

Pest Animal Review,
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Submission to Natural Resources Commission Pest Animal Management Review Draft Report 2016

Dear Natural Resources Commission,

The NPA, established in 1957, is a community-based organisation with over 20,000 supporters from rural, remote and urban areas across the state. The NPA promotes nature conservation and evidence-based natural resource management. We have a particular interest in the protection of the State's biodiversity and supporting ecological processes, both within and outside of the formal conservation reserve system. The NPA has a long history of engagement with both government and non-government organisations on issues of park management.

The National Parks Association of NSW (NPA) appreciates the opportunity to comment on the Pest Animal Management Review (PAMR). Having already engaged extensively on the PAMR in meetings and via a submission to the issues paper we will keep our responses brief and address some key issues that we particularly support or would like to see improved.

Brief comments on the review

1. We support a prioritisation approach that focuses on prevention and eradication;
2. We support a cross-tenure regional approach and efforts to build capacity through education and targeted community engagement;
3. We support the development of regional pest animal management committees and regional pest animal management coordinators;
4. We support proactive surveillance of risk points such as the online trade in invasive species, and the proposal to list pet shops and aquariums as biosecurity entities;
5. We support using environmental flows to the advantage of native freshwater species over introduced species;
6. We support the development of a regulation that addresses pest animals under the NSW *Biosecurity Act 2015* framework that lists pest species and clearly stipulates mandatory measures across tenure;
7. We support the exclusion of deer from the NSW *Game and Feral Animal Control Act 2002* and the declaration of deer as a pest animal (anecdotal information that NPA receives, and photographic evidence gathered via our Who's Living on my Land program, suggests deer are widespread and increasing in number);
8. We welcome novel strategies to help reduce the impacts of domestic cats in peri-urban areas such as mandatory desexing, the provision of cat confinement areas and targeted education. We also broadly support the measures around feral cats, but we urge caution on one element: The Commonwealth policy of killing 20 million feral cats is not an outcome in itself as it is not tied to any response of native species. We urge the NSW Government to ensure that measures around cat control are outcomes focussed and evidence-based.
9. We support the inclusion of Schedule 2 lands under the NSW *Biodiversity Act 2015* and welcome the Commission's recognition of the importance of dingo conservation. To this end **we urge the NRC to recommend that reserves in western NSW, such as Sturt National Park,**

- be listed under Schedule 2.** At present no reserves the far west are listed under Schedule 2, and there is therefore no current requirement for dingo conservation in the region. We also have some issues with the apparent assertion that dingoes are present within National Parks, but outside National Parks they become wild dogs. This is addressed more thoroughly below;
10. We support measures to implement biocontrol strategies for carp, though we stress that all biocontrol methods should undergo rigorous science-based testing and be able to demonstrate there are no adverse effects on native species or local environmental conditions. Equally there must appropriate strategies in place for the removal and disposal of dead carcasses;
 11. We support the recommendations around feral horses. Please note that we will not raise all of the individual elements, but NPA supports the submission to the PAMR by Di Thompson. Di is a long-time NPA member and speaks on NPAs behalf on the issue of feral horses;
 12. We support the recommendation that the NSW government work with local government to manage urban avian pests;
 13. We support the expansion of research capabilities into pest animal management (freshwater and terrestrial), the adoption of standardised data collection techniques and we welcome the inclusion of the concept of rewilding in the PAMR.
However, **we urge the NRC to specifically recommend rewilding and ecological solutions to pest management as a subject worthy of support, research and further investigation under Recommendation 26.** This is due to the potential for positive outcomes in regards the interaction between pest animals and native species (Glen et al. 2007). In the long-run, rewilding could be a cost-effective solution to pest animal management by increasing ecological resilience;
 14. We commend the NRC for accurately determining the breakdown of expenditure on pest animal management, and for specifically stating that the perception that the NPWS does not ‘pull its weight’ is false;
 15. We support the recommendation to maintain an accessible source of funding to stop new incursions and the creation of rapid response funds.

Key issues requiring attention

There are three key issues that require further investigation or consideration by the NRC: dingoes / wild dogs, recreational hunting and markets for pest animals.

1. Dingos, wild dogs and rewilding

Consensus does not exist as to whether there is indeed a functional difference between dingoes and wild dogs (hybrids between dingoes and domestic dogs or feral dogs) (Claridge and Hunt 2008), whether the presence of domestic dog alleles is an appropriate method of differentiation and whether ‘pure’ dingoes and hybrids can indeed be differentiated.

Humane Society International (HSI) have recently submitted a nomination to the Commonwealth *Environment Protection and Biodiversity Conservation Act* (EPBC Act) to list the dingo as ‘vulnerable’. The nomination does not distinguish between ‘pure’ dingoes and ‘wild dogs’ and makes the case that the distinction is irrelevant as hybrids and non-hybrids share several behavioural aspects with dingoes. Furthermore, HSI’s nomination demonstrated that the vast majority (>90%) of 3637 analysed DNA specimens were >60% dingo—even in areas where hybridisation has been occurring for the greatest length of time. This apparent resistance to hybridisation is also evident from a recent study that showed cranial morphology of hybrids to be indistinguishable from dingoes, meaning that the ecological niche of hybrids is unlikely to be different to dingoes (Parr et al. 2016). HSI recommend that, given the genetic and morphological uncertainties, dingoes be defined from an ecological perspective rather than a genetic purity perspective.

In a separate, but related, nomination HSI have also nominated ‘the cascading effects of the loss or removal of dingoes from Australian landscapes’ as a Key Threatening Process under the EPBC Act. This is as a result of the growing body of evidence that indicates that dingoes can indirectly protect native species via exerting control over introduced mesopredators—foxes and cats (Johnson et al. 2007, Johnson and VanDerWal 2009, Wallach et al. 2010, Brook et al. 2012, Letnic et al. 2012, Letnic et al. 2013, Wallach et al. 2015), although there is some debate on the magnitude of the effect on cats (Allen et al. 2014).

Given that the PAMR questions the expenditure of such a large amount of money on ‘wild dogs’ by the NPWS in light of the lack of negative impacts of wild dogs on biodiversity, that the impact of dingoes on Australia’s sheep flock may be overestimated in comparison to other economic factors (Forsyth et al. 2014) and given that the presence of dingoes can, in some circumstances, be beneficial to farmers by reducing herbivore density (Prowse et al. 2014), we believe that more work needs to be done in the area of dingo/wild dog impacts on biodiversity and livestock. This is particularly important in light of the fact that significant amounts of money are spent on species conservation efforts that may be assisted by dingoes via their apex predator role.

We urge the NRC to be proactive in recommending research into dingoes and hybrids and ways in which agricultural production can be safeguarded while allowing the biodiversity benefits of dingoes via mesopredator suppression to come to bear over the broader landscape (this reinstating of apex predator function is one element of the broader concept of rewilding).

2. Recreational hunting

The PAMR correctly points out that population control is not the primary purpose of recreational hunting. In fact, anecdotal evidence suggests that recreational hunters are occasionally responsible for introductions of feral species as sport. The PAMR also correctly raises ethical considerations when debating the role of recreational hunting in pest animal control. NPA emphasises our support for strict ethical considerations to be paramount in any pest animal control.

NPA does not object to the inclusion of recreational hunters in regional pest management plans, but cautions against an over-reliance on recreational hunters that may compromise outcomes for biodiversity. However NPA does oppose recreational hunting as a management tool on public land. This was the subject of a major campaign in 2013 that garnered broad support from across the community. NPA does not oppose hunting on private land, though we commend the NRC for rejecting the use of bounties.

3. Markets for pest animals

NPA believes that markets for pest animals should be deliberated with caution, as again population control is not the primary purpose of the activity. In fact, using a pest as a market resource provides an incentive to maintain the population so as to maximise yield. **We urge the NRC to amend Recommendation 24(i) to include a review should deer and wild boar become marketable commodities.** The review should consider whether the commercial use of the pest animals has compromised conservation outcomes and include the provision to suspend the commercial use of pest animals if it is leading to perverse outcomes.

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