

Submission to the Review of the Fraser Island Dingo Management Strategy (EcoSure)

by

**The National Dingo Preservation and
Recovery Program**

(Inc. A0051763G)

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Prepared by Jennifer Parkhurst and Ernest Healy

(In Confidence)

Taken at the K' Gari indigenous camp Fraser Island



Oaths Act 1876-1988

STATUTORY DECLARATIONQUEENSLAND)
TO WIT)I, MARILYN (MALLY) CLARKE
Of 6 COLYTON ST TORQUAY

In the State of Queensland, do solemnly and sincerely declare that,

On behalf of the Butchulla people of K'Gari Camp we would like to make it clear that we are extremely angry and upset about your decision to kill our camp dogs.

We were not consulted, or informed of your decision, and only found out after one dog was killed and the other was seen wounded. This shows a lack of respect for our Community and Elders. We have been living with dingoes long before your government even knew what a dingo looked like and we understand our animals much better than any of the rangers.

Our dogs are not dangerous, the visitors don't know how to act properly around them and that is the problem, but because visitors do the wrong thing our dogs must die. That is not right. The pup you shot and are now trying desperately to trap is not a bad dog, so why are you determined to kill him? How many other dogs have you killed around our camp? All the animals seem to have disappeared recently.

We expect that you respect our Community and leave our animals alone.

And I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the Oaths Act 1867-1988.

Taken and Declared before me, at TORQUAY QLD this 19TH day of SEPTEMBER 2012.

JR Howard (JP Qual)
A Justice of the Peace

M. Clarke
Signature of person making



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INTRODUCTION

The Fraser Island Dingo Management Strategy (FIDMS) has been in place for 20 years. Since its implementation there has been extensive conflict between its administrative body and members of the general public, tour operators, conservation groups and other stakeholders. This long history of community concern has led to the formation of a conservation group called Save Fraser Island Dingoes Inc (SFID), an affiliate of the National Dingo Preservation and Recovery Program (NDPRP). The NDPRP is an organization that brings together into a collaborative partnership different state-based dingo conservation organizations (to date across Queensland, New South Wales and Victoria) and environmental experts (including professional scientists and academics) to advocate for dingo conservation and educate the public and governments about the importance of the dingo in Australian ecosystems. The powerful lobbying of SFID has caused the clash between human right to recreation and the welfare of the dingoes, a population of national and international significance, to become an overly politicized situation. Despite pressure applied by SFID, the government refuses to adopt proactive conservation even in light of good published and unpublished research showing the need for immediate change. 'When someone dies because of wildlife, and that wildlife is itself a tourist attraction, then wildlife tourism has "gone wrong"'.¹

A more holistic and eco-centric approach to management of the Island's dingoes, using sound science, input from stakeholders, and a transparent approach is recommended. The National Dingo Preservation and Recovery Program (NDPRP) in conjunction with SFID has prepared this document to provide an incoming government a starting point to develop a new Fraser Island Dingo Management Strategy.

Brief overview/history of Fraser Island and the establishment of the FIDMS

In order to understand the evolving conditions for the dingo on Fraser Island, we need to first look at Human impact on Fraser Island over the last 140 years which has created an unnatural situation on the Island that cannot be reversed.

In 1863, the first known saw logs were taken from Fraser Island. In 1879 land was leased from the Queensland Government and the first homestead was built near Eurong for private enterprise (cattle and Arab horses). Around 1904 the last of the Aborigines was removed from the Island missions. In 1906 saw-millers purchased the rights to log 4300 acres from the Qld Lands Dept. Between 1918 and 1935 townships were established, including Central Station and Happy Valley. Timber from Fraser Island was used to line the Suez Canal and London's Falmouth Dock².

In 1971 QPWS took over management of the northern end as a declared national park; The Forestry Department managed the remaining 2/3 as state forest. Between 1974 and 1976, a sand mining operation took place under the Mines Department.

In 1978 the Fraser Island Management Plan (Vol 1) was drafted by the Qld Govt incorporating a multi-departmental responsibility for the Island. In 1991 QPWS took full control of the Island. At this time the brumbies were culled and removed. 1992 saw Fraser Island listed as World Heritage. In

¹ When wildlife tourism goes wrong: a case study of stakeholder and management issues regarding dingoes on Fraser Island Australia, Georgette Leah Burns and Peter Howard, Tourism Management 24 (2003) 699-712

² Fred Williams 'Princess K'Gari's Fraser Island'

1993 –1994 open landfill dumps were closed³. Between 1905 and 1994 there was no report whatsoever of dingoes attacking humans.⁴

In 1994, approval to ear-tag dingoes was denied. In the same year, dingoes' behaviour and condition noticeably changed, and this change was attributed to starvation⁵. Six dingoes were destroyed for showing allegedly aggressive behaviour.

In 1996 32 dingoes were culled and their skulls were lodged with the Qld Museum for research purposes, including skull morphology testing for purity (this method of determining purity has since been proven unreliable). In 1998 an ecotourism complex was established at Kingfisher Bay⁶.

In 1998 Laurie Corbett was appointed as consultant to the QPWS. His five day field trip to the Island comprised a review of department records, observations of dingoes and discussions with rangers. Based on his report, a draft FIDMS was placed for public comment in 1999. 37 submissions protesting the new strategy were lodged in response to the draft document but were apparently ignored.⁷ For the most part submissions concentrated on the lack of planning for sustainable ecology of the Island. Fraser Island Defenders Organisation (FIDO) said in their critique: 'At present the objective could be construed only as stopping dingoes attacking humans⁸.'

By 2001 the tourism industry was hosting over 300,000 visitors to the Island per year. On 30 April 2001 a nine-year-old boy, Clinton Gage, was attacked by dingoes when 150 meters away from his parents at their campsite. Subsequently 31 dingoes were officially culled – possibly outside legal power to do so⁹.

Minister Kate Jones stated in Parliament that 'Following the tragic death of a young boy in April 2001... the state government developed a comprehensive strategy for the management of dingoes on the island'. This was released as the Fraser Island Dingo Management Strategy 2001. This strategy was the result however of a management plan that had been in place for at least seven years prior to 2001, as can be seen from the information above.

Approval of ear-tagging in 2002

During 2003 the FIDMS was officially audited for the first time, by its original author, Laurie Corbett. Modifications were recommended. It was stated that that current studies were insufficiently advanced to provide significant input to the long term impact of culling on Island dingo populations or whether natural food supplies could maintain a minimum viable dingo population. It was also

³ Fred Williams 'Princess K'Gari's Fraser Island'

⁴ Fraser Island Defenders Organisation Response to Draft Dingo Management Strategy 1999

⁵ Stephen Price internal report to QPWS 1994

⁶ Fred Williams 'Princess K'Gari's Fraser Island'

⁷ Pat O'Brien, Wildlife Protection Association of Australia Inc

⁸ Fraser Island Defenders Organisation Response to Draft Dingo Management Strategy 1999

⁹ the decision of the Queensland government to cull dingoes on Fraser Island was arguably *ultra vires* (that is, beyond its legal power) as inconsistent with the management principles for National Parks stated in s 17 (Management principles of national parks) of the NCA⁹

'Requirement for approval of activities with a significant impact on a declared World Heritage

Property (1) A person must not take an action that: (a) has or will have a significant impact on the world heritage values of a declared World Heritage property; or (b) is likely to have a significant impact on the world heritage values of a declared World Heritage property.

Civil Penalty: for an individual - 5,000 penalty units; for a body corporate - 50,000 penalty units.⁹

stated that insufficient data was available to assess whether or not current management of the total island dingo population was sustainable in the long term.

2006 'review' of FIDMS by Laurie Corbett

In 2009 an audit of FIDMS was undertaken by Laurie Corbett. Seventy-one public submissions regarding dingo management on Fraser Island were assessed from which seven issues were identified that were relevant to the Audit and dingo research program. It was 'strongly recommended' that data sets be reported and assessed by peer-review. Relevant recommendations identified in the previous Audit were again recommended in this Audit, indicating that they were not implemented in the six year time span between.¹⁰

At time of writing, none of the recommendations have been implemented. In order to move forward with humane management of dingoes on Fraser Island, it is strongly felt that the dingo population should be managed as a population of national and international significance and 'any recreation on national parks or world heritage areas should be undertaken in the context of conservation objectives and not merely from the point of view of managing human recreation.'¹¹

¹⁰ Prepared by: L K Corbett Job No: 0809-3 19 Prepared for: Queensland Parks and Wildlife Service August 2009

¹¹ Environmental Defenders Office 2002 'Submission on review of the recreation areas management act, regulation and by-law, prepared by Rob Stevenson, Solicitor.

A STRATEGY RELIANT UPON PSEUDOSCIENCE

Example: The Fraser Island Dingo Population Study Stage 1

Because of the confounding of political with wildlife management priorities under the present dingo management strategy, there has been an increasing reliance upon a façade of scientific management, or pseudoscience, by Queensland authorities in the management of the dingo population of Fraser Island. The Fraser Island Dingo Population Study – Stage 1, provides an example.

Two questions, the answers to which are central to any viable management strategy for the Dingo population on Fraser Island are: What is the size, sex/age composition and distribution of the Fraser Island dingo population? And, What is the size of the *effective breeding* population?

An answer to the second of these questions is crucial. Without this knowledge, it cannot be known whether or not the immediate management actions are detrimental to the long-term survival of the dingo on the Island. If these questions cannot be answered with confidence, then the claim to sustainable management cannot be made; the sustainability objective of the Fraser Island Management Strategy cannot be met.

Indeed, the crucial nature of the answers to these questions is recognised in the Fraser Island Management Strategy itself. In the 2009 Audit of the FIDMS by Dr Laurie Corbett, it is stressed more than once how crucial it is to ensure that the management strategy itself does not undermine the sustainability of the Dingo population. To prevent such a dire outcome, he insists on good data about the size and distribution of the dingo population and the ability of park staff to understand the implications of such data. Referring to an unpublished Fraser Island dingo population study, commenced in 2002, Corbett states:

The current [population] results are ... 'provisional' and possibly represent an inadequate or misleading baseline for Park Managers to base current and future management decisions. It is therefore strongly recommended that these research data be critically assessed as soon as possible **so that the current rate of dingo mortality by humane destruction and accident can be reconciled with a sustainable natural dingo population on Fraser Island.** (FIDMS Audit, 2009, p. 10) (Our emphasis)

Again, this statement highlights the significance of a high level of certainty about the size and composition of the Fraser Island dingo population for sustainable management. It also makes it clear that, at the time of the 2009 audit, such knowledge about the population was not held by the Queensland authorities responsible for the enactment of the management strategy.

In relation to the potentially damaging impact of dingo management practices (discouraging all human contact, culling, hazing and denial of dingo access to beach areas) on the Island, Corbett states:

...it is apparent that the intensive virulence and dingo control in tourist areas in recent years has 'educated' dingoes so that most now live and feed in the forest. It is therefore vital **to regularly assess dingo abundance, distribution and diet; and food availability** (variety and abundance) in forest areas to ensure that the Fraser Island dingo population is sustainable over the long term. (FIDMS Audit, 2009, p. 10) (Our emphasis)

Similarly, because management is now heavily focused on restricting dingoes to the forested areas of the Island, remote from human activity, Corbett emphasises how crucial it is to know about the size and distribution of the dingo population in forest areas:

...these data [un-peer-reviewed and unpublished population data] are likely to be vital in estimating the current size and distribution of the Island dingo population, **and thus assessment of whether or not dingo numbers have been culled below a naturally sustainable level.**¹² (Our emphasis)

This emphasis on a sound empirical basis for managing the Fraser Island dingo population is also reflected in statements made in June 2009 by the Climate Change and Sustainability Minister, Kate Jones, when she announced that an independent audit of the FIDMS (by L. Corbett - he architect of the strategy) would ensure the maintenance of a healthy dingo population on the Island:

I want to be fully satisfied that Dingoes are prevalent on the island.¹³

Knowledge gap persists

It is disappointing, therefore, that on examination of the Interim Report Stage 1 of the FI Dingo Population Study (July 2010), despite recent research, these crucial questions concerning size and composition of the Fraser Island dingo population are still not answered with any confidence.

The study used the CMR (capture, mark, recapture) techniques as well as intensive sighting surveys. As the Interim Report states, in practice, the execution of these techniques proved problematic:

- Because of inaccessibility of much of Fraser Island, only 25% of the land area of the Island was included in this stage of the study.¹⁴ This meant that, for the greater part, forested regions were not included for the CMR research, even though knowledge of the dingo population in forested areas was given a high priority by the 2009 management-strategy audit.
- At the time of the Interim Report release (July 2010), 'most' of the CMR work had been limited to 'the easily accessible eastern beach, where visible Dingo activity is highest and management issues are more evident'.¹⁵ 'Most' is not quantified.
- Dingo sighting survey results are equally problematic. 810 dingo sightings were recorded, but this count included multiple sightings of the same animals.¹⁶

How great an effect such multiple sightings had in inflating the actual number of dingoes observed is not discussed in the Report.

While the Report states that 611 or 67% of the sightings 'positively identified the dingo', the proportion of multiple sightings that occurred amongst this 611 is not reported. Why is not clear. Presumably, since these were positive sightings of individual animals, the extent of multiple counting could easily have been calculated and reported for this subgroup.

¹² FIDMS Audit, 2009, p. 9

¹³ Media Release, Hon Kate Jones, 21 July, 2009

¹⁴ Interim Report Stage 1, July 2010, p. 6

¹⁵ Interim Report Stage 1, July 2010, p. 7

¹⁶ Interim Report Stage 1, July 2010, p. 8

As a consequence of these shortcomings, the results reported in the Interim Report do not provide credible insight into the size, distribution and age/sex composition of the dingo population on Fraser Island.

It is also of concern that the Report does not present any *analysis* of the observations reported. The Report jumps from a cursory description of observations to a preliminary conclusion without any explanatory account of how these observations support the conclusion arrived at. A simple *description* of observations does not comprise *analysis*.

Despite the unreliable and incomplete nature of the observations in the Report, it is nevertheless asserted that the Fraser Island dingo population is in good condition, and that the observations 'strongly suggest a current population in excess of 200 individuals' (Interim Report Stage 1, July 2010, p. 6). To the contrary, unfortunately, on the basis of the information presented, it may be concluded that Stage 1 of the Fraser Island population study is based on incomplete and unreliable observations. Indeed, the Report reads as if these conclusions were preconceived, and were reiterated despite the paucity of evidence. The figure of 100-200 for the Fraser Island dingo population keeps appearing, mantra like, in official documentation and public statements, regardless of the evidence available. This figure appears to reflect Laurie Corbett's back-of-the-envelope estimate of the dingo population from a whistle-stop, five-day visit to the Island in April 1998.

Publication and Peer Review of findings

This disconcerting dissociation between observations and conclusions raises a number of questions about the policy requirement that the Interim Report will be subject to peer review for publication. Will this peer review process be for publication in a double-blind peer reviewed academic journal, as stipulated in the Fraser Island Dingo Management Strategy? The strategy requirement is for peer-viewed publication in an academic journal. Strategy 1, Action 25 requires that:

All research projects must submit key results for publication in a peer-reviewed scientific journal within 12 months of completing University requirements...¹⁷

If the reference to peer review in the Interim Report is intended to address this requirement, why is it indicated that peer review will be conducted by persons who have participated in the research? As the Report stands, this suggestion is extraordinary. Dr Lee Allen, Dr Luke Leung, Dr Gregg Baxter and Assoc. Prof. Darryl Jones are all both thanked for the participation in the research (Interim Report Stage 1, July 2010, p. 2) and proposed as peer reviewers (Interim Report Stage 1, July 2010, p. 6). By any normal academic standard, persons cannot peer review research for publication which they have advised on or have been otherwise involved with.

The Interim Report does not inspire confidence that the Fraser Island Dingo Management Strategy is being implemented with scientific integrity, and in a way that will ensure the sustainability of the Fraser Island dingo population.

¹⁷ Interim Report Stage 1, July 2010, p. 8

MORE PSEUDOSCIENCE - HABITUATION = AGGRESSION

Background - Risk management versus dingo conservation

The FIDMS recognises the high conservation value of the dingo population on Fraser Island and acknowledges the responsibility of Queensland authorities to conserve the Island's dingoes as a native species within the Great Sandy National Park.¹⁸ The 2006 Queensland government review of the FIDMS noted the inclusion of the dingo as a species vulnerable to extinction on the World Conservation Union's Red List and concluded that the conservation of the Fraser Island dingo population was of national significance.¹⁹ The strategy, therefore, includes the objective to:

...ensure the conservation of a sustainable wild dingo population on Fraser Island.²⁰

The strategy also acknowledges the increased opportunity for interaction between dingoes and humans as a result of the rapid growth in year-round tourism to the Island (from 100,000 in 1980 to nearly 400,000 in 2004),²¹ and it claims that the Island's dingo management strategy has been adapted to these changing circumstances.

In this context, the FIDMS places strong emphasis upon the need to 'reduce the risk posed to humans by dingoes' and to:

...reduce the frequency and intensity of aggressive and destructive behaviour by the Island dingoes towards visitors and local residents to the greatest extent possible...²²

In attempting to reconcile the twin objectives of dingo conservation and public safety, the strategy prescribes a number of specific management actions aimed at eliminating dingo/human interaction. The strategy assumes that the elimination of negative or potentially harmful dingo/human interaction centres on the issue of food availability from human sources.²³ More precisely, the strategy aims to eliminate dingo/human interaction altogether. Not only will dingo behaviour be 'modified' to prevent dingoes from seeking food from human sources, but the very opportunity to seek food from humans is to be eliminated. In the quest to eliminate opportunities for food-seeking from human sources, the strategy implicitly adopts a zero tolerance position on dingo/human interaction.

To this end, the specific measures adopted include encouraging 'appropriate behaviour towards dingoes', 'discouraging dingoes from interacting with people', actions to 'modify dingo behaviour', the humane 'destruction' of dingoes deemed to be dangerous, and the culling of the Island's dingo population to a 'sustainable level' to ensure 'balance with the seasonable availability of natural foods'.²⁴ An underlying assumption of the management strategy is that the island's dingo population has grown to unnatural levels as a consequence of access to human food sources – a questionable assumption that is discussed below.

¹⁸ FIDMS – review, 2006: 3

¹⁹ FIDMS – review, 2006: 3

²⁰ FIDMS – review, 2006: 3

²¹ FIDMS, - review 2006: 11

²² FIDMS – review, 2006:3

²³ FIDMS, - 2006: 4

²⁴ FIDMS, - 2006: 4

A factor which has greatly influenced the adoption of the management strategy's zero-tolerance approach to dingo/human interaction was the 2001 death of Clinton Gage from dingo attack.²⁵ It is now common knowledge that the complete elimination of dingoes from Fraser Island was seriously considered by the Queensland government immediately after this event. However, the negative impact that such action would almost certainly have had on the credibility of the Queensland government as manager of Fraser Island as a World Heritage Listed Area appears to have acted as a deterrent.²⁶ The immediate response of the Queensland government was to sanction the destruction of 31 dingoes, carried out by April 30 2001. The flurry of culling immediately after Clinton Gage's death and in the following year or two demonstrates the knee-jerk nature of the response. (See the dingo destruction register, Appendix 1) This appears to have been an attempt to quell public concern and involved the destruction of many animals that had had regular contact with people, but without significant incident. The degree to which the Clinton Gage death subsequently shaped the Queensland authorities' attitude to the dingoes on Fraser Island was profound. This was acknowledged in the May 2001 *Risk Assessment* Report, which was hastily compiled as a result of the incident:

...the tragic death of a 9 year-old boy on 30 April 2001 has redefined the risk dingoes pose to humans.²⁷

The 2006 review of the FIDMS also acknowledges the impact that this incident had on the direction of dingo management:

The incident confirmed the risk that dingoes pose to humans and as a consequence significantly altered the required approach to dingo management.²⁸

From the time of Clinton Gage's death, the approach to dingo management on Fraser Island has been governed by an overriding assumption that dingoes are dangerous. To help justify this shift in management perspective, the current management strategy makes an unconvincing attempt to portray a long history of problems with dingo aggression on Fraser Island. A reported attack in 1988; a reported 'problem' with dingoes in a local newspaper report around 1930; and dingoes taking food from forestry worker camps in the 1960s is presented as evidence of a long-standing dingo problem on the island.²⁹

There is now considerable evidence that, from the time of Clinton Gage's death, the balance between the objectives of dingo conservation and the management of perceived public risk has become increasingly skewed in favour of the latter. This bias, however, has been more to do with managing public perceptions, than to do with any actual threat. The principal distortion that now characterises the dingo management rationale of the QPWS is outlined below.

As a further consequence, the efforts of the QPWS to maintain an outward appearance of policy balance have become more strained, to point of being disingenuous. At the same time, the tolerance of the QPWS to external criticism of the serious imbalances in its current dingo management approach has diminished to the point of barely-disguised hostility.

²⁵ There is evidence, however, that the view that dingo/human interaction should be prevented was gaining management policy traction within QPWS before this date.

²⁶ Risk Assessment, May 2001, p. 8

²⁷ Risk Assessment, May 2001, p. 3

²⁸ FIDMS, 2006: 6

²⁹ FIDMS, 2006: 11

The habituation = aggression fallacy

A core assumption of this overall management approach is the claim that interaction between dingoes and humans (presumed to be principally through food seeking) results in loss of fear towards humans, which in turn results in dingo aggression. The management strategy represents this 'habituation = aggression' hypothesis with the following diagram, based on four presumed developmental stages:

Attraction → Habituation → Interaction → Aggression

Food is identified as central to the first stage, where the dingo is attracted to humans as a food source. The second stage, 'habituation', is described as an adaptation by dingoes whereby repeated contact with humans without 'negative reinforcement' results in loss of fear. The habituation stage may be compounded by human attempts to interact with dingoes, as if they were domestic dogs. The final stage in the process is dingo aggression. The FIDMS, however, does not identify the nature of the presumed causal link between the habituation/interaction stages and the presumed consequence – aggression towards humans. The final, crucial, causal link in the alleged progression from habituation to aggression is left unexplained. The management strategy simply leaves the reader with the implicit assumption that the dingo, being a 'wild animal', is innately aggressive and, if people interact with them, the dingoes will attack them. The logical conclusion from this schema is that *any dingo contact with humans must be essentially aggressive in nature*. By extension, it might be assumed that any dingo that makes contact with humans is a 'problem' animal.

It may be instructive to cite the management strategy at length in its description of the 'aggression' stage of the presumed habituation = aggression process:

Dingoes involve people in their feeding activities and behavioural development (Corbett 1998a, pp. 9, 10) that can result in human injury or, in the worst case, death. A person responding in a way that will further excite or encourage aggressive animals can exacerbate the seriousness of the outcome. This includes behaviour such as running near dingoes, throwing objects at it, splashing water or waving arms around, walking alone and leaving children unattended.³⁰

A similar quotation along these lines is found on the Queensland government website, under the heading 'Dingo Management on Fraser Island'.

Since 2001, a number of dangerous dingoes have been humanely destroyed by appropriately trained and authorised Queensland Parks and Wildlife Service rangers...it is done to protect people from attack. Once a dingo has lost its fear of people and starts to use aggressive tactics to gain dominance over, or food from, people the habit cannot be changed. These dingoes display aggressive or dangerous behaviour such as nipping and biting, and in some cases this escalates very quickly to attacks and serious mauling.³¹

This statement exemplifies a further assumption that has come to characterise the thinking which now informs the FIDMS. This is that all dingo/human interaction, even juvenile dingo playfulness, can be reduced to an attempt to gain 'dominance', which is in turn interpreted as a proxy for aggression, or as latent aggression.

³⁰ FIDMS, 2006: 16

³¹ <http://www.derm.qld.gov.au/parks/fraser/dingo-management.html>

Given the centrality of the 'habituation = aggression' claim in framing the FIDMS, it is important to examine the sources cited by Queensland authorities in justification for this approach. There are several sources cited in QPWS and FIDMS documents. The key document is 'Corbett 1998a'.³² The others are unpublished internal departmental reports conducted by Fraser Island rangers and junior academic researchers in the period around 1994.

'Corbett 1998a' is an unpublished (and therefore not peer-reviewed) consultancy report conducted for the Queensland Department of Environment by Dr Laurie Corbett. The relevant comments by Corbett are found under the sub-heading '*Interactions between dingoes and humans – some reasons for dingo attacks*'. Here, Corbett states that the 'nature, frequency and intensity of [dingo/human] interactions' vary according to a number of factors, including time of year, supplementary natural food supplies, and the human reaction to dingoes.³³ Concerning the issue of dingo predation on, or aggression towards, humans, Corbett points to a generic body of literature dealing with human/predator interaction. However, the specific source that he relies upon for his claims about dingo/human interaction is 'Carbyn, 1989'. This is a brief paper written by L.N. Carbyn, of the Canadian Wildlife Service and published in the *Wildlife Society Bulletin*, vol. 17 no. 4, 1998.³⁴ Carbyn examines archival documentation, analyses the circumstances surrounding four serious attacks by coyotes on humans, and identifies some circumstances that these attacks had in common. Citing Carbyn's investigation of coyote attacks for his recommendations to the Queensland Department of Environment in relation to dingo/human interactions, Corbett states:

There appears to be many parallels in the case of the coyote (the ecological equivalent of the dingo in North America) **where many attacks are directed towards young human females** and in one instance a baby was killed.^{35 36} (Our emphasis)

A number of observations can be made about the validity of Corbett's reliance upon Carbyn's article and his degree of accuracy in reporting it. First, Corbett's statement certainly distorts, and possibly misrepresents, Carbyn's observations and discussion of coyote attacks upon humans. Having initially found reference to only one documented case of serious coyote/human attack (In Howell, 1982), Carbyn conducted an extensive search of archival material from a number of North American national parks to identify a further four cases of serious attack by coyotes. Corbett's reference to 'many attacks' is therefore seriously misleading. The average reader would take Corbett's statement to mean that coyote attacks upon 'young human females' may be commonplace. Further, contrary to Corbett's implication that Carbyn concluded from his examination of the records that young 'female' humans in particular may be a target of coyote attack, Carbyn, in fact, draws no such conclusion in the article cited. What Corbett actually rather clumsily refers to is the fact that three of the four, rare cases of serious coyote attack uncovered by Carbyn (75%) involved young or infant females. Yet, Carbyn places no special significance upon the sex of the children concerned as a factor in the attacks.

³² Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998

³³ Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998, p. 6

³⁴ Carbyn, L. N. (1998) 'Coyote attacks on children in Western North America', *Wildlife Society Bulletin*, vol. 17 no. 4

³⁵ Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998, p. 6

³⁶ It is surprising that Corbett refers to the dingo as the 'ecological equivalent' of the coyote in North America. This is not correct. In North America, the coyote is a meso-predator, sitting below the wolf and possibly other predatory taxa. In Australia, the dingo is the top-order land predator.

So, what did Carbyn actually say on the relationship of coyote habituation to humans and aggression? He does observe that loss of fear to humans was apparent in all four cases and that the coyotes appear to have regarded the children as prey (Carbyn, 1989: 445). To put this observation in perspective, however, he notes that loss of fear in humans by coyotes is widespread, it being particularly common in national parks and urban areas where humans are associated with food, as at campgrounds (Carbyn, 1989: 445). It may be reasonably inferred from Carbyn's discussion, therefore, that coyote habituation to humans alone does not provide a sufficient explanation for aggression towards humans. Carbyn also notes that the four attacks occurred at times of the year when coyotes were about to have pups, were feeding pups, or had recently been feeding pups. A key observation was that '...serious attacks were made only on infants', an emphasis that Corbett omits to report (Carbyn, 1989: 445). Despite Carbyn's findings that the only four documented cases of serious coyote attack on humans were upon infants, Corbett cites Carbyn in justification of his conclusion:

At Fraser Island, **a similar tragic incident** involving humans **of any age or sex** is a distinct possibility.³⁷ (Our emphasis)

Corbett's selective reliance upon Carbyn is notable in another respect that is relevant to an assessment of the FIDMS 'habituation = aggression' assumption. Notwithstanding Carbyn's observation that the four attacks occurred in situations where coyotes were familiar with humans and where there may have been an expectation of human-derived food, he emphasises the possibility that the coyotes may have been suffering 'food stress'.³⁸ He states:

It is possible that boldness in coyotes toward humans is related to food stress.

And:

Predatory instincts may, therefore, be redirected to other potential sources of food.

And:

It follows that adults with young would be more persistent in their efforts to kill and may therefore be more likely to switch to novel prey if food shortages should occur.³⁹

So, in Carbyn's view, it is not simply the association of humans with food by coyotes, and coyote familiarity with humans, that may lead to aggression, but these factors in association with 'food stress'. It is notable that Corbett does not report Carbyn's discussion of food stress as a possible contributing factor in the cases of coyote aggression to humans. Corbett does refer to the potential for dingoes to switch prey preferences in circumstances where established food sources become scarce. However, he refers to this in context of the observed deduction of swamp wallabies, the reduction of brumby numbers and the closing of rubbish dumps on Fraser Island (Corbett, 1998: 5). At no stage, however, does Corbett explicitly suggest or acknowledge that adding to the food stress of dingoes on the Island may be conducive to circumstances where dingoes may become an increased threat to humans.

It is remarkable that, having relied so heavily upon the observations of Carbyn to inform his recommendations to the Queensland government on the management of dingo/human interaction on Fraser Island, Corbett proceeds to recommend dingo management actions likely to induce one of the risk factors highlighted by Carbyn - food scarcity.

³⁷ Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998

³⁸ Carbyn, L. N. (1998) 'Coyote attacks on children in Western North America', *Wildlife Society Bulletin*, vol. 17 no. 4, p. 445

³⁹ Carbyn, L. N. (1998) 'Coyote attacks on children in Western North America', *Wildlife Society Bulletin*, vol. 17 no. 4, p. 445

Quite contrary to the insights of Carbyn, Corbett advocates a dingo management strategy on Fraser Island based on denying dingoes an established source of food – human-based food supplements in locations of high human contact.

One of Corbett's principal recommendations was to exclude dingoes from high visitor use areas. Specifically he recommends the installation of dingo exclusion fences around camping grounds and picnic areas, where dingoes may easily solicit or steal food.⁴⁰

Whereas Carbyn pointed to the possibility that food shortage may have been an important factor in the documented cases of coyote attack on humans, Corbett asserts the opposite in relation to dingoes:

The provisioning of food for dingoes and the **resulting change in dingo behaviour (discussed below)** is well documented...To access these non-natural food sources, dingoes have become accustomed to the close presence of humans so that it is inevitable there will be direct interactions between dingoes and humans.⁴¹ (Our emphasis)

By misrepresenting Carbyn, Corbett entrenches the simplistic notion of 'habituation = aggression'. To justify this, he refers to Carbyn, who, as we have seen, held a more complex appreciation of the issue in relation to coyotes.

Given the very small number of documented serious attacks by coyotes on humans, Carbyn considers another explanatory factor that Corbett also ignores in relation to dingoes. This is that the documented attacks may say very little about the behavioural patterns of coyotes, *per se*, but may more reflect the idiosyncrasies of particular animals.⁴²

Nevertheless, together with the idea that 'habituation = aggression', Corbett presses the view that Fraser Island is over populated with dingoes. He introduces the idea of two distinct dingo populations on Fraser Island – one living naturally and distant from areas of high human visitation, and another living unnaturally, in close contact with humans and reliant on human food sources. With scant empirical support, and nothing more than an estimate of the Island's dingo population (100-200), based on a five-day visit to the Island in April 1998, Corbett asserts that Fraser Island is probably 'over-saturated' with dingoes:

Whatever the actual numbers may be, it is evident that there are more territories and dingoes than the island can sustain on a natural basis...⁴³

Corbett does not appear to reconcile this claim with his prescription for research to establish, amongst other things, the size of Fraser Island's dingo population, the number of dingo territories, and to assess the dingo's natural prey base.⁴⁴

⁴⁰ Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998, p. 8

⁴¹ Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998

⁴² Carbyn, L. N. (1998) 'Coyote attacks on children in Western North America', *Wildlife Society Bulletin*, vol. 17 no. 4, p. 445-446

⁴³ Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998, p. 5

⁴⁴ Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998, p. 10

Another recommendation is the introduction of dingo culling on a 'scientific basis'.⁴⁵ 'On current, limited knowledge', Corbett posited that the Island's dingo population naturally rises and falls each year (between 100 and 200 animals) and that it may be a valid management strategy:

...to speed up this natural process and cull appropriate animals so that the severity and frequency of attacks on humans would be reduced.⁴⁶

Inconsistencies and contradictions in the 1998 Corbett report

A striking overall flaw in Corbett's 1998 consultancy report is a dissociation between the author's forthright prescription of management measures on the one hand and the admission of a seriously limited knowledge base regarding the Fraser Island dingoes and their ecology on the other.

One would expect that the admission of a seriously deficient knowledge base would preclude the immediate prescription of very definite actions that would normally reflect a higher level of knowledge and certainty. In layman's language, Corbett's report 'put the cart before the horse'. Yet, despite these deficiencies, the report has acquired an iconic status amongst QPWS staff in justification of the current management strategy. Corbett does in fact advocate a research program and a rigorous management regime (including adequate record keeping by Island wildlife operatives) to provide an improved knowledge base for sound dingo management. However, this clearly did not exist at the time of the consultancy report.

Several other serious deficiencies of the report should be mentioned. The introduction to Corbett's report suggests that his consultancy brief was to advise on the management of the Fraser Island dingo population in context of the Queensland government's environmental responsibilities arising from the World Heritage Listing of the island. In particular, these responsibilities concerned the 'genetic, species and ecosystem biodiversity' of the Island and the 'control of threatening processes'.⁴⁷

The adequacy of Corbett's treatment of the genetic-management component of the brief requires comment. Corbett's recommendations deal with one genetic dimension of the Island's dingo population while ignoring another, arguably more significant, dimension. As a long-term management option, Corbett recommends measures to 'assess and improve the purity of the dingo population on Fraser Island'. This recommendation is reflected in the FIDMS, which prescribes the collection and measurement of dingo skulls. Corbett was instrumental in the refinement of a skull measurement test for dingo purity and has been publicly critical of alternative genetic testing for dingo purity. The genetic testing of the Fraser Island dingo population by Dr Alan Wilton of the University of New South Wales (now deceased) suggested that the population was one of the purest remaining in Australia. Corbett's decision to concentrate on the purity of the Island's population may have been motivated by a sense of professional rivalry with Wilton, rather than by any realistic expectation that the purity of the Island's population may be improved as a result of purity testing. This recommendation by Corbett is curious because in the 2009 review of the FIDMS by Corbett, he admits that his skull-measurement method suffers from the same flaw he ascribes to the genetic

⁴⁵ Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998, p. 11

⁴⁶ Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998, p. 11

⁴⁷ Corbett, L., DINGOES ON FRASER ISLAND, Report to Queensland Department of Environment by ERA Environmental Services Pty Ltd, April 1998, p. 2

method. This is that there is no pre-European settlement representative sample against which to compare any contemporary sample. In his 2009 review of the FIDMS, Corbett admits:

Regarding tissue samples for DNA analysis, a recent research paper (Elledge *et al.* 2008) that compared molecular (DNA), morphological (skull) and visual appearance methods on the same data set indicated a high level of inconsistency both between and within methods. The discrepancies are likely to be related to the time of collection of the reference samples used in both skull measurements and DNA analysis – both reference data sets are of recent origin (post-European settlement) and thus possibly contain domestic dog genes. **Given this limitation of the current methodology in assessing dingo status, it is unlikely that a practical method of determining dingo purity can be resolved.**⁴⁸
(Our emphasis)

Given this admission as to the unreliability of his own skull-measurement method of ascertaining dingo purity, why then did Corbett include skull collection and testing as a management action in his consultation report? Might he have considered that the Queensland authorities may use the pretext of dingo 'impurity' to justify the culling of the Fraser Island dingo population to levels more compatible with escalating tourism?

This recommendation is all the more puzzling given that the potentially serious issue of insufficient genetic diversity within the isolated Fraser Island dingo population is ignored in the current strategy. Purity issues aside, existing methods of genetic molecular analysis could be better used to measure the populations' genetic viability.

A significant deficiency of the FIDMS is that no account whatsoever is given to the possibility that culling conducted under the auspices of the strategy (in large of part of juveniles), combined with inadequate knowledge of the number of breeding pairs, may be undermining the genetic diversity and viability of the dingo population.

⁴⁸ L. Corbett, Audit of Fraser Island Dingo Management Strategy, for Queensland Parks and Wildlife Service, 2009, p. 11

SUBSTANDARD ANIMAL WELFARE

The RSPCA concerning the handling of the Fraser Island dingoes:

'The number of complaints made to RSPCA concerning FID welfare has steadily increased in recent years as public awareness has increased.'

Serious concern has been expressed by members of the public and veterinarians about the use of Valbarb as a means of euthanasing (destroying) dingoes, as well as about the method of trapping dingoes on Fraser Island. Despite our best efforts at obtaining data through RTI legislation, it seems that the records are either deficient or not available.

In this section, we explore two areas where animal welfare practices have been incompetent and inhumane, and which point to a culture of unaccountability that has taken root in dingo management of Fraser Island.

These are the use of Valbarb during destruction without the anaesthetic Zoletil, and trapping techniques that have resulted in at least one blatantly cruel death of a dingo. There may have been more cruel deaths of dingoes at the hands of Fraser Island wildlife managers, but the deficient nature of staff record keeping does not make verification possible.

The Misuse of VALABARB on Fraser Island Dingoes

The following paper from Western Australia, entitled 'PROTOCOL FOR THE USE OF CONTROLLED DRUGS AS PART OF A DOG HEALTH PROGRAM IN ABORIGINAL COMMUNITIES' has this to say about the use of Valbarb:

'Pentobarbitone (300 - 320mg/ml) (e.g. Valbarb Euthanasia Solution, Jurox 500 ml, Apex Euthanasia Solution, Apec Laboratories 100ml vial) is to be administered by the intravenous or intracardiac injection for rapid euthanasia. Intraperitoneal and intrathoracic administration of barbiturates is accompanied by extreme pain and is not regarded as humane.' (Our emphasis)

It is highly recommended by veterinarians that Zoletil (anaesthetic) be administered prior to euthanasia. However, recent RTI data shows that, of the approximately 30 animals euthanized with valbarb, 9 did not receive Zoletil prior to destruction. Of these, 7 were animals that Wildlife photographer Jennifer Parkhurst had observed, and which were later deemed by QPWS to be 'dangerous' because of habituation.

This document states that there is a requirement that records/data only be kept for only two years. The appended document was shown to an independent veterinarian in Melbourne, who was astonished at the incompetent and unprofessional nature of the record keeping.

All States and Territories in Australia have provisions in their drugs and poisons legislation for the approval of veterinary professionals and wildlife carers to use some restricted drugs in the treatment and management of animals. This includes provisions for access to and use of veterinary euthanasiates such as Valbarb (also known as pentobarbitone sodium or Lethobarb).

In Queensland, these drugs are regulated under the [Health \(Drugs and Poisons\) Regulation 1996](#), in conjunction with a number of codes of practice or wildlife management guidelines. In addition to these provisions, Veterinary Surgeons or Veterinary Practitioners Boards have been established in each state to regulate the veterinary profession and promote high standards of practice and animal welfare. As well as maintaining a registry of appropriately qualified professionals in each respective state, these Boards have also developed guidelines, codes of practice and standards with implications for the use of Valbarb and the broader practice of animal euthanasia.

The Legislation, Guidelines and Codes of Practice Governing Animal Euthanasia, including the administering of Valbarb, that apply in Queensland are outlined here in some detail because these codes of practice have not been consistently adhered to by wildlife management staff in the management of dingoes on Fraser Island.

The supply and use of prescription drugs (*Health (Drugs and Poisons) Regulation 1996*) and the maintenance of animal welfare standards (*Animal Care and Protection Act 2001*) is administered through the [Veterinary Surgeons Act 1936](#). This legislation aims to ensure that all persons accessing restricted substances and treating animals are suitably qualified and registered to do so. Use is subject to:

...the verbal direction of the veterinary surgeon, employed by, contracted or providing services to the organisation and in accordance with the protocol developed by the veterinary surgeon for the organisation; or

...where it is not practicable for the veterinary surgeon to give a verbal direction to administer the restricted drug, e.g. where the approval holder is in a remote location – that the veterinary surgeon is contacted to review the administration of the drug within 24 hours. The approval holder must note the specifics of the review on the relevant record entry.

[When administered by a wildlife carer] each use of valbarb also has to be signed off by a veterinary surgeon within 24 hours of its use.

Permission to use valbarb is usually only granted to veterinary surgeons, but can be used by wildlife carers and government officials. However, there are strict guidelines for use by wildlife carers. Each instance of use must be fully documented. (See Appendix 2 for conditions of use) ***This document must be written or endorsed by a veterinary surgeon employed by, contracted or providing services to the organisation. In addition, the organization must re-submit a protocol, which has been updated or endorsed by a registered veterinary surgeon, every three years.***

At this stage we have not been able to gain access to any protocol documents from DERM, nor have we been able to discover if any were submitted.

However, the attached document, 'QPWS NRM Eurong Drug register Entries' has been obtained. It clearly shows that approvals were not granted by a veterinary surgeon prior to, or even within 24 hours of its use, in every instance - contrary to the code of practice. Documents we did receive show that in a most cases, the authorisation has been given by DERM rangers such as Linda Behrendorff from QPWS.

We believe that this failure to adhere to the code of practice for the use of these drugs reflects a culture of unaccountability in relation to dingo management by QPWS on Fraser Island.

There is evidence of gross negligence in the use of Velabarb on Fraser Island Dingoes. In one case, (see attached vet report) an animal was injected 4 times in the intracardiac region (heart) before it eventually died. This is considered by vets to be inhumane. The following assessment of this instance is from a veterinary surgeon:

The process of intracardiac injection in a conscious animal in my opinion is a very painful one and should not be tolerated except in exceptional circumstances. The euthanasia drug causes a very painful reaction if given into the pulmonary cavity in error. In my experience the most humane method is to inject the drug into the peritoneal cavity where it is slowly absorbed to bring about a slow onset of anaesthesia. This method seems to inflict minimal pain if any, other than the sensation of the needle insertion. Once the animal is unconscious more drug can be injected by the intracardiac or intravenous route without pain, and rapid death is achieved. I have not seen any evidence in literature to support these comments, but rely on almost 40 years of experience to confidently use this technique in cases where intravenous use of euthanasia solution is not possible or permitted. I hope these comments are of some use.⁴⁹

Further professional testimony states:

Intracardiac injection is a technique that we use sometimes to perform euthanasia under certain circumstances. As Dr Gunn pointed out, the technique itself is more painful than a simple intravenous or intramuscular injection. It is also sometimes difficult to achieve an intracardiac injection on the first attempt, as there are no palpable landmarks and we are generally aiming for the point at which the animal's heart beat is loudest.

We will generally perform this technique if the animal is already anaesthetised, heavily sedated, or debilitated in such a way that intravenous access cannot be obtained. The most common reason for lack of IV access would be if the animal is suffering from a cardiac condition or associated shock causing low systemic blood pressure or peripheral oedema over the typical intravenous access points. In these cases, it will often require many more attempts to achieve IV access than it will to perform an intracardiac injection.

When performing intracardiac injection, I will generally place the animal lying on its right side. As mentioned above, I will normally use chemical restraint for the procedure, either heavy sedation or anaesthesia. This may be administered by intramuscular injection or inhalation. Whilst there would certainly be pain associated with the penetration of the needle itself, an agent such as valabarb will deliver anaesthesia almost immediately and the animal would pass away very quickly.

I have read the attached necropsy report. Points I would focus on are the degree of trauma to the intercostal muscles and the amount of pericardial bleeding involved. I would imagine a certain amount of trauma and bleeding would occur with an "atraumatic" intracardiac injection such as that performed under general anaesthesia. It would be interesting to get the pathologists opinion on whether this was likely the case or whether the degree of change was more **consistent with an animal that was awake and moving at the time of injection**. I do not think it is unusual that 4 injections were performed, as I will sometimes

⁴⁹ Tony Atyeo BVSc On 03/07/2011 12:56 PM tony@gawlvvet.com.au

take several attempts before obtaining cardiac blood myself even in an anaesthetised patient.

As I mentioned previously, there are multiple agents that may be administered by intramuscular injection which would sedate the animal sufficiently to allow for a humane intracardiac injection. These would include medetomidine, xylazine, zoletil (combination of zolazepam and tiletamine commonly used for wildlife).⁵⁰

Trapping

This year, RTI data revealed an extreme case of dingo cruelty at the hands of QPWS staff on Fraser Island. It received wide media attention, including the overseas media. The independent veterinary necropsy report stated:

The circumstances of this case indicate a need for a critical review of the capture and restraint procedures for dingoes. This case also highlights the desirability of appropriately administered chemical restraints and close monitoring of vital signs (particularly rectal temperature), preferably by experienced veterinary personnel. **This is a preventable occurrence with proper procedures and appropriate monitoring.**' (Our emphasis)

The necropsy report for this juvenile male dingo reads like a horror story. Upon examination of this document, veterinarian and animal ethics expert of more than 40 years experience in animal welfare, Dr Ian Gunn said:

In all my years as a veterinary surgeon, I have never witnessed anything like this. This animal died in agony while trapped and restrained as part of 'research' being conducted by Queensland government authorities charged with its protection.

The necropsy report stated that the otherwise healthy dingo had been restrained for 'some period of time'. It had been pinned down by a pole noose and pinning device. It had chipped and fractured teeth, extensive internal bleeding, including widespread bruising and haemorrhaging to the thorax, limbs, neck and lumbar spine region, bleeding from the eye, tearing of the muscles between the ribs and the chest wall, and congested and collapsed lungs. In its final moments of life, the dingo vomited its stomach contents into its airways.

Using the graph shown below, we feel the following criteria puts that animal into the category of extreme impact:

⁵⁰ **From:** Ascot Veterinary Hospital [mailto:ascotvet@telstra.com]
Sent: Thursday, 14 July 2011 1:24 PM

Domain 2: Environmental Challenge

Impact Category	Description of Impact	Examples
NO IMPACT	Exposure to environmental challenge is not a feature of or consequence of the mode of action.	Exposure to ambient conditions that are within an animals' thermoneutral range.
MILD IMPACT	Short term exposure to environmental conditions which are outside the normal range encountered by the animal but remain within their physiological adaptive capacity.	Exposure to levels of heat or cold which are outside the thermoneutral range, but which do not lead to debility in the long-term.
MODERATE IMPACT	Marked short-term or moderate long-term environmental challenges that elicit body responses beyond the physiological adaptive capacity of the animal, but where the untoward effects are readily reversed by restoration of normal ambient conditions.	Short-term heat stress caused by exposure to high ambient temperatures combined with exercise (e.g. mustering).
SEVERE IMPACT	Severe environmental challenges that lead to serious physiological compromise or permanent dysfunction, injury or illness.	An animal is exposed to severe heat or cold which could possibly lead to failure of thermoregulation and collapse.
EXTREME IMPACT	Long-term exposure to extremes of heat or cold that bring about the death of the animal from hyper- or hypothermia.	Animals that are left in leg-hold traps, cage traps or yards in extremes of heat or cold and subsequently die from hyper- or hypothermia.

Mr Ross Belcher of QPWS unconvincingly claimed that a full investigation had taken place into this incident and that there was no case to answer with regards to animal cruelty. He also indicated that this was an isolated case and had not occurred before. However, deficient record keeping means that no such data is available for scrutiny. Only recent necropsies have been outsourced to independent veterinarians, due to pressure applied by SFID.

Nothing short of a full, independent investigation of the circumstances surrounding this cruel death is now required, with a view to criminal charges being laid under prevention of cruelty to animals legislation.

The following photos show that at the time of its death this dingo underwent 'extreme impact' as described in the chart above.



It is of great concern that RTI information relating to the research for which this juvenile dingo was trapped showed that DERM had not received the necessary animal welfare ethics approval for the research prior to the trapping. Not only is this a case of gross negligence and cruelty, but the trapping took place as part of research for which DERM did not have ethical approval, which is necessary under the code of practice for animal research that DERM is subject to. Ethics approval for this research was received months after this incident took place. (See NDPRP media release concerning lack of ethics approval for this research – Appendix 3.) The unprofessionalism on the part of the QPWS surrounding this cruelty received international attention. (See letter from the Jane Goodall Institute – Appendix 3.)

This is what the Aspinall Foundation, located in the U.K. thought of this incident. The comments point to the inadequate animal welfare practices used by DERM and the QPWS:

With regard to this particular incident, we are obviously saddened that this dingo died whilst under restraint. I am unsure from the reports whether this restraint was part of the research project or for some other reason. It is unusual for a research project to start before receiving the ethical approval... **I would be very surprised if this method of restraint was given ethical approval. ..**

It is quite clear from the autopsy that this dingo died as a result of heatstroke (the actual cause may have been inhalation of vomit, but this would have been due to hyperthermia). The use of a muzzle on a restrained canid, especially in heat, is avoided for exactly the reasons shown here – the dog cannot pant and dies. **I do not know of any other research project that would use this method. Usually animals caught in a trap are sedated and then examined when their metabolism can be controlled.** The Aspinall Foundation would certainly support efforts to ensure any research project has the highest animal welfare standards possible.⁵¹ (Our emphasis)

Again, this incident indicates an entrenched culture of unaccountability within DERM and the QPWS in relation to the management of dingoes on Fraser Island. In our view, the Queensland Government should have no confidence in the DERM and QPWS personnel who have been involved in dingo management on the Island to date. We recommend a complete turnover of staff at the policy administrative and implementation levels vis-a-vis dingo management on Fraser Island. Consideration of the Animal Welfare standards and practices shown in Appendix 4 further highlights the inadequacy of the animal welfare measures applied to the dingo population on Fraser Island.

Hazing – misguided policy with unpredictable results

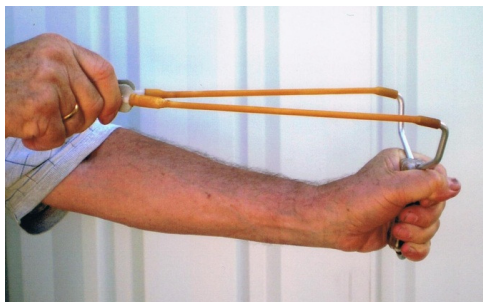
Many of the stated objectives of the FIDMS are ill-conceived and lead to management outcomes that are unpredictable and detrimental to the wildlife they are deemed to protect. We believe this is the case with hazing.

The FIDMS states:

At every opportunity, Rangers will scare dingoes by using simple and appropriate techniques such as non-lethal projectile weapons, spray bottles containing offensive or irritating contents, 'Shu-roo' ultrasonic devices and stock whips to discourage the animals from entering camping, picnic and other high-use areas.

The principles of hazing

In effect, hazing is a process of harassment, whereby the animal's sense of security is disturbed to such an extent that it is forced to abandon part of its habitat.



⁵¹ Private communication, date: 20/03/2012 2:40:44 AM

To be effective, hazing must be continuous, concentrated and caustic. The goal is to *convince an animal to leave its home or food source*.

I. Continuous: You must harass the animal on a daily basis for as long as necessary. Don't be surprised if this activity goes on for weeks.

II. Concentrated: Your efforts must focus on the animal causing the problem. (Failure to concentrate the harassment technique simply makes the animal get used to the problem because the problem will be everywhere.)

III. Caustic: The harassment technique must be bothersome to the animal. The greater the discomfort to the animal the faster the technique will develop results. Warning: *when you harass an animal there are no guarantees where it will decide to take up residence next*.

Being on an island, there is a very limited amount of territory for the hazed or harassed dingoes to 'move on to', especially if the harassment is widespread. The potential impact of hazing upon the breeding patterns of the Island's dingo population also needs to be considered. In breeding season, such harassment may lead to the abandonment and death of pups.

A U.S. Yellow Stone National Park biologist asked of SFID, 'Where do the dingoes go when hazed on an Island?' According to this biologist, Yellow Stone hazing was designed to make an animal 'move on' but they need a very large territory in which to do so, such as the large expanse of land available in Yellow Stone.

Public disapproval of hazing

Some members of the public are shocked that wildlife is treated this way. Research completed by Leah Burns on Fraser Island found that hazing met with mixed reactions from stakeholders interviewed. Some declared it was cruel, while several commented that because dingoes were very clever they would quickly learn to avoid people wearing ranger uniforms.

Rather than seeking to return dingoes to some 'wild' and 'natural' state, it would seem that management strategies (in particular hazing) seek to modify dingo behaviours to make them match human expectations..⁵²

Hazing may cause problem behaviour

In some instances, harassment or hazing has been proven to cause animals to become more unpredictable towards humans – hazing and aversive conditioning can essentially lower the animals' tolerance of humans within their territory (especially in a fragmented, contained habitat like Fraser Island with a very frequent human presence). Aversive conditioning may lead to harassed animals reacting aggressively or unpredictably towards humans in their territory, and become potentially dangerous. In other words, it needs to be considered whether hazing is causing the very problems it is deemed to deter. Some overseas experience suggests this is possible.

⁵² Burns, p. 274

The extracts below were taken from two reports that outline a *Wild Black Bear Hazing project* in Sequoia National Park, and a *Sea Lion Hazing/Aversive conditioning project* in the USA.

...Aversive conditioning reduced but did not eliminate the occurrence of bears entering developed areas to forage on human food and trash in Sequoia National Park...

...Aversive conditioning was *least effective on yearlings (juveniles)*...

...some (bears that were hazed) became less persistent or aggressive, but some became so persistent, aggressive, or caused so much damage that they were removed from the area or destroyed by management...

...bears subjected to hazing ...in many cases continued to go to extreme lengths to get non-natural food...

The expectation that dingoes should be made to fear humans loses sight of the fact that human-dingo interactions have occurred on a benign basis for thousands of years. Nevertheless, strategies (such as hazing) have been implemented to force dingoes to fear humans.⁵³

These strategies are not appropriately monitored and are often an over-reaction to a dingo simply being on the beach. Please see testimonies from residents who have witnessed hazing and found it to be inappropriate (Appendix 5). As well being seen by the general public as cruel, evidence suggests that hazing may be ineffective in changing dingo behaviour.

There is insufficient scientific basis to show that hazing has the intended affect on dingo behavior. The practice should be discontinued immediately.

⁵³ Burns p. 256

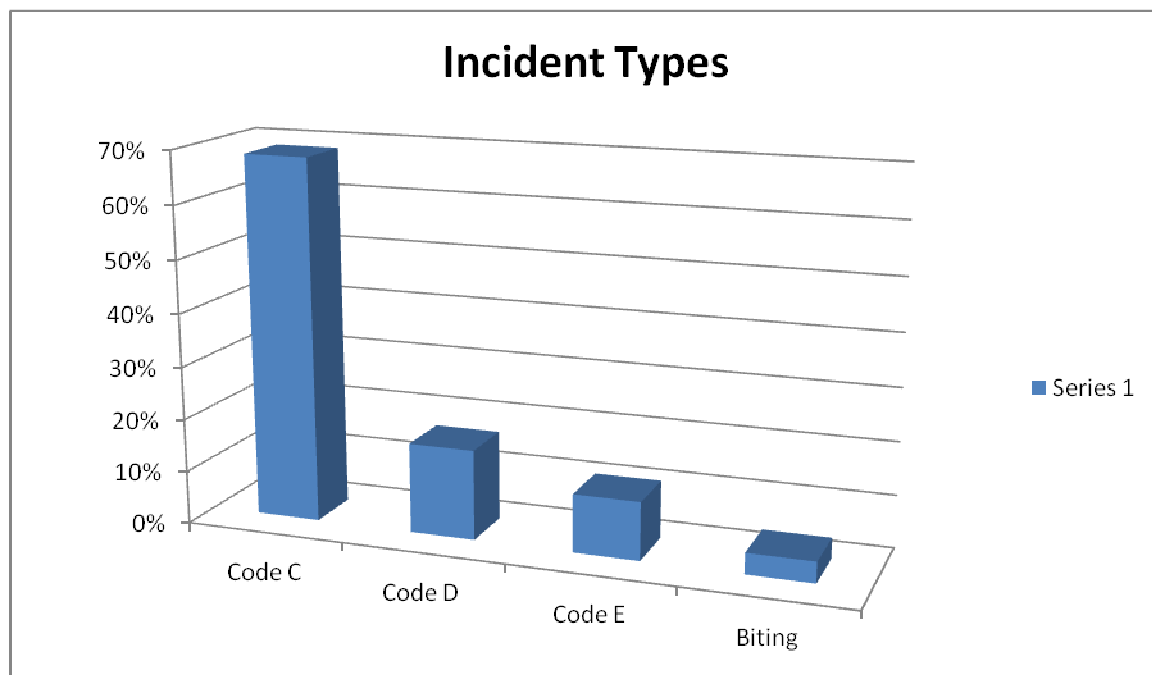
'INCIDENTS' AND INCIDENT REPORTING

Under the FIDMS, dingo behaviour is coded as follows:

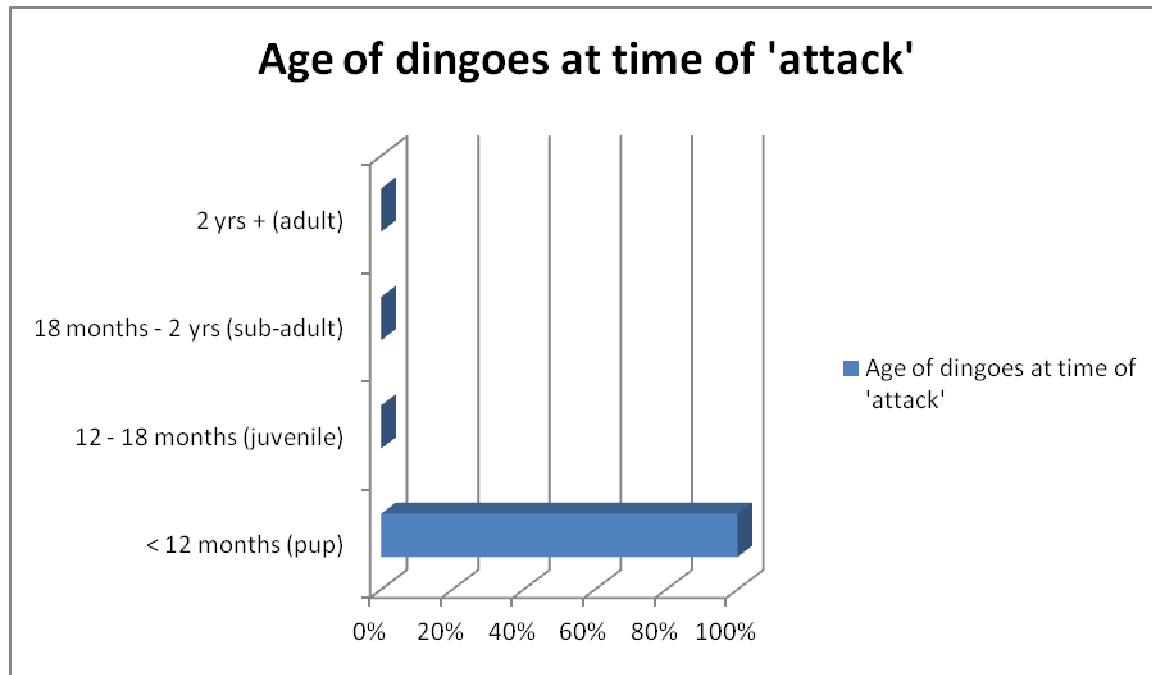
- A Avoidance or wary
- B Habituated
- C Nuisance or problem
- D Aggressive
- E Dangerous

The sample of DERM incident reports that we have used in this analysis shows that 68.5% were code C incidents; 17% were code D, and only 11% were code E. However, close examination of the Code D and E incident reports indicates that the severity of many of these was exaggerated. As a consequence, in our view, a significant number of dingoes were unnecessarily destroyed. (See Appendix 6 incident report spread sheet)

Of the code E incidents described in the reports, only 4% record biting, or attempted biting. We have in this collection only two incidents where biting did take place. In a separate code E incident, the dingo nipped a person, but didn't puncture the skin; in three cases dingoes were destroyed for 'attempted biting'; there were two cases of the dingo 'circling' a person, and one code E record where the dingo 'did not bare its teeth or attempt to bite'.



In many Code D incidents, the dingoes were easily scared away, which casts doubt on the seriousness attached to the incidents. In 23% of C & D 'incidents', the dingo was noted as 'non-aggressive'. We submit that, in many cases, the behaviour was merely juvenile play behaviour. **In 100% of the reports available to us, the dingoes were juveniles under 12 months old.**



This observation is supported by an early Department report which states: 'nuisance behaviour is usually associated with a juvenile animal's playful character.'⁵⁴

It is disturbing that a large percentage of 'incidents' (22%) was instigated by DERM rangers.

There were no reported incidences of the lesser code A or B behaviour. This reflects the tendency to exaggerate the significance of incidents by rangers. It appears that even the most minor incidents are treated as serious (classified as Code C).

As further evidence of this tendency, 40% of the 'incident' reports were principally cases of dingo 'sightings', recorded as 'loitering'. **In such cases, the mere presence of a dingo was treated as an incident.** The response in 30% of these circumstances was to haze the dingo.

Notwithstanding the dubious characterisation of dingo behaviour in alleged attacks on Fraser Island, the degree of responsibility exercised by parents and adults with children in such circumstances has been questionable. Where information is available, it is instructive to note what people were doing prior to alleged attacks. For example, people giving food to dingoes to lure them for a photo and then chasing them with sticks when they were tired of them (footage available).

Wildlife photographer, Jennifer Parkhurst, was never once attacked or even threatened by a dingo in the seven years she was working closely with them on Fraser Island. In *every* encounter she had with dingoes she behaved in a gentle/passive/submissive manner. Much could be learned from talking to Island residents who likewise have never been attacked:

Basic analysis of the dingo "incidents" shows they all involve visitors – mainly children (often running) without close adult supervision. The dingoes' play behaviour is mistaken for aggression, and that's enough for a dingo to be killed. Almost daily I witness children playing alone on the beach, while the adults are metres away, sometimes in the water fishing, with their back turned to the child on the beach. If a ranger was present (or even passing in a

⁵⁴ Price 1994

car), these adults should be spoken to directly, and a potential incident averted. The rangers need to be more proactive in educating – not scaring – the public about dingo awareness. **The obvious reason that local residents and regular visitors are not involved in dingo incidents is that they know how to act around these animals.**⁵⁵ (Our emphasis)

The testimony of persons who lived on Fraser Island for many years, including with children, is that the dingoes were rarely, if ever, a problem. Residents often lived in close proximity to the local dingoes.

The validity of dingo incident ‘data’ is highly questionable because the subjectivity of ranger assessments of dingo behavior and the fact their judgements are likely to have been shaped by preconceptions derived from misconceived policy assumptions. The 2009 FIDMS Audit recommended that rangers should ‘apply accurate and consistent criteria when assessing behavioural categories’ and that ‘rangers and students are to undertake regular assessment to ensure appropriate interpretation of dingo behaviours.’ Even when applied consistently, ranger assessments would be subject to the limitations and inadequacies of the current FIDMS criteria in understanding dingo behavior.

Nevertheless, reporting has continued to be subjective and ‘eyewitness statements’ are primarily non-existent. Rangers’ observations differ from each-other’s, and vary significantly from those of residents and other witnesses, such as tour operators.

Entrenched ideologies and assumptions need to be challenged to create new possibilities for action.⁵⁶

‘Incident’ reports of dingoes loitering at camp sites or walking along the beach skew the data. These are simply sightings.

‘The problem is that dingoes are not staying in their designated space. During the May 2001 cull, it was the dingoes that entered camping grounds that were shot, regardless of their temperament or behavior towards people, even though the fatal attack did not occur in a camping ground. However there is no reason for a dingo to differentiate between a camping ground and ‘the bush’. Dingoes are both territorial and scavengers. Therefore there is nothing ‘unnatural’ about dingoes that scavenge for food in campgrounds that fall within their territory.’⁵⁷

...dingoes frequenting high-use human areas such as campgrounds and resorts are doing something natural rather than crossing a known line between human and animal spaces. Consequently, this is not a problematic behavior and does not warrant the animal being killed.⁵⁸

The attached table describes categories of behaviour used to characterise dingo behavior incidents. These categories range from A (non-aggressive) to E (attack where numerous bites have occurred). It also incorporates 25 specific descriptions of potential dingo behaviour. The categories are self contradictory and their interpretation and application is likely to be confusing. For example: ‘nipping’ includes mouthing of any description. So, it seems that, if a dingo licks someone, it has performed a major category E incident and will be destroyed. Disturbingly, it appears that the

⁵⁵ Judi Daniel, Jan 2010, submission to Glen Elmes LNP Discussion Paper

⁵⁶ Burns p. 37

⁵⁷ Burns p. 265

⁵⁸ Burns p. 323

incident classification system has been designed to exaggerate the seriousness of dingo behaviour towards humans.

CATEGORIES	COMMENTS
A/ AVOIDANCE OR WARY	
Avoids people	
B/ HABITUATED	<i>Dingoes 'Loitering' at recognised visitor sites and frequenting high-use human areas such as campgrounds and resorts are doing something natural rather than crossing a known line between human and animal spaces. Expressing curiosity is also normal.</i>
Non-aggressive Not wary of humans Moving through common areas to humans (using campgrounds as thoroughfares) Curious Loitering at recognised visitor site (no humans in sight)	
C/NUISANCE OR PROBLEM	<i>Loitering at recognised visitor sites, stealing food or property, damaging property and tent ripping are mere nuisance behaviours and should not warrant a code C report.</i>
Loitering at recognised visitor sites (people nearby) Stealing food or property (specify) Soliciting food Being fed or encouraged Living under infrastructure Following closely (distance) Damaging property Tent ripping (vacant campsite and/or tent)	<i>Being fed or encouraged is not the dingo's fault.</i>
D/ AGGRESSIVE	<i>Aggression is said to be an aberration because it usually does not foster survival of the individual and therefore tends to be a trait that is generally absent from wild populations. Agonistic behaviour, as described here, is functional behaviour, deeply rooted in the species' own mechanisms for survival. This includes 'play behaviour'. Play in young dogs is meant to hone skills for later life –hence is an extremely useful and thus functional preparation for adult survival. It should not be seen as a reason to destroy an animal.</i>
Growling/snarling Dominant/submissive testing Stalking Tent ripping (camper inside tent) Circling (distance) Dominance towards humans Incorporate humans into pack behaviour Humans regarded as competitors for resources Bailing up/ambushing (walking alone, unsupervised) Hunting tactics (with intent to test a response) Lunging (not attempting to nip or bite)	
E/ DANGEROUS	<i>Dingoes belong to the small group of remaining wild and endangered species of dog whose social rules are those specific to their species and functional for their own survival. We do not kill humans for major let alone minor aberrations and an endangered species should be allowed full expression of its normal range of behaviours.</i>
Nipping/biting Attacking Casualty Hunting tactics (intent to attack) Bailing up/ambushing (genuine attempt to attack) Lunging (attempting to nip or bite)	

A less biased set of dingo behavior criteria should be formulated, which does not mischaracterize innocent dingo contact with humans as an 'incident'. As a result, innocent contact would not be used to construct a history of 'problem' or 'aggressive' behavior for individual dingoes. Revised criteria would incorporate:

...an understanding of the difference between aggression and agonistic displays to allow a wild animal to express its normal range of behaviour (some expressions of which are agonistic....⁵⁹

In North America, bear management is aimed more at reducing bear-human *conflict* rather than simply *interactions*⁶⁰ and may provide a model that QPWS could utilize for sustainable wildlife tourism.

The systematic mischaracterisation of dingo behavior that has occurred under the current FIDMS has had detrimental effects beyond dingo management on Fraser Island. The flawed data records on the incidence of dingo aggression on Fraser Island were furnished by the Queensland government to recent Northern Territory Coronial Inquest into the findings of the Azaria Chamberlain Case. It is now a serious matter that **flawed dingo aggression data has been used in the determination of a Coronial Inquest**. It is also unfortunate that the current FIDMS may acquire a degree of credibility in the public mind as a result of the weight attached by the Northern Territory Coroner to the flawed Fraser Island data. However, any such credibility is misplaced. Appendix 7 includes a letter sent to the Northern Territory Coroner, drawing her attention to the flawed nature of the data.

⁵⁹ Kaplan 2012, publication forthcoming

⁶⁰ Smith et. al. 2005

MISUNDERSTANDING DINGO BEHAVIOUR

'dangerous' behavior

DERM and QPWS have systematically misunderstood and misinterpreted dingo behaviour in the framing and implementation of the Fraser Island Dingo Management Strategy (FIDMS). It is crucial that a revised management strategy is based on a realistic understanding of the difference between dingo behaviour that does pose a risk to humans and that which does not. The purpose of the discussion below is to help clarify that distinction.

Virtually any interaction between animals and humans involves a degree of 'risk'. Even the most well-trained, well-loved domestic dogs may bite for no apparent reason. Notwithstanding the inevitability of such risk, the FIDMS not only seriously exaggerates this risk, but asserts an inconsistent and unconvincing explanation for the alleged aggressiveness of Fraser Island dingoes:

The FIDMS states that 'dingoes are inherently aggressive and dangerous... and are capable of killing people'. However, in direct contradiction to these assertions, an assumption underpinning current management is that 'dingoes have become threatening', as opposed to being naturally threatening. Dingoes displaying aggression towards people are constructed as unnatural, and the threat posed by them is not seen to derive from their 'wildness' but rather their deviance from it.⁶¹

In so characterizing alleged dingo aggression as unnatural, the FIDMS fails to grasp the function of dingo behavior. In characterising virtually all contact with humans as 'aggression', the FIDMS is often anthropocentric, attributing human thoughts and motivations to animals. On this issue, animal behaviour expert Professor Gisela Kaplan states:

Clearly, territoriality is not aggression, but territorial defense, maternal aggression is not aggression, but protection of her young.

Further:

No animal is inherently aggressive or dangerous to humans, per se. Dangerous means 'overt and unprovoked' aggression. Aggression in animals is unhelpful to their survival, aggression is not a function required for an animal unless it is to sustain or protect life. In defending its young, an animal may aggressively attack a human or animal, even a larger animal than itself, but is doing a job to ensure the survival of its family. This animal is not dangerous, it **has been provoked**.

Agonistic behaviour, by contrast, is functional behaviour, deeply rooted in the species' own mechanisms for survival. I should add to this catalogue 'play behaviour'. Play in young dogs is meant to hone skills for later life, help establish hierarchies and provide experiences that will be usefully remembered in adult life –hence is an extremely useful and thus functional preparation for adult survival. (Our emphasis)

Most animal behaviouralists agree that play behaviour in dogs and dingoes can be mistaken for aggression. Dingoes that approach people with playful posturing are not attempting to attack, but are testing their newly acquired social skills. 'Social rules can be rough and cause injuries in a group but conformity is vital and rough play and/or chastising individuals has its place in dingo society.' (Gisela Kaplan)

⁶¹ Burns p. 226

The nature of **chastisement behaviour** by dingoes should be emphasized and properly understood. To the untutored observer, chastisement may appear like an attack. It is in fact often a loud symbolic display, where minimum physical harm is inflicted. Adult dingoes frequently chastise pups and juveniles by forcing them to the ground, standing over them and snarling. However, this is not an attack; it is instruction about social order and the limits of acceptable behaviour.

DERM's own research cites the following: 'a person standing still is found to cause the dingo to either retreat, behave submissively, or not respond'⁶²

The mischaracterisation of dingo behaviour in the FIDMS raises questions about the nature of the prescribed management response to alleged dingo attacks. Even lions in the Kruger National Park that kill humans are not shot. At the other extreme, dingoes on Fraser Island have been shot on the slightest of pretexts. Dingoes do not understand that they are transgressing arbitrary human boundaries when they interact with people within their environment.

Negative human-wildlife interaction that results in human injury, or even death, needs to be put into perspective. The media response to the 2001 fatal dingo attack in Clinton Gage tended to be emotional and sensationalist. The politically-motivated response, including the immediate cull, could be described in the same way.

The attack needs to be viewed in perspective. On average, 64 Australian children drown each year, 68 are killed in car accidents, and 11 are murdered... each of these deaths is equally tragic, but none bring about the sort of panicked political response that resulted in the dingo cull.⁶³

And,

Potentially dangerous wildlife is a common issue in protected area management but statistically not the greatest risk to visitor safety.⁶⁴

Current dingo management on Fraser Island treats all human/dingo interaction as negative and aims to eliminate it. This is neither practical nor warranted for public safety.

The adoption of a management strategy based on a realistic understanding of the difference between aggression and agonistic displays would provide a way forward for educating the public appropriately about what is happening to them when a dingo approaches.

There is nothing inherently threatening about a dingo sitting on a dune watching human activity. Treating such behaviour as dangerous or potentially dangerous represents the current FIDMS at its worst. Such behaviour should not label that dingo as 'habituated' and presumably 'aggressive', but rather, as a dingo surveying its habitat of which human activity is a part. On most occasions, if the dingo is left alone, the tourists involved have the rare opportunity of spending time in the presence of a native animal.

Roughly 10 % of visitors report a 'negative' interaction with dingoes on their visit to Fraser Island, including harassment, food theft and damage to property, particularly tents. However, food theft and property damage are not aggression. Such an assumption is anthropocentric, superimposing

⁶² Beckmann and Savage *Ibid* p. 26

⁶³ Burns, p. 261

⁶⁴ Beckman and Savage p. 27

human attributes on animals; dingoes simply perceive human property within their habitat as part of their environment, which they naturally explore. Ninety per cent of visitors have either no encounter with a dingo or a positive encounter. This is what we should be focusing on.

Note video below, showing dingo play behavior: rushing, chasing, wrestling, jaw-sparring, body slamming, biting, chewing on objects, water play, adult play.

http://www.youtube.com/watch?v=g7Cpx_LYz50

A further illustration of the way the current FIDMS mischaracterizes the nature and behavior of the dingo is the assumption that dingoes, through contact with humans, are adopting behavior that is 'unnatural'. Attempts to virtually eliminate human/dingo contact are therefore justified as an attempt to restore Fraser Island dingoes to their 'natural' or in a 'truly wild' state.

However, this perspective is misconceived. It fails to grasp the unique character of the dingo. This unique character lies in the fact that, in ancient times, the dingo had undergone a rudimentary level of domestication.⁶⁵ Dingoes are likely to be the remnant descendants of the first animal that underwent domestication by humans. It is therefore a form of Australian wildlife that is unique in having a rudimentary affinity with humans. It is also, thereby, of unique cultural significance not only to Australia, but to the whole of humanity.

Indeed, author of the 2009 audit of the Fraser Island Dingo Management Strategy, Dr Laurie Corbett, maintains that the dingo is an ancient semi-domesticated, which underwent an initial phase of domestication thousands of years ago, a process which was then discontinued leaving the dingo in a state of semi-domestication.⁶⁶ This view has been supported by recent genetic research which shows the Australian dingo to fall within a haplotype grouping shared with domestic dogs.⁶⁷

Subsequent genetic research has also pointed to the semi-domesticated origins of the Australian dingo, an affinity it has with the New Guinea Singing Dog.⁶⁸

Although the earliest archeological record of dingoes is about 3,500 years old, new genetic studies suggest it last shared a common ancestor with the domestic dog at least 5,000 years ago, says Dr Wilton...

The study notes that the dog [dingo] is unique in that it was the only domestic animal accompanying humans to every continent in ancient times and was the only domestic animal introduced into ancient Australia. (<http://www.physorg.com/news/2011-09-dingo-earlier-route.html>, September 8, 2011)

This helps explain the ease with which Indigenous Australians formed commensal relationships with dingoes. The contemporary relatives of the dingo in places like Thailand and Vietnam today survive as pariah dogs, living in close proximity to village life. Similarly, people who had lived for decades on Fraser Island, readily talk of the familiarity they had with the dingoes that routinely hung around their houses and businesses without serious incident.

⁶⁵ Domestication is not an all or nothing development, but may occur in degrees.

⁶⁶ Corbett, L., (2001) *The Dingo in Australia and Asia*, J.B. Books Australia, pp. 9-16

⁶⁷ Savolainen, P., et. Al. (2004) 'A detailed picture of the origin of the Australian dingo, obtained from the study of mitochondrial DNA', PNAS, vol. 101 _ no. 33 _ 12387-12390

⁶⁸ Mattias C. R. Oskarsson¹, Cornelya F. C. Klu² tsch¹, Ukadej Boonyaparakob², Alan Wilton³, Yuichi Tanabe⁴ and Peter Savolainen¹, 'Mitochondrial DNA data indicate an introduction through Mainland Southeast Asia for Australian dingoes and Polynesian domestic dogs', *Proc. R. Soc. B* published online 7 September 2011, doi: 10.1098/rspb.2011.1395

The no-tolerance approach to dingo-human contact enforced by the Fraser Island dingo Management Strategy is not natural, but artificial.

THE CONSEQUENCES OF LETHAL CONTROL

The importance of dingo pack stability

The long-term survival and ecological functioning of socially complex species such as dingoes depends on more than merely their numerical status. Dingoes are eusocial, with breeding restricted to the dominant pair in the pack (alphas), while the other pack-members assist in rearing the young. Eusocial systems have developed to increase fitness for pairs that are part of multi-generational groups comprised mainly of non-breeding helpers. Young dingoes have a long period of parental dependency, which provides the basis for the transfer of complex information between generations. Where the dingoes' social structure is intact, dingoes maintain stable territories, population size, genetic identity and a demography dominated by adults.

Controlled populations tend to have a higher proportion of juveniles and floaters (dispersing individuals), a higher mortality rate, lack of territorial boundaries, and an unstable population size. Complex behaviors that are learned and developed within stable packs, such as cooperative hunting techniques, may be lost, leading to simplification and aberration of social traditions. Lethal control may also lead to elevated stress levels and disruptive and aggressive behavior.

Dingo social groups rather than individuals are the basic driving force of predator-prey dynamics, providing underlying stability of populations and ultimately ecosystems. The ecological role of dingoes is tightly linked with the cohesiveness of their social groups, and even low levels of control may have far reaching ecological impacts. The cessation of lethal control is therefore essential for the conservation and recovery of biodiversity.

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Action 71 on page 26 of the 2009 Audit states that 'justification for the elimination of a 'dangerous' dingo requires a *documented history of behaviour*'.

The subjective and unreliable nature of such documented histories of dangerous behaviour has been discussed above. However, a further example is illuminating. In one instance, a ranger describes being circled by a group of dingoes as she walks to her car, and states that they were nipping and biting each other, but did not hurt her and she did not feel threatened. In another instance involving a different ranger, the same situation was construed as dangerous behaviour and written up as 'circling with intent to attack'.

There are no scientifically-justifiable, conservation-based criteria in the FIDMS for culling. Primary consideration needs to be given in a revised management strategy to the acceptable ecological limits to any culling, that is, to the overall long-term impact of culling on the viability of the dingo

population on Fraser Island. No adequate consideration of this kind has been included in the FIDMS to date. The current strategy only superficially purports to do this. There is no recognition in the current strategy that the fracturing of social groups may perpetuate the problem of 'nuisance' behaviour. It has been observed that, if juvenile dingoes are left alone to 'grow up', they spend more time in the bush, are more subdued in the presence of human company, and only patrol their territorial boundaries (ie the beach and camp grounds) twice a day, as per their normal routine. Rarely, if ever, are there any incidents involving adult dingoes.

Similar to our own societies, stable family environments and intact social structures are essential for the healthy development of offspring, both psychological and physical. Recent studies in Africa have identified social upheaval as the predominant cause of stress in wild carnivores. (Cited by Adam O'Neill, Van Meter et al. 2008)

Research on cougars in America's northwest provide some potentially instructive insights into cougar social behaviour and the consequences of cougar persecution. In Washington State, following a six-fold increase in the cougar cull, cougar/human conflict doubled in the first year and continued to rise. The ensuing investigation revealed that juvenile males dominated the cougar population and these unruly teenagers were causing consternation everywhere.⁶⁹

Instead of making Fraser Island a safer place, culling may cause more problems than solutions.

In spite of close scrutiny and comprehensive research, we have failed to conclusively identify feeding/habituation as a root cause [of aggression]. We have reviewed numerous publications on the subject and have found only one common factor associated with all cases of human/predator conflict: lethal control.

'We hypothesise that lethal control and the associated fracturing of predator social structures is the primary driver of dangerous and aggressive behaviour.'⁷⁰

National parks throughout the world are now relaxing lethal control, and even hazing, as a way forward in managing wildlife. Fraser Island gives us with an opportunity to not only bring management policies in line with the rest of the world, but to devise models that are 'world's best practice', which may be emulated elsewhere. At the moment, Fraser Island dingoes are subject to 'world's worst practice', which may well see their elimination from the Island in the medium to longer-term.

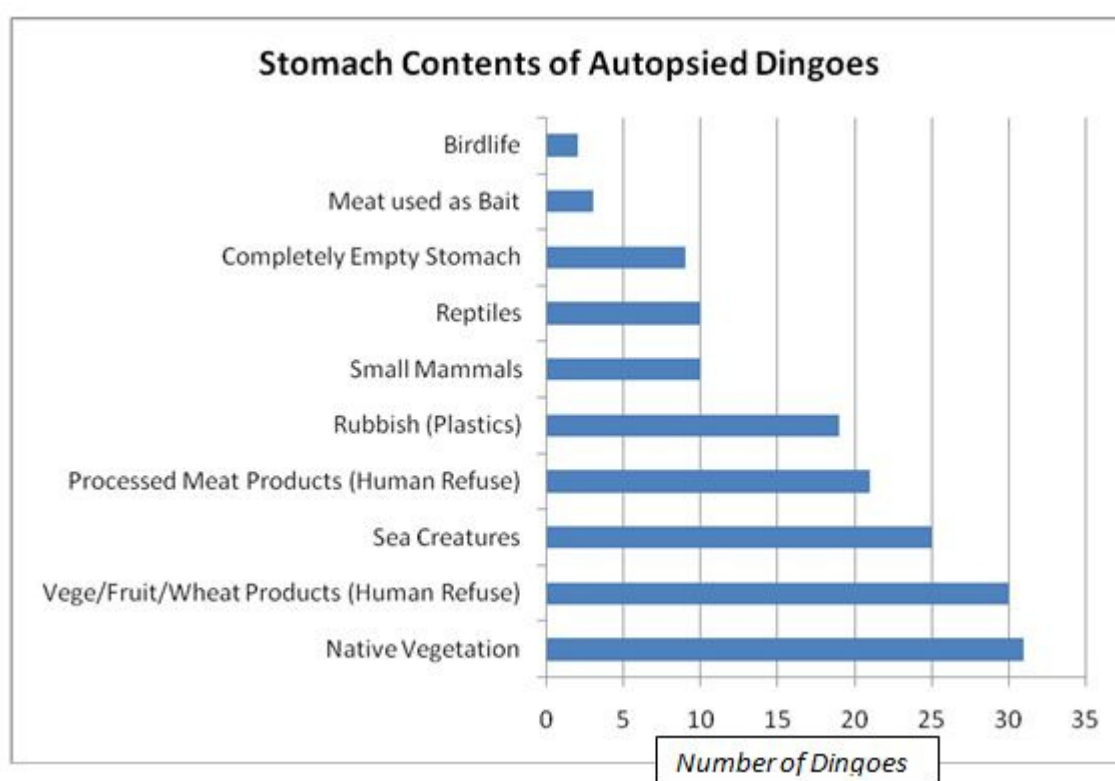
⁶⁹ ⁶⁹ Adam O'Neill personal communication

⁷⁰ Adam O'Neill personal communication

STARVATION/DIET/PREY AVAILABILITY

Because of the large number of complaints and eyewitness reports from people concerned about 'skinny dingoes', this concern should be explored. Without having access to current scat studies being conducted on Fraser Island, we have gathered information from the 96 necropsy reports that we received through the RTI legislation.

One misleading response to these observations is that there will always be starving dingoes because alpha dingoes deny access to food to weaker members of the pack. Alpha males and females always eat first to reinforce their position in the pack, and to make sure they have enough strength and sustenance to continue breeding. Subordinate members do have to wait their turn. Nevertheless, close observation shows that alpha males and females do make special efforts to ensure that all the pups in their litters are fed – if enough food is available.



By removing the availability of human refuse as a food source for the dingoes on Fraser Island through increased fines for feeding, fences, and hazing, the dingoes are being forced to rely on native vegetation, sea creatures, mammals, reptiles and birdlife as their only available food sources.

Yet, 60.7% of the autopsied dingoes over a 7 year period were shown to have been dependent in some degree upon human refuse as a food source. Dingoes that have been raised with access to human refuse over generations may not easily adapt to staying away from humans and campsites within the immediate future.

Essentially, hazing is designed to 'retrain' dingoes to stop approaching humans and campsites for food. However, as discussed in a previous section, hazing programs only succeed in teaching the dingoes to be wary of the 'hazers' – namely rangers and their vehicles. Dingoes have learned to flee when they hear ranger vehicles approaching, and to return when the rangers have moved on.

In recent years, bushfires have decimated the Island's native vegetation, reptiles and mammals, resulting in a further decrease in the abundance and distribution of the dingoes' natural food sources.

It is concerning that 22.6% of all autopsied dingoes' stomachs contained traces of rubbish, such as meat absorption pads, alfoil, garbage bags and plastic bags. Obviously, the dingoes have sourced this matter around campsites, and rubbish bins.

The vast majority of autopsy reports that listed the dingoes' stomachs as 'Full' contain food of no sufficient nutritional quality. Twenty eight autopsied dingo's stomachs contained food that had no nutritional value such as sticks, sand and leaves. Nineteen autopsied dingo's stomachs contained food that could not be digested, such as plastic food wrappers and garbage bags – which indicates many of the dingo's could not access the food necessary to their overall survival & well-being and, consequently, consumed artificial products (that smelt like food) to ease their hunger. In addition, eight dingo's stomachs were completely empty. This indicates that most of dingoes autopsied were unable to access food of substantial nutritional quality, and in many instances were suffering from starvation.

This interpretation is further supported by the fact that at least 25 autopsied dingoes were recorded as being in 'poor condition', and showing signs of starvation such as 'prominent hips or ribs', and that at least 20 dingoes autopsied had 'empty intestines', indicating they had not eaten anything substantial for at least 24 hours. The majority of autopsied dingo's stomachs did not contain an abundance of native foods, especially in the form of food that can be 'gathered' (such as native vegetation), or food that can be hunted (such as small mammals & reptiles). Twenty seven autopsied dingo's stomachs contained food that could be hunted; however 20 of these dingoes had also eaten a large percentage of human food refuse. Fifteen dingoes' stomach contents contained native vegetation namely native berries, coconut flesh and vegetative matter. However, in the majority of instances, these dingo's stomachs also contained a large proportion of human food refuse.

According to the reports, a total of 46 dingoes autopsied gained the majority of energy to sustain their normal daily activities from human food refuse, specifically fish, fruit, vegetables, wheat products (cereal/bread/oats) and meat. At this stage, it should be noted the contents & fullness of the stomachs of 10 dingoes autopsied is unknown/unrecorded, which reduces the number of total autopsies that can be used to base a confirmed analysis of stomach contents and food dependency to 74.

Thus, a total of 62.% of autopsied dingo's stomachs predominantly contained human food refuse, 11% of autopsied dingoes stomachs were completely empty, 12% contained purely native foods, 12% of autopsied dingoes stomachs predominantly contained bait used to trap the dingo, gas, worms, fluid or maggots. In the majority of instances, food sourced from human refuse (including fish), appears to have helped supplement the three major dietary components for dingoes, namely: carbohydrates, protein, and fats. The vast majority of autopsied dingoes were able to access this food from humans both directly and indirectly - predominately via direct feeding, access to food refuse around bins/campsites/dumps, and fish remains discarded by fisherpersons.⁷¹

In conclusion, according to a combined analysis of the stomach contents and intestinal contents listed within the autopsy reports, the majority of autopsied dingoes were not obtaining enough food to eat when they were alive. It should be noted as a result of this continued starvation, chronically underfed adult dingoes can experience impaired ability to nurse young, reducing the number of pups

⁷¹ Thanks to Kim Thompson for providing statistical analysis of this information.

born, and subsequently raised. Pups that are born may be stunted in their growth, due to a lack of food resources and/or weak mothers. An increased susceptibility to bacterial infections and parasites can also occur.

Unless addressed, the lack of native food sources and the continuation of a 'no feeding' policy will result in an increase in the dingo mortality rate through starvation, or through the 'humane destruction' of dingoes that continue to approach people, or campsites in hope of accessing food. If hungry or starving dingoes can smell camp food cooking, they are naturally going to wander closer towards campsites out of desperation *even if they risk being 'hazed' or 'shot'*.

'Hazing' and 'Humane destruction' is not a conservation-orientated approach to the situation. Instead of relying primarily on punitive methods of control, such as hazing and culling, it would make more sense to provide random food drops (not feeding stations) across the different territories of the Island, during peak visitor times and peak dingo breeding times. This would help to keep dingoes away from camp sites and also help them to raise healthy puppies. Dingo population increase, if it occurred, would quickly self-regulate.

Appendix 1

QPWS, Great Sandy Region - Fraser Island
Record of Humane Destruction of Dingoes since 2001

Ref #	Location	Reason	Date	Circumstance	Ear Tag	Year
DC01	Waddy Point	Dingo Cull 2001	30/04/2001	May 2001 Cull		2001
DC02	Waddy Point	Dingo Cull 2001	30/04/2001	May 2001 Cull		2001
DC03	Waddy Point	Dingo Cull 2001	2/05/2001	May 2001 Cull		2001
DC04	Central Station	Dingo Cull 2001	3/05/2001	May 2001 Cull		2001
DC05	Central Station	Dingo Cull 2001	3/05/2001	May 2001 Cull		2001
DC06	Dilli Village	Dingo Cull 2001	3/05/2001	May 2001 Cull		2001
DC07	Dilli Village	Dingo Cull 2001	3/05/2001	May 2001 Cull		2001
DC08	Wangoolba barge landing	Dingo Cull 2001	3/05/2001	May 2001 Cull		2001
DC09	Lake Boomanjin	Dingo Cull 2001	3/05/2001	May 2001 Cull		2001
DC10	Lake Boomanjin	Dingo Cull 2001	3/05/2001	May 2001 Cull		2001
DC11	Eurong	Dingo Cull 2001	3/05/2001	May 2001 Cull		2001
DC12	Waddy Point	Dingo Cull 2001	3/05/2001	May 2001 Cull		2001
DC13	Waddy Point	Dingo Cull 2001	3/05/2001	May 2001 Cull		2001
DC14	Wangoolba barge landing	Dingo Cull 2001	4/05/2001	May 2001 Cull		2001
DC15	Dilli Village	Dingo Cull 2001	4/05/2001	May 2001 Cull		2001
DC16	Hook Point	Dingo Cull 2001	4/05/2001	May 2001 Cull		2001
DC17	Hook Point	Dingo Cull 2001	4/05/2001	May 2001 Cull		2001
DC18	Woralle Track	Dingo Cull 2001	4/05/2001	May 2001 Cull		2001
DC19	Wyuna Creek	Dingo Cull 2001	4/05/2001	May 2001 Cull		2001
DC20	Central Station	Dingo Cull 2001	5/05/2001	May 2001 Cull		2001
DC21	Lake McKenzie	Dingo Cull 2001	5/05/2001	May 2001 Cull		2001
DC22	Kingfisher Bay	Dingo Cull 2001	5/05/2001	May 2001 Cull		2001
DC23	Eurong	Dingo Cull 2001	5/05/2001	May 2001 Cull		2001
DC24	Indian Head	Dingo Cull 2001	5/05/2001	May 2001 Cull		2001
DC25	Indian Head	Dingo Cull 2001	5/05/2001	May 2001 Cull		2001
DC26	Indian Head	Dingo Cull 2001	5/05/2001	May 2001 Cull		2001
DC27	Waddy Point	Dingo Cull 2001	5/05/2001	May 2001 Cull		2001
DC28	Moon Point	Dingo Cull 2001	5/05/2001	May 2001 Cull		2001
SI01	Waddy Point	Sick / Injured	28/10/2002	Broken leg (fl)		2002
SI02	Poyungan Rocks	Sick / Injured	5/11/2002	Injured leg (fl)		2002
SI03	Awinya Creek	Sick / Injured	6/12/2002	Injured broken back		2003
SI04	Waddy Point	Sick / Injured	18/06/2005	Injured, unable to move		2005
SI05	Eurong	Sick / Injured	28/09/2007	Broken leg (Truck hit)	Purple/Purple/Red	2007
SI06	Waddy Point	Sick / Injured	28/01/2010	Broken back (car hit)	Purple/Orange/White	2010
DA01	Moon Point	Dangerous / Aggressive	9/05/2001	Aggressive, Dangerous		2001
DA02	Waddy Point	Dangerous / Aggressive	10/05/2001	Aggressive, Dangerous		2001
DA03	Indian Head	Dangerous / Aggressive	13/05/2001	Nipping, Dangerous		2001
DA04	Dilli Village	Dangerous / Aggressive	9/07/2001	Aggressive, Dangerous		2001
DA05	One Tree Rocks	Dangerous / Aggressive	23/01/2002	Biting, Dangerous		2002
DA06	Indian Head	Dangerous / Aggressive	23/03/2002	Aggressive, Dangerous		2002
DA07	Happy Valley	Dangerous / Aggressive	18/04/2002	Aggressive, Dangerous		2002
DA08	Eurong Township, Beach	Dangerous / Aggressive	8/05/2002	Aggressive, Dangerous		2002
DA09	Connors Corner	Dangerous / Aggressive	12/05/2002	Aggressive, Dangerous		2002
DA10	North Eurong	Dangerous / Aggressive	14/05/2002	Aggressive, Dangerous		2002
DA11	North Eurong	Dangerous / Aggressive	14/05/2002	Aggressive, Dangerous		2002
DA12	Hook Point	Dangerous / Aggressive	13/06/2002	Nipping, Dangerous		2002
DA13	Yidney Rocks	Dangerous / Aggressive	29/08/2002	Aggressive, Dangerous		2002
DA14	Waddy Point	Dangerous / Aggressive	29/08/2002	Aggressive, Dangerous		2002
DA15	Coolooloi Creek	Dangerous / Aggressive	31/08/2002	Aggressive, Dangerous		2002
DA16	Waddy Point	Dangerous / Aggressive	29/09/2002	Aggressive, Dangerous		2002
DA17	Moon Point	Dangerous / Aggressive	5/10/2002	Aggressive, Dangerous		2002
DA18	Moon Point	Dangerous / Aggressive	16/10/2002	Aggressive, Dangerous		2002
DA19	Kingfisher Bay Resort	Dangerous / Aggressive	7/02/2003	Aggressive, Dangerous		2003
DA20	Happy Valley	Dangerous / Aggressive	18/03/2003	Aggressive, Dangerous	Yellow/White/Yellow	2003
DA21	Kingfisher Bay Resort	Dangerous / Aggressive	4/04/2003	Aggressive, Dangerous		2003
DA22	Lake McKenzie	Dangerous / Aggressive	20/04/2003	Aggressive, Dangerous		2003
DA23	Lake McKenzie	Dangerous / Aggressive	20/04/2003	Aggressive, Dangerous		2003
DA24	Lake McKenzie	Dangerous / Aggressive	20/04/2003	Aggressive, Dangerous		2003
DA25	Dundubara	Dangerous / Aggressive	19/06/2003	Aggressive, Dangerous		2003
DA26	North Eurong	Dangerous / Aggressive	8/07/2003	Aggressive, Dangerous	Red/Pink/Yellow	2003
DA27	North Eurong	Dangerous / Aggressive	9/07/2003	Aggressive, Dangerous	Red/Green/Red	2003
DA28	Central Station	Dangerous / Aggressive	26/10/2003	Nipping, Dangerous	Yellow/Yellow/Purple	2003
DA29	Kingfisher Bay Resort	Dangerous / Aggressive	31/01/2004	Aggressive, Dangerous	Red/Yellow/White	2004
DA30	Eurong	Dangerous / Aggressive	29/02/2004	Aggressive, Dangerous	Purple/Red/Yellow	2004
DA31	Lake McKenzie	Dangerous / Aggressive	25/04/2004	Aggressive, Dangerous	White/White/White (KBR)	2004
DA32	Hook Point	Dangerous / Aggressive	25/05/2004	Aggressive, Dangerous	Green/Red/Red	2004
DA33	Eurong	Dangerous / Aggressive	20/06/2004	Aggressive, Dangerous	Blue/Red/Yellow	2004
DA34	Kingfisher Bay Resort	Dangerous / Aggressive	20/07/2004	Nipping, Dangerous	Purple/White/White	2004
DA35	Kingfisher Bay Resort	Dangerous / Aggressive	1/08/2004	Aggressive, Dangerous	Floppy Right Ear	2004
DA36	Poyungan Rocks	Dangerous / Aggressive	7/10/2004	Aggressive, Dangerous	Orange/Purple/Red	2004

Ref #	Location	Reason	Date	Circumstance	Ear Tag	Year
DA37	One Tree Rocks	Dangerous / Aggressive	10/10/2004	Aggressive, Dangerous	Green/White/Purple	2004
DA38	Kingfisher Bay Resort	Dangerous / Aggressive	11/11/2004	Aggressive, Dangerous		2004
DA39	Happy Valley	Dangerous / Aggressive	5/05/2005	Aggressive, Dangerous	Green/Blue/Green	2005
DA40	Kingfisher Bay Resort	Dangerous / Aggressive	25/06/2005	Aggressive, Dangerous	Blue/Blue/Blue	2005
DA41	Waddy Point	Dangerous / Aggressive	1/09/2005	Aggressive, Dangerous	Blue/Green/Purple	2005
DA42	Maheno Beach	Dangerous / Aggressive	6/03/2006	Aggressive, Dangerous	Blue/Green/White	2006
DA43	Eurong Second Valley	Dangerous / Aggressive	10/04/2006	Aggressive, Dangerous	Purple/White/White	2006
DA44	Happy Valley	Dangerous / Aggressive	7/08/2006	Aggressive, Dangerous	Green/White/Red	2006
DA45	Eurong	Dangerous / Aggressive	23/09/2006	Aggressive, Dangerous	Purple/Blue/Purple	2006
DA46	Orchid Beach	Dangerous / Aggressive	25/09/2006	Aggressive, Dangerous	Pink/White/Red	2006
DA47	Eurong	Dangerous / Aggressive	9/04/2007	Aggressive, Dangerous	Pink/White/White	2007
DA48	Eurong	Dangerous / Aggressive	19/04/2007	Biting, Dangerous	Red/Pink/Yellow	2007
DA49	Happy Valley	Dangerous / Aggressive	18/08/2007	Aggressive, Dangerous	Green/Green/Green	2007
DA50	Eurong	Dangerous / Aggressive	3/07/2007	Aggressive, Dangerous	Red/Blue/Yellow	2007
DA51	Waddy Point	Dangerous / Aggressive	25/03/2008	Aggressive, Dangerous	Green/Yellow/White	2008
DA52	Lake McKenzie	Dangerous / Aggressive	22/04/2008	Aggressive, Dangerous	Green/Orange/Orange	2008
DA53	Eurong	Dangerous / Aggressive	7/07/2008	Aggressive, Dangerous	Yellow/Orange/Yellow	2008
DA54	Waddy Point	Dangerous / Aggressive	25/02/2009	Aggressive, Dangerous	Blue/Yellow/Green	2009
DA55	Eurong	Dangerous / Aggressive	8/04/2009	Biting, Dangerous	White/Pink/White	2009
DA56	Eurong	Dangerous / Aggressive	14/04/2009	Biting, Dangerous	Purple/Purple/Purple	2009
DA57	Coolooloi Creek	Dangerous / Aggressive	7/05/2009	Aggressive, Dangerous	Orange/Purple/Red	2009
DA58	Coolooloi Creek	Dangerous / Aggressive	8/05/2009	Aggressive, Dangerous	White/Green/White	2009
DA59	Coolooloi Creek	Dangerous / Aggressive	8/05/2009	Aggressive, Dangerous	Yellow/Orange/Yellow	2009
DA60	Coolooloi Creek	Dangerous / Aggressive	8/05/2009	Aggressive, Dangerous	Blue/Blue/Green	2009
DA61	Eurong	Dangerous / Aggressive	9/06/2009	Biting, Dangerous	Blue/Orange/Pink	2009
DA62	Coolooloi Creek	Dangerous / Aggressive	7/08/2009	Biting, Dangerous	Blue/White/White	2009
DA63	Eurong	Dangerous / Aggressive	28/08/2009	Aggressive, Dangerous	Blue/Blue/Blue	2009
DA64	Cathedral Beach	Dangerous / Aggressive	1/01/2010	Aggressive, Dangerous	Orange/Yellow/Orange	2010
DA65	Eurong	Dangerous / Aggressive	9/04/2010	Aggressive, Dangerous	Green/Green/Green	2010
DA66	Lake Wabby	Dangerous / Aggressive	19/05/2010	Aggressive, Dangerous	Pink/Purple/White	2010
DA67	K'Gari	Dangerous / Aggressive	2/07/2010	Aggressive, Dangerous	Purple/Orange/Purple	2010
DA68	Cathedral Beach	Dangerous / Aggressive	23/11/2010	Aggressive, Dangerous	Green/Green/Pink	2010
DA69	Eurong	Dangerous / Aggressive	31/03/2011	Aggressive, Dangerous	Orange/Blue/Pink	2011
DA70	Eurong	Dangerous / Aggressive	18/04/2011	Aggressive, Dangerous	Orange/Yellow/Orange	2011
DA71	Coolooloi camping ground	Dangerous / Aggressive	19/04/2011	Aggressive, Dangerous	Orange/Blue/Orange	2011
DA72	Hook Point	Dangerous / Aggressive	26/04/2011	Biting, Dangerous	Blue/White/White	2011
DA73	Hook Point	Dangerous / Aggressive	26/04/2011	Aggressive, Dangerous	Pink/Pink/Pink	2011
S107	Platypus Bay	Sick / Injured	3/05/2011	Broken back (dingo fight)	Pink/Green/White	2011
DA74	Eurong	Dangerous / Aggressive	14/06/2011	Biting, Dangerous	Blue/Red/Blue	2011
DA75	Wathumba	Dangerous / Aggressive	28/10/2011	Aggressive, Dangerous	18Black10m	2011
S108	Wathumba/Exploration brk junct	Sick / Injured	15/09/2011	Paralysed (unknown)	Orange/Red/White10f	2011

Released under the
RTI 11-078

Appendix 2

15

15

ORIGINAL

Queensland
Government

Queensland Health

POPULATION HEALTH BRANCH

Enquiries to:

Drugs and Poisons Policy and
Regulation
Environmental Health Unit
(07) 3234 0349
(07) 3234 1480
QCOS002191
EH-ATH-3768

Telephone:
Facsimile:
File No:
Our ref:

HEALTH (DRUGS AND POISONS) REGULATION 1996APPROVAL UNDER SECTION 18(1)

I, _____, delegate of the Chief Executive, Queensland Health, approve:-

Dingo Manager _____
Queensland Parks and Wildlife Service, Fraser Island
Eurong Ranger Base
Fraser Island Qld 4581

to be in possession of, store, use and administer restricted drugs listed in the schedule attached hereto, subject to the following conditions:-

1. That the restricted drugs are used in accordance with the directions of a veterinary surgeon employed or for such purposes as may be directed by the Queensland Parks and Wildlife Service. Where it is not possible for the veterinary surgeon to give a verbal direction to administer the restricted drug for example where the approval holder is in a remote location - the veterinary surgeon must be contacted to receive the administration of the drug within 24 hours. The approval holder must also complete the review on the relevant record entry.
2. That the possession, storage, use and administration of the restricted drugs are for the capture, sedation, anaesthesia and treatment of animals while performing duties as an officer of the Queensland Parks and Wildlife Service.
3. That administration of the restricted drugs is undertaken by the approval holder providing they have received suitable training and instruction in this task by a registered veterinary surgeon. Furthermore, where the attached schedule of drugs includes the drug zolozepam/tiletamine (zoletil), the approval holder shall not use or administer that drug unless in the company of another officer of the Queensland Parks and Wildlife Service who has a Queensland Health approval for that drug, or who has appropriate first aid training, or is a veterinary surgeon.
4. The quantities of the restricted drugs to be held at these premises do not exceed the limit stipulated in the schedule attached to the approval.

Office
10th Floor
Queensland Health Building
147 Charlotte Street
Brisbane Q 4000.

Postal
GPO Box 48
Brisbane Q 4001

Phone
(07) 323 40938
(07) 323 40939

Fax
(07) 323 41480

5. That the restricted drugs are stored at all times in a locked approved drug storage receptacle or secure place, at the Queensland Parks and Wildlife Service premises at Rainbow Beach/Fraser Island or in a locked box in the approval holder's vehicle, except when such drugs are being used or administered. The key to such receptacle or secure place shall be kept at all times in the possession of the approval holder.
6. Restricted drug records must be kept in a book reserved exclusively for such purpose and shall show the following information. Separate pages must be kept for each drug type and strength. The record must show a progressive balance.
 - (a) Incoming Stock
 - (i) Date of purchase/obtaining of restricted drug.
 - (ii) Source of supply of restricted drug.
 - (iii) Order No./invoice No.
 - (iv) Type, strength and quantity of restricted drug.
 - (v) Signature for receipt and supply.
 - (b) Outgoing Stock
 - (i) Date of administration/issue.
 - (ii) Purpose of use.
 - (iii) Name of veterinary surgeon concerned.
 - (iv) Type, strength and quantity of restricted drug.
 - (v) Signature of approval holder.
 - (vi) Balance.

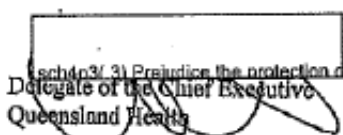
All restricted drug records must be checked and initialled on a monthly basis by the veterinary surgeon employed by or contracted to the Queensland Parks and Wildlife Service. The exceptions to such checking and initialling are:

- Where the organisation or approval holder also utilises an electronic stock control system that is capable of monitoring (in real time) the usage of the restricted drug approval holder. Such system must be monitored routinely by a veterinarian employed by or contracted to the organisation. The system must also have been deemed acceptable system for this purpose by the delegate of the Chief Executive Officer.
- Due to remoteness of the location where the veterinary surgeon is not able physically check and initial the drug records on a monthly basis, it is acceptable for a Queensland Police Officer to undertake such monthly checking and initialling. Following such drug check, the Police Officer must forward a copy of the drug record to the veterinary surgeon employed by or contracted to the Queensland Parks and Wildlife Service. Further, such veterinary surgeon is required to undertake a physical check and initialling of the drug records not less frequently than on a six monthly basis.

All records including copies of orders/invoices must be retained for a period of two years from the date of the last entry and must be provided on demand to an Environmental Health Officer of Queensland Health.

7. All orders and re-orders for restricted drugs are only to be obtained on an order signed by the veterinary surgeon employed or contracted by the Queensland Parks and Wildlife Service.
8. The approval holder must only use the restricted drugs listed in the schedule to the approval, in accordance with their registered purpose as registered by the Australian Pesticides and Veterinary Medicines Authority (APVMA) under the Agricultural and Veterinary Chemicals Control Act 1994, unless used in accordance with an off-label permit granted by the APVMA.
9. This approval is effective forthwith and shall remain in force only during the term of employment of Robert Fishburn with the Queensland Parks and Wildlife Service or for a period of two years from the date of issue, unless sooner suspended, cancelled, replaced or surrendered, whichever first occurs.

Given under my hand


 Delegate of the Chief Executive
 Queensland Health

Approval number: EH-ATH-3768

Please note that no expiry reminder will be issued. Should you wish this approval to be reissued then a fresh application request should be made.

SCHEDULE attached to an approval number EH-ATH-3768, issued under the Health (Drugs and Poisons) Regulation 2006, in the name of:

Generic Name	Form	Strength	Maximum quantity allowed to be held collectively for all QPWS approval holders at the nominated premises
Pentobarbitone	1.0g/mL	g/mL	1 x 500ml
Tiletamine/Zolazepam (Zoletil 100)	100mg	mg	5 x 5ml

-END OF LIST-

Appendix 3

Media Release

National Dingo Preservation and Recovery Program (Inc. A0051763G)

Date: Monday March 19, 2012

DERM defence against cruelty and animal ethics accusations evasive

Today, President of the National Dingo Preservation and Recovery Program (NDPRP), Dr Ernest Healy, labelled the response of the Queensland Department of Environment and Resource Management (DERM) to recent allegations of gross animal cruelty and inadequate animal ethics approval for research conducted on Fraser Island dingoes, as imprecise and evasive.

'DERM's response is evasive and raises more questions than it answers regarding the adequacy of its animal welfare ethics approval practices concerning its research on Fraser Island dingoes,' he said.

On March 15, 2012, the NDPRP issued a media statement demanding an explanation from DERM, and the Environment Minister, Vicky Darling, about an independently documented case of extreme cruelty inflicted upon a captured juvenile male dingo on Fraser Island, which occurred on March 14, 2011. The dingo, which died in agony, had been captured as part of research being conducted by DERM.

The NDPRP also expressed concern that the radio collaring research, for which this dingo was captured, did not appear to have received rigorous and adequate animal ethics approval from the Department's Animal Ethics Committee (AEC) at the time when this cruel death occurred. Dr Healy stated that:

'The NDPRP affiliate organisation, Save Fraser Island Dingo Inc. (SFID), had lodged a Right to Information (RTI) request under Queensland legislation, asking for all animal ethics approval documentation relating to DERM's dingo radio collaring research. The only document found was an animal ethics application to the Department's AEC by the Queensland Parks and Wildlife Service (QPWS), which was submitted on September 4th, 2011, and was assessed and approved on October 28th, 2011.'

Dr Healy further stated:

'The received RTI documentation makes it clear that ethics approval was granted on October 28, 2011, for research that had commenced much earlier in 2011. Most, if not all the capture and collaring of dingoes had already been conducted months before this animal ethics application was even lodged. It is a curious anomaly that the QPWS ethics application to the AEC, in September 2011, and assessed and granted in late October 2011, indicates that the research would be conducted between April 1st 2011 and April 1st 2014. The application was clearly retrospective.'

DERM has since released a statement, which asserts that animal ethics approval was not retrospective and that such approval had been granted on April 27th, 2011. However, Dr Healy states that DERM has yet provided no convincing evidence or documentation to support this assertion and that DERM's public statements on this matter require close scrutiny.

'DERM's statement does not say that AEC approval was received on April 27th 2011, only that 'ethics approval' for the radio tracking 'stage' of the dingo research was obtained. DERM also states that the 'required approvals' were obtained. It is not at all clear from DERM's statements that any adequately detailed and, rigorous ethics approval application had been lodged with the AEC specifically, or permission granted by that Committee, relating to dingo capture and radio collaring in April 2011.'

'If AEC approval had been received in April for DERM to conduct dingo capture for radio collaring, prior to the actual commencement of collaring, why was the departmental documentation for this approval not forthcoming from SFID's RTI application?' Dr Healy said.

Dr Healy added:

'To date, DERM's response to these serious questions of animal cruelty and inadequate animal ethics is opaque and unsatisfactory. The NDPRP considers DERM's management of Fraser Island dingo population to be consistently substandard. If the Liberal National Coalition wins government in Queensland next weekend, the NDPRP encourages it to make a clean sweep of Fraser Island dingo management. The NDPRP believes that there is currently a culture within DERM that is resistant to informed, valid criticism of its management of the Fraser Island dingo population. Unfortunately, the present and previous Environment Ministers in Queensland have appeared equally indifferent to this criticism.'

Contacts: Dr Ernest Healy, President NDPRP: 0432503106 ernest.healy@monash.edu
Malcom Kilpatrick, President Save Fraser Island Dingoes: (07) 4124 1979 mkrail@bigpond.net.au
Jennifer Parkhurst NDPRP & SFID: 0428 281 967 fidingo@bigpond.net.au (newspaper only please)
Dr Ian Gunn BVSc. FACVSc. 0427 387778 (mob.) ianmgunn@bigpond.com

The Jane Goodall Institute

April 2012

To Whom It May Concern:

I am deeply saddened to hear about the plight of the dingoes on Australia's Fraser Island. I understand these dingoes are a rare and valuable species proven with DNA unique to the entire world and the last remaining population of purebred dingoes.

Conservationists, scientists and Island stake holders are now concerned that these valuable pure breed dingoes are at risk of extinction. I also understand that the current approach to dingo management on Fraser Island has created enormous suffering as a result of a government-driven management program compiled without proper research from scientists. I am disappointed to hear that the local Aboriginal people are not represented and that there has been no input from the settled residents of the Island who well know 'their' dingoes and had a peaceful co-existence with them before.

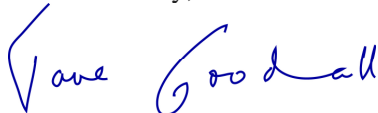
I have been told that the dingoes of Fraser Island are revered by the Butchulla Aboriginal people who regard them as one of their spirit protector animals in a place they call K'Gari (meaning paradise), yet it is now a sad dark place where the dingoes struggle to coexist with the vast numbers of tourists and development.

It is with deep sadness that I have heard of a cruel death of a dingo caught with a pole noose. He was, I understand, strangled and suffocated, and I can well imagine her fear and terror. This was for an experimental collaring programme. I have also heard there are verified reports of siblings mating, indicating a species in crisis and under duress, with over culling of adult and juvenile dingoes, causing a breakdown in the dingoes' social structure.

April, I am told, is the breeding season for these dingoes, when animals are more active, more territorial and more likely to come into conflict with visitors. There is an urgent need now, for a successful breeding season, to help the continuation of these unique iconic animals.

As an unofficial ambassador for endangered animals all over the world, I am frequently asked to write letters in support of conservation programmes; I am writing now on behalf of these endangered dingoes of Queensland, Australia. I certainly agree, whole heartedly, that there should be no further trapping for ear tagging or any other reason (save for veterinary assistance to an individual), and no culling. I would hope that all concerned would agree there should be a requirement for the most stringent commitment to the welfare of individuals in any kind of research. And I urgently beg everyone involved to ensure that all possible measures are taken to protect these dingoes so that there may be a thriving and sustainable population of the last pure breed dingoes in Australia – the last in the world.

Yours sincerely,



Jane Goodall, PhD, DBE
Founder – the Jane Goodall Institute
& UN Messenger of Peace

Appendix 4

Animal Welfare standards and practices

A consideration of the animal welfare principles outlined below highlights the extent of dingo mismanagement on Fraser Island.

The Australian Government document (A model for assessing the humaneness of pest control) discusses correct procedures and ethical treatment of animals. This particular section deals with farm animals, but should apply across the board to animals in any sort of 'care', such as the FID's which are being 'cared for' by the QPWS:

There are five freedoms defined as standards for acceptable welfare. They are:

1. **Freedom from Hunger and Thirst** - by ready access to fresh water and a diet to maintain full health and vigour.
2. **Freedom from Discomfort** - by providing an appropriate environment including shelter and a comfortable resting area.
3. **Freedom from Pain, Injury or Disease** - by prevention or rapid diagnosis and treatment. (This is impossible on FI without a vet facility)
4. **Freedom to Express Normal Behaviour** - by providing sufficient space, proper facilities and company of the animal's own kind. (Freedom for dingoes to roam their territories without harassment)
5. **Freedom from Fear and Distress** - by ensuring conditions and treatment which avoid mental suffering.

Many of these freedoms are not afforded to the FID's, and it is alarming that The *Animal Care and Protection Act 2001 (ACPA)* does not provide for prosecution of DERM or QPWS in relation to *any* allegations of neglect of the FID or any other wildlife. We strongly urge that this law be changed because our evidence suggests that suggests dingo abuse at the hands for QPWS staff in the use of these drugs.

The RSPCA states: 'Section 17 of the *ACPA* provides an offence of breach of duty of care in relation to an animal. However, one essential element needed to establish this offence is the identification of a "person in charge" of the animal. Section 12 of the *Act* defines 'person in charge' as being an owner or having custody of the animal. The FID is a wild animal which is not owned by, or in the custody of, any person. Therefore there can be no breach of duty of care. This is the case for all wildlife.'

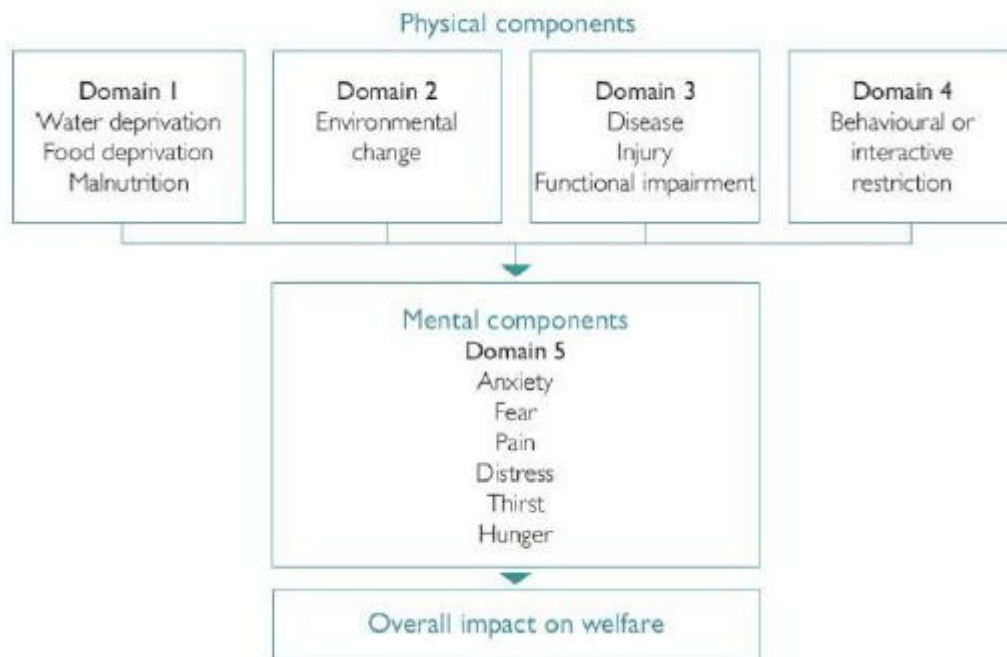
This is a very contentious issue considering that the FID's are handled at will and managed extensively by DERM rangers.

Section 18 of the *ACPA 2001* provides the offence of cruelty to an animal. The definition of cruelty for the purposes of prosecution under the *ACPA 2001* is clearly defined in s18. It is necessary, when the act involves injuring the animal, to prove the act is unjustifiable, unnecessary or unreasonable. A Government Department and its employees implementing an authorised management plan are exempt from this provision so long as they were individuals acting within the scope of the plan.

Having said that, if anyone, including QPWS rangers, kills a dingo inhumanely, then RSPCA Inspectors can conduct an investigation and prosecute the offender under the *ACPA* if sufficient evidence is obtained.' (RSPCA discussion paper.)

Generally speaking the flow chart below described the ideal criteria for humane animal management (taken from Aust Govt dept of Agriculture, Forestry and Fishing document, **PART B: A MODEL FOR ASSESSING THE HUMANENESS OF PEST ANIMAL CONTROL**)

Figure 1: Five domains of potential welfare impact divided broadly into physical and mental components. Modified from Mellor (2004)



Domain 1: Food deprivation due to hazing dingoes from beaches

Domain 2: environment change due to fencing and other human developments including 4WD encroachment.

Domain 3: Disease/injury not treated due to no vet facility

Domain 4: Behaviour restriction during peak visitor periods due to hazing dingoes from beaches and campsites

Domain 5: Anxiety/fear etc due to hazing and trapping.

A 'humaneness criteria' needs to be established urgently incorporating the ideals above and rectifying the methods within the management strategy particularly focusing on how much suffering these methods cause and the duration of this suffering.

It is imperative that the methods used are genuinely 'best practice' as set out in the relevant legislation and RSPCA guidelines.

For example, the [Australian Veterinary Association Code of Professional Conduct](#), in emphasising that veterinarians should 'always consider the health, welfare and respectful treatment of the animal', states that:

(d) Veterinarians should promote humane management of domestic and feral animals. If culling of feral animals or the euthanasia of animals (companion, domestic or feral) is deemed necessary, it should be carried out as humanely as possible with due consideration to the individual animal and to the group from which it is drawn.

The code of conduct recommends that managers anticipate the likely impact of the control method on the individual target animal. Information on the physiological, behavioural and pathological responses to a particular method should be considered (no impact, mild, moderate, severe or extreme impact). This grade should reflect the state of the animal at the time of maximum impact including the intensities of anxiety/fear/pain/distress etc. caused by a particular method, and if found to be extreme, should be modified.

Appendix 5

Hazing – witness statements

To whom it may concern

I write this brief letter as part of Fraser Island's permanent resident population to support a submission calling for a halt to the cruel practice of hazing the island's native dingo population.

Whilst I have not personally witnessed dingoes being mistreated by QPWS rangers in this way, I know of fellow residents who have, and even one tour bus driver who tells of rangers unashamedly hazing dingoes on deserted beaches in full view of busloads of tourists.

Slingshots and their ammunition of clay pellets have also been handed out to some residents who wished to chase the dingoes away from their properties.

Far from deterring these animals from patrolling their established territories, the practice is resulting in dingoes that are snappy, anxious and increasingly aggressive towards humans.

One only has to study the island's administrative history to see that dingoes posed no problems in the past. QPWS policies and practices since taking over the island's administration have led to the reduction of the dingoes' available food sources, and attempts to change dingoes' natural habits through the cruel practice of hazing have been futile.

This clipping (below) from the Fraser Coast Chronicle (14-5-09) is self-explanatory.

'WE'RE DEALING WITH A SERIAL DINGO KILLER'

By LOBETTA BRYCE **P 1**

Fraser Island residents fear they may be dealing with a serial dingo killer following the deaths of four juvenile dingoes last week.

Seven dingoes have been killed by rangers on Fraser Island this year. The four dingoes killed by rangers on Thursday last week had been continually hazed before their deaths, a Department of Environment and Resource Management spokesman said.

Hazing involves pelting the dogs with clay pellets using a slingshot. DERM senior director Ross MacLeod said the four dingoes killed by lethal injection last week were juveniles, born in 2008, and had displayed increasingly aggressive behaviour towards people.

None of the dingoes had bitten or scratched a person but, Mr MacLeod said, they had been displaying pack hunting techniques and had taken turns to lunge at people.

CONTINUED ON PAGE 3

Hazing no longer worked so dingoes destroyed

FROM PAGE 1 **F-CC 14-5-09** **P 3**

"If the dingoes had targeted a single adult or small children, there is every possibility that they would have been injured or possibly killed," he said.

"Continued hazing by rangers was no longer an option. Rangers decided that the action taken was appropriate."

The Fraser Island Dingo Preservation Group's Bree Jashin said the actions of the rangers were extreme and out of control.

"We're dealing with a serial dingo killer here," she said.

"(The rangers) are in charge of an animal that's on the edge of extinction."

"The dingoes have been provoked mercilessly."

When left alone, the dingoes are generally timid animals – evidenced by residents who used to have dingoes traversing their properties or resting in shady gardens. Even a dingo who knew us on sight would take a step back if we came too close.

We have a healthy respect for the animals' wild nature, and it breaks our heart to see ignorance and arrogance endangering the future of our famous Fraser Island dingoes.

J. Daniel

Mrs Judi Daniel
Eurong Second Valley
Fraser Island.

To Whom It May Concern

As a permanent resident and business owner of Fraser Island please accept this brief submission in support of a call to halt the cruel practice of hazing dingoes in their natural habitat.

I have witnessed a dingo being slingshot by QPWS employees for just being on the beach minding its own business.

This is just one of several incidents that I have witnessed:

As Steven (my husband) was fishing in the surf, I witnessed a pup just playing, jumping over the waves near him, not harassing him in any way. I was sitting in the car on the beach, when about 3 backpacker cars and 2 large tourist buses stopped to take photos or just watch the dingo playing. A QPWS employee came driving up very fast, jumped out of the car (in amongst all these cars and people) took aim and slingshot the dingo not very far away from Steven who was oblivious to all that was going on behind him. The dingo ran away yelping as he continually got shot. The dingo wasn't causing Steven any trouble, just frolicking in the waves nearby.

This cruel behaviour by Rangers certainly does not deter the dingoes, as in this case the dingo just waited in the bushes until the ranger drove away to come back on the beach to continue patrolling his natural territory.

This incident by the 'ranger' was witnessed by in excess of 100 people. Was he supposed to look like a martyr and save the day? Are we to stand there idly and just watch the cruelty continue?

QPWS are apparently supposed to be using clay pellets to shoot with, but over my time here, just over 4 years, cleaning the private holiday houses, I have found in excess of 100 glass marbles either around the properties, or have been collected and left by departing guests. Again in the township areas, where work, health and (public) safety should be a priority.

Residents have had no problems with any of the dingoes and it's sad to see the animals' future threatened by QPWS policies and practices.



Lisa Walker
Lot 12 Jarvis St
Eurong
FRASER ISLAND

Mrs Noeline Walk
Thargana Eurong
Fraser Island MS2173
via Rainbow Beach QLD 4581

6.9.09.

To Whom it may Concern.

Having observed dingoes being hazed by
sting shot when they have been merely walking
along beach minding their own business & why
should they not be able to enjoy the freedom
to run on their beach?

Hazing no deterrent if dingoes don't know
why they are being hurt by shot, more likely
that like any other dog or animal to turn
on their aggressors.

Noeline J. Walk
NOELINE J. WALK,

Appendix 6

Incident report spreadsheet

Dingo ID	Date	Age	Location	Incident Code	Most severe action of the dingo	Person's activity prior to incident	What does person believe caused incident	How many people involved	Why did the dingo leave	Action taken by officer:	Proposed further action	Officer responsible	Additional notes	Photos of dingo id	Photos of injury	Signed witness statement
O-B-O	15/04/2011	juv	Hook Pt	D	attempt to steal bait, dominant, lunging (NOT attempt to bite)	in water fishing	attracted by scent of bait, habituated	3 adults	fisherman left	dingo photo'd & monitored.	hazing	Kim F & Sheryl B	sheryl saw incident, said dingo bit man, man denied it, Kim took report	Y	N	N
O-B-O	15/04/2011	juv	Hook Pt Barge	C	curious, loitering,	driving alongside dingo to photo him	blank	8 car loads	distracted	dingo photo'd	TBA	Kim F & Sheryl B	it was a ranger driving alongside the dingo	Y	N/A	N/A
O-B-O	16/04/2011	juv	Hook Pt/ Coolooloi	E	lunging/attempted biting	walking, Sitting	blank		when yelled 1 at/chased away	report circulated, RM notified	DESTRUCTION	Rob Fishburn	RANGER INSTIGATED. It followed, 'nearly grabbed my heel'	Y	N/A	N/A
O-B-O	16/04/2011	juv	Hook Pt/Coolooloi	C	Loitering	walking, sitting	blank		this lead up to 2 code E incident	report circulated	humane destruction recommended due to prior history	Rob Fishburn	rangers checking area	N	N/A	N/A
B-R-B & O-B-Pi	22/01/2011	juv	Eurong	C	not wary of humans, loitering, approaching closely,	many people milling outside bus	bus driver let passengers out	20 - bus tour group	yelled at, clap hands, bus left	report generated	continued patrols, rec. close campsites, hazing, fish offal prohibited, tour ops prohibited from disembarking passengers to photo dingoes	Kim F	dingoes had investigated pippie bucket. People told to throw sand at them in future	N	N/A	N/A
O-Y-O & O-B-Pi	23/01/2011	juv	OTR (Near Eurong)	C	loitering	walking, fishing, talking	dingoes visiting campsites	up tp 10, walking, fishing, talking	lost interest	report, photos of dingoes	monitor, encourage visitors to haze/chase dingoes, ban fish cleaning	Lynda Gaston	people didn't want the dingoes hazed. Ranger suggests aversive baiting	Y	N/A	N/A
O-B-Pi	6/02/2011	juv	OTR (Near Eurong)	C	loitering, following	walking, sunbaking	ranger-observed incident - person not concerned		chased when coconut thrown at 1 it by ranger	ranger clapped and threw coconut at it, told lady to be vigilant	haze, consider close camp zone	Kim F took report on behalf of Darren B & Laurie W	sat 5 m from woman sunbaking	N	N/A	N/A
O-Y-O & OOBOPi & B-R-B	6/02/2011	juv	OTR (Near Eurong)	C	loitering	RANGER PATROL	N/A Ranger obs	0 voluntary		photographed	Monitor, consider close of camp zone	Kim F took report on behalf of Darren B & Laurie W	sniffing around ground 'most likely for food scraps'	N	N/A	N/A
O-B-Pu	19&20/3/11	juv	Cornwells (Nth of Eurong)	C	loitering, sleepign against tent, 'living under infrastructure'	sleeping in tent	people not involkved, ie asleep, rangers general duties taking 'incident reports'	3 asleep	when chased by rangers	general duties taking 'incident repts'	monitor, haze, consider close camps, establish dominant dingo activity	Kim F & photos Linda Glaston	dingo may consider itself as part of a human pack due to regular contact? 'O-B-Pi' 'strutting around with his tail cocked'	Y	N/A	N/A

Dingo ID	Date	Age	Location	Code of incident	Most severe action of the dingo	Person's activity prior to incident	What does person believe caused incident	How many people involved	Why did the dingo leave	Action taken by officer:	Proposed further action	Officer responsible	Additional notes	Photos of dingo id	Photos of injury	Signed witness statement
O-B-Pi	29/03/2011	juv	Eurong (SV entrance)	D	dominant, circling (< 1m)	walking	3 girls followed, threw coconut, yelled when dingo didn't leave, stood their ground		when intervened by man driving 3 vehicle	report generated, monitoring, inform campers of dangerous dingo	humane destruction	Anthony Dargusch	incident took place prior to code E	N	N/A	N/A
O-B-Pi	29/03/2011	juv	Eurong (SV entrance)	E	growling, snarling/ dominance	walking	dingo came from behind, she defended herself with thongs, it growled		when intervened by ranger driving 1 vehicle	report generated, monitoring, inform campers of dangerous dingo	humane destruction	Rob Fishburn on behalf of Matt Davies & Scott Buttsworth	resort worker Nikita	Y	N/A	N/A
O-B-Pi	30/03/2011	juv	OTR (Near Eurong)	C	loitering and 'cocky'	ranger - driving, stopped to take photos and ID dingo	N/A Ranger instigated	2 rangers	rangers left it to its own business	photographs taken & report generated	dingo already destroyed at time of report, suggest campsite closures	Kim F on behalf of Darren & ?	dingo was lying on dune. Rangers approached. Ranger crouched down. The dingo 'lay with its tail raised at one stage'. Dingo trotted off.	Y	N/A	N/A
O-Y-O	6/01/2011	juv	Eurong	C	loitering, not wary, following closely (3m)	ranger observation	?	50 blank		report generated and circulated	Continued monitoring, brief and educate campers	Anthony Dargusch for Ruth Thomas	O-Y-O was watching tourists arrange flight	N	N/A	N/A
O-Y-O, B-R-B, B-Pu-Pu,	9/01/2011	juv	Eurong	C	loitering	ranger observation	people recreating	up to 6	fisherman shoosed her with stick	info missing	info missing	Lynda Gaston	3 dingoes observing people and staying near them, sniffed inside a vehicle	Y not supplied	N/A	N/A
O-Y-O	16/01/2011	juv	Eurong	E	lunging, hunting tactics (intent to attack), growling	walking and talking	girls watching sunrise, one ran away, other stayed	2 didn't leave		report generated, supervisors notified, patrolled area	intensive monitoring of area, talk with campers about dangerous dingo in area	Anthony Dargusch	O-Y-O dominance tested girl, 4 other dingoes approached, circled, began pulling at her pants, bit her thigh and hand.	Y but not supplied	N	N
O-Y-O, B-R-B	19/01/2011	juv	Eurong	C	loitering, watching fishermen, not wary	fishing	ranger-observed		when fishermen 3 left	report generated and circulated	Continued monitoring, brief and educate campers	Anthony Dargusch	circled the vehicles looking for bait scraps	N	N/A	N/A
O-Y-O	19/01/2011	juv	Eurong	C	loitering	ranger sitting in car	ranger observed	1	lost interest	report	monitor	Lynda Gaston	circled the vehicle	Y	N/A	N/A
O-Y-O	21/01/2011	juv	OTR (near Eurong)	C	loitering	ranger observation	people camping	up to 40	yelled at by ATO, sand thrown at it, hazed at base	report, photos of dingoes	monitor, brief campers, haze	Lynda Gaston	campers took photos till they saw ranger and then threw sand at dingo	Y	N/A	N/A
O-Y-O & O-B-Pi,	23/01/2011	juv	OTR (near Eurong)	C	loitering	people camping fishing	ranger-observed	up tp 10, walking, fishing, talking	lost interest. People refused to haze/aggravate/hazass them	report, photos of dingoes	monitor, brief visitors to haze dingoes, ban fish cleaning	Lynda Gaston	L told people to haze dingoes and they refused and also did not want rangers to do it. L Again suggested aversive baiting.	Y but same set of photos as another incident	N/A	N/A

Dingo ID	Date	Age	Location	Code of incident	Most severe action of the dingo	Person's activity prior to incident	What does person believe caused incident	How many people involved	Why did the dingo leave	Action taken by officer:	Proposed further action	Officer responsible	Additional notes	Photos of dingo id	Photos of injury	Signed witness statement
O-Y-O R-B-R & O-B-Pi	6/02/2011	juv	OTR (Near Eurong)	C	loitering at unoccupied camp	no people	ranger observed	0 - ranger	voluntary	photographed	monitor, brief ATO, close camp	Kim F	habituated dingoes... recognise the area is used for cooking and there may be scraps'	Y	N/A	N/A
O-Y-O	23/03/2011	juv	Eurong beach	C	loitering	RANGER fishing	RANGER fishing	RANGER fishing	blank	report generated and circulated	monitor behaviour	Anthony Dargush	dingo watched him fishing tioll he left. 'O-Y-O is a habituated dingo...this dingo will be monitored'	N	N/A	N/A
O-Y-O	24/03/2011	juv	OTR (Near Eurong)	C	loitering	walking sitting or standing	ranger patrol observation	several	voluntary	report generated and circulated	monitor the area closely	Rob Fishburn	no aggressive behaviour reported by ATO from these dingoes	N	N/A	N/A
B-Pi-R, O-Y-O & 3 other juveniles	25/03/2011	juv	OTR (Near Eurong)	C	during ranger patrol BPIR sat within 2 metres of RF and then AD and howled at RF	ranger insitigated	ranger patrol observation	rangers	voluntary	report generated and circulated	monitor the area closely	Rob Fishburn & Anthony Dargush	dingo walked to withing two metres with his tail curled but then kept on walking past	N	N/A	N/A
Pu-Y-Y, G-G-G,	15/12/2009	juv	Eurong	blank	loitering, sitting in dunes & watching fisherman	dingoes observing fisherman	ranger patrol observation		1 didn't leave	blank/not supplied	blank/not supplied	Shane Benson	fisherman commented he had been visiting area for 20 years and dingoes only bite children when they run. TRICIA & NIGEL DROVE PAST A COUPLE OF MINUTES LATER AND REPORTED SAME.	N	N/A	N/A
G-G-G	13/01/2010	juv	Eurong	blank	loitering	fishing	ranger patrol observation		ranger presence 0 scared dingo	blank/not supplied	blank/not supplied	Kim F	whilst driving past...I believe this dingo has been fed by people fishing and has learnt to wait patiently for food'	N	N/A	N/A
B-W-W	10/07/2009	juv	Hook Point	C	chasing car (JP)	ranger was hazing dingo	ranger was hazing dingo		2 N/A	report generated		0 Greg I	Ranger was hazing dingo. Got in his car when he saw another vehide. Dingo chased the vehicle. Dingo drove up to fishers then lay down and was sniffing. Dingo moved to tree line when ranger drove up. Ranger approached dingo which went away along the beach.	Y	N/A	N/A
NO TAG	30/10/2008	?	Hook Point	C	loitering/ soliciting food	eating/ fishing	soliciting food	15 waiting for barge	when chased by rangers	report generated		0 Greg I		N	N/A	N/A

Dingo ID	Date	Age	Location	Code of incident	Most severe action of the dingo	Person's activity prior to incident	What does person believe caused incident	How many people involved	Why did the dingo leave	Action taken by officer:	Proposed further action	Officer responsible	Additional notes	Photos of dingo id	Photos of injury	Signed witness statement
orange juvenile	15/03/2009	juv	?	D upgraded to E	nipping	fishing	loitering		when girl 4 screamed	reported and noted as D incident but upgraded to E at a later date	discussion with management	nil reported	felt a sharp pinching on the buttocks/no puncture wound. No other sign of aggression	N	N	Phone call
no ID reported	15/05/2009	juv	Hook Point	C	loitering	digging out bogged car	curious		when hazed by rangerhazed within a distance 5 of 5 m	dingo did not reappear		0 Greg I	ranger waiting for barge saw dingo trot towards people, people took photos, ranger approached and hazed dingo	N	N/A	N/A
B-W-W	13/07/2009	juv	Hook Point	C	chasing people'	waiting for barge	standing near people	12 people altogether, 2 ran towards car	when hazed by ranger	drove up to dingo and identified it as BWV		0 Greg I	dingo saw people running to their car and followed. Noted as 'non aggressive'	N	N/A	N/A
3 dingoes no tag id reported	14/07/2009	juv	Hook Point	C	hanging around people, difficult to disperse	waiting for barge		0 not stated		0	0	0 Greg I	there was no real aggression shown towards humans during this encounter'	N	N/A	N/A
W-W-W dingo reported as male but later B-W-W female destroyed	6/08/2009	juv	Hook Point	E	child bitten and (allegedly) dragged towards water	walking along beach with back to the children		family of 5 plus witness in 0 car	dingo stayed at 10 metres watching till all drove away	senior ranger informed, seeking more information	identify dingoes in vicinity	Greg I	child taken to Cooloolo Cove med centre, given tetanus and antibiotics. Parents forgot to keep an eye on children 'for a small period of time'.	N	N	N family went back to Holland
no tag	7/04/2008	juv	Coolooloi Ck	D	tent ripping while people inside	sleeping in tent		0 4 & 2	left first tent of own accord, left second when yelled at no items were taken	barge operators and other rangers informed of dingo activity in area	monitoring area during holiday period	Linda B	non-aggressive not wary of humans	N	N/A	N/A
Pi-W-Pu	2/05/2008	juv	Hook Point	D	dingo got into ranger's car, ranger instigated	ranger trapping on beach	curious		opened door to let 2 him out	reported		0 Linda B	was not aggressive when she leant over to let him out of vehicle, apparently the same dingo was seen at Orchid beach tent-ripping?!	Y	N/A	N/A
5 juveniles y & o + 2 others	19/04/2009	juv	Hook Point Inland track	C	following closely, approaching people in non-aggressive manner, being encouraged	Rangers waiting at Jen's vehicle to capture dingo for collaring	no incident occurred	3 rangers plus Jennifer	dingoes remained	dingo collared	collar and monitor	Linda B	dingoes showed no sign of aggression towards jennifer or rangers and no displays of dominance testing	Y	N/A	N/A
	27/01/2008	juv	Coolooloi Ck	C	stealing food and property		0	0 1 + 2		0 report circulated	hazing	Rob F	illegible	N	N/A	N/A

Dingo ID	Date	Age	Location	Code of Incident	Most severe action of the dingo	Person's activity prior to incident	What does person believe caused incident	How many people involved	Why did the dingo leave	Action taken by officer:	Proposed further action	Officer responsible	Additional notes	Photos of dingo id	Photos of injury	Signed witness statement
B-W-W	2/06/2009	juv	Midyim Camp Zone	C	loitering	ranger patrol	camping curious and looking for food		2 own accord	report circulated	monitoring	Rob F	dingo hung around outskirts of camp, did not attack or do anything aggressive	N	N/A	N/A
B-Y-G	21/05/2009	juv	Coolooloi Ck	C	nothing	ranger patrol	ranger saw a dingo		1 own accord	report circulated	monitoring	Rob F	talked to people on beach, dingo hadn't approached them	N	N/A	N/A
B-Y-G	6/06/2009	juv	Coolooloi Ck	C	following closely	ranger instigated	followed ranger spraying weeds at a distance		1 it ran off	report circulated	hazing and monitoring	Rob F	dingoes seen by campers have kept their distance	N	N/A	N/A
B-W-W	22/06/2009	juv	Hook Point	C	chasing cars	ranger observation	curious		1 when cars were too far away	report circulated	monitoring	Rob F	saw her chase several cars. 'there has been no problem dingoes reported or seen around Hook Point'	N	N/A	N/A
B-B-B	28/08/2009	juv	Second Valley	E	dominance testing, growling, bailing up	playing cricket	trying to attack their son		7 rangers intervened and hazed	report circulated	humane destruction	Rob F	dingo circled family, jumped back and growled, circled again, hairs on neck up, tail raised, looked at one of the young boys. Chased it away but it kept coming back.	N	N/A	N/A
Pu-Pu-R	7/08/2008	juv	Hook Point	C	being fed or encouraged	patting dingo' person sitting on beach with dingo	long term habituation of this dingo by this person		2 tour operator observation	reported. Permit conditions researched	interview person with objective of educating her and changing her behaviour towards	Ivan Thrash	This was later refuted and agreed that the report was untrue.	N	N/A	N/A
Y-O-Y, W-G-W, B-B-G	7/05/2009	juv	Coolooloi Ck	E	hunting tactics, bailing up, lunging attempting to bite	rangers trapping to destroy sibling O-Pu-R	rangers trapping to		2 not stated	report circulated	humane destruction of all three dingoes, closure of campground, continual monitoring of pack	Ivan Thrash	Note: aversive conditioning had commenced on 19/04/09 for 10 days. 3 dingoes lunged at Ivan when he was setting traps to destroy their sibling. Was not actually bitten.	N	N/A	N/A
no id provided or taken	23/06/2008	?	Coolooloi Ck	C	tent ripping campsite vacant	fishing	not sure		2 own accord	reported	monitoring	Alana K	returned after fishing to find tent ripped - no food inside tent	Photo taken of a dingo later in the day	N/A	N/A
no id	9/09/2008	?	Hook Point	C	running towards cars	driving along beach cars exiting barge	curious of disembarking vehicles		2 hung around area	reported	monitoring	Alana K	dingo looked underweight (not well fed) and not quite full size	N	N/A	N/A
B-W-W	17/04/2009	juv	Hook Point	C	loitering at barge landing	rangers at barge landing		2 rangers	hazed and hit on rump	hazed	monitoring	Alana K	dingo was non-aggressive	N	N/A	N/A

Dingo ID	Date	Age	Location	Code of incident	Most severe action of the dingo	Person's activity prior to incident	What does person believe caused incident	How many people involved	Why did the dingo leave	Action taken by officer:	Proposed further action	Officer responsible	Additional notes	Photos of dingo id	Photos of injury	Signed witness statement
O-Y-O	13/04/2011	juv	Wongai camp zone	D	incorporating humans into pack behaviour' (went swimming with woman in ocean	woman was swimming and dingo joined her, she described him as playful.	ranger - dingo not discouraged from loitering around these campers	1-Feb		0 reiterated dingo safety	action on dingo to be determined at a higher level, consider closure of campsites, rangers be allowed to haze as soon as possible, consider employing casual rangers for holiday periods	Kim F	dingo also stole a towel placed it on ground and laid on it... seems to be a solitary dingo excluded from previous pack. Dingo had not been discouraged.	Y by persons involved	N/A	N/A
O-Y-O	13/04/2011	juv	OTR	C	accessed unsecured rubbish bag	camping		0	when it realised only empty	photos provided by campers, campers briefed, including importance of securing rubbish	exist on this dingo, action to be determined by management, more staff, consider closure of camp grounds, rangers to be allowed to haze	Kim F	Y by campers	N/A	N/A	
O-Y-O	14/04/2011	juv	OTR	E	circled adult female and four children (one a baby), attempted to drive them into ocean	swimming	severely habituated dingo - curious of activity in water, especially interested in children	5	woman yelled for assistance, another woman came down from campsite	details recorded thoroughly. Group praised for calm response under duress. Left messages for rangers in-charge	action on dingo to be determined at a higher level, consider closure of campsites, rangers be allowed to haze as soon as possible, consider employing casual rangers for holiday periods	Kim F	the dingo approached young boy and sniffed his hand which had earlier been cut and bleeding, did not bare its teeth or attempt to bite, dingo bounced around, didn't bark or yip. Left for a few seconds then came back and circled them again	N	N/A	N/A
orange'e	16/04/2011	juv	Wongai Camp Zone	E	dingo herded two men into ocean	walking along water's edge	severely habituated - aggressive/dangerous dingo	2	witness told men to 'stop wading away from him, cross your arms, eyeball him and growl at the dingo' and it lost interest	thorough report details taken and campers briefed	humane destruction	Kim F		0 N	N/A	N/A
O-B-O	19/04/2011	juv	Coolooloi Ck	D	growled and dominance tested a group of young adults fishing at the ramp, stole bait	fishing		0	when rangers arrived	dingo humanely destroyed as per humane destruction directive issued 16/04/11	Nil	Linda B	the aggressive behaviour was described as 'teeth were showing and it was growling at them with its tail up and front paws forward'.	N		
G-G-Pi	15/08/2010	juv	K'Gari	0	loitering, living under infrastructure, following closely	camping		0	when yelled at/chased away	yelled at/chased away		0 Anthony D	dingo came to within 2 metres of rangers & tour guide, moved from one backpacker group to another, uses a shelter as a resting area.			

Appendix 7

National Dingo Preservation and Recovery Program# Submission to the Northern Territory Coronial Inquiry into the death of Azaria Chamberlain, February 2012

22.02.2012

Ernest Healy,
643 Pascoe Vale Road,
Oak Park,
Melbourne,
Victoria 3046

The Coroner, Elizabeth Morris,
The Coroner's Office,
Magistrate Courts,
Nichols Place,
Cnr Cavanagh Street and Harry Chan Avenue,
DARWIN NT 0800

Re. Credibility of Fraser Island Dingo incident data

Dear Coroner,

I am writing to provide information which I believe may be useful to your deliberations in the Azaria Chamberlain inquiry, due to commence on February 24th, 2012.

The information relates to the credibility of dingo aggression data provided to the inquiry by the Queensland Department of Environment and Recourse Management (DERM) and to the credibility of the view held by DERM that dingoes that are 'habituated' to humans pose a particularly serious threat to human safety.

The National Dingo Preservation and Recovery Program considers that DERM's understanding and definition of dingo aggression and, therefore, its recording of incidents of dingo aggression towards humans has been seriously flawed. We submit that DERM's records of dingo aggression on Fraser Island do not provide an accurate indication of the propensity for dingoes to be aggressive towards humans. These records of dingo aggression reflect the mistaken assumptions about dingo behaviour which, unfortunately, underpin the Fraser Island dingo management policy (and about which the Queensland authorities have been constantly criticised), rather than any actual propensity for dingoes to pose a risk to humans.

The unreliability of the records derives from the fact that DERM has applied a ridiculously loose standard in labelling contact between dingoes and humans on Fraser Island as 'attacks' or as 'dangerous'. The Department has applied a no-tolerance approach to dingo-human contact, whereby virtually any contact at all may be deemed 'aggression' on the part of the dingo. DERM has persisted with categorizing the most trivial forms of contact as aggressive, for which large numbers of high-conservation-value dingoes have been destroyed. Essentially, DERM's strategy since the death of Clinton Gage on Fraser Island in 2001 has been to attempt a complete separation of the island's dingo population from the now massive tourist population. In this context, virtually any dingo that presents itself near humans has been treated as threatening by DERM operatives.

The key assumption within the Fraser Island management Strategy used by DERM in enforcing a no-tolerance approach to dingo-human contact is that dingoes which become 'habituated' to humans lose their fear of humans and, as a result, are prone to be aggressive towards them. An investigation

into the sources cited in the Fraser Island Dingo Management Strategy, and other DERM documentation, in justification of this assumption reveals that it is lacking in supportive evidence. Indeed, the key source cited does not support the 'habituation = aggression' assumption. Nevertheless, this is an idea that has been so often repeated by DERM management, and more broadly, that it has taken on a life of its own. On this issue, I invite you to read the document accompanying to this letter, in which I have investigated the sources cited by DERM in justification of their position. I believe it casts serious doubt on the credibility of the 'habituation = aggression' hypothesis.

I would like to emphasise to you that this criticism of DERM on these matters is not motivated by animosity towards DERM on my part, or on the part of the National Dingo Preservation and Recovery Program. Nor is it motivated by any naïve attempt to cast the dingo in the best light possible, regardless of the facts. My principal fear is that the false assumptions that have underpinned the mismanagement of the dingo population on Fraser Island may be used in context of the Azaria Chamberlain inquiry in a way that would lend further legitimacy to these false assumptions. I assure you that I am agnostic on the issue of the cause of Azaria Chamberlain's death. It would be an unfortunate outcome, however, if the conclusions of your enquiry were to be based on flawed data concerning dingo aggression and the poorly supported, but often stated, assumptions of the dingo management authorities on Fraser Island.

Thank you for your consideration of these matters.

Yours Sincerely,

Dr Ernest Healy –
President, National Dingo Preservation and Recovery Program (Inc. A0051763G)

The National Dingo Preservation and Recovery Program is a non-profit organisation that brings together environmental scientists, conservation organisations and concerned individuals to ensure the protection of the dingo as an integral part of Australian ecosystems. The organisation aims to:

- * encourage legislative and government policy change to ensure the protection and survival of the dingo in the wild, and

- *inform and educate the public and government as to the cultural, ecological and historical significance of the dingo.