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Friday 17 April 2020

**Re: Comments on the revised Wild Dog Management Policy**

To whom it may concern,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to comment on the revised Wild Dog Management Policy. As South Australia's primary nature conservation advocacy organisation, since 1962, NCSSA has been a strong advocate for the protection of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and the management of protected areas.

Specifically, NCSSA has long held an interest in dingo ecology and conservation, having contributed to the development of the SA Dingo Policy in 1977 as well as providing comment on the draft Dingo Management Strategy in 2012 and the South Australian Wild Dog Strategic Plan (SAWDSP) in 2015. We strongly support the view put forward in the SAWDSP that the role of the dingo as an apex predator in Australia's ecosystems needs to be recognised and advocate that the strategic management of dingoes be based on scientific evidence.

NCSSA acknowledges that wild dogs are a serious pest for sheep graziers, however, we do not support the revised Policy's requirement for all land managers south of the Dog Fence to undertake widespread baiting *where there is no evidence of wild dog activity*. Rather, NCSSA suggests that land managers south of the fence should be required to monitor for the presence of wild dogs, and if found to be present, then control should be required. NCSSA believes the Policy should also provide clearer guidance on when control is warranted north of the Dog Fence, given that dingoes are an important top order predator that helps regulate prey species including feral herbivores. Particularly, NCSSA is concerned that the revised Policy allowing for aerial baiting could lead to more widespread, less discriminate use of baits, a practice that would be inconsistent with the evidence for optimal wild dog management.

NCSSA believes that the management of dingoes across South Australia must be underpinned by rigorous, long-term monitoring and evaluation programs that are adequately resourced, especially given the investment of public funds into wild dog control efforts (including in programs such as BiteBack and the \$1.2m dog trapper program<sup>1</sup>) and Dog Fence maintenance (including annual State Government contribution to fence maintenance plus \$20m of the \$25m recently invested in upgrading the fence<sup>2</sup>). This Policy revision offers an opportunity to articulate how our various control efforts will be monitored and evaluated. At a minimum, this revised Policy

<sup>1</sup> [https://www.pir.sa.gov.au/alerts\\_news\\_events/news/biosecurity/trapping\\_program\\_to\\_upskill\\_producers\\_on\\_wild\\_dogs](https://www.pir.sa.gov.au/alerts_news_events/news/biosecurity/trapping_program_to_upskill_producers_on_wild_dogs)

<sup>2</sup> [https://www.pir.sa.gov.au/biosecurity/weeds\\_and\\_pest\\_animals/animal\\_pests\\_in\\_south\\_australia/established\\_pest\\_animals/wild\\_dogs/dog\\_fence/rebuilding\\_the\\_dog\\_fence\\_in\\_south\\_australia](https://www.pir.sa.gov.au/biosecurity/weeds_and_pest_animals/animal_pests_in_south_australia/established_pest_animals/wild_dogs/dog_fence/rebuilding_the_dog_fence_in_south_australia)

should stipulate the data which will be collected, analysed and published by Biosecurity SA to facilitate the planned review of the Policy by 2024.

NCSSA notes that a bounty has recently been placed on wild dogs in drought affected areas<sup>3</sup>. NCSSA does not support this approach, since bounties are an ineffective form of control that does not guarantee a significant reduction in wild dog numbers and such schemes are vulnerable to fraudulent and deceptive behaviours<sup>4</sup>. NCSSA notes that drought affected areas includes areas north of the Dog Fence, where this revised Policy acknowledges the ecological and cultural significance of dingoes and states that land managers limit their control to places and times where wild dogs are impacting cattle. NCSSA understands that the bounty does not form part of this revised Policy, however, it should be a priority for any relevant Ministers and their agency staff to ensure that all policy tools for wild dog control that are endorsed by the State Government, and implemented using public funds, are effective and evidence-based.

Further comments on the revised Policy are provided on the following pages. If you would like to clarify or discuss this submission please contact me on (08) 7127 4633 or via email at [julia.peacock@ncssa.asn.au](mailto:julia.peacock@ncssa.asn.au).

Yours sincerely,

A handwritten signature in blue ink that reads "Julia Peacock". The signature is written in a cursive style and is set against a light yellow rectangular background.

Julia Peacock  
Nature Advocate

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<sup>3</sup> [https://www.pir.sa.gov.au/biosecurity/weeds\\_and\\_pest\\_animals/animal\\_pests\\_in\\_south\\_australia/established\\_pest\\_animals/wild\\_dogs/wild\\_dog\\_bounty\\_scheme](https://www.pir.sa.gov.au/biosecurity/weeds_and_pest_animals/animal_pests_in_south_australia/established_pest_animals/wild_dogs/wild_dog_bounty_scheme)

<sup>4</sup> <https://www.pestsmart.org.au/awms-position-statement-on-bounties/>

## NCSSA's comments on the revised Wild Dog Management Policy

### *Comments on 'Preamble'*

The statement that "Outside of the Dog Fence .... their impacts on cattle have been excessive" needs amendment and further clarification since excessive means "higher than desired", a subjective term open to interpretation by individual landholders and therefore potentially disparate views about what this may mean. Given that the impact of wild dogs outside the Dog Fence is variable and appears to be, at least to a certain extent, related to the availability of prey as a result of weather patterns, we suggest amending this to "at times and under certain environmental conditions their impact can be high", and that the Policy include some kind of quantitative evidence of this, as has been provided for sheep.

The preamble should address why the previous policy, the aims of which are virtually identical to the revised Policy, has not been successful.

This section should also acknowledge significant advances in knowledge since the last policy was drafted, including the six year study by Eldridge et al (2016) in the South Australian Arid Lands Natural Resource Management Region that investigated the relationships between wild dogs, calf loss, prey abundance and biodiversity.

### *Comments on 'Management required to virtually eradicate wild dogs inside the Dog Fence'*

NCSSA recognises that wild dogs are a serious pest for sheep graziers south of the dog fence, however, we do not support requiring all land managers to undertake widespread baiting where there is no evidence of wild dog activity. From comments on Your SAy, we understand that the revised Policy proposes 'proactive and regular baiting' with the aim of minimising incursions and destroying dogs already inside the Dog Fence, however, baiting is labour intensive and can impact non-target species of native fauna. Therefore NCSSA advocates for the use of 1080 to be restricted to times when it will be most effective rather than used as a routine control measure when there is no evidence of presence or impact of wild dogs.

Rather than the Policy requiring baiting where there is no evidence of wild dog activity, NCSSA suggests that land managers south of the fence should be required to monitor for the presence of wild dogs, and if found to be present, then control should be required. Initially, the manner in which the control is undertaken should be guided by knowledge of the individual circumstances, rather than prescribed with rigid minimum baiting standards, since the optimal approach to wild dog control may vary between properties, for example there may be some instances where trapping may be more effective than baiting.

As a last resort, the Policy could stipulate that if there is evidence that a high number of wild dogs are present on a property south of the fence and that they are moving onto neighbouring properties resulting in unacceptable impact on livestock, and the relevant land manager has failed to implement adequate controls despite requests to do, then that land holder should be compelled to undertake control. This could include complying with minimum baiting standards if that is deemed to be the most effective form of control on that property.

NCSSA understands that, in practice, Landscape Boards will enforce this Policy and, given the diversity of land uses south of the Dog Fence, will likely target its enforcement to protect the livestock industry. The changes suggested above would still allow enforcement of minimum baiting standards on properties where control is required due to unacceptable impact on the livestock industry, but without requiring the widespread baiting of areas where there is no evidence of wild dog activity.

*Comments on 'Management required to prevent wild dog incursions through the Dog Fence'*

NCSSA understands that the area of 35km for the buffer zone north of the fence was determined in the 1990's on the understanding that distance would cover the home range of wild dogs and their dispersal distance, however, it does seem like a large area. As stated in the previous section, NCSSA does not support baiting in the absence of evidence of wild dog activity, which is a proposed requirement for properties within the buffer zone, but rather baiting be targeted to times when wild dogs are known to be present.

*Comments on 'Wild Dogs – Outside the Dog Fence'*

NCSSA supports the first sentence "...where dingoes have important ecological functions, including reducing kangaroo numbers" but the Policy should also acknowledge the benefits of dingoes in terms of reducing the presence of other pest animals such as feral goats, donkeys, pigs as well as overabundant native herbivores such as kangaroos and wombats.

*Comments on 'Management required to minimise impacts on cattle outside the Dog Fence'*

NCSSA believes the Policy should provide clearer guidance on when control is warranted outside the Dog Fence given that dingoes are an important top order predator that helps regulate prey species including feral herbivores. Particularly, the statement that "Where impacts on cattle are too high, land managers outside the Dog Fence may control wild dogs by ground or aerial baiting, shooting, or leg-hold trapping" needs amendment and further clarification to establish what "too high" means. NCSSA notes that it is not always possible to confidently attribute calf loss to wild dog predation, as Eldridge et al (2016) notes that "Monitoring the fate of individual calves is extremely difficult and impractical to do in an open rangeland setting, so as the best alternative, lactation failure in cows was measured to assess calf losses".

Importantly, Eldridge et al (2016) found there was *no difference in calf losses between baited and unbaited properties*, and NCSSA believes this important finding should be acknowledged in the Policy as it is relevant for landholders making decisions regarding investments into baiting. Also, the Policy should explicitly reflect the finding that variation in wild dog diet between properties suggests that the drivers for calf predation differ from property to property and therefore strategies for wild dog management need to be tailored to individual properties.

NCSSA is concerned that the revised Policy of allowing for aerial baiting could lead to more widespread, less discriminate use of baits, and is therefore inconsistent with the aim of control of wild dogs only when and where they are impacting on cattle outside the Dog Fence. Widespread baiting would also be inconsistent with the evidence for optimal wild dog management, including a Queensland study that found that baiting could exacerbate damage due to behavioural changes in the way that surviving or re-colonising wild dogs interacted with livestock (Allen, 2013). Furthermore, there is evidence that baiting affects the social structure of a stable dingo pack where breeding is restricted to the dominant pair (Corbett, 1995). This can paradoxically lead to increased dingo abundance as subordinate females may produce several litters compared with fewer litters in a stable pack (O'Neill, 2002). Allowing for more widespread baiting, such as would be facilitated through aerial baiting, may increase this risk.

NCSSA understands that the impact and benefits of dingoes both on and to production, as well as the natural environment, north of the Dog Fence remains contested, so we call for further support for rigorous research into this issue. We believe that, in particular, the ecological and production benefits provided by dingoes through their control of pest animals and native herbivores should be investigated. Support for this research should be explicitly expressed in the revised Policy.

Comments on *'Appendix 1 – Prescribed Manner and Specified Treatment for Wild Dog Control'*

With the notable exceptions of Region1 part (2) and Region 2, NCSSA notes that the triggers for baiting are based on "evidence of wild dog activity". Given that this "evidence" is central to the Policy's implementation in those regions, it would be beneficial for examples of what comprises "evidence" to be provided so that the threshold for action is clear.

Comments on *'Review'*

NCSSA believes that the management of dingoes across South Australia must be underpinned by rigorous, long-term monitoring and evaluation programs that are adequately resourced. This Policy offers an opportunity to articulate how our various control efforts will be monitored and evaluated, both in terms of data that could be collected and reported as a matter of course by landholders and trappers undertaking routine control activities, as well as research programs that will require experimental design and data collection and analysis above-and-beyond what could be collected as part of routine control activities.

At a minimum, the revised Policy should stipulate the data which will be collected, analysed and published by Biosecurity SA to facilitate the review of the Policy by 2024. Specifically, the review section of the Policy has four points for evaluation, and it is important to understand how each will be measured before the Policy is finalised. Some of these evaluation points are very broad and so the Policy should include what measurable parameters will be required to determine if it has been 'successful'.

**References:**

- Allen LR (2013). Wild dog control impacts on calf wastage in extensive beef cattle enterprises. *Animal Production Science* doi.org/10.1071/AN12356.
- Corbett LK (1995). *The Dingo in Australia and Asia*. UNSW Press, Sydney.
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- O'Neill A (2002). *Living with the Dingo*. Envirobook, Annandale.
- South Australian Wild Dog Advisory Group (2016). *South Australian Wild Dog Strategic Plan: A plan to protect the livestock industries and public safety whilst maintaining the integrity of the dingo as a wildlife species*.