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Nature Conservation Saves for Tomorrow

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The Director
Live Import List and CITES Policy Section
Department of Climate Change, Energy, the Environment and Water
Australian Government

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SUBMISSION: IMPORT OF BENGAL CAT FOR NON-COMMERCIAL HOUSEHOLD PET PURPOSES

Blue Mountains Conservation Society (the Society) is a community-based volunteer organization with over 900 members. The Society's mission is to help conserve the natural environment of the Greater Blue Mountains World Heritage Area and to increase awareness of the natural environment in general.

The Society wishes to make a public comment on the application to include the Bengal cat, a hybrid animal of a domestic cat (*Felis catus*) and an Asian leopard cat (*Prionailurus bengalensis*), for non-commercial household pet purposes in the Live Import List under the *Environment Protection and Biodiversity Conservation Act 1999* (C'wlth).

The Society opposes listing of the Bengal cat for non-commercial household pet purposes in the Live Import List.

Relevant background information

The Australian Government Department of Climate Change, Environment, Energy and Water reports that feral cats are an introduced predator in Australia.

They kill over 1.5 billion native mammals, birds, reptiles and frogs, and 1.1 billion invertebrates each year. Predation by cats is a recognised threat to over 200 nationally threatened species, and 37 listed migratory species. Feral cats have contributed to the extinction of more than 20 Australian mammal species, including the pig-footed bandicoots, lesser bilby and broad-faced potoroo. They are a major cause of decline for many land-based threatened animals such as the bilby, bandicoot, bettong and numbat. Feral cats can also carry infectious diseases which

can be transmitted to native animals, domestic livestock and humans.¹

The Bengal cat is a sexually fertile hybrid cat. Consistent with the historical behaviour of *Felis catus* in Australia, there is a strong likelihood that imported Bengal cats and their offspring will become established as feral specimens. There is the possibility that Bengal cat genes featuring enhanced physical traits characteristic of Asian leopard cats may be passed on to feral offspring and to the Australian feral cat gene pool. Possible physical traits that may be passed on include greater physical ability including enhanced climbing prowess, greater size, and the ability to swim or develop swimming capability.

The Society's reasons for opposing the application

1. An increased range of Australian native animal species may become vulnerable to predation.

The Australian Government's *Threat Abatement Plan For Predation by Feral Cats 2024* states that hybrid cats *have different body sizes, physical abilities, and behaviours that could give them access to native species that are currently less susceptible to impacts from the feral cat*². When existing Australian domestic and feral cat gene pools are contributed to by an additional introduced breed of *Felis catus*, such as the Bengal cat, there is a possibility that certain traits that enhance predation of currently non-predated Australian native animal species may manifest in *Felis catus* offspring and future generations in Australia.

2. An increased number of Australian native animals may be predated upon.

A disastrously high number of Australian native animals are already subject to predation by domestic and feral cats. As discussed, Bengal cat gene distribution in Australia may possibly lead to enhanced predation capability among *Felis catus* offspring and future generations, and increased predation of Australian native animals. The Asian Leopard Cat is a competent swimmer and Bengal cats have a reported similar affinity for water³, whereas *Felis catus* rarely enjoy swimming. This trait would allow Bengal cats to predate a broader range of native animals.

The Society notes that Australian researchers have recently recorded successful attempts by introduced species, the Red Fox, to climb trees. To date, only the Grey Fox (non-introduced) has been acknowledged as a regular tree climber, but it should be noted that the Red Fox and Grey Fox share a common ancestor.

3. The Australian Government's first priority must be to protect Australian native species from any real or possible threats.

The vast majority of Australia's evolved native animal species are unique to Australia and its natural environments. Many species exhibit alarmingly small populations, and many species are confronted by predation and habitat threats brought about by introduced species, environmental degradation and climate change. It is crucial that whenever possible, Australian animal species are protected from real or potential

¹ <https://www.dcceew.gov.au/environment/invasive-species/feral-animals-australia/feral-cats> 2024

² <https://www.dcceew.gov.au/environment/biodiversity/threatened/publications/tap/threat-abatement-plan-feral-cats>

³ <https://royalbengalcattery.com/about-bengals/bengal-and-water.html#:~:text=After%20all%2C%20the%20common%20domestic,seem%20to%20absolutely%20love%20it.>

threats. The Bengal cat is an artificially bred hybrid cat, and facilitation of its distribution by the Australian Government is a matter of extremely low priority. The Society is pleased to note that wild evolved species, Asian leopard cat (*Prionailurus bengalensis*), is not a threatened species, and apparently occurs in adequate numbers.

4. Australian native animals are entitled to protection from potential introduced predators.

Australian native animal species exhibit sentience, including care for their lives and offspring. They exhibit a limited range of evolved, specific defences against predators. Many animal species introduced to Australia exhibit or rapidly develop novel predatory behaviours, that native species cannot defend against and are often slow to adapt to. It is extremely unacceptable to allow unrestricted importation of non-Australian animal species, such as the Bengal cat, that may possibly cause serious distress and pose possible predatory risks to relatively defenceless Australian native animal species.

5. DCCEEW should adopt the precautionary principle of conservation when considering the application to include Bengal cat in the Live Import List.

"In order to protect the environment the Precautionary Approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

(Principle 15 of the Rio Declaration on Environment and Development 1992).

Australia is a signatory to the Rio Declaration on Environment and Development 1992.

Applying the precautionary principle to the Bengal cat Live Import List application, the Society maintains that although the link between Bengal cat importation and increased predation of Australian native animal species has not been scientifically demonstrated conclusively, the possibility of increased predation and the possible resultant dire environmental outcomes fully justify a decision to not list Bengal cat on the Live Import List. The Society notes that until March 2025, Bengal cat was not listed on the Live Import List, as part of the Australian Government's *Threat Abatement Plan for Predation by Feral Cats 2024*. Non-listing would appear to be an appropriate application of the precautionary principle.

Thank you for the opportunity to comment on this matter. Please keep me informed about any further developments relating to the application.

For further information or enquiries, please contact me at president@bluemountains.org.au

Yours sincerely



Annette Cam
President
Blue Mountains Conservation Society