

**Submission to the Senate Standing Committee on Environment, Communication and the Arts: Inquiry into the operation of the Environment Protection and Biodiversity Conservation Act 1999**

Submitted to:

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## **Warrigal - where have all the dingos gone?**

Who is looking after World Heritage Fraser Island, and, who is looking after the viable and sustainable genetic future of one of Fraser Islands significant world heritage and indigenous cultural and spiritual heritage values, the wild and threatened Fraser Island Dingo.

The Commonwealth *Environmental Protection and Biodiversity Conservation Act (EPBC)* is sleeping.

The practices and strategies, both conceptual and implemented by the current Fraser Island management agency EPA and its arm QPW, in no way reflect a harmonious, intelligent, informed, sensitive, ethical, ecologically and aesthetically integrated presence or custodianship, that in the 21st century would be mandatory in the critical conservation and preservation of biodiversity in 'Matters of National Environmental Significance' and precious 'World Heritage Values' - in particular an animal, vital to Fraser Islands ecology and a world heritage value itself and indigenous cultural and spiritual

heritage - the Fraser Island dingo. Many of us are of the view that the social and genetic fabric of this most pure strain of wild dingo is in a state of collapse, pushing the animal to the edge.

**We call for the EPBC to initiate a moratorium on dingo destruction on Fraser Island and a parliamentary inquiry into the reckless threatened dingo management and failed *Fraser Island Dingo Management Strategy FIDMS*.**

What we are witnessing on Fraser Island is a never ending script of a retrograde and perverse perception and implementation of preservation on every level. A mechanistic view of nature and an inability to perceive the inherently transitional and dynamic ecological and geomorphological nature, and the natural aesthetic and soulful beauty of Fraser Island. World Heritage Fraser Island is becoming an international showcase of

- Key Stone Cop wildlife management
- dingo killing fields
- frontal dunes littered with human faeces and rubbish
- irrational and propagandistic management
- a warlike agency with an 'arsenal' of attitude, infrastructure, and increasingly, heavy machinery
- a beach in an absent state of recovery
- the concept of beautification and preservation confused with uglification and devastation
- expose` of ugly infrastructure with highly toxic component materials Copper Chromated Arsenate CCA that is a registered hazardous substance and banned internationally
- lack of understanding of the concept of cumulative degradation of biodiversity and ecological integrity
- ignorance of, and unwillingness to voluntarily embrace the preservation of ecological integrity principles of the Commonwealth EPBC
- disregard for both State and Commonwealth international statutory obligations to the biodiversity and ecological integrity preservation and restoration principles of a range of treaties and conventions - in particular the *Convention on Biological Diversity 1992*

Most critical is *Canis lupus dingo*, remnant wilderness and dreaming, both commodified and vilified, on an edge in history, and, for thousands of years companion to the traditional owners of this country - is expected to both gratify and weather a proprietorial,

generationally urban stream of tourists and visitors, who are both covertly and overtly encouraged by EPA/QPW to project their fears and fantasies and inconveniences on to the animal, and, choose not to practice extra vigilance and a high level of personal accountability and awareness of where they have placed themselves.

This archaic, anthropocentric, mothballed world heritage Fraser Island 'wilderness experience' in the context of the dingo, is managed by the kindergardenesque, one dimensional *Fraser Island Dingo Management Strategy (FIDMS)*. A management strategy that

- by default promotes neglect of children in a wild place, usually on the highway which is the beach (where dingo/human interactions are likely to occur)
- promotes 'Hitchcockian' hysteria
- is deficient in a visitor enhancement of respect of the animal rather than sensationalism and fear
- in no way reflects the public perception of the conservation priority this pure strain of wild dingo is assumed to be afforded
- is contradictory and clearly lacks direction in the objective of preserving Fraser Islands wild dingo population
- is devoid of intelligent alternatives to destruction, in particular for juveniles vulnerable to being provoked into play and displays of misinterpreted developmental behaviour, by irrational and erratic human responses to the animals presence
- demonstrates a of lack of awareness of the intense vulnerability of the closed gene pool, that the Fraser Island dingo is
- lacks even the remotest reflection of preservation principles urgently needed to ensure the longevity of Fraser Islands wild dingo population
- promotes disintegration of dingo social and family dynamics and genetic groups
- is devoid of the knowledge of what constitutes a healthy social and genetically sustainable wild dingo population
- advocates persecution of, and cruelty to dingos
- is ignorant of critical historical wild dingo population and behavioural analysis, or even current social structures and family groups, the interactions of different family groups and territory range
- promotes a social and genetic dumbing down of the Fraser Island dingo population

- promotes destruction of critical dominant individuals (alpha males and females)
- lacks consideration of the unique nature, age and current or potential social and genetic status of individual dingos marked for destruction or otherwise,
- is based on reductionist science, so old, it has no relevance to the current dire circumstances
- lacks transparent, democratic, consultative, philosophical, ethical, scientific and public process

Further, the *Fraser Island Dingo Management Strategy* ethos is implemented by a sentinel core culture of long term, out of date EPA/QPW staff flanked by a constant stream of transient, novice and ill informed field staff. For some years now, we on Fraser Island have watched the systematic harassment, persecution and disappearance of an ecologically vital top predator and World Heritage Value, the wild Fraser Island dingo

- indiscriminate culling, baiting, relocation, stealing pups, trapping and exhausting the animal and damaging their fine legs
- setting dangerous traps in public places
- speeding up and down the sandy tracks of peaceful townships chasing dingos and checking traps
- discharging firearms within the townships, wounding and killing dingos in front of people, including a 15 year old boy who watched a shot bleeding wounded dingo, within the township, get finished off with another shot,
- outdated, officially sanctioned provocation and cruelty 'hazing' conducted by QPW rangers - slingshots with clay pellets and other harmful projectiles, trapping, running after and stalking in vehicles - fragment, disturb, distress and make the animals edgy ( attachment 1 Scene of Beauty Destroyed by Ranger)
- we see rangers slingshot dingos simply because they were visible walking on the beach
- we see rangers leaping out of their vehicle, flailing arms around yelling and chasing dingos along the beach and into townships, interacting and exciting them more than any resident or visitor ever would
- recorded dingo 'incidents' for transgressions as banal as 'dingo seen loitering near toilets', 'dingo seen soliciting food from fisherman', 'dingo loitering near buried fishframes', 'dingo digging up and eating fish-frames', 'dingo noted loitering on beach', ' dingo stealing food from unsecured esky' - the concept of 'habituation' and 'incident' taken to the dizzyingly

ridiculous (while the rest of the world believes an 'incident' is an aggressive act)

- we have had rangers drive urgently up to us, get out of the vehicle with a slingshot and tell us 'that dingo was sneaking up on you' when all along the dingo had been there minding its own business, nose to the ground, head tilted, ear hanging and head shaking with tag discomfort
- we see, the QPW sport of out dated ear tagging, the dingos ear being a critical and astute sonic translator of the animals world, result in ill-placed tags, localised ear infections, crinkled ears, young ears not fully developed hanging with the weight of the tag, vines and grass hanging from tags, often causing the animals to walk with heads lowered, tipped to the side, and with regular head shaking in an attempt to remove the source of aggravation. There are stories of very young dingo pups found dead within days of being tagged, appearing to have been killed by another dingo. Although we are aware that Alpha dingos kill the pups of non alpha dingos, this is still cause for concern that the forceful interference and interaction of tagging was the possible cause of their deaths.
- we see duplicated tags, one on a male and one on a female causing confusion
- we see the de-lamination of tags rendering the exercise of tagging a useless assault on the animal, as well as, faded tag colours causing mis-identification and identification confusion
- the fact that complete identification of the colour combinations only occurs if one is within a metre or two of a quiet dingo, raises questions as to the the viability and ethics of an invasive strategy that contributes so little to identification, apart from the day the tag was placed on the dingos ear or is removed from the dingos ear upon death or destruction
- we see, dingoes disappear that are not officially accounted for, in particular socially and genetically significant alpha dogs (attachment 2 Missing Alpha Male Eurong Family)
- we see the persistent indiscriminate destruction of dingos, particularly juveniles, often victims of social fragmentation due to QPW indiscriminate destruction - for the merest of perceived transgressions, with the onus, only ever, on the dingo (attachment 3 Destroyed Juvenile 11 month old male Eurong Family)
- we have watched; one known Happy Valley dingo family group completely disappear; another known dingo family group at Eurong in a state of social disarray and genetic collapse due to destruction, mortality ( attachment 4 Old Girl Eurong Family)

and disappearance, with only young inexperienced dingos remaining; another known dingo family group with only the old alpha male and female dingos remaining due to pups being removed or destroyed; a little further investigation would reveal the demise of other family groups such as Kingfisher and Lake Mackenzie and Orchid Beach

- there has been an alarming comment passed around 'get me a dog, any dog', also, we have been told on a number of occasions by the Fraser Island Area Manager Rob Allan at two different Fraser Island Association meetings, as well as the traditional owners being told, that if there is another incident 'they will kill them all' - that is, the powers that be, will kill all the dingos. This sort of rhetoric, anecdotal, or not, as in the first comment, belies a deceptive and sinister managerial ethos clearly not attuned to the conservation of this animal, nor the indigenous cultural heritage and spiritual landscape the dingo belongs to

All this, blithely perpetrated and sanctioned by a government agency that openly admits that it doesn't know how many dingoes are on Fraser Island, nor, what constitutes a sustainable population and demonstrates a serious lack of understanding of the animal. A regime referred to by some, as the 'secret dingo killing society', secret that is until it comes to discharging firearms within townships and wounding dingos in front of people, and, referred to by others, as an EPA/QPW private dingo research and autopsy farm that has little left but DNA to play with down the track - a more sensationalist re-introduction programme or a cyber-robo-frankendingo.

Beyond that, those who are closest and witnessing the harassment, cruelty and rapid decline in presence of the wild dingo on Fraser Island, know that the *Fraser Island Dingo Management Strategy (FIDMS)* and its indiscriminate implementation, is a Trojan Horse to this World Heritage Value, and the indigenous spiritual and cultural heritage value, the Fraser Island *Canis lupus dingo* - Warrigal - that should be protected by the preservation objectives of the Commonwealth EPBC Act. Following is a letter forwarded to me by two Eurong residents, disturbed by the current dingo management regime.

Dingo Cruelty Fraser Island  
30th May 2008

Please find following some dingo incidents that I have found to be cruel to the dogs, especially when they are found to be one of the most pure bred dingoes in Australia - who is looking out for the dingoes.

Mid April 2007 - There was notice on the beach in front of Eurong Second Valley, stating there was a 'dangerous/aggressive' dingo, which was actually trapped and killed at this time. The traps were set right in front of the Beach Houses in Eurong Second Valley and there was a witness to the capture and injection of the dingo as mentioned.

Just prior (maybe the previous day, or that morning) to this capture, I was driving down our track in Eurong Second Valley, and noticed the alpha female dingo of our area limping badly, hardly able to walk. There was also a dingo (a dingo not recognised) lying in the middle of the track not moving when approached by the car, which was unusual as they normally move off fairly quickly as a car approaches. So as not to disturb him I drove around him, which when alongside him, he was alarmed and tried to move, but after several attempts could not stand. Finally he stood up with the back leg affected, but the front leg on the same side was completely broken in fact bending where it was broken as he could not lift it high enough to keep it off the ground. He moved a few paces and just collapsed. The next week, you could hear him howling especially at night as he stayed within the township area, obviously not being able to move far. After several weeks he was finally able to put a small weight on the leg, but mainly limping. Because he stayed around the township area a lot of the time, most people knew him as a nice natured dog. Approx 8 or so weeks, he was killed - what, due to friendliness?? What about the days and nights he was in agonising pain?

Easter 2006 - There was a young dingo (just a puppy) running around with a bright pink collar on (due to research), so she was very easily recognised. Being busy here at Easter there were a lot of comments/talk about the pup. In the middle of the day there were gunshots very close to Eurong Second Valley (some said within the township) and we heard that the pup was killed. There were children crying, people upset by the obvious killing close to home and right at one of the busiest times of the year.

Another incident of the traps being placed between Eurong and Eurong Second Valley in an area that is used as a walkway by most of the residents and holiday makers staying here. A family and friends of the family, staying at their house in Eurong walked up the sandblow to view the whales as it is quite high, when the two men walked on the set of traps placed without any roped off area, signs, right in the middle of day. They managed to escape the traps unharmed and instantaneously stopped all the children from walking on these traps but were furious about them being set in the middle of a walking area without any signs etc certainly not safe for children, or for that fact any people walking. We then noticed some tape around areas in the same sandblow not knowing what they were there for, (maybe a collection of timbers that needed to be collected by QPWS), again people were walking through this area, not knowing what it was all about, luckily the traps were not stood on.

At this same time, some holiday makers were coming back through this same area at night and came across a dingo that had been trapped. She had been there for quite some time and was obviously distressed. She was frothing at the mouth, two of her legs on the same side were trapped. This was a dog that caused no problems at all and normally stayed well away from people.

Is this how the declining 'purest breed of dingoes' should be treated on Fraser Island.

Cruelty to animals - now the grids. I have seen, again the alpha female, the oldest in this area - walking across the grid and her legs were slipping down every step, it was alarming to watch, so sad to witness. There have been a few sightings of dingoes limping, is this also from them slipping into the grids. The grids nor the new supposedly 'dingo proof fence' will

not stop the dingoes, they are too clever for this. Stop the cruelty to the dogs (and to humans who can't manoeuvre the grids).

Can someone stand up and help the plight of the dingoes.

Lisa Walker & Steven Belcher  
Eurong Second Valley

On March 4 2008, in the aftermath of mind numbingly witnessing the aggressive bulldozing (attachment 5 Eurong Bulldozed) at Eurong for a dingo fence, and, one whole month prior to the senseless bulldozing of Happy Valley, the Queensland Compliance and Enforcement Branch of DEWHA was contacted. The expectation was, that the fundamental preservation principles of the EPBC Act would call for accountability of EPA/QPWs erosive and avoidable cumulative degradation of the integrity of Fraser Islands world heritage values - sustained through the conceptually reductionistic and hysterical implementation of an anachronistic and contradictory FIDMS. Our hope, was that at best, the EPBC would call for this unacceptable level of destruction to be withheld at Happy Valley, and the necessity for the dingo fence to be reviewed, or, at worst, its installation and all associated works, such as clearing, component materials, location, and stakeholder consultation, be directed by the Commonwealth Department to be conducted in a manner that harmoniously synchronised with the spirit of world heritage values, and, the concept of critical preservation of ecological integrity - the principles of which are inseparable from and advocate, an embracement of the well being of the community and community relations. In particular the community most directly affected. Devastatingly for us all, and despite the matrix of urgent concerns raised - the inextricable ecology, indigenous cultural heritage, spiritual landscape and the Fraser Island dingo - Happy Valley, along with Butchulla middens and artifacts was bulldozed - the antithesis of the legislated preservation objectives of the EPBC Act. The Commonwealth Enforcement and Compliance Unit of the DWEHA, hid behind a deliberate lengthy process of investigation, and was thus complicit with, what amounts to an environmental vandalic assault, that strikes at the very heart of universal environmental and ecological good will. That this could happen on a prestigious world heritage site, such as Fraser Island is incomprehensible. ( Attachment 6 and 7 Aunty Mally)

The Departments superficial interpretation, assessment and conclusion of the investigation on 28th May 2008 (which had been on



hold due to the negative publicity surrounding the fence) found EPA/QPWs environmentally destructive and futile activities in relation to dingo management - **'the Department recognises that the clearing of vegetation around the Happy Valley and Eurong townships for the purpose of firebreaks'**, which, in some areas in Happy Valley at least, have been constructed, along with the fence, in breach of the Emergency Services recommended defendable zone - is a frightening demonstration of the ecologically inter-dimensional ineptness of the EPBC Act, the chronic impotence of the Departments compliance and enforcement administration, and evinces an urgency, for a more astute and holistic definition and interpretation of the Acts preservation of ecological and cultural and spiritual heritage integrity objectives, and national and international biodiversity commitments.

In 2006, the Australian Institutes independent inquiry into the effectiveness of the Commonwealth *Environment Protection and Biodiversity Act 1999* (EPBC Act) and the implementation of compliance and enforcement of the Acts statutory biodiversity and ecological integrity conservation objectives, and its environmental achievements in the protection of Matters of National Environmental Significance and World Heritage Values, which Fraser Island and the Fraser Island dingo is, aptly describes the EPBC Act as an 'ongoing failure'. The FIDMS can also be described, as 'an ongoing failure'. In fact, the FIDMS is such an 'ongoing failure' that the Fraser Island dingo management team, in an effort to shore up the strategies hemorrhaging public inefficiencies, over a beer, identified the two tiny peaceful Fraser Island eastern beach townships of Happy Valley and Eurong, as the source of the strategies ineffectualness and resultant disgraceful loss of dingos to mindless management and indiscriminate state authorized destruction.

In an orchestration of contempt for Commonwealth and State statutory, ethical, consultative, environmental and duty of care obligations, as well, as the rights, safety and wellbeing of stakeholders, the local Butchulla, private property owners, residents and the dingo; contravening the 'desired outcomes' of the World Heritage Fraser Island *Great Sandy Region Management Plan* (GRMPS); and, a smoke and mirror act to avoid triggering legislated compliance and enforcement of the EPBC Act - EPA/QPW master drafted a punitive, ad-hoc non statutory action, without due consultative process on any level, to 'fence 'em in' - a management action not even alluded to nor recommended as a significant action by Dr Laurie Corbett in the 2003 audit of the 2001 FIDMS - a dingo fence around the townships. Otherwise know as 'the dingo fence debacle' or 'the dingo fence fiasco'. (Attachment 8 Dingo Walking Grid)

The Queensland State Government, without scrutiny, or, comprehensive transparent procedural, conceptual or scientific accountability from EPA/QPW, handed over to the maverick Fraser Island EPA/QPW, a cool \$750,000.00.

The \$750,000,000 was not utilized to initiate a transparent inquiry into the current dingo management strategies weaknesses and inconsistencies both conceptual and administrative, nor, to create a cutting edge, holistic preservation and restoration initiative befitting a twenty first century consciousness of critical cumulative global ecological degradation and a threatened animal - but instead, in keeping with the anachronistic EPA/QPW culture, the embodiment of outdated behavioural reductionism and the very proprietorial, mechanistic view of nature responsible for global ecological degradation - EPA/QPW, in an assault on community and public relations, bulldozed precious habitat and indigenous cultural heritage, to build an ugly ole toxic arsenic (Copper Chromated Arsenate CCA) post and dog mesh dingo fence on a prestigious World Heritage site - implemented in the name of the comprehensively emaciated *Fraser Island Dingo Management Strategy (FIDMS)* and subsequently disguised by the Commonwealth EPBC as being in accordance with the *Fraser Island World Heritage Area Fire Management Strategy*.

From November 2007, and, in particular from mid February 2008, after the bulldozing of Eurong, many of us on Fraser Island were in communication with the DWEHA, the Premiers office and, the office of Minister for Sustainability, Climate Change and Innovation, registering our objections and reasonings for why the proposal and concept was so inappropriate. We appealed for a review of the FIDMS itself and its implementation, with its associated extremity of, overkill infrastructure, ongoing demand on both human and non-renewable resources and costs, environmental damage, destruction to cultural and spiritual heritage, and its irrationality as environmentally ethical and viable dingo management - in particular, with the absence of negative dingo/human interactions, and the potential of dingo/human interaction to occur on the wide open beaches where thousands camp throughout the year. At the time, Happy Valley had one known remaining dingo which regularly was not seen for months at a time, making the cost per dingo and the entire concept absurd. (attachment 9 Dingo Proof Fishing Happy Valley Fraser Island), (attachment 10 Energex Community Rescue Helicopter callouts to FI, not for dingo incidents)

We asked for scientific documentation, and the alleged dingo incident details in relation to Happy Valley, that could demonstrate the need for the fence. Although the advisor repeatedly requested this information from QPWS it was unforthcoming. After the bulldozing of Eurong township and prior to the bulldozing of Happy Valley, photographs of the extent of the

destruction to Eurong were forwarded to the DWEHA, The Premier, Minister for Sustainability, Climate Change and Innovation, and the policy advisor we were communicating with, and all were informed that the bulldozing at Eurong had gone through the local Butchulla middens. We requested the bulldozing be withheld until documentation could be forwarded and reviewed. Such a mindless destructive act was incomprehensible.

Also, in our communications to the above Departments, we questioned the highly toxic attributes of CCA ( a registered hazardous substance under further review by the Australian Pesticides and Veterinary Medicine Association APVMA) as the proposed component material to be used for the dingo fence. We were concerned as to the environmental ethics of the persistent use of a known carcinogen such as arsenic, on a world heritage site, and requested that if the fence had to be built, a benign component material was more appropriate. Also, we informed the Departments that the material was hazardous to children and animals, particularly dogs and cattle. In the past, due to arsenic being a salt, arsenic licks were used to kill dingos belonging to the aboriginals as the most effective way to bring the culture to its knees. So far, there has been two reports of dingos seen licking CCA timber on Fraser Island. The Victorian Environmental Health recommendations (below) regarding ash from CCA, in post bush fire circumstances, spell these concerns out even further.

Following, is a copy of a section of the email forwarded to the Minister for Sustainability, Climate Change and Innovation, The Premier, the EPA/QPWS Area Manager Rob Allan, as well as the Queensland Compliance Enforcement Branch of the Department of Environment, Water, Heritage and the Arts. The email contained extensive information, research results, and further internet links.

(copy)

'Just to put forward a view regarding CCA timber. A product with such a scientifically proven propensity for leeching contaminants into the environment, is not an appropriate material component for any application on a site such as World Heritage Fraser Island. Although it will probably be claimed as insignificant in quantity, its increased use on Fraser Island contributes to a systematic degradation of the islands world heritage values. Also because arsenic is a salt there are concerns that animals and children lick the product. Following is some info re CCA'

**'PRECAUTIONS for young children and farm animals**

Young children are more likely to put the ash in their mouths, and swallowing only a few grams of ash is harmful. Farm animals may

also lick or swallow the salty ash residue. Children, pets and farm animals should be kept away from CCA ash until it is cleaned up.' ( Ash from CCA Treated Timber Environmental Health, Victorian Government Health Information. [http://www.health.vic.gov.au/environment/emergency\\_mgmnt/ash.htm](http://www.health.vic.gov.au/environment/emergency_mgmnt/ash.htm))

### **Canberra Fires 2003**

"Australian research by Tame et al (2003), has tested ash from burnt CCA-treated pine for polychlorinated dioxins (dibenzo-p-dioxins) and furans (polychlorinated dibenzofurans, PCDD/F), well-known atmospheric pollutants. They concluded that these pollutants formed mainly during the smouldering of the char (ash), raising concerns about the impacts after bushfires in residential areas, such as Canberra during 2002. In Canberra 55 sites were contaminated with treated timber ash. Site remediation required removal of 2000 tons of soil, took a year to complete and cost around \$3,000,000 (Godson, W. Pers. Comm., 27/2/05)"  
Quote from Treated Timber (Nina Lansbury Hall and Sharon Beder paragraph2) <http://homepage.mac.com/herinst/CCAtimber/waste/incineration.html>

The US EPA advises:

Saw, sand and machine CCA-treated wood outdoors. Wear a dust mask, goggles, and gloves. Clean up all sawdust, scraps, and other construction debris thoroughly... Do not compost or mulch sawdust or remnants... Do not burn CCA-treated wood, as toxic chemicals may be released as part of the smoke and ashes. After working with the wood, wash all exposed areas of your body, especially the hands, thoroughly with soap and water before eating, drinking, toileting, or using tobacco products. Wash your work clothes separately from other household clothing before wearing them again. (Office of Pesticide Programs, 2002) Quote from Treated Timber (Nina Lansbury Hall and Sharon Beder paragraphs 1,2,3,4,5)  
<http://homepage.mac.com/herinst/CCAtimber/health/workers.html>

### **Hurricane Katrina**

'Hurricane Katrina. Of the 72 million cubic meters of disaster debris generated, roughly 12 million cubic meters were in the form of construction and demolition wood resulting in an estimated 1740 metric tons of arsenic disposed. Management of disaster debris should consider the relatively large quantities of arsenic associated with pressure-treated wood.' ( [http://pubs.acs.org/cgi-](http://pubs.acs.org/cgi-bin/abstract.cgi/esthag/2007/41/i05/abs/es0622812.html)

[bin/abstract.cgi/esthag/2007/41/i05/abs/es0622812.html](http://pubs.acs.org/cgi-bin/abstract.cgi/esthag/2007/41/i05/abs/es0622812.html) )

Our concerns regarding this highly toxic product and its international status as a banned product altogether were ignored and the product installed. Our concerns regarding it as potential hazard to dingos was also ignored. Also, during throughout the construction of the fence the wood spoil from the CCA was left lying along both fence lines. Although we requested it be removed we were again also ignored.

**(Profile of an Agency in charge of the threatened Fraser Island**

**Dingo:** As an example of the low level of consideration on every level involved in the management and installation of the dingo fence project, the concept of the Kingfisher dingo fence, with one electrified cattle grid over one kilometer from the western beach, was transposed, with nine lethally modified, electrified cattle grids, on to the two eastern beach international/local focal points of visitation, the townships of Happy Valley and Eurong. Even the most basic of mandatory requirements, a survey of each of the proposed sites, did not occur. This resulted in the fence, along with a number of these conceptually barbaric cattle grids, being built, unknowingly by EPA/QPW, along almost the entire length of the gazetted road called The Esplanade. The Esplanade runs along the beachfront of the Eurong township. One property had the fence built, in their absence, across the access to their property. Also EPA/QPW failed to conduct a safety risk analysis of the potential hazards and insitu safety consequences of the fence and the nine lethally modified, electrified steel cattle grids, installed it the two townships. EPA/QPW had also not taken pedestrian gates into consideration, leaving walkers with no alternative but to walk across the grids. The pedestrian gate they did think to install, was next to the beachfront grid at Eurong, however, the gate, being constructed of the same material, dimensions and colour as the fence, was not discernible as a gate, resulting in international tourists falling in the infamous Eurong beachfront grid and being injured, while heading to the beach for sunrise - a number of which were taken by the Energex Community Rescue Helicopter to the mainland for medical treatment and stitches. This high level of injurious incidence in one month out performed Fraser Islands negative human/dingo interactions. In fact, over a period of the last almost four years prior to the installation of the grids, the Fraser Island paramedic had attended only one negative/human interaction that did not require any medical aid. In a recent local newspaper interview an Energex spokesman estimated it to be going towards five years since there was a call out regarding a Fraser Island dingo episode. Over a period of six weeks during August and September 2008 Energex was called to Fraser Island twenty eight times, and on average touch down on Fraser at least ten times in one calendar month for a range of other incidents. While, unexpected to EPA/QPW, the dingos mostly leapt over the grids, or, trotted across them, a

number of dingos have been witnessed and photographed falling in the grids causing pain and injury to them - with one leg wound, and the witnessed incredible blood loss on the grid and along the one kilometer he walked immediately after the accident occurred, causing, the now destroyed 11 month old juvenile dingo, to be laid up for days. He was destroyed 7 July 2008 for scratching a 19 year old tourist on the back of her leg (the evening he first began to walk around). The tourist became distressed when she accidentally came upon him in the dark, inside the fence at Eurong. Unlike the tourists injuries resulting from falling in the grid, her scratch did not even require a band-aid. All this, prior to electrification resulted in EPA/QPW removing the already installed, but not yet electrified trip wires, stake open all the pedestrian gates, and fill the grids with sand bulldozed from the beach ( photo of bulldozer on beach) - the electrification is proposed to be installed any time soon. ( It is a well known fact that if someone with a pace maker gets a shock of any kind they have to go to the hospital to get the device inside their chest interrogated. Shock can also cause the wires of the device to fry. For people with weak hearts any level of shock can cause a change in rhythm which has the potential to be fatal.) Aside from all that, the over kill presence and maintenance demand on human and non-renewable resources and associated heavy noisy polluting machinery, and the ugly conceptual and physical nature of the fence and electrified cattle grids, are out of sync with EPBC and contemporary international ecological integrity objectives, cutting edge minimalist intervention and integrated ecological aesthetics - and the beautiful wild gentle and alluring nature of Fraser Island - Kgari. EPA/QPW were also aware that the disturbance they were to cause would result in the bulldozed lines being colonized by both weeds and the introduced Black African Ant, known to displace the local Fraser Island ant species. This is inexcusable.) (Attachment 11 Sand Chokes Dingo Grids)

A Senate Inquiry, in 2006, held to consider amendments of the EPBC Act, found administration of the Acts objectives, of the conservation of biodiversity and ecological integrity, to be chronically under-resourced. The International Fund for Animal Welfare (IFAW) in its submission to the current Senate inquiry into the EPBC Act points out that - ' without sufficient Federal Government commitment, resources and political will to implement and enforce the Act's provisions, biodiversity conservation in Australia is without foundation and will certainly fail to achieve its objectives and international obligations under the *Convention on Biological Diversity 1992 (CBD)*.

Notwithstanding the fact that, behind every dune on World Heritage Fraser Island there is human faeces, (Attachment 12 Human Faeces From Short Term Campers at Beach Camping Zones) every nook and cranny on the eastern beach is littered with thousands of cigarette butts and trash from the ocean and uncaring visitors, (Attachment 13 and 14 Rubbish on Fraser Island Ocean Beach) and that the eastern beach remains in an unaddressed

perpetual state of absent recovery ( Attachment 15 Squashed Crab on Beach) - in mid February 2008 and early April 2008, the publicly decried lack of Queensland EPA/QPW resources was called onto action to heavily handedly bulldoze, through World Heritage Fraser Islands virgin coastal woodland, two 8m wide swathes around the two tiny eastern beach townships of Eurong and Happy Valley - focal points of national and international visitation - both, nestled in stunningly complex and uniquely vegetated World Heritage frontal dune systems, and both, dune catchments to small but significantly populated wetland habitat of World Heritage and RAMSA foreshore wetlands on World Heritage Fraser Island - all, potential habitat for rare, vulnerable and threatened species listed in the *Queensland Native Conservation Regulation (1994)* and the *Commonwealth Environmental Protection and Biodiversity Act 1999*. At the time, as far as dingos were concerned, there was one remaining dingo known to Happy Valley who regularly was not seen for many months at a time. As with along the beach and all camping zones, other dingos would be seen passing through town.

According to the EPBC Compliance and Enforcement branch, none of the above rated as having any impact on a 'Matter of National Environmental Significance' nor 'World Heritage Values' with the 'investigation on hold due to the publicity'. Even more concerning was that in April the Fraser Island World Heritage Scientific Advisory Committee, on its return to Canberra after a Joint WHFSAC, CAC and IAC on Fraser Island (some of the destruction was viewed) advised that the damage did not effect 'World Heritage Values' or 'Matters of National Environmental Significance'.

The DWEHA Compliance and Enforcement Branch letter on 29 May 2008, three months after initial contact, which was one month prior to the bulldozing of Happy Valley, states the investigation found **'the firebreaks were constructed in accordance with the *Fraser Island World Heritage Area Fire Management Strategy*' - 'the clearing for the firebreak is not an action that triggers a compliance response under the EPBC Act'**.

However, the bulldozed line is not a firebreak for the townships, but a fire break for the fence. Neither of these bulldozed lines, with sliced open high frontal dunes within metres of private property, and especially the firebreak section by the sea, has ever been perceived as necessary, requested, nor discussed or negotiated with EPA/QPW, by the two township Fire Chiefs, the NRW Rural Fire Team or the State Emergency Services Fire Team. All are involved in the fire management of Fraser Island - no such fire break action was required in relation to the *Fraser Island World Heritage Area Fire Management Strategy*.

In relation to the Environmental Impact Report November 2007 compiled by EPA/QPW in November 2007 that purports to give EPA/QPW clearance for '**considerable disturbance**' around the townships of Happy Valley and Eurong, the EPBC compliance units findings were - '**Similarly the department considered the Environmental Impact Report prepared by QPW, and its conclusion that the Dingo-deterrent fences constructed within the firebreaks are unlikely to have a significant impact on matters of environmental significance**'.

While the Department may have viewed the seemingly benign, but misleading EIR, which itself is of questionable status and answerable to whom, the EPBC Qld Compliance Department also received reports and photographs demonstrating that EPA/QPW were not following even their own development recommendations. In particular, the recommendation that the dunes be '**cleared by hand to avoid unnecessary erosion**' (QPW EIR Nov 2007). However, in both townships the undulating, catchment frontal dune systems, along with Butchulla middens and artifacts, were sliced open and ripped apart by a bulldozer and continue to collapse. Also in the EIR, the dingo risk rating presented for Happy Valley as justification for the fence was fabricated and blatantly contrary to EPA/QPWs own documentation of risk ratings. The EPBC compliance unit turned a blind eye.

Further, the QPW Environmental Impact Report had no reference to the

- *Fraser Island World Heritage Area Fire Management Strategy*
- *Great Sandy Region Management Plan 1994-2010*
- *Aboriginal Cultural Heritage Protection Act 2003 (Qld)*
- *Aboriginal and Torres Strait Islands Heritage Protection Act 1984*
- *Native Title Act 1993 (Cth)*
- fact that it was Unallocated State Land (USL)
- disturbance to Butchulla cultural heritage, middens and artifacts bulldozed or the possibility of unearthing human remains.
- nine dangerously modified electrified steel cattle grids

This entire infrastructure is inconsistent with the desired integrated ecological aesthetics and minimised risk outcomes of the *Great Sandy Region Management Plan 1994-2010 Review 2005*:

- p86 "Desired Outcomes. By or before 2010, to have minimised risk to visitors and public liability. As far as practicable, damage, deaths or injuries associated with recreation activities will be limited to those



caused by willful misbehaviour or **unforeseeable accidents.**"

- p85 "management must consider what measures can and should be reasonably taken in different circumstances to try to prevent harm.
- p22 refers to "a secure community setting for those people living within the region."
- p33 "preservation of all landforms and soil to the greatest possible extent" - "impact assessment and development approval through the IDAS and other legislative requirements will be required for all proposed developments, including minor works that disturb geomorphological processes
- p35 "management practices will be in line with research results"
- p37 "Desired Outcomes. By or before 2010, to have all developed areas or areas disturbed by human activity within the Region visually integrated with the surrounding natural landscapes  
p38 "scars (that) have resulted from previous activities be rehabilitated" as "they intrude on landscape values"
- p45 "Desired Outcomes – to have land eroded by non natural activities restored as closely as possible to their original condition"
- p58 "minimisation of earthworks ... provision to minimise visual impact of developments

Who is this maverick EPA/QPW answerable to if not the Commonwealth EPBC Act. How is it that any private developer should be expected to have regard for environmental concerns or Australia's own, or, international biodiversity and ecological integrity conservation objectives and obligations, when this is how World Heritage Fraser Island's registered custodian EPA/QPW conduct their so called environmental affairs, and the Compliance and Enforcement Branch of the Commonwealth EPBC Act's assesses triggers for compliance and administers enforcement of compliance.

The Departments letter of response 29th May 2008, to the investigation of the Fraser Island Dingo Fence, dingo management and its associated concerns, there was no mention of the plight of the threatened Fraser Island dingo, no reference what so ever to the conceptually barbaric, nine lethally modified electrified cattle grids, and no mention of CCA as having any impact on either the dingoes nor the tangible or intangible world heritage and cultural heritage values of the internationally prestigious world heritage Fraser Island -

all of which are 'Matters of National Environmental Significance' and 'World Heritage Values', the integrity preservation of which are the core objectives of the *Environmental Protection and Biodiversity Conservation Act (EPBC)*.

With the Queensland's EPA/QPW current FIDMS successful management towards extinction of an animal on the edge on a world heritage site like Fraser Island, and, its Commonwealth monitor the EPBC Act in a state of amnesia with its administrative and compliance enforcement of ecological integrity preservation of biodiversity objectives an 'ongoing failure', where, and, to whom does Fraser Island and the Fraser Island dingo turn to next.

Since the eastern beach fences have been constructed, but not complete, dingos have disappeared at an alarming rate. As the saying goes in relation to the Kingfisher Dingo Fence - 'before and after the fence went up, they killed the dingos to prove the fence works'. The remaining dingos which frequented Kingfisher were seen regularly within the Kingfisher compound, and witnessed crossing the electrified cattle grid situated over one kilometer from the beach. This grid was locally known to rarely work since being installed in 2005. However, over this year, during the construction of the eastern beach dingo fence and associated proposed electrified modified cattle grids, these sighting of dingos at Kingfisher have become rare, along with each years pups disappearing at an alarming rate. While many are aware of the high dingo mortality rate, and that, 'being killed' is anecdotal, the visible absence of dingo presence has everyone concerned as to to what is going on.

Alarmingly, EPA/QPW appear to have the misguided view that if they destroy all the dingoes that have exposed their presence or 'loitered' or 'solicited' in a public place, or walked in family groups on the beach, they will have solved all of their problems. This is an unreasonable and genetically detrimental expectation of an animal that inherently frequents open spaces, hunts and scavenges food on the beaches and is historically associated with humans - that is, humans who do not view the dingo as 'other', nor commodify, nor vilify, nor fantasize, but simply embrace as a part of the everything we all are.

While all canid species can potentially be dangerous, the dingo is not an inherently dangerous animal that stalks around looking for people to attack. The reality on Fraser Island is that it is the EPA/QPW, along with tour companies and tourists, who are stalking the dingos. Rather than killing all the dingos for an 'in the bush clean slate', change the perceptual culture that EPA/QPW and the tourist industry have created and reorientate the focus of management off the dingo and onto the visitor - extra vigilance,

responsibility and accountability. Leave the dingo alone and the dingo will look after itself.

With three international tourists a year rendered quadreplegic, the alluring Lake Wabby is more dangerous than the dingos could ever be. Would this not be, though, an abandonment of extra vigilance and personal accountability - and nothing to do with Lake Wabby.

Something so irrational and so absurd has gone on here. All this at a time when there are calls for 'the great Australian dingo fence' to be removed due to its inefficiencies on every level, including the degradation of biodiversity in areas where the dingo was most absent.

Every department and each individual who was party to the 'dingo fence debacle' from conception to its implementation, and, all of those who had the power to have stopped it, need to be utterly ashamed of themselves for indulging in something, so conceptually small, so uninspired, so destructive, so hazardous, so ugly, and so utterly dysfunctional as a strategy in the preservation of the Fraser Island dingo. The contracted concept of the dingo fence is incongruous with the generous and expanded wilderness nature of Kgari. This fence is an imposition and a degradation of the spirit and soul of country.

**All of us who have watched all of this call for the EPBC to urgently action a moratorium on the dingo killing on Fraser Island and to initiate a Parliamentary Inquiry into the dingo management and its administrative history on Fraser Island.**

**Many of us fear we are witnessing a dingo genocide and call for the Commonwealth to intervene. EPA/QPW have demonstrated their agency is disabled in the management of this animal**

### **Recommendations**

- 1. an immediate official moratorium on the destruction of dingos for banal transgressions and perceived negative interactions sustained through negligence or provoked by hysteria.**
- 2. a parliamentary inquiry into what has gone on and is going on with dingo management on Fraser Island.**
- 3. public accountability for those EPA/QPW staff involved in misrepresenting the the dingo risk analysis rating for Happy Valley in the EIR, used as justification for the dingo fence**
- 4. an official disbanding of the current EPA/QPW dingo management team.**

5. a new publicly transparent Fraser Island Dingo Management Strategy created that is capable of a dynamic, responsive, communicative and holistic perspective of, the complexity of wild animal management, befitting the twenty first century principles of preservation, (and low impact observation) rather than the cliched controlling, behavioural reductionism and mechanistic perspective of nature that EPA/QPW demonstrate on a daily basis.
6. a new dingo management strategy that embraces the innate characteristics of the dingo. The dingo is a highly cognitive animal that displays curiosity, behavioural development and intelligently interacts with the world it lives in.
7. that a criteria of what constitutes a sustainable robust dingo population be urgently investigated.
8. that the management team do not perceive the wild and highly cognitive dingo as a personal challenge and something to be conquered
9. that the wild dingo and its innate hunting tactics are not demonised
10. the dingo has a complex social and family group structure and when seen in groups should not be the subject of ill-informed psychological projections nor fragmented by culling and hazing simply because they were there.
11. a new publicly transparent dedicated dingo management team be initiated, where, the psychological profile of each team member ensures the animal an umbrella of universal commitment to preservation and continuity on every level, as opposed to for example, the current dingo management team member position description of, pest extermination capability with a fire arm licence.
12. the new management team should have a capacity to scrutinise and identify, both, incident reporting, and political directives for phobic projections or revenue desire, and, refuse to heroically embellish or pander to misunderstood, misinterpreted and misrepresented dingo behaviour. We are talking about an animal that in a very short while may simply 'not be'
13. each team member is a dedicated, informed and perceptive professional befitting the status of the animal as threatened, and is capable of responding accordingly with discerning, insightful collation of observations, rather than an ad-hoc party line field team chasing, hazing and randomly recording banal and ridiculous 'incidents' on individual dingos.
14. that true 'incidents' of negative/human interactions be reported to the management team and not canvassed for by the

management team. Canvassing incites over interest in the animal for all the wrong reasons.

15. a management ethos that acknowledges and accommodates the important fact that dingos prefer to walk in and frequent open spaces, such as beaches, roads and fence lines and in particular, lakes for fresh water.
16. that the new management strategy acknowledge that the dingo traditionally existed in the company of the traditional owners of this country and on Fraser Island the period without that company is historically very short and was continued by the Forestry, Queensland National Parks and Wildlife, the residents and the public. In this context, the aim of the current management regime to have dingos retreat into the bush is unrealistic and illinformed, especially when 350,000 faces a year enter the animals territory. To embrace this perspective does not equal condoning feeding and interaction. This perspective embraces a transitional process and time for the dingos to rebuild genetic social, and family group structures
17. the onus off the dingo and on to the visitor. Visitors to Fraser Island should modify their behaviour to not attract or interact with the animals. If visitors are not comfortable with wild animals that are imperative to a healthy and vibrant ecology then it may not be the place for them to holiday. Other wise its simple, extra vigilance is required in particular with children.
18. that unless small children are within arms reach it be regarded as negligence, just as it would if a child was beyond arms reach in the main street of a city.
19. hit and run incidents causing injury to, or, the death of dingos on the beach should be should attract severe penalties.
20. the speed limit reduced to accommodate the peaceful pace of nature on Fraser Island.
21. the current practice of burying fish frames be reviewed more carefully. Dingos with their heads in the sand are vulnerable to being hit by vehicles, particularly at night. Fish frame disposal into the ocean is cleaner and safer for scavenging dingos - scavenging (cleaning) being an important aspect of the dingos role as Fraser Islands top predator.
22. juvenile dingos displaying natural developmental behaviour should not be destroyed. It has been proven, that if left alone they can become aloof and distant adults. Many of us on Fraser Island are of the view that this 'public display' of juvenile behaviour is the result of state sanctioned indiscriminate culling that has undermined the social fabric of the dingo.

23. **management alternatives to destruction be considered for dingos that have engaged in developmental behaviour with humans.**
24. **the commodification of the dingo to encourage tourism in any form cease immediately. This is an animal on the edge and revenue driven agendas are ethically and environmentally inappropriate.**
25. **'hazing', sanctioned aggravation and harassment of an animal be forthwith banned. Hazing dingos has only a momentary effect on an animal that is committed to its territory, but has long term negative behavioural effects resulting from persistent and deliberate aggravation. This along with tagging is forceful interaction. Ignored dingoes generally go about being a dingo if they are just left alone.**
26. **a moratorium on tagging and that the activity be fully audited**
27. **menstruating women should be publicly informed not to take walks on their own in early mornings and late afternoons if they are unable to cope with a dingo showing too much interest.**
28. **that it seriously be taken into consideration that historically, Fraser Island locals and seasoned visitors have little to no issue with dingos. This is an important fact that exposes the QPW prescriptivism of visitor perception.**
29. **the behavioural reductionism and antiquated scientific notion that feeding equals aggression in the context of the dingo is incorrect and should be left to fade away. This is the concept of habituation reduced to its lowest common denominator. A new perspective does not mean condoning feeding or interaction with dingos.**
30. **that dingos should not be interfered with in any way and that fines for such be increased.**

Bree Jashin  
Happy Valley  
Fraser Island