops, and self-locking snares including those using stops, ratchets, etc.) because of welfare harms snares inflict on animals (Iossa et al., 2007; Proulx & Rodtka, 2017). Some injuries may not be evident for hours to days after the animal is released or escapes (Iossa et al., 2007). Incorrect use of snares can increase the likelihood of trapping non-target animals and trapping animals by body parts for which the snare is not designed, increasing the likelihood of injuries, pain, and distress (Iossa et al., 2007).

SPCA is concerned with traps that rely on a noose-like mechanism to kill an animal. Traps that use a noose-like mechanism to constrict the animal's blood supply to the brain. Traps with a noose-like kill mechanism have passed welfare performance testing and are available for sale and use in New Zealand (Bionet, n.d.). However, breathlessness is a serious welfare harm, and the potential of these types of traps to cause extended breathlessness is concerning (see Beausoleil & Mellor, 2015). SPCA advocates for more research on this topic to determine if the mechanism of death is acceptable based on welfare harms.

Improving lethal trapping of animals

Lethal traps are designed to lure an animal into the trap, and the killing mechanism is triggered when the animal touches the bait or triggers a sensor. Lethal traps should cause irreversible loss of consciousness and death as quickly and painlessly as possible and avoid catching non-target animals. Lethal traps are available as manual resetting or self-resetting. An animal caught in a lethal trap may be sensible for a protracted period before they become unconscious before death if the trap is not well designed for killing target species, is not set properly, or is in poor working order.

Many options of traps are available for importation, sale, or use in New Zealand, however, they range in their effectiveness in safeguarding the welfare of targeted and non-targeted animals. The use and sale of animal traps and devices in New Zealand is regulated by the Animal Welfare Act 1999. However, there currently are no regulations for the use, importation, and sale of lethal traps in New Zealand (Sumner et al., 2021).

SPCA advocates that only traps that have passed welfare performance testing such as the [National Animal Welfare Advisory Committee Guideline: Assessing the welfare performance of restraining and kill traps] be allowed for import, sale, and use. Traps are assessed based on the time it takes an animal to become insensible, and dead once trapped; traps either pass or fail assessment (National Animal Welfare Advisory Committee, 2024). These assessments are available to inform trap operators of which traps will minimise the negative welfare impacts (Bionet, n.d.).

The cost of welfare assessment is paid for by the trap manufacturer and with no meaningful market differentiation for traps that have passed welfare performance assessment, there is little incentive to undertake the process (Sumner et al., 2021). Increased access to funds that support the development and welfare-based assessment of lethal traps would provide incentives for manufacturers to develop improved traps.

Trap operator competence

Humane trapping is more likely to occur when trappers are familiar with the type of trap they are using and the species of animal they are targeting. Trappers should first assess an area intended for animal control using track tunnels, chew cards, wax tags, or cameras (Department of Conservation, 2024). Trap operators should know how to properly position bait to ensure the animal is trapped as intended and maintain traps in proper working order (National Pest Control Agencies, 2015a). Trap operators should be skilled in trap maintenance to ensure they work effectively and determine when a trap is worn out and ineffective.

Shooter competence

SPCA advocates for only those competent and skilled to conduct lethal management of wild animals through shooting. Lethally controlling animals by shooting is often considered a relatively more humane practice than other methods of control (Fisher et al., 2015; Littin et al., 2014).

Humanely shooting some species such as feral cats is difficult. Shooting feral cats tends to be either opportunistic and can supplement trapping by targeting specific trap-shy animals (Parkes et al., 2014) or killing cats caught in traps (Fisher et al., 2015). Feral cats avoid humans, therefore, shooting them as a management technique is more likely to be successful when the cat is unaware of the person (Fisher et al., 2015).

A humane shooting should result in the shortest period between when the animal is shot and when they experience irreversible loss of consciousness followed by death (Aebischer et al., 2014; Sharp, 2012; Stokke et al., 2018). Best practices to ensure a humane shooting include (Aebischer et al., 2014; Sharp, 2012):

- Shooters are competent and can clearly identify the animal before taking a shot.
- The correct firearm, ammunition, range, and shot placement are used.
- A wounded animal is promptly killed.
- If lactating animals are killed, efforts are made to find and humanely kill her offspring. All efforts should be made to avoid peak kitten season.

Practical guidelines that hunters can use in the field to evaluate if they have humanely killed an animal are new and not well-tested in the field, therefore, hunters should rely on current best practices for humanely shooting animals (Hampton et al., 2015; Stokke et al., 2018).

Non-targeted animals

SPCA advocates for funding to develop more species-specific trap excluders to prevent the non-target capture and killing of animals. Recent reports indicate that native wildlife such as kiwi, kea, weka, tieke, kākāriki, and tuatara are vulnerable to harm from traps (Lyth, 2025). Many traps are designed to exclude non-targeted animals which helps reduce unintended harms of controlling and eradicating targeted animals. For example, certain traps require placement in a tunnel that has wire mesh baffles to prevent non-target animals from entering the tunnel (Department of Conservation, 2024). Excluders can be purchased by the trap manufacturer or in many cases constructed according to instructions (see Department of Conservation, 2024).

Poisons

SPCA opposes the use of poisons due to the harm an animal experiences once poisoned and the duration of time until they are insensible before death. Many poisons pose a welfare risk for non-target animals. The relative humaneness of poisoning varies due to the severity and duration of what an animal experiences after ingestion (Littin et al., 2014).

Brodifacoum is commonly used to kill non-native animals such as rodents and possums in New Zealand in commensal and wild settings (Eason et al., 2017). Brodifacoum is considered to cause extreme welfare harm relative to other poisons for possums, rats, and ferrets (Landcare, 2010). Brodifacoum leads to prolonged and painful death for an animal (Mason & Littin, 2003; Littin et al., 2014; Landcare Research, 2010; Eason & Spurr, 1995; Merola, 2002), is potent and persists in an animal's body posing a high risk of secondary poisoning to other animals (Eason & Spurr, 1995; Merola, 2002), and persists in soil for long periods (World Health Organization, 1995).

Animals poisoned with brodifacoum will show behaviours consistent with sickness such as inactivity and increased time resting in a curled position, and abnormal behaviours such as crouching, lying prostrate, and pushing or pulling themselves across the ground (Littin et al., 2000). Clinical signs of poisoning can include external bleeding, pale extremities, paresis, and full paralysis (Littin et al., 2000). Animals that have been poisoned with brodifacoum will have extensive intramuscular haemorrhaging and haemorrhaging throughout their bodies (Littin et al., 2000), which is associated with moderate to severe pain (reviewed by Mason & Littin, 2003). The time to death is much longer in possums than in rats, but for both species, sickness begins days before death (seven days for possums, three days for rats; Littin et al., 2000). Clinical signs of poisoning occur over days to weeks with the animal aware and conscious during this time indicating significant suffering (Eason & Wickstrom, 2001; Littin et al., 2000; Mason & Littin, 2003).

1080 is available by permit only and used in aerial and ground baiting in remote areas to target possums, stoats, and weasels (Eason et al., 2017). Species vary in their sensitivity to 1080, but death is from eventual failure of the cardiac system (Goh et al., 2005), metabolic system (Dunn & Berman, 1966; Twigg & Parker, 2010), and/or nervous system (Atzert, 1971). For all animals, the common clinical signs of 1080 poisoning include lethargy, retching/vomiting, trembling, shivering, ataxia, muscular weakness, incontinence, abnormal vocalisations, hyperactivity, excessive salivation, rapid respiratory rate, hypersensitivity, and paralysis (Sherley, 2004; Sherley, 2007). 1080 is particularly lethal for carnivores such as stoats and cats; these animals experience central nervous system disturbances and convulsions as their metabolic energy supplies are depleted and they eventually die of respiratory failure (as reviewed by Sherley, 2007).

Currently, there are two poisons (Vertebrate Toxic Agents) registered for use in the control of feral cats in New Zealand: sodium fluoroacetate (1080) and para-aminopropiophenone/4-aminopropiophenone (PAPP). Improvements in the use of poisons to target feral cats have focused on stabilising the bait in the field and improving bait uptake by cats (Cox et al., 2021; Rickett et al., 2023). However, this still leaves the problem of poisoning leading to a prolonged time to death whilst the animal experiences negative states of welfare before insensibility.

Funding for effective non-lethal control methods

SPCA supports funding for research to develop more humane lethal control methods for targeted animals and to develop non-lethal control methods that can effectively reduce the impacts of introduced predators. Pest management is largely accomplished through lethal control. However, alternative approaches such as fertility control (Massei et al., 2023) and those that use cat behaviour (e.g., landscape of fear) to manage feral cats may provide useful options where lethal options are not feasible or not working (Miller & Schmitz, 2019; Yiu et al., 2024).

Have community values been considered alongside scientific, technical, and practical information?

SPCA advocates that pest management under Predator Free 2050 maintains social license through ongoing engagement with diverse groups that support conservation and cat welfare. The social benefits and costs of Predator Free 2050 are not settled, and important questions remain that impact animal welfare (Palmer & McLauchlan, 2023). New Zealanders support efforts to protect native animals and habitats however, they are also concerned about the welfare of targeted animals (Goldson et al., 2015). Killing animals to benefit others is an ethically important topic, whether it is a question about the humanness in how animals are killed, that individuals are harmed to benefit populations, or a focus on eradication instead of suppression can result in many more deaths, notwithstanding the risk of eradication efforts failing (see Palmer & McLauchlan, 2023). Some have argued that community engagement for Predator Free 2050 has been post–hoc (Linklater & Steer, 2018) resulting in people feeling left out and that their views, particularly, if not favourable, being dismissed (Bidwell & Thompson, 2015).

Feral cats

Implementing and maintaining successful cat management requires having the social license to do so (Deak et al., 2019). Managing feral cats will require a better understanding of the values, attitudes, and beliefs that people have about cats (Deak et al., 2019). New Zealanders show rather high support for feral cat management (Palmer & Thomas, 2023). Studies in New Zealand have found the public is more concerned about the impacts of feral cats, (and unmanaged strays and colony cats) on native and non-native wildlife compared to companion cats (Ovenden et al., 2024; Walker et al., 2017). However, public support of feral cat management can be impacted by confusion in determining if a cat is truly feral or stray (Deak et al., 2019). People have different connections to types of cats, which underscores the need to identify the values they attach to cats (Deak et al., 2019). For example, lethal control of feral cats is generally more acceptable to the public, conservationists, and cat advocates than lethal control of stray cats (Farnworth et al., 2011; 2014; Nguyen et al., 2022; Palmer & Thomas, 2023). Concerns for feral cat welfare are mostly focused on humanely killing them, which often comes down to the method used (e.g., shooting, trapping, poisoning), rather than the actual act of killing (Deak et al., 2019; Palmer & Thomas, 2023). Some research has found that non-lethal control methods for feral cats are preferred over lethal control methods by the public (Farnworth et al., 2014). Importantly, inadequate justification and use of lethal control may be poorly supported by the public (Farnworth et al., 2014).

Is the control action part of a systematic, long-term management programme?

SPCA advocates for adequate high-level resourcing and financing for comprehensive, long-term management programmes under Predator Free 2050.

Currently, animals such as feral cats are managed through sustained control that keeps populations of cats at a low number or prevents reestablishment of feral cats when removed from an area. Eradicating cats happens on offshore islands such as Raoul Island, Rangitoto and Motutapu Islands, and Little Barrier Island (Campbell et al., 2011), and from fenced sanctuaries such as Zealandia and Maungatautari fenced sanctuaries (Burns et al., 2012). The techniques used to control feral cats in both situations are similar, but control efforts undertaken during eradication campaigns are more intensive. Inclusion in a Predator Free 2050 strategy would shift the focus from suppression to eradication on the main islands. SPCA is concerned about the implications of this given the widespread popularity of companion cats and presence of stray cats in New Zealand and the potential for this to be an ongoing source of feral cats.

A temporary decrease, but an overall increase in cat numbers can occur with low-level culling and one-time trapping of cats (Lazenby et al., 2015; Niebuhr & Norbury, 2020; Palmas et al., 2020). Feral cat management will likely require ongoing attention due to the potential for cats to repopulate an area (Lazenby et al., 2015; Palmas et al., 2020). Managing cats to protect native wildlife should be part of a comprehensive predator control programme that targets multiple species of mammalian predators (Glen et al., 2023; Mills et al., 2018; Monks et al., 2023).

Additionally, a dual focus on short-term gains in protecting biodiversity through predator control whilst also focusing on preventing repopulation through bottom-up efforts that allow vulnerable wildlife to thrive in healthy ecosystems would help shift the focus of feral cat management onto biodiversity protection (King, 2023).

Are the decisions warranted by the specifics of the situation rather than negative labels applied to the animals?

SPCA advocates cat management efforts are informed by specifics of the situation to justify management of animals considered pests, understand the scope of management needed, and evaluate the impact of cat management.

Feral cats

SPCA is pleased to see the Predator Free 2050 Review distinguishes between three different types of cats in New Zealand. These distinctions help inform decision-making about cat management. SPCA recognises the following types of cats in New Zealand:

- **Feral cats** do not rely on human activity to survive and are generally located in remote areas. Feral cats have a wild temperament and are not suitable as companion animals. None of their needs is provided by humans and their population is self-sustaining.
- **Stray cats** are considered unowned and live near people. Stray cats vary in their sociality and dependence on humans. They may rely on people to some degree, either directly or indirectly, to meet their needs, such as food and shelter. Stray cats can live as individuals or in groups (colonies). Some stray cats are lost or abandoned companion cats, whereas others were born stray.
- **Companion cats** are considered owned and dependent on people to meet their needs.

Feral cats live in a wild state, are self-sustaining, and have none of their needs provided for by humans. Feral cats generally avoid living near people but are found in most terrestrial habitats from sea level to alpine areas throughout all main islands and some outlying ones (Gillies & van Heezik, 2021; Parkes et al., 2014). SPCA advocates that clear management goals and objectives that identify feral cats as distinct from stray cats are used in cat management.

SPCA supports funding to better understand feral cats and determine the best strategies for feral cat management. Feral cat densities vary widely and are largely dependent on the availability of prey (Cruz et al., 2015; Gillies & van Heezik, 2021; Glen et al., 2023; Nottingham et al., 2024; Recio et al., 2015; Rodríguez-Recio et al., 2022). Feral cat home ranges vary by sex of the cats, season, competitors, habitat type, land use, prey availability and type (see Nottingham et al., 2022). However, important questions remain about how feral cat density, individual behaviour and physical traits, population dynamics, and habitat complexity impact native wildlife and how these factors inform cat management (see Glen et al., 2023; Kemp et al., 2023; McDonald & Hodgson, 2021; Miller et al., 2014).

General

SPCA is concerned that animals targeted in Predator Free 2050 are vulnerable to welfare harm due to categorisation as pests. Categorising animals as pests can objectify them and lead to the justification for inhumane treatment (Potts, 2009). A humane approach to pest management recognises that regardless of their perceived nuisance, animals considered pests are sentient beings that can experience negative states of welfare.

Prioritising welfare as a secondary concern may also lead to problematic means of encouraging the New Zealand public to support PF2050. Stewardship for New Zealand biodiversity is encouraged through grammar schools and community groups as the conduit to link Predator Free 2050 messaging and methods with children and their families (Palmer & Birdsall, 2023). SPCA is concerned that normalising violence towards targeted predators can have detrimental effects on child development. We are concerned that community conservation and school fundraising events that promote the trapping, hunting, and killing of cats by children and young people may not routinely include recommendations to ensure child wellbeing or identify the possible psycho-social impacts on child participants. Exposing and encouraging children to participate in animal-directed violence can impede their ability to develop empathy (McPhedran, 2009), and the ability to understand the consequences of being cruel towards another animal or human (Hensley & Tallichet, 2005). Children exposed to animal maltreatment may become desensitised to violence, which enables them to commit further acts of violence towards animals and humans (Arluke et al., 1999).

Conclusion

SPCA appreciates the opportunity to contribute to the Predator Free 2050 Strategy Review. Our organisation is happy to discuss this matter if further information is required.

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