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### **Re-Feedback on the draft SA Wild Dog Strategic Plan**

Dear Peter,

The Nature Conservation Society of South Australia (NCSSA) welcomes the opportunity to review and provide feedback on the draft SA Wild Dog Strategic. As South Australia's primary nature conservation advocacy organisation, the NCSSA has an active interest in the protection and conservation of South Australia's natural resources with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and management of protected areas.

NCSSA acknowledges the challenges involved in the management of dingoes and wild dogs in South Australia due to the competing perceptions on whether they require protection, as a legitimate wildlife species with important ecological and cultural roles, or a serious pest to the pastoral industry. We commend the South Australia Government for recognizing the role of the dingo in Australia's ecosystems and advocating for the strategic management of dingoes based on scientific evidence. We do, however, have a number of concerns regarding how the plan will be implemented in practice and strongly recommend that the SA State Plan incorporate more stringent guidelines for the timing and deployment of 1080 baits for wild dog control and ensure that these are based on scientific evidence.

Please refer to the following pages for our comments on the draft SA Wild Dog Strategic Plan. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at [nicki.depreu@ncssa.asn.au](mailto:nicki.depreu@ncssa.asn.au)

Yours sincerely,

Nicki de Preu  
Conservation Ecologist

**Our comments on the questions in the feedback form for the draft SA Wild Dog Strategic Plan (SAWDSP) are as follows:**

*1. Do you think the objectives in the draft plan address the key issues? Are there any other issues that should be addressed?*

NCSSA supports the 3 overarching aims of the draft SAWDSP and the need for strategic and co-ordinated broad scale management across the State with specific management aims for each of the 3 management zones.

We are particularly concerned about proposed management of wild dogs in Zone 3: Outside the dog fence incorporating cattle production and non-production areas. The goal for this zone is to “Protect the cattle industry and human safety whilst maintaining the ecological and cultural roles of wild dogs outside the dog fence”. The draft SAWDSP will enable the South Australian Arid Lands (SAAL) NRM Board to provide baits to properties on a regular basis with no restrictions on when baits are laid or requirement to demonstrate what constitutes “serious impact” or “unacceptably high risk of predation”. As stated in the draft SAWDSP, there is strong scientific evidence from across Australia that wild dogs only cause significant damage to calves during certain periods such as the onset of dry conditions when alternative prey availability declines. We strongly recommend that that further definition of what constitutes a “serious impact” and “unacceptably high risk of predation” are included in the draft SAWDSP as there are many views within the community about what these actually entail.

We also strongly recommend that the current findings of the SAAL NRM study investigating the relationships between wild dogs, calf loss, prey abundance and biodiversity are used to inform proposed management in Zone 3 and an adaptive management approach applied as more information is collected from this study

We also strongly support the need to “Improve understanding of the impacts of wild dogs on production and biodiversity outside the dog fence” (Goal 3, Action 3.4) through further rigorous research into the ecological and production benefits that wild dogs create through control of pest animals and native herbivores. There have been a number of studies in South Australia into the effects of wild dogs on suppression of populations of mesopredators such as cats and foxes that have shown benefits to threatened mammal species and relevant references should be cited.

We support the aim of Goal 4 to “Ensure good governance for management of wild dogs across South Australia” and need for adequate monitoring, evaluation and reporting of actions and an adaptive management approach to improve future programs. We strongly recommend the draft SAWDSP provide further emphasis on the need for management within all 3 Zones to be underpinned by rigorous and long-term monitoring and evaluation programs that are adequately resourced. Information should include more than the number of baits laid as this only provides a measure of baiting effort rather than actual bait uptake. Similarly where trapping is used as a control technique monitoring should report on for the number of trap nights and captures of both target and non-target species.

*2. The draft plan seeks a balance between adequately protecting the pastoral livestock industries and ensuring survival of wild dog populations outside the dog fence. Do you think the plan gets this balance right?*

Refer to our comments on Question 1. We do not consider the balance is right in the draft SAWDSP in its present form.

*3. What is your view on whether landholders should or should not be compelled to control wild dogs on their land inside the Dog Fence under the Natural Resources Management Act 2004?*

We support the need for all landholders to be involved in control of wild dogs inside the Dog Fence as required under the NRM Act but . We recommend that the plan clarify that landholders inside the dog fence can participate in wild dog control programs through a range of control options rather than reliance on 1080 baiting programs.

#### 4. Any other comments or concerns about the draft plan?

##### Section 2.6

We recommend that this section include reference to the *National Parks & Wildlife Act 1972* and regulations under this Act that relates to management of protected areas including Parks where Co-management Agreements are either in place or being negotiated.

##### Section 3.3

We agree that the success of this Strategy will be very much reliant on clarifying the roles and responsibilities of all stakeholders involved in Wild Dog management in South Australia.

##### Australian Government

We recommend an example/s of Commonwealth managed lands is provided in the final version of the SAWDSP.

##### Natural Resource Management Boards

We recommend that District NRM Groups are acknowledged as stakeholders in this section as they have a key role to play in implementation of the SAWDSP.

##### SA Wild Dog Advisory Group (SAWDAG)

We question whether it is the role of this group to implement monitoring and reporting protocols for the plan. We recommend that this is changed to facilitate as it will require specialist advice and expertise from staff within Biosecurity SA and DEWNR.

##### Pastoral Board

We understand that the pastoral Board is to be abolished following the recent review by the SA Government of Boards and Committees so recommend that this paragraph is removed.

##### Section 3.4

We are extremely interested in the indicators and monitoring of success in the SAWDSP. We recommend that further information is required in this section to clarify whether the annual reports by SAWDAG will be made publically available.

#### 4 Technical Background

##### 4.2 Past & current distribution and abundance

Paragraph 3 states that “wild dogs have increased in abundance since European settlement due to the provision of permanent waters.....” We recommend that this section also acknowledge the importance of large macropod species in the diet of wild dogs outside the Dog Fence.

We also recommend a reference is provided for the statement regarding the gradual resurgence in the rabbit population in the last paragraph of this section.

##### 4.10 Impacts

##### Agricultural impacts

There is a considerable amount of duplication in this section that is already covered elsewhere in the draft SAWDSP. We recommend the content is reviewed and revised accordingly.

The last paragraph on page 32 summarising the case study on the potential economic benefits of wild dog control to cattle production outside the dog fence is not particularly clear. We recommend the content is reviewed and revised accordingly.

##### 4.11 Control

##### Aerial baiting

The last paragraph of this section states that “Some have argued for aerial baiting in the 35km wide buffer zone outside the dog fence...” In order for the plan to be more transparent for all stakeholders it would be useful to know what groups were represented here.

##### The Dog Fence

As for our comments on Section 4.10, there is a considerable amount of duplication in this section that is already covered adequately elsewhere in the draft SAWDSP. We recommend the content is reviewed and revised accordingly.

The acronyms under the Responsibility columns in the Tables showing specific Actions and Activities for Goals 1, 2, 3 & 4 require further definition/expansion. We recommend that this information is included as a Glossary at the end of the plan along with definition of technical terms within the plan. For example there needs to be clarification of the definition of a keystone species or at the very least a definition should be included in the glossary.