



Referral Business Entry Point,
EIA Policy Section (EPBC Act)
Approvals and Wildlife Division
Department of the Environment, Water, Heritage and the Arts
GPO Box 787
Canberra ACT 2601

Via Email: epbc.referrals@environment.gov.au

Date 22nd November 2011

SUBMISSION

***Title of Referral: Department of Primary Industries/Natural resources management/Gippsland /VIC/Wild Dog Aerial Baiting Operation
Date Received: 08 Nov 2011 Reference Number: 2011/6183***

Environment East Gippsland appreciates that there are attacks on certain farmers' stock and this needs to be addressed, especially for those without good electric fencing and/or livestock guardian animals.

We acknowledge that dogs can cause serious impact on wildlife as well as livestock but would prefer to see greater effort in resourcing and advancing alternatives to using 1080. See work being done on this here - <http://www.invasiveanimals.com/research/goals/goal-1/1t3/> and http://www.dpi.nsw.gov.au/_data/assets/pdf_file/0006/178908/guard-animals.pdf

General comments:

The use of 1080 is indiscriminate and in particular threatens the Spot-tailed Quoll, *Dasyurus maculates*.

We believe the species' perilous status should now be considered and listed as Critically Endangered in Victoria.

The large bushfires of '03, '06 and '09 covered about 2 million hectares of forest in eastern Victoria. They have reduced the state's viable population of quolls to one major population around the Upper Snowy and possibly smaller now even more fragmented colonies in the NE. These populations would be extremely vulnerable to even small impacts on individuals. See attachment B.

Randomly dropping 1080 baits along ridges and spurs throughout likely habitat that could support relatively small quoll colonies would be an extreme impact on likely populations that still exist in remote areas.

There has been no surveys and therefore no detections in these areas. This does not mean that there are no quolls surviving in these areas.

At this stage of the demise of the Quoll in Victoria, every individual's genetic material is extremely valuable and *must* be protected.

The recent Supreme Court case against plans to clearfell likely quoll habitat in East Gippsland shows that the Victorian Government is legally bound to adhere to laws which are to protect the state's threatened species. However, with plans for aerial baiting in likely habitat, this is not being done.

We believe the planned action is unnecessary, has unproven outcomes for control of wild dogs/dingos yet is very likely to have a significant impact on a matter of national environmental significance.

We ask that the Victorian Government be ordered to withdraw plans for the aerial baiting before it progresses any further.

In response to particular points in the DPI referral:

Section 1.1 *"...to target inaccessible land in an area of eastern Victoria..."*

Judging by just some of the maps we cross checked, it would appear there are tracks running through some of these areas. See attachment A. We believe the claim that areas are inaccessible may not be totally correct. We also note that dogs are assumed to have a territory of about 10 sq kilometres. From our checking of most maps, there appears to be few areas if any that would not have access via tracks that would allow edge treatment with buried baits.

Section 1.2 *"The proposed project will take place within ten possible areas ..."*

The lack of proper definition for their project areas should be a concern. The DPI submission is very confused about the extent and location of this baiting project. Several map attachments appear to indicate that the project is to be confined to blue hatched areas on the map. However, the application actually seeks approval for conduct of the baiting program within a much larger area defined by red rectangles on the attached maps and with specific details presented in a table in section 1.2 of the application.

However, in section 1.3, DPI states that the actual areas to be baited will only be decided after further consultation with landowners. We believe that bringing a project for approval at this stage is not appropriate because the precise areas to be affected have not been determined. Expecting the Federal Government to assess a much wider area which will probably not be used seems to be a waste of Government resources.

One example of the very poor work submitted by the DPI is shown in the coordinates provided. Certain points they specify for the project are not correct. It states that the NW corner of the Bullhead area as 36 55' 45.909 S, but this is further south than the NW corner of the Bindi area (36 55' 44.690). Note that on the supplied map, the Bindi area is about 60 km from the Bullhead area. The fact that DPI were not able to provide an accurate table of coordinates for this project just underlines how little care has gone into developing the proposal. In fact what they have done is use the same coordinates for the NW corner of Bullhead as the NW coordinates of King Basin.

Section 1.3 *“...no records of the endangered spotted-tailed quoll occur in the area; and the habitat is not ideal or likely to support quoll populations.”*

The absence of records is simply a consequence of the lack of surveys for quolls in any of these areas. Because of the poor quality of data in DSE's online biodiversity map, it is not valid to conclude that a lack of quoll records means a lack of quolls. Also:

“While greater detail for each site is provided in Section 3, overall the terrain of the proposed areas is extremely rugged, being comprised of steep valleys with rocky outcrops on their peaks, which run into drainage lines and watercourses.”

This description of habitat is that which is preferred by Quolls; forested country with rocky outcrops. Steepness would also make this less than ideal for foxes and wild dogs.

Throughout their submission, DPI relies heavily on DSE's Interactive Biodiversity map. However, when we checked survey data for some areas, it is clear that the most recent observations are very old. For example, in an area roughly 25 km by 25 km centred on Mt Burrowa, the median age for threatened vertebrate species observations seems to be around 33 years. Many of the species listed from those surveys are still on the record, so the age of the observations means that there have been no recent surveys conducted.

Except for a few sites studied as part of the Robley research – see Attachment B - it appears there have been no quoll surveys for decades. Without systematic surveys in the right season by qualified people, it is impossible to determine if there are quolls living in this area.

The median age of the records for vertebrates (mammals/birds/amphibians/reptiles) was 33 years, i.e. most records were from a survey in 1978. There have been no surveys targeting quolls in these areas since DPI's referral should have stated that there are no recent survey data, rather than there are no quolls.

Section 1.8. *“The proposed timing of aerial baiting avoids the quoll breeding season (should there be any quolls in the areas to be baited).”*

This is an absurd statement. It is irrelevant when a quoll might be poisoned – before or during the breeding season. The impact of a dead quoll or quolls would be the same on both the individual/s and the population.

Section 2.1 *“Fresh meat baits containing 6.0mg of 1080 will be aerially deployed at a rate of 10 baits per linear kilometre...”*

We are concerned that there is a push to increase this rate to 40 per km to be more effective. This was stated on ABC radio recently. Despite the referral stating only 10 per km will be used, we have concern this could be altered under pressure from locals and stakeholders. This link shows how the VFF is lobbying for increased baiting rates. <http://www.abc.net.au/rural/news/content/201111/s3358896.htm>

If the DPI plan is approved, we understand that the State Government can then apply for an exemption to the current restriction of 1 bait every 100 metres to one bait every 25 meters.

“Monitoring, including wildlife and wild dog, will be conducted before and after aerial baiting in order to assess the impact of aerial baiting on the wild dog population and wildlife.”

It would be useful to have more details of the methods that would be used, timelines, techniques and so on. Much of the monitoring planned could simply be collecting anecdotal observations from farmers. We also find it difficult to understand how this monitoring will be done. After all, DPI claims it is necessary to use aerial baiting because the area is inaccessible.

Section 2.4. *“The Catchment and Land Protection Act 1994 (CaLP Act) requires declared pest animals to be controlled on Crown lands.”*

The government is fulfilling the requirements of the CaLP Act by currently using buried bait techniques and trapping.

Section 2.6 .

“To ensure proposed aerial baiting in Victoria was considered and planned effectively, a workshop was held on 20-21 September 2011 in Melbourne and was attended by 50 guests...”

DPI's claimed public consultation is extremely limited. As far as we understand there were no environment group representatives or people with ecological interests who attended this meeting. In a DPI media release dated 17th November <http://www.premier.vic.gov.au/media-centre/media-releases/2504-committee-to-give-fresh-advice-on-wild-dog-control.html> the committee members do not appear to be very representative of the wider community:

The committee includes Victorian Farmers Federation representative Michael McCormack; landholders Marilyn Clydsdale, (Tintalra), Peter Star (Bethanga), Alan Brown (Orbost), Simon Turner (Bindi), Jim Fisher (Yanac), and Ken Skews (Ensay); and Graeme Dear (catchment management authorities), Andrew Woolnough (Department of Primary Industries), Scott Lawrence (Department of Sustainability and Environment) and Andrew Marshall (Parks Victoria).

Section 3.1(b). *“The proposed aerial baiting program will not impact upon any National Heritage areas; the program will be aerially deploying baits with the use of a helicopter, therefore no on-ground impact is expected.”*

Although the helicopters themselves might not cause any impact ‘on-ground’, the 1080 baits will impact on any number of native species within the National Heritage Areas. This would include bush rats, antechinus and the four endangered forest owls which prey on them, bandicoots, brush-tailed possums, swamp wallabies (which are known to eat meat baits), scavenger birds such as magpies, bower birds, currawongs, and the raptors which would feed on the smaller meat-eaters. And:

“There are a number of current threats to quoll, including: land clearing and associated loss of habitat such as hollow logs and earth burrows, competition from foxes and feral cats, injury from road traffic, poisoning and trapping.”

This is quite true, but points to the fact that if there are remote areas away from land clearing, habitat disturbance and land that is easily traversable for foxes, remain potential and critical refuges for the Quoll.

Section 3.1 (d) *“Quoll prefer to inhabit escarpments, gullies, saddles and riparian habitat as well as rocky areas.”*

This fully contradicts the claim that planned sites do not provide good quoll habitat. The potential for these areas supporting populations of quolls is reinforced by the comment under 3.3 (e) Remnant native vegetation.

“Much of the Park has remained relatively undisturbed by human influences, and thus most vegetation communities are in an essentially natural condition (DNRE 1996a).”

It would be reasonable to assume then, these areas could support Quolls and should be required to have decent surveys carried out before being considered for dropping poison baits over.

p.37 *“Aerial baiting transects will be targeted at identified wild dog travelling routes only...”* also:

“Furthermore, sand plot monitoring, collaring and satellite tracking of wild dogs and use of fixed cameras, will be utilised to determine if the aerial baiting has had an impact on wild dog abundance.”

This monitoring plan sounds very similar to the research which has already been conducted by Alan Robley (see comments at 5.2 and attachment B). Judging from that report, it would appear such monitoring, to be credible and useful, would be time consuming and costly.

Section 4. *“The proposed operation will be a one-off aerial baiting operation...”*.

We are puzzled that after pointing out the problems posed by dogs, DPI proposes to only run this project once. If this proposal is approved, we believe that the approval must specifically state that the approval has been only for this single project.

Section 5.2 *“The action will not reduce the area of occupancy of the species – quoll populations in Victoria are sparsely distributed and fragmented.”*

This claim shows a lack of understanding of the population dynamics of any surviving quoll colonies. DPI is making claims based on guesswork or assumptions. The fact that quoll populations are now small and disjointed means that baiting any fragmented population could easily weaken and wipe out a small colony or colonies and cause regional extinction. Due to the fragmented nature of surviving quoll populations, they cannot recolonise from adjoining populations. This is a sure way to “reduce the area of occupancy of the species”. And:

“The action will not disrupt the breeding cycle of a population of quoll... The action will not interfere with the recovery of the quoll...”.

These are absurd statements. DPI does not know if there are populations in these areas, gives no evidence to back up this statement, and small fragmented populations which might still exist would be highly likely to be impacted by the baiting.

DPI referral deliberately omits papers by Dr Chris Belcher on the Quoll, and the Victorian study dated June 2011 by Alan Robley, *Assessing the safe and effective use of aerial baiting for the control of wild dogs in Victoria*. (see attachment B) This was produced by DSE in partnership with DPI. DPI was well aware of the results of this study that was carried out to establish the effectiveness of aerial baiting. This showed that aerial baiting had a poor cost/benefit effect, killing only one of 11 radio collared dogs in the area it baited.

Section 7.2. *“... and the information is up to date as at 10 October 2011.”*

DPI was supposed to comment on the currency of the information used in the proposal, its reliability and uncertainties. DPI's claim that the DSE information used in section 3 was *up to date as at 10/10/2011* is patent nonsense.

We checked a few areas from the DSE Biodiversity mapping system <http://mapshare2.dse.vic.gov.au/MapShare2EXT/imf.jsp?site=bim> and were appalled at the lack of any recent data. See our comments on 1.3 above. This system is totally inadequate for making informed decisions about environmental management and it is scandalous the DPI has gone to this data source, fully aware of its limitations, to help justify the dog baiting program.

We believe that the lack of adequate data alone makes the DPI proposal unsupportable and highlights the need for urgent quoll surveys that was recommend in the Robley report.

Other issues:

1) Coordination of project

DPI expects this proposal to be evaluated in isolation from all the other land management programs the Victorian Government is running which could impact any remaining quoll populations in these areas. For example, there is a large prescribed burning program that will affect these areas. We believe that this project has not considered possible impacts of other Victorian Government programs.

2) Lack of balanced presentation of the facts

We believe that the Victorian Government has withheld information from the Federal Government to influence the outcome of deliberations. For example, there is no discussion of possible adverse impacts on Quolls as detailed by experts such as Chris Belcher. In conjunction with ARI, DPI only released a report on aerial baiting by Robley in July 2011, but the outcome of this report is not discussed either. There is no indication that DPI consulted with other Quoll experts in the formulation of this project, such as DSE's Jenny Nelson, who works from their fauna research facility at ARI.

Moreover, DPI has excluded environmental groups from the preliminary stage of consultation process.

The lack of evidence for wide consultation and a balanced presentation of facts means that DPI has not followed best practice in developing a program that could adversely impact threatened wildlife.

3) Threat posed by wild dogs

We accept that wild dogs are a pest and pose a threat to stock and wildlife. However, DPI has failed to provide any documentary evidence to support their claim that the target areas are the areas facing the highest threat. We believe that assessments like this should be backed up with publically available data.

Furthermore, DPI appears to have presented no documentation indicating that the data on which this decision has been made has been through any adequate quality control process. We are sure some areas have been adversely affected by dog attacks, but often determining if a carcass is a result of a dog attack or simply feasting on a carcass after it died from other causes will be difficult to determine. Some people see this move as simply fulfilling an election promise that was made without due consideration.

We hear from reliable sources that the numbers of stock killed by dogs is well below the natural mortality rate (i.e. death due to natural causes). But because it is a more dramatic loss happening quickly and all at one time, it becomes a media issue.

4) Effectiveness

There appears to be limited or no data that has demonstrated that aerial baiting reduces or stops wild dog attacks, or that shows it is more effective than currently

employed methods or that it effectively stops killing once it starts. This is a key issue. We understand that taking out the alpha male and female of established dog packs can cause higher breeding rates than otherwise – causing even more dog attacks the following year.

5) Lack of process in developing control programs

We are concerned that the DPI proposal has been submitted for consideration before DPI has acted on recommendations from earlier reports on wild dog baiting programs.

Only in July 2011, the Robley report recommended, among other things, that quoll surveys for proposed baiting areas should be done particularly because of the fragmented populations left in Victoria. Furthermore, he was concerned that there was not enough information about the optimal rate of baiting for wild dogs i.e. the proposed rate of baiting may have little impact on dogs.

The fact that DPI has advanced the baiting program immediately after receiving a report recommending further work in key areas highlights once again that environmental management programs being rolled out by DPI are far from best practice.

6) Project timing

There appears to be no work to identify what time of the year dog control would have most impact

Comments on the Claridge report attached to DPI referral

After looking through the report which DPI uses to bolster its referral, we have some concerns about its content and conclusions:

- a) The paper claims to show that quolls were not killed by aerial baiting but there is a bad methodological problem that is even partially acknowledged in the paper: if a quoll was found to have fluorescent whiskers as a result of Rhodamine B ingestion, there is no way of knowing how much of the bait they ate:
 - i) They may have eaten part of the bait and the amount of 1080 was sublethal (mentioned in report)
 - ii) They may have eaten another animal that had eaten the bait (animals killed by these baits can have their digestive tract stained with the marker)
 - iii) Due to the length of the trial, the level of 1080 may have dropped to sublethal amount for quolls towards end of trial.
- b) The number of quolls in the area of the bait transect was small (about 10 animals and most of these apparently did not eat baits)

In conclusion, we request that the Federal Govt assist the Victorian Government to develop new methods for controlling dogs that will not impact on other wildlife, in problem areas. This could include assistance with electric fencing along public land

boundaries, promotion of livestock guardian animals and possible assistance to progress research on toxins that only affect placental mammals.

Sincerely



Jill Redwood
Coordinator

Attachment A. Four maps from the DSE website 'Forest Explorer'.

Attachment B., *Assessing the safe and effective use of aerial baiting for the control of wild dogs in Victoria*. Alan Robley, June 2011.