

Guidelines for feral animal control on organic properties

All land managers are required under state biosecurity legislation to manage feral animal populations. The National Standard for Organic and Bio-Dynamic Produce (Standard) is the Australian Export Standard for products labelled organic or biodynamic. Each certifying company operates under its own compliance variation of the Standard. Organic certifiers recognise the need to manage feral animal species and their populations to meet these legislative requirements, but also to reduce environmental damage and the animal welfare impacts of predators on livestock production.

Best practice management of feral animal species requires an integrated approach using a variety of techniques aimed to target vulnerable periods of the species' ecology and/or limiting predation on livestock. In the case of highly mobile feral animal species such as wild dogs, foxes and feral pigs, landholders are encouraged to deliver coordinated control and baiting programs at local and regional scales. These regional baiting programs involve the use of Sodium Fluoroacetate (1080) baits which is a prohibited substance under the USDA National Organic Program (USDA NOP). Therefore, 1080 cannot be applied in areas that are organically certified as USDA NOP.

Processes exist whereby non-permitted substances can be used on an area of land removed from the organic certification. In this case, 1080 products may be used to control feral animals on fully fenced parcels of land removed from the organic footprint. Information on nationally endorsed, best practice, feral animal management techniques to be used in these excised areas are provided in the guidelines and it is expected that operators liaise with their certifying organisations to obtain appropriate approval before starting any control activities.

The checklist below and attached guidelines have been provided to guide the operator through the process required by certifying organisations to receive permission to use a non-permitted substance, in this case sodium fluoroacetate (1080) under limited circumstances on a property for the purpose of controlling feral animal species. Always check with your certifying organisation **BEFORE** embarking on any chemical-based control to ensure any accreditations properties/businesses have are not put at risk.

<input type="checkbox"/>	Map of area excised from organic certification for the purpose of feral animal control using 1080 poison. (Refer to Section 1 of the Guidelines)
<input type="checkbox"/>	The Management Plan of the certified operator outlines how livestock will be managed to restrict access to areas where 1080 baiting will occur. (Refer to Section 2 of the Guidelines)
<input type="checkbox"/>	The Management Plan will outline how and when baiting will occur in relation to the feral animal species to be controlled. (Refer to Section 2 of the Guidelines)
<input type="checkbox"/>	Is ground baiting be used? (Refer to Section 3 of Guidelines)
<input type="checkbox"/>	Is aerial baiting to be used? (Refer to Section 4 of Guidelines)
<input type="checkbox"/>	Is the feral animal control program being delivered as part of a regional program? (Refer to Section 5 of the Guidelines)
<input type="checkbox"/>	Has consultation occurred with the relevant statutory authority, state government agency and neighbours regarding the feral animal control program being delivered? (Refer to Section 5 of the Guidelines)

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Guidelines

Section 1. Creation and or use of non-certified land

- Feral animal management including wild dog control may be required to be undertaken annually as part of regional control programs or on an ongoing basis to manage feral animal populations to reduce impacts on livestock and the environment.
- Certified operators may consider removing a portion of land from their certification for the purpose of undertaking wild dog and feral animal control including baiting with 1080.
- Operators will need to determine the portion and size of the land to be removed from the certification for baiting and develop a program based on best practice techniques and technology suitable for the feral animals to be targeted and the environment or landscape where they exist.
- The period before this portion of land can be brought back into full organic status - should it be required - after the baiting, is three years.
- Areas that are permanently fenced to exclude livestock may be removed from organic certification for extended periods and would therefore be the most suitable for control of feral animals using baits or ejector devices.
- These areas may include fully fenced buffer zones set aside for environmental and biodiversity purposes, and other sites such as fenced watering points like ring tanks or turkey nests, or any other portion of land not used for organic production purposes.
- Operators must notify their certifying organisation of their intent to undertake feral animal control using baits and ejectors, prior to undertaking and receiving approval to remove a portion of land from their certification for the purpose of undertaking the control action.
- Operators must notify their certifying organisation and follow the appropriate process to remove a portion of land from organic certification.

Section 2. Detailed “Organic” management plan outlining when baiting is to occur and how livestock will be excluded from baited areas

- The certifying organisation will grant approval for the use of baits or ejector devices on non-certified portions of land on the receipt of an organic management plan (Plan) that clearly indicates how livestock will be managed and excluded from areas where baits are laid.
- The requirements for operators/landholders to use 1080 vary in each state so it is imperative you contact your local authority to find out what these may be prior to embarking on a baiting program.
- The Plan will clearly detail the operator’s chemical endorsement or licence to use 1080 where required by the local authority.
- The Plan will also identify when baiting on non-certified portions of land will take place in relation to regional feral animal management programs and ongoing on-farm management programs.
- It is expected that the operator will utilise current best practice information on feral animal ecology, behaviour and management techniques in order to maximise the effectiveness of the program while minimising the amount of bait used. Links to current best practice information are provided below.
- The Plan will clearly identify the bait type or ejector device to be used in relation to the feral animal species that is to be controlled on the property.
- Assistance and templates for the development of feral animal management plans is available through Regional Wild Dog Coordinator Officers, NRM and Landcare groups and state government agencies in your local area or online.

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- The Plan will also illustrate the mandatory requirements undertaken by the operator to meet the statutory guidelines for notification of neighbours and use of the poison for primary production.
- Where possible the Plan should clearly identify the statutory organisation and/or staff person within that organisation that has approved use of poison baits or ejector devices on the property as part of the feral animal control program.

Section 3. Best practice ground baiting techniques

- The use of sodium fluoroacetate (1080) poison to control feral animals on non-certified parcels of land must comply with state legislative requirements and current best practice.
- 1080 is a plant extract native to Australia used for feral animal control (feral pig, wild dog, foxes, feral cat and rabbits). It is a highly selective poison that has little effect on Australia native species due to their co-evolution with the toxin in native vegetation.
- The requirements for operators/landholder to use 1080 vary in each state so it is imperative you contact your local authority to find out what these may be prior to embarking on a baiting program.
- 1080 is applied either in shelf stable (manufactured) baits, meat baits for wild dogs and foxes, or delivered in a Canid Pest Ejector (CPE) device.
- Techniques used for baiting wild dogs and foxes can be found in the following document. <https://www.pestsmart.org.au/field-guide-poison-baiting-wild-dogs-foxes>
- Baits must be secured to avoid them being moved by animals outside of the non-certified parcel of land. This can be done through burying or tethering (tying) the bait with wire to a peg or other structure so that it must be chewed off and not easily picked up and shifted.
- The number of baits used in small non-certified areas such as fenced off water points of ring tanks should be limited but checked and replaced regularly.
- Foxes and dogs can eat more than one bait before being impacted by the toxin.
- Regular checking and replacement will ensure more individuals are exposed to the baits resulting in a more effective program. See <https://www.pestsmart.org.au/field-guide-poison-baiting-wild-dogs-foxes> for more details.
- The CPE device is physically driven into the ground preventing it from being moved outside of the non-certified area. The 1080 is also encapsulated and held within the device until it is triggered by a wild dog or fox, at which time the contents of the capsule is ejected into the animal's mouth.
- The CPE could be considered just like a tethered bait with the added benefit that only wild dogs and foxes are capable of setting it off, giving greater target specificity.
- Further details and instruction on the use of the CPE is available in the following video clip. www.pestsmart.org.au/canid-pest-ejector-cpe-fox-wild-dog-control and <https://animalcontrol.com.au/products/trap-zdkqa>.
- Further advice and information on the regulations for ground baiting wild dogs and foxes should also be obtained from your local authority prior to undertaking any control programs.

Section 4. Best practice guidelines for aerial baiting

- Aerial baiting is permitted in some states for the purpose of wild dog and fox management to deliver baits into areas with limited accessibility due to terrain and/ or habitat.
- In some cases, aerial baiting may be used in rangeland environments where control is required over vast distances whereby aerial distribution at national endorsed rates is the most cost effective manner to manage pest populations.
- State government authorities stringently regulate the use of aerial baiting in accordance with state and federal regulations including the need to apply to the relevant Environmental Protection agencies to conduct operations in some states.

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- The operator may consider aerial baiting if it is permitted by state authorities in the region and if they have non-certified areas of land that are large enough or meet the requirements for aerial baiting by the local or state authority.
- The certifying organisation would need to review any plan to aerial bait to ensure that significant buffers exist between the bait lines and the adjoining certified areas to limit the risk of baits being shifted onto the certified land.
- Aerial baiting may be considered under extreme circumstances where the areas of non-certified land is large enough, the impacts of predators are significant or the non-certified land in question inaccessible for the deployment of an effective ground baiting program.

Section 5. Is the feral animal control program being delivered as part of a regional program

- State and local authorities undertake coordinated management programs for feral animals, particularly wild dogs and foxes across the country.
- Operators should seek information on these programs from local and state authorities.
- Operators are encouraged to work in with local community groups where they exist to undertake their control program as part of a coordinated approach.
- Wild dog and pest management groups occur across the country and are often affiliated with Landcare groups in some regions. Operators are encouraged to participate in these groups for the purpose of managing feral animals, particularly wild dogs and foxes.
- Regulations pertaining to the use of sodium fluoroacetate (1080) and notification process exist in each state. These include timeframes and requirements for notifying neighbours of a baiting program and adequate signage being displayed at the entrance and boundaries of the property.
- Being associated with a wild dog or pest management group will facilitate these requirements to some degree but will also allow operators to better understand these requirements.
- Operators are encouraged to contact their relevant state or local authority to clarify these regulations and requirements and include them into the certifying organisation's operational management plan for endorsement.

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The National Wild Dog Action Plan will guide the implementation of a nationally-agreed framework for a strategic and risk based approach to wild dog management; emphasising humane, safe and effective management techniques and appropriate scales for mitigating the impacts of wild dogs.



More information via www.nationalwilddogactionplan.org.au