Background

Statements of compliance with the ten conditions of EPBC 2011/6183 approval

Condition 1: Aerial baiting must not occur outside the aerial baiting areas as identified for each of the six sites.

Condition 2: Aerial baiting must not occur between 20th June and 10th October in any given year.

Condition 3: For the entire first season of aerial baiting, the person taking the action must monitor for Spot-tailed Quoll in at least three of the six areas.

Condition 4: In the event that a Spot-tailed Quoll is recorded during the monitoring period then the person taking the action must undertake a review of aerial baiting activities at the affected site.

Condition 5: Five days prior to the commencement of the action, the person taking the action must advise the Department verbally and in writing of the planned date of commencement.

Condition 6: The person taking the action must maintain accurate records substantiating all activities.

Condition 7: By September 30th each year, the person taking the action must publish a report on their website addressing compliance with the conditions of approval.

Conditions 8-10

Statement of compliance with relevant state conditions

Permits to conduct aerial baiting

Operational Delivery

Baiting rate

Bait manufacture, handling and deployment

Aerial contractor

Neighbour notifications and signage

Deployment

Conclusion

Appendix 1: All six aerial baiting zones in Gippsland and Hume regions of Victoria

Appendix 2: Bait deployment maps for each site
Background

The Victorian Government submitted an application to the Australian Government in 2011 to undertake aerial baiting for the management of wild dogs in the eastern highlands of Victoria. On 21st December 2011, this submission was deemed a controlled action under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) based on the relevant controlling provisions of Sections 18 and 18A (listed threatened species and communities). The species of concern was the endangered Spot-tailed Quoll (Dasyurus maculatus maculatus), populations of which are considered to be fragmented in Victoria.

In 2012-2013 the then Department of Environment and Primary Industries (DEPI) conducted a monitored remote ground baiting operation which served the dual purpose of carrying out control in lieu of aerial baiting and gathering monitoring data to inform a variation to the existing aerial baiting submission.

On 21st March 2014, based on a resubmitted application that included the information from ground monitoring and additional information on Spot-tailed Quoll prevalence in baiting areas, the Australian Government provided conditional approval under the EPBC Act (2011/6183) to conduct aerial baiting. This approval allowed for baiting to occur until 31st December 2019 in nominated zones across Gippsland and North East regions which collectively cover the eastern highlands of Victoria.

On 15th and 18th October 2019 an aerial baiting operation was conducted under the above approval. This report provides an overview of the operation and describes how the conditions of the EPBC approval were met. The aerial baiting operation complements the Victorian Government’s current wild dog program which incorporates a suite of techniques to reduce the impact of wild dogs on livestock enterprises.

Note that, following the machinery of Government changes in January 2015, the relevant functions in the Department of Environment and Primary Industries were incorporated into the Department of Environment, Land, Water and Planning (DELWP) and Department of Economic Development, Jobs, Transport and Resources (DEDJTR).
Condition 1: Aerial baiting must not occur outside the aerial baiting areas as identified for each of the six sites

Baiting occurred at the six sites identified in the EPBC application and in no other area (see Appendix 1). On 15th October 2019, the aerial baiting operation commenced in six aerial baiting zones approved in the EPBC Approval (2011/6183). The operation was conducted over a three-day period and concluded on 18th October 2019 (Table 1).

The baits were only deployed along the predetermined transects with an accuracy of within 10 metres (Appendix 2: Bait deployment maps for each site).

Table 1: Summary of completed aerial baiting program

<table>
<thead>
<tr>
<th>Baiting Zone</th>
<th>Airbase</th>
<th>Deployment Date</th>
<th>Kms baited</th>
<th>Baits deployed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gippsland</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Angora and Cobungra</td>
<td>Swifts Creek</td>
<td>15 October 2019</td>
<td>91.4</td>
<td>849</td>
</tr>
<tr>
<td>Bindi</td>
<td>Swifts Creek</td>
<td>15 October 2019</td>
<td>110.7</td>
<td>1,035</td>
</tr>
<tr>
<td>Wonnangatta and Punchen Budweid</td>
<td>Swifts Creek</td>
<td>15 October 2019</td>
<td>66.8</td>
<td>618</td>
</tr>
<tr>
<td><strong>Sub Total</strong></td>
<td></td>
<td></td>
<td><strong>268.9</strong></td>
<td><strong>2,502</strong></td>
</tr>
<tr>
<td>Hume</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bullhead</td>
<td>Corryong</td>
<td>18 October 2019</td>
<td>54.0</td>
<td>493</td>
</tr>
<tr>
<td>Burrowa</td>
<td>Corryong</td>
<td>18 October 2019</td>
<td>54.3</td>
<td>499</td>
</tr>
<tr>
<td>Wabba</td>
<td>Corryong</td>
<td>18 October 2019</td>
<td>52.6</td>
<td>484</td>
</tr>
<tr>
<td><strong>Sub Total</strong></td>
<td></td>
<td></td>
<td><strong>160.9</strong></td>
<td><strong>1,476</strong></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td><strong>429.8</strong></td>
<td><strong>3,978</strong></td>
</tr>
</tbody>
</table>

Condition 2: Aerial baiting must not occur between 20th June and 10th October in any given year

Aerial baiting was conducted from 15th to 18th October 2019 (Table 1).

Condition 3: For the entire first season of aerial baiting, the person taking the action must monitor for Spot-tailed Quoll in at least three of the six areas

Monitoring for Spot-tailed Quoll occurred during the first season of aerial baiting at Wabba, Angora and Cobungra and Bindi. The monitoring was conducted in accordance with the relevant guidelines and no Spot-tailed Quolls were detected. Monitoring is not required in subsequent seasons.

Condition 4: In the event that a Spot-tailed Quoll is recorded during the monitoring period then the person taking the action must undertake a review of aerial baiting activities at the affected site

No Spot-tailed Quolls were detected in any of the three monitored zones.
**Condition 5:** Five days prior to the commencement of the action, the person taking the action must advise the Department verbally and in writing of the planned date of commencement

Five days prior to the commencement of the action the Department of Environment was notified verbally and in writing of the starting date.

**Condition 6:** The person taking the action must maintain accurate records substantiating all activities

The Department of Environment and Primary Industries (now DELWP) keeps records in accordance with the Public Records Act 1973, and as such maintains accurate records of the actions pertaining to EPBC Approval (2011/6183).

**Condition 7:** By September 30th each year, the person taking the action must publish a report on their website addressing compliance with the conditions of approval

This report outlines our compliance with the EPBC approval 2011/6183 and has been published on the Agriculture Victoria website.

Note: In January 2015 the Department of Environment and Primary Industries (DEPI) was split into two new departments with the on-ground operations of the wild dog program coming under the Department of Environment, Land, Water and Planning (DELWP).


**Conditions 8-10**

Conditions 8-10 of the EPBC approval 2011/6183 are not applicable at this time.

8. Upon the direction of the Minister, the person taking the action must ensure that an independent audit of compliance, with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.

9. If, at any time after three years from the date of this approval, the person taking the action has not commenced the action, then the person taking the action must not commence the action without the written agreement of the Minister.

10. Unless otherwise agreed to in writing by the Minister, the person taking the action must publish all documentation referred to in these conditions of approval on their website for a period of no less than six months. Each report of document must be published on the website within one month of being submitted to the Department.
Statement of compliance with relevant state conditions

In addition to meeting the conditions of EPBC approval 2011/6183, the aerial baiting operation in Victoria complied with state requirements.

Permits to conduct aerial baiting

Under the current 1080 label conditions and 1080 Directions for Use (DFU) 1080 predator baits cannot be aerially deployed in Victoria. In addition, 1080 is a restricted use chemical in Victoria, therefore under the Agricultural and Veterinary Chemicals (Control of Use) Act 1992 it cannot be used off-label without a Section 25A(2)(b) permit.

In order to commence aerial baiting, a Section 25A permit was applied for and granted by the regulator. Public land manager approval was sought to bait on public land, with consideration of the following components:

- compliance with State Aircraft Unit policies
- OHS standards
- legislative requirements
- welfare of staff/contractors/stakeholders
- alignment to department values
- location of baiting zones
- adequate communications plan (signage and notifications) and
- occurrence reporting arrangements.

These issues were addressed via an internal DELWP Notification to Conduct works on Pest Animals (NTCPA). In October 2019, approval for the aerial baiting program on all nominated public land was granted.
Operational Delivery

Baiting rate

The DELWP GIS team determined bait drop points along baiting transects ensuring strict adherence to the minimum buffer distances prescribed in the Section 25A permit outlined below.

Maximun baiting rate:
- 10 baits per kilometre
- 1 bait per 10 hectares

Distance restrictions
- Baits must not be placed within 500 metres of a dwelling
- Baits must not be placed within 100 metres of a permanent or flowing water body
- Baits must not be placed within 100 metres of a drinking water supply
- Baits must not be placed within 100 metres of boundary fences
- Baits must not be placed within 50 metres of formed public roadways

The helicopter was fitted with a GPS system that was operated by the pilot and bait dispenser operator in tandem to ensure the baiting transects and bait drop points were accurately implemented.

In addition, the pilot and bait dispenser operator visually verified the area was clear of people, water points, neighbouring land and tracks before each bait was deployed.

The baits were dropped from 60 to 80 metres above the tree canopy, through a bait dispenser tube, fitted with a trigger device that recorded each bait drop point. Following the completion of the operation a full record of the flight path and bait drop locations were downloaded from the GPS (Appendix 2: Bait deployment maps for each site).

Table 2: Planned aerial baiting zones

<table>
<thead>
<tr>
<th></th>
<th>Transects to be Baited (km)</th>
<th>Baits Required per Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gippsland</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Angora and Cobungra</td>
<td>91.4</td>
<td>850</td>
</tr>
<tr>
<td>Bindi</td>
<td>110.7</td>
<td>1,034</td>
</tr>
<tr>
<td>Wonnangatta and Punchen Budweid</td>
<td>66.8</td>
<td>619</td>
</tr>
<tr>
<td>Sub Total</td>
<td>268.9</td>
<td>2,503</td>
</tr>
<tr>
<td>Hume</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bullhead</td>
<td>54.3</td>
<td>499</td>
</tr>
<tr>
<td>Burrowa</td>
<td>52.6</td>
<td>485</td>
</tr>
<tr>
<td>Wabba</td>
<td>54.0</td>
<td>492</td>
</tr>
<tr>
<td>Sub Total</td>
<td>160.9</td>
<td>1,476</td>
</tr>
<tr>
<td>Total</td>
<td>429.80</td>
<td>3,979</td>
</tr>
</tbody>
</table>

Bait manufacture, handling and deployment

The baits were manufactured by a company approved and licensed by the Department of Health and met the standards set by the Australian Pesticides and Veterinary Medicines Authority.
The baits were manufactured and packed into containers that met the specifications detailed within the Victorian Code of Practice for the Preparation of Perishable 1080 Pest Animal Bait Product Using 1080 Aqueous Solution. The baits were labelled as per the requirements of Part 2 Labels and Containers of the Standard for the Uniform Scheduling of Drugs and Poisons.

In accordance with an order made under Section 25A of the Agricultural and Veterinary (Control of Use) Act 1992, all perishable 1080 pest animal baits must be laid within three days of the date of manufacture. Consistent with this order, the date of the manufacture was included on the perishable 1080 pest animal bait product label and the manufacturer was requested to produce the baits as close to the time of delivery as practicable.

All unused baits, rubbish and waste potentially containing 1080 was disposed of in accordance with the DFU. All the buckets that the baits were delivered in were thoroughly decontaminated and returned to the manufacturer.

All bait products were stored according to the specifications documented within the DFU and product label. Baits were delivered daily therefore refrigeration was not required at the airbase, and baits were stored securely on site in a lockable area.

**Aerial contractor**

The State Aircraft Unit (SAU) was employed to contract the aircraft contractor for the aerial deployment of baits. The SAU provided a list of suitable contractors from their “Call When Needed” register. Based on the accreditations, qualifications and experience of the contractors, a preferred contractor was identified.

An aerial operations plan was developed by the air contractor, SAU and DELWP staff. It identified risks and developed mitigation strategies as required in the Section 25A permit. The contract for services included all aspects of air operations including fuel supply and aircraft personnel (pilot, navigator, bait dispenser operator and ground crew.)

All air operations were managed within the requirements of the State Air Unit.

The air contractor:

- met all relevant conditions specified under the Section 25A permit
- met all State Aircraft Unit policies
- supplied a pilot and a bait dispenser operator that met chemical handling and commercial operator requirements for conducting aerial baiting
- supplied a Type 3 (light) helicopter compliant with requirements of State Air Unit Procedure (SAUP SO 4.01- aerial application, baiting or spraying operations)
- supplied a bait dispenser/GPS recorder capable of dispensing and recording bait drop information, to ensure:
  - compliance with the required baiting rate of 10 baits per lineal km;
  - a track log of each flight was recorded; and
  - compliance with SAUP SO 4.01 requirements.

All aircraft operations were performed under day visual flight rule (VFR) conditions

These conditions mandate that flights only proceed under clear weather and between first and last light, with flight work completed half an hour before last light.

Compliance with the VFR conditions resulted in the operation being conducted over two days, 15th and 18th October 2019.

A detailed briefing was held at the commencement and conclusion of each day’s operation.
Neighbour notifications and signage

In order to fulfil the notification requirements of the DFU all neighbouring landowners were notified of the baiting operation at least 72 hours prior to its commencement.

The DELWP team identified every property that required notification and landowner details were then obtained from the relevant local government council.

The standard 1080 neighbour notification for ground baiting was modified to reflect the differences for aerial baiting and mailed to every identified neighbour.

Where aerial baiting occurred on public land leased or licensed by private interests, the licensee/lessee were sent a letter informing them of the operation.

Immediately prior to the commencement of the aerial baiting operation, warning signs were posted at all entry points including roads and major walking tracks, as required by the DFU.

Deployment

Fresh meat baits containing 6mg of sodium fluoroacetate (1080) were deployed from a Bell 206 Long Ranger helicopter in inaccessible areas of eastern Victoria known to be prone to regular wild dog activity (Appendix 1: All six aerial baiting zones in Gippsland and Hume regions of Victoria).

The operation was held over a twoday period on the 15th and 18th of October 2019.

The timing of the operation took into account:

- EPBC approval and conditions
- Spot-tailed Quoll breeding period
- planned burning operations
- availability of contractors
- establishing appropriate monitoring
- obtaining relevant approvals (e.g. section 25A)
- effective timing for wild dog control
- DELWP and approval timelines (e.g. expiry of Section 25A)
- minimising off target bait take (e.g. goanna activity) and
- favourable weather conditions.

An airbase was established at the Swifts Creek and Corryong DELWP airbases providing operational support for refuelling, bait storage, logistics and flight following.

Deployment dates for each baiting zone are outlined in Table 1.

Baiting was completed in all baiting zones within the approved time period specified in the EPBC 2011/6183 approval.
Conclusion

The wild dog aerial baiting program conducted from 15th to 18th October 2019 complied with the conditions of approval (EPBC 2011/6183) and all other legal requirements.

Aerial baiting is complementary to the other control techniques, including proactive, year-round ground baiting on public land; community baiting programs on private land; proactive and reactive trapping on public and private land; and the provision of advice regarding wild dog management to reduce the impact of wild dogs on livestock.

This report outlining the Victorian Governments’ compliance with the EPBC approval 2011/6183 is published on the Agriculture Victoria website and is available at http://agriculture.vic.gov.au/.
Appendix 1: All six aerial baiting zones in Gippsland and Hume regions of Victoria
Appendix 2: Bait deployment maps for each site