

26th September 2023

Legislative Reform Team
Industry, Partnerships and Strategy Division
Department of Primary Industries and Regions
E: PIRSA.BiosecurityAct@sa.gov.au

RE: Developing a Biosecurity Bill for South Australia

Animal Care Australia (ACA) is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

Animal Care Australia supports the new Draft Biosecurity Bill for South Australia, and we are pleased to see that our previous concerns have been addressed with sensible solutions.

Animal Care Australia has completed the online survey, however as part of our responses we feel it is important to highlight one point of contention with the new Bill, that we have highlighted in previous consultations.

Animal Care Australia has concerns that the definition of a pest in Section 10 could be interpreted broadly to include captive animals just in case they escape, when the intent is for them to only become pests once they escape captivity. In addition, animal rights activists could claim that livestock are pests under the current draft pest definition. Therefore, Animal Care Australia recommends Section 10 2A is added as follows.

‘2A An animal whilst in captivity and under the management and control of a person is not a pest.’

Animal Care Australia notes that the "Landscape South Australia Act 2019 Part 9—Control of animals and plants" which is not being repealed, regulates the movement, possession, sale, and management of specified animals deemed likely to become pests should they escape captivity.

Animal Care Australia does not support the continuation of the Dog Fence Act 1946.

On 7th February 2023 Animal Care Australia made the following statement:

ACA supports the Dog Fence Act being repealed and absorbed into the new Biosecurity Act. The Dog Fence Act is outdated, and a broader scientifically based review of wild dog control is necessary and well over-due. The recognition of and separation of dingo from wild dogs is vital to the continued ecological and conservation protection of our native wildlife. Management of livestock and pastoral land has been drowning in myth and outdated practices. The updating of the requirement for landowners including farmers to adequately protect the dingo while still removing feral dogs and foxes is vital.

On 15th April 2020, Animal Care Australia also communicated directly with The Honourable Tim Whetstone MP, Minister for Primary Industries and Regional Development, South Australia, in response to the ‘Proposed changes to the SA Wild Dog and Dingo Policy’. A copy of that communication is attached in order to highlight our concerns.

It is disappointing that the department and the Minister have continued to prioritise the exaggerated claims made by the agriculture and farming industry rather than prioritising the animal welfare of a native species.

Animal Care Australia again calls on the government to actually recognise the dingo as a native species and re-define the definition of a 'wild dog' to exclude the dingo. In addition, the current legislation requires to be reviewed in order to reflect current scientific studies. The mandated requirement for landowners to kill all wild dogs (including the dingo) must be revoked and re-worded to require landowners to invest in more humane methods for the removal of actual wild dogs and to cease the use of 1080 baiting and trapping in order to protect the dingo.

Thank you for the opportunity to comment on this next stage of the new Biosecurity Bill for South Australia.

Please do not hesitate to make contact if we can assist further.

Kind regards,

A handwritten signature in black ink, reading "M Donnelly". The signature is written in a cursive style with a large, stylized 'M' and a long, sweeping underline.

Michael Donnelly
President
0400 323 843

15th April 2020

The Honourable Tim Whetstone MP,
Minister for Primary Industries and Regional Development, South Australia

RE: PROPOSED CHANGES TO THE SA WILD DOG AND DINGO POLICY

Dear Minister,

I am contacting you on behalf of Animal Care Australia.

The proposed changes to the South Australian Wild Dog and Dingo Policy are not in the best interest of our native wildlife and appear to be a ‘chest-thumping’ gesture by the South Australian government to endear votes from the drought-suffering farming industry. These changes raise serious concerns due to the following:

1. Requires all landholders to follow minimum baiting standards, including all farmers (organic producers and others not experiencing or experienced in stock predation). The requirement for ground baiting on land irrespective of whether stock predation is occurring or not, or evidence of dingo (wild dog) presence is totally irresponsible and unnecessary.
2. Allows aerial baiting of dingoes in all regions – including within National Parks. Aerial baiting is irresponsible. While baiting maps must be prepared to designate the drop zone for baiting, this indiscriminate distribution does not guarantee the required take-up of baits, and opens avenues for free-lying baits to be collected by other wildlife (particularly corvids) and re-distributed into areas outside of the approved baiting zones. Widespread aerial baiting programs are not compatible with the continued persistence of genetically intact and distinct dingoes in SA.
3. Uses inappropriate and misleading language to justify what is basically a government-sanctioned slaughter of a native animal species.

We strongly urge the Primary Industries and Regions South Australia to reject the proposed amendments and seek consultation with scientific experts in ecology, biodiversity and wildlife-conflict to develop a policy which considers the important ecological and cultural identity of the dingo whilst seeking to minimise their impact on livestock using best-practice and evidence-based guidelines to avoid lethal control wherever possible.

Studies have shown lethal control of dingoes leads to increases in mesopredator (cat and fox) and herbivore (kangaroos, feral goats, feral pigs, etc.) populations. This will in turn threaten livestock production through the spread of disease by cats (e.g., toxoplasmosis, which can cause abortion in livestock), increased fox populations (which pose a significant risk to lambs), overgrazing by non-stock animals (e.g., kangaroos), and suppress populations of native, threatened species.

The dingo population in South Australia is predominately pure. The proposed eradication and aerial baiting measures threatens the genetic integrity of dingoes in SA

The use of Aerial baiting north of the dingo fence does not have any scientific justification and sets a dangerous precedent. Many of South Australia’s threatened mammals still survive in these areas where dingoes are present and an increase in intensity and frequency of baiting is likely to trigger catastrophic impacts to the detriment of their continued existence.

There are no triggers listed for commencement of aerial baiting and no justification for its use.

Lethal control should be targeted, evidence-based, and balanced against the need to maintain ecological resilience and animal welfare. Further, there is considerable evidence that haphazard, broad-scale baiting can actually make conflict with livestock producers worse.¹

4. Uses inappropriate and misleading language to label dingoes as “wild dogs”

The continued use of the terminology ‘wild dog’ is not justified because wild canids in Australia are dingoes and dingo hybrids, not feral domestic dogs.²

This misleads the public about the identity of dingoes being killed in SA. The dingo population in South Australia is predominately pure. The proposed eradication and aerial baiting measures threatens the genetic integrity of dingoes in SA. A 2015 study in SA, observed that none of 165 wild canids sampled was a feral domestic dog³

5. The proposed SA wild dog policy is not evidence-based

The dingo is a keystone species that benefits small animals and plant communities by suppressing and changing the behaviours of mammalian herbivores and smaller predators (including introduced foxes and feral cats). Their presence adds a stabilising influence and provides ecosystem resilience for species only found in Australia.⁴ The proposal is also not in keeping with scientific advice to maintain healthy dingo populations across the landscape and will ultimately be counterproductive to livestock producers.

Dingoes only pose a marginal risk to cattle and baiting has been observed to increase calf losses (Allen & Gonzalez 1998). The net productivity and ecosystem benefits of dingoes substantially outweigh the limited risk that dingoes pose to livestock, risks that we believe are manageable with appropriate animal husbandry practices, non-lethal measures (i.e., livestock guardian animals and electric fencing) or targeted lethal control (shooting and trapping).

6. Widespread use of mandatory 1080 baiting will limit producers use of livestock guardian dogs and endanger working or pet dogs

Mandatory baiting densities and frequency south of the dingo (and in the proposed 35 km buffer zone) fence pose a substantial risk to owned domestic dogs on farms that may have an important role as livestock guardian dogs or stock management (herding) animals. Farmers currently using livestock guardian dogs will have to cease using them as their animals will be at risk of consuming baits, either laid on the property or spread onto the property by birds and foxes⁵, therefore precluding SA farmers from incorporating livestock guardian dogs stock protection on their properties and risks the poisoning of working or pet dogs on the property.

Legal questions are raised where landholders are forced into baiting with 1080 on their land, particularly if it precludes them from using established best-practice measures of livestock protection such as livestock guardian dogs.

¹ Allen & Gomez 1998; Allen 2015 - <https://onlinelibrary.wiley.com/doi/full/10.1111/emr.12138>

² Royal Zoological Society of NSW Symposium; <https://conservationbytes.com/2019/03/07/the-dingo-is-a-true-blue-native-australian-species/>

³ Stephens et al. (2015) - <https://onlinelibrary.wiley.com/doi/10.1111/mec.13416>

⁴ Johnson & VanDerWal 2009 - <https://besjournals.onlinelibrary.wiley.com/doi/10.1111/j.1365-2664.2009.01650.x>

Wallach et al 2010 - <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1461-0248.2010.01492.x>

Letnic et al 2012 - <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1469-185X.2011.00203.x>

Letnic et al 2013 - <https://onlinelibrary.wiley.com/doi/10.1111/emr.12035>

Newsome et al 2015 - <https://onlinelibrary.wiley.com/doi/10.1111/rec.12186>

Morris & Letnic 2017 - <https://royalsocietypublishing.org/doi/full/10.1098/rspb.2017.0111>

⁵ Van Bommel 2010 - <https://www.pestsmart.org.au/wp-content/uploads/2010/09/Guardian-Dogs-web.pdf>

7. Non-target species at risk by unnecessary aerial baiting and ground baiting

Bait consumption by non-target species is a significant concern. There is ample scientific evidence that non-target species such as corvids (crows), varinids (goannas), omnivorous or carnivorous marsupials such as quolls will consume 1080 baits.⁶ Studies show non-target consumption of 1080 baits was in excess of 80%⁷

This poses an unacceptable risk to SA's native fauna, who will consume baits and may be poisoned. It also provides increased risk of pest species developing bait shyness and increased tolerance to 1080 when used indiscriminately. More importantly, the impact of feral cats and red foxes is likely to be amplified where dingo populations have been dramatically decreased. Cats in particular infrequently eat baits and a reduction in the number of larger predators is likely to result in a substantial increase in cat abundance.

This has the potential to negatively impact on ongoing threatened species recovery efforts. Indiscriminate and non-target specific lethal management should not be implemented if there is a risk to the persistence of threatened native fauna.

Surveys of the public suggest that lethal management of dingoes is not widely supported and do not fit with society expectations to protect and conserve the natural environment.⁸

Furthermore, Animal Care Australia does not support any policy that seeks to allow and possibly force aerial baiting and in particular on Indigenous Land.

Signed:



Michael Donnelly
President & Native Mammal Representative,
Animal Care Australia
0400 323 843

- cc: The Honourable David Speirs MP, Minister for Environment and Water, South Australia
- cc: Primary Industries and Regions South Australia
- cc: Dr Bradley Page, PIRSA Wild Dog Program

⁶ Glen et al 2007 - <https://onlinelibrary.wiley.com/doi/full/10.1111/j.1365-2907.2007.00108.x>

Buckmaster et al 2014 - <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0107788>

⁷ Allen et al 1989 - <https://www.publish.csiro.au/wr/wr9890593>

Moseby et al 2011 - <https://www.publish.csiro.au/wr/WR10236>

Dundas et al 2014 - <https://www.publish.csiro.au/wr/wr13136>

Kreplins et al 2018 - <https://www.publish.csiro.au/WR/WR17182>

⁸ Van Eeden et al 2019 - <https://www.sciencedirect.com/science/article/abs/pii/S0006320718313533>