



# WAFARMERS

**Submission to:**

**Chair of the WA Wild Dog Action Plan Group  
Biosecurity and Regulation  
Department of Agriculture and Food, Western  
Australia**

**Western Australian Draft Wild Dog Action Plan  
2016 - 2021**

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## **Agriculture in Western Australia**

The Western Australian Farmers Federation Inc. (WAFarmers) is the State's largest and most influential member based rural advocacy and service organisation. Founded in 1912, WAFarmers boasts a membership of over 3,300 farmers including grain growers, meat and wool producers, dairy farmers, commercial egg producers and beekeepers. Collectively our members are major contributors to the total gross value of production that agriculture in its various forms contributes annually to Western Australia's economy. Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental wellbeing of that land and the animals that graze it.

## **Introduction**

WAFarmers welcomes the opportunity to respond to the consultation on the draft WA Wild Dog Action plan and commends the Department for taking the initiative to work with the industry to develop an action plan to manage this significant issue.

WAFarmers is extremely concerned by the increasing wild dog [and vermin] problem occurring across WA and the significant impact on the retention of livestock in the State. Sheep numbers have decreased to such a low number that obligations for domestic and export markets could be jeopardised. WAFarmers is working with the government and the Sheep Industry Leadership Council to try and reverse this trend by encouraging more sheep into the wheat belt and pastoral areas. This can only be achieved if we control and potentially eradicate the wild dogs from these areas by firstly supporting the urgent maintenance and repair of the SBF and construction of the Esperance extension and secondly, by adequately funding biosecurity groups on both sides of the fence to eradicate the dogs through agreed pest management plans.

WAFarmers would like to point out that vermin control, including wild dogs, is a universal problem with responsibilities and obligations that must be shared by all concerned, public and private, in the interests of public health and safety, as well as improved industry growth and sustainability long term. We believe there is no rite of passage for any one identity to opt out of these obligations if the recommendations within the draft action plan are to be achieved.

The draft plan presents a strong focus on agricultural benefits whereas there is less discussion on the public good elements of protecting biodiversity. This may not be a sufficient signal for urban/peri-urban based community members in cities and regional communities to become engaged with the plan prior to the development of the community engagement strategy in recommendation 17.

WAFarmers believes the draft wild dog action plan is a positive step forward in terms of achieving the desired outcomes for all concerned, but there are some elements of the draft plan that can't be substantiated or supported and needs further investigation and modification.

## **Discussion**

### **1. The State Barrier Fence and Esperance Extension**

WAFarmers supports the premise of the draft wild dog action including the completion of the Esperance extension and maintenance programs for the existing State Barrier Fence (SBF). We also support the ongoing commitment to the repair and replace of up to 300 km of the existing north-west section of the SBF with shared funding from Federal and State Governments.

However, we are of the opinion that State government funding towards the long term maintenance costs of the SBF and the Esperance extension must continue beyond the three year funding commitment from Royalty for Regions funds.

The government (DPaW) is the largest land owner in the State and therefore it must meet its ongoing obligations to contribute to the annual cost of maintaining the fence in accordance with all other land owners including all farmers in the agricultural areas, pastoralists, mining companies, shires and Indigenous groups.

WAFarmers supports the development and funding of the Esperance extension, but is concerned about the potential for the maintenance costs to escalate given deterioration of the fence due to salt and flooding, which the area is prone too. We propose a robust maintenance plan must be established early in the construction phase to ensure frequent inspection and repair of the fence to minimise costs over time so that the proposed funding estimates in the draft plan don't spiral out of control.

### **2. Situation Analysis and Cost Benefit Analysis**

WAFarmers question why other historical datasets, for example the 2014 report from the MRBA, were not included as part of the cost benefit analysis (CBA). We believe different outcomes would have been achieved if these datasets had been included and resulted in a greater acceptance of the draft wild dog action plan by those on the outside of the fence. WAFarmers have received comments from members questioning the figures used in the analysis believing some to be inaccurate and/or over-inflated. We propose this should be investigated further by the Advisory Group.

The CBA also infers that property redevelopment costs are required to re-establish property based infrastructures that currently don't exist to support an increase in livestock numbers without evidence to support this suggestion. We would also challenge the estimations for an industry rate of remuneration for professional Licensed Pest Management Technicians (i.e. doggers). WAFarmers believes these assumptions need further investigation.

We also question the assumptions used to determine the recommendations as a result of the CBA. We struggle to understand the reasoning behind the 'Optimal Cell size' concept for fenced cells as referenced on page 54 of the draft report. WAFarmers cannot support this theory and question the logic behind these assumptions. For example, there are differences between the carrying capacities of land in the Goldfields compared to the Murchison area, for example. Ongoing funding support cannot be restricted to predictions based solely on production benefits in selected areas.

Prioritisations for investment should focus on future potential returns and must take account of social and public health benefits as well as increased livestock production parameters.

The Meekatharra Rangelands Biosecurity Association (MRBA) provides an example of an RBG that has grasped the opportunity for self-determination of wild dog management. Historically the MRBA area has been an important area for small stock, particularly sheep. Wild dogs have been one of the major factors contributing to the decline of sheep in the area.

Furthermore, a considerable achievement has already been made towards the building of a fenced cell and further funding should continue to assist the biosecurity group to fence off the gap to link it up with the SBF. This should be achieved before the implementation of the revitalisation strategy intended to split this large cell into two small cells. We must control dogs moving to the west or everything is undermined.

The MRBA is also one of the few RBGs that have a comprehensive wild dog management plan to eradicate dogs inside and outside the cell. WAFarmers does not support the statement that the ability to control wild dogs in these cells is marginal.

Responses provided by landholders in wild dog management groups as part of the ABARES survey for AWI, clearly shows they believe there are significant benefits from being part of a local wild dog management group. The majority of the groups surveyed self-rated their effectiveness as high. This effectiveness however was not based purely on reductions in wild dog impacts but more importantly reflected a range of factors the landholders considered to be important in working as a group. These factors included but were not limited to; dog control success, participation levels, commitment and collaboration, and extent to which decision-making process was democratic and shared amongst the entire group. The view held by many of the people interviewed was that without the group's activities stock losses could have been significantly higher, and many people reported that being within a group provided the opportunity to be far more strategic and targeted with their control actions and communicate better with neighbours.

We also concluded the Kimberley and Pilbara regions will have better returns on investment percentages given they only use aerial baiting options as compared to other regions that use a combination of control options at greater costs to the biosecurity groups. It could be argued that if more control options had been implemented in these regions the movement of dogs from north to south would have been restricted. Also those in the southern rangelands have to spend a lot more on controls in order to protect small stock assets and are being penalised in the CBA.

Furthermore, the draft plan presents a simplified version of control options when there are many elements to best practice. Consideration must be given to the promotion of integrated wild dog controls, which provides efficiencies in resource use and greater benefits to agriculture and wildlife through looking at bait strength and varieties (the restricted use of strychnine in WA is not mentioned in the draft plan), quantities deployed, timing and duration of activities.

WAFarmers propose further consideration is needed on cell structure options.

WAFarmers would also suggest consideration should be given to who will administer and coordinate the RBGs to avoid quasi administrators particularly in the rangelands. We would like to acknowledge

the contributions made by AWI in its appointment of a State coordinator to assist with program developments and linking RBGs together.

WAFarmers believes the SBF/EE is a vital tool for the protection of the agricultural area on the inside of the fence to prevent a further influx of wild dogs. There is already a significant wild dog population inside the fence. This is largely due to the apathy in realizing how significant the problem was some years ago.

Currently, there are only three FTE's maintaining the State Barrier Fence and these individuals are doing a good job in isolated conditions. If the dog population continues to grow, it will reach a critical level and losses will be significantly higher than anything currently experienced. If enough resources are provided early, the contribution rate should not be an on-going issue as the problem could be eradicated in say 3-5 years. Then the rate could be dropped right back to fund targeted areas for a few more years before it is cancelled and the RBG'S should be able to fund any remaining areas. The Department has been very keen to support the move from DSGs to RBGs, some of which have struggled to work with the resources being made available.

While cattle remains the only option for some landholders, an opportunity will be missed for the sheep industry of WA, if some fenced cells are rendered incapable of running commercial quantities as is being suggested in the draft action plan.

### **3. Key Considerations for Further Investigation**

WAFarmers has an extensive membership with members based in many areas throughout Western Australia, and as a result of this consultative process a number of issues have been identified which are varied depending on whether the landowner is on the inside of the barrier fence or on the outside of the barrier fence.

#### **3.1 Key Concerns of Pastoralist on the outside of the State Barrier Fence**

Although there is good support across the board for the development of the Esperance extension and the need for urgent maintenance of the state barrier fence, land holders are concerned they will be required to pay for the maintenance of the fence three times over as a result of the hand over from RFR funding support.

Currently, pastoral and rangeland owners/leasees contribute income via;

- a. The vermin rate through pastoral/rangeland leases.
- b. The RBG agreed land service pest rate based on one enterprise unit (VEN) set on the unimproved value of the land; and
- c. In the future to a potential levy contribution via the Industry Funding Schemes (IFS) legislated under the BAM Act.

At present there is no appetite across the industry, for an increase in the levy rate currently collected for the IFSs, or for a new levy to be established to support the costs associated with the maintenance of the SBF and EE.

WAFarmers believes this is an unacceptable burden on pastoralists and suggests further investigation is needed to determine the payment thresholds for landholder contributions towards the maintenance of the state barrier fence beyond three years' time.

### **3.2 Key Concerns for the Agricultural area on the inside of the State Barrier Fence and EE.**

There is concern for the allocations of funding between all sectors of industry. The SBF and EE has been built for the protection of the public, communities and agricultural enterprises across the whole agricultural region, and therefore it is reasonable to expect all aspects of the community and industry sector to be involved in the funding.

WAFarmers suggest further consideration is needed to determine how SBF/EE maintenance contribution payments will be set and collected across the whole agricultural region. This must include payment contributions from government owned crown land, parklands and reserves.

### **3.2 Responses to Specific Recommendations**

Recommendation 1:

WAFarmers supports the formation of a WA Wild Dog Alliance to develop policy and drive action on the ground within agreed timelines and the Alliance must have good representation between industry and government.

Recommendation 2:

WAFarmers supports this recommendation.

Recommendation 3, 4, 6, 10, 11, 12

There is a need for a bigger conversation about optimisation of funding opportunities and clarity around the current funding mechanisms for all biosecurity related aspects.

### **In Conclusion**

WAFarmers supports the development of the Esperance extension and the ongoing maintenance of the SBF to stop the movement of dogs and other vermin. It would like to acknowledge its appreciation for the Royalty for Regions funding contribution towards the construction of the fences and their continued support of the RBGs.

WAFarmers believes the SBF/EE are State Based Assets and therefore the government must continue to contribute towards the long term maintenance costs of the fence as landholders of crown lands, parks and reserves.

WAFarmers acknowledges the importance of the SBF (when dog proofed) and the development of the EE, but this is only one part of the action plan. The second most important factor is the eradication of wild dogs from inside and outside of the fence. All RBGs established on the outside of the fence will need all the support possible to help them with integrated control policies through the establishment of wild dog management plans and the appointment of group coordinators to ensure KPIs are achieved in a timely manner. Control groups will also have to be established inside the SBF/EE to achieve the same outcomes as noted above.

In terms of the fenced cells and the proposed recommendations as a result of the cost benefit analysis, WAFarmers recommends these need further investigation as the recommendations in the draft plan can't be supported. We believe the assumptions of costing's used are inaccurate and comparisons between fenced cells in Queensland is not appropriate for fenced cell development in WA. We are concerned the authors of the draft plan may have inadvertently or otherwise, been selective with the information included or omitted in the CBA to support a desired outcome.

Over the last 70 years, as noted in the consultation, the wild dog numbers have increased across Australia despite current management and control plans. The plan does not clearly state why this increase is occurring. We don't believe this is the result of climate change related issues; it is more like a rapid increase in the number of domestic dogs interbreeding with the native dingo.

The consultation incorrectly identifies the target wild dog culprit as being pure dingo; however we do not believe this to be correct. In approximately 2011, the initial 4000 dog DNA Australian wide trial conducted by the UWA showed 2 dogs were 86% pure dingo, with the majority testing between 54-65% pure dingoes.

WAFarmers welcomes the first draft of the WA Wild Dog Action Plan and looks forward to further engagement on this important topic.