



11th May 2016

Mr Sean Halse

Pest Animal Review

Natural Resources Commission

GPO Box 5341

Sydney NSW 2001

By online submission: <http://www.nrc.nsw.gov.au/submissions-pest-animal-review>

Dear Mr Halse

On behalf of the Implementation Steering Committee for the National Wild Dog Action Plan (NWDAP), please accept these comments on the Draft Report "Shared Problem, Shared Solutions: Pest Animal Management Review March 2016".

I congratulate the Natural Resources Commission for the expansive nature of the analysis. The recommendations regarding wild dogs align well with the NWDAP, by supporting leadership and coordination, awareness, understanding and capacity building, reducing impacts and monitoring, evaluating and reporting. In particular, the plan profiles the importance of coordinators, metrics, best practice pest animal controllers and R&D, as does the NWDAP.

Whilst the NWDAP promotes national consistency in general, it is recognised that mechanisms for implementing activities in any State must meet unique State needs and funding capacities. Therefore, the following observations on potential gaps in the draft for consideration make no comment on the appropriateness of the legislative mechanisms for the stakeholders in NSW.

Throughout the review the generic term "wild dog" is used which falls in line with the definition within the NWDAP as being all wild-living dogs which include dingoes, feral dogs and their hybrids. However, the terms "wild dogs and dingoes" are used in the discussion in section 2.3.4 relating to balancing economic, social and environmental impacts and in section 6.4 relating to Schedule 2 lands. This introduces confusion and it is suggested that in these sections terms should be "feral dogs and their hybrids and dingoes" to differentiate genetics. The NWDAP is referred to within the text, however is not listed in the Works Cited list. The plan is available at <http://www.pestsmart.org.au/national-wild-dog-action-plan/>

Recommendation 3 iv and ix: The recommendation for regional pest animal management committees and Local Land Services to develop standardised systems (and templates) for surveillance and reporting must be clarified to ensure each region is using the same surveillance and reporting system. Consistency between regions is vital not only for land managers responsible for properties in multiple regions, but for any stakeholder to be able to compare impacts and resource inputs without systematic biases in how that data is collected or presented.

Recommendation 5 i: The recommendation to ensure regulation of non-indigenous species is commensurate with the risk that they pose and commensurate with Invasive Plants and

Animals Committee threat assessments needs to enable a broad assessment. A threat assessment must include the resource input and aims of the private sector which may be managing a non-indigenous endemic species threatening private commercial returns (eg primary producers tackling wild dog impacts on livestock in a defined area). Without the support of regulation, applicable in targeted situations, past large private investments can be negated by the actions of an individual and those actions can be a barrier to any future private investment. Such a scenario highlights that threat assessments must also be on a case by case basis.

Recommendation 11 i: The discussion relating to the establishment of one regional pest management coordinator in each LLS refers to retaining the two AWI coordinators while the LLS coordinators focus on other pest species. This fails to recognise that AWI funding is time bound and that negotiations must occur regarding handover of functions before the AWI project funding ceases.

Recommendation 14: Regarding promotion of vocational education and training, I can update the NRC that the NWDAP has recently contracted a project to develop a nationally endorsed course for vertebrate pest animal (wild dog) controllers. The project will be seeking endorsement and funded participants from NSW agencies to pursue updated VET certificate level qualifications.

Recommendation 18: The recommendation to maintain the outcome delivered through Schedule 2 lands must acknowledge that dogs move through landscapes unless dog proof exclusion fencing exists. Therefore, the efforts of Schedule 2 land managers on perimeters must either be in line with the efforts of other landholders within that region who are endeavoring to reduce wild dog impact from dogs traversing their own land or more than those of other landholders who have achieved a desired level of acceptable impact and are preventing re-establishment. There has been a large variation of the levels of control in Schedule 2 lands, some resource determined, some due to the values of the local land manager. A “good neighbour” ethos and a standardised hierarchical assessment of control on Schedule 2 lands may assist the sustainability of investments from private landholders within the region of a Schedule 2 land.

Section 2.3.4: The statement that “wild dogs” are believed to have ecological value in some parts of the state similar to the role of the dingo in the landscape must be referenced so readers (policy makers, investors and the public) can assess if this belief is based on scientific fact and in what part of the state and under what circumstances it is relevant.

Section 2.3.5: The statement that some pest animals (including wild dogs) are currently located in specific hotspots while others are more widespread can infer that those areas without hotspots do not have a pest animal problem. Wild dogs in some areas are being successfully managed to achieve a level of impact that is acceptable to land managers. Thus there is a third category that describes both distribution and abundance which relates to “presence at an acceptable level of impact”. If these areas are not acknowledged and ongoing management promoted for investment, they will return to hot spots thus wasting

previous investment and increasing the cost of future resources. Additionally, pest species must be viewed as total pest pressure and not individual species pressure because of the potential for ecological interrelationships but also the reduction in efficacy of control tools used when the presence of multiple pests is ignored (eg 1080 bait uptake by wild dogs, foxes and pigs). The report supports integrated pest species management and the evidence for this would be enhanced by referring to total pest pressure.

Section 4.2: The report discusses the need to prioritise investments after a risk assessment, refers to commissioning risk assessment processes in Recommendation 2 and indeed highlights the limitations of inaccurate data and subjective judgements. Additionally, the comments above on Recommendation 5 and Section 2.3.5 highlight that ignoring past investment that has reduced risk and current sustained investment that is maintaining low risk may lead to return of a high pest threat as numbers build up, if those resources are not sustained. It is important to recognise that a risk assessment must be geographically broad because of the ability of wild dogs to travel across landscapes. The development of a risk assessment process must be temporally and spatially relevant to the pest and location, involve a substantial community consultation and validated by retro fitting real pest scenarios into any evolving model. The community needs to develop trust in these models as their use or misuse will go beyond investment decision making by government.

Section 7.7: The use of the rewilding concept is discussed with a concluding sentence from the report authors that it “could” inform or be integrated into programs. This conditional phrasing is better explained by including qualifiers such as evidenced based science, good neighbour values and pest proof fenced perimeters.

Sections 4.5.2 and 8.5: Information management and the standardising of data protocols is essential for the discussed data sharing and comparison. As the report notes, the NWDAP is conducting a project for standardised metrics on inputs and impacts. The report would be enhanced by including the benefits of sharing data for national consolidation and noting that the potential for information technology and intellectual property barriers to national consolidation need to be factored into any NSW system in development.

Section 9.2: The discussion on the expenditure of established species refers to the relative priority of wild dog management being worthy of further consideration given the greater biodiversity impacts of other pests. It is important to note that a “good neighbour” ethos is essential when promoting the key pillar of this report as a “shared problem and shared solution”. Good will and trust are vital within a community and biodiversity impacts within a tenure should not be the only measure of future resource allocation when that tenure boundary is not secure to pest movement out of it.

Section 9.4.2: The proposed special purpose rate for funding coordinators is referred to as improving the government’s return on investment. Given the proposed rate is sourced from private landholders, the report should include the value to the landholders of this proposed rating and any value add to existing public and private investment (eg better timing or placement of control tools and identification of resource sharing efficiencies).

Section 9.4.3: The proposed special purpose rate for funding a rapid response is discussed in terms of local and regional decision making and planning. The value of funds proposed to be raised should require some form of scrutiny of their planned use beyond the LLS Board if the Board and its staff has no experience of that “new pest entering a region”.

Yours sincerely



Duncan Fraser

Chairman
Implementation Steering Committee
National Wild Dog Action Plan