

Sacrificing Steve

How I Killed the Crocodile Hunter

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There has been a long campaign claiming that in a changed world and in a changed Australia, the values and symbols of old Australia are exclusive, oppressive and irrelevant. The campaign does not appear to have succeeded.¹

Let's begin this paper with a peculiar point of departure. Let's abjure for the moment the approved conventions of academic discussion and begin not with the obligatory expounding of some contextualising theoretical locus, but instead with an immersion much more personal. Let's embrace the pure, shattering honesty of humiliation. Let's begin with a tale of shame and, for the sake of practicality, let's make it mine.

Early in September 2006, I was desperately trying to finish a paper on Australian representations of masculinity. The deadline had crept up on me, and I was caught struggling for a focusing point. I wanted a figure to drape my argument upon, one that would fit into a complicated and altogether shaky coagulation of ideas surrounding Australian icons, legends and images—someone who perfectly

straddled an exploration of masculine constructions within a framework of cringing insecurities and historical silences. I could think of men, I could think of iconic men, and I could think of them in limitless abundance, but none of them encapsulated everything I wanted to say. It was as if I needed something more than human. I wanted to hold up someone who embodied but was beyond embodiment, not in some deified sense, not a god, someone real, and also just a little legendary. I whittled my remaining hours away trying to meet this want.

Eventually I gave up. It was time to face reality, this metaphysical figure eluded discovery and the hour was late, too late to sit and wonder who or what or anything. As so many have done, I gave up on the idea of finding Mr Right—even if he did exist, the universe would not present him to me. Not perfectly formed and ready for some deconstructive critique. That, I conceded, would be a miracle. Resigning myself to this truth, I tried writing the paper without a focus, and somewhere into the seventh attempt, gave up on that too. In the end I accepted defeat and in doing so was reduced to a kind of pseudo-academic despair.

Then, at the eleventh hour, came a fateful SMS. A message from my brother that read in his eloquent way 'Did u hear? Steve Irwin dead.'

I must admit, the news struck me with a kind of rocking horror. Like many Australians, the impossible and almost absurd profundity of the man's passing hit home hard. It was shocking. The reasons for this reaction were hard to reconcile, especially given my ambivalence towards, and essential unfamiliarity with, Mr Irwin. But that spared me not at all the feelings that came.

When this initial reaction passed, there was for me a great rolling joy. Irwin, the awkward icon—a cringing cultural figure of Basil Fawlty clumsiness and masculine Aussie heroics, had died, and in keeping with our fine tradition, would soon be resurrected utterly disentangled from his faults and flailing embarrassments—leaving him in prime position to ascend into the smooth Valhalla of Larrikin Legends. Of course, this process would take time, but I could feel it coming even as the news sunk deeper. Thus, through some ludicrous act of serendipity, Irwin instantly became everything I needed to complete my paper, and I was overjoyed to have that sudden surety to exploit.

I share this sorry anecdote because I want to talk about shame. It is shameful to be shameless, to be unashamed, as I almost am, of feeling good that Irwin died,

that I took advantage of his demise and felt satisfied—close to justified—in doing so. It's the shame many writers feel when they see others' misfortunes as their potential 'muse' (to put it in most gracious terms). Before that there was the shame of almost failing, and the shame of whimpering about it. There is all that to be ashamed of and a great deal more, to be sure. But, most mortifying of all, is this confession: in my weakest moments, in moments of absolute solipsistic abandon, I sometimes allow myself to believe that in its unending benevolence for me, the universe struck Irwin down, literally penetrating his heart, for no other reason than my academic convenience. To think this way is beneath contempt, I know, but I sometimes do despite myself, and to confess it to you humiliates me no small amount indeed. And so I decided, unable to escape the shame of it all, to share it around. What better way to absolve myself of any accompanying guilt than by shamelessly exploiting Irwin one more time—and with this essay, that is exactly what I intend to do.

Silvan Tomkins called shame 'the sickness of the soul'² expressed most malevolently in the word 'mortification'; literally, a kind of death by embarrassment. Shame is a powerful social force, and an intensely personal one. As a fundamental element of human existence, integral to our conception of society and self, it needs to be understood that shame is not merely a negative affect. Elspeth Probyn states in *Blush*, her masterwork on shame's manifestations and potentialities, that she hoped to 'reanimate a sociological comprehension of how we feel shame, so that we may more broadly envision using the effects of shame productively'.³ As Probyn points out, shame compels reflexivity, it opens up the possibility of self-transformation and is in this way a positive and essential part of being human.⁴ This possibility is available to us whenever we are willing to acknowledge shame. The problem is, like a lot of things that are actually good for us, shame is a particularly bitter experience. So much so, our society has developed a strict repulsion and an outright dread of shame. Indeed, we are humiliated by its very presence.

But you can't spit shame out, you can't leave the room when it walks in, you can't get an AVO against it or have it whacked. In fact, shame is kind of like the Abrahamic god, it's omnipresent, it's omniscient, and it's always watching with judgemental eyes, especially when you're naked. The only way to dodge shame is to deny it. Of course, this too, as Probyn notes, is an act of utter futility, whether 'by an individual or a community'.⁵ Once avoidance of shame is adopted, escape from the

cycle of negation is almost impossible. Donald Nathanson points to figures such as the machismo male, who convert shame into anger, as an example of the type of narcissistic destruction of identity and empathy that occurs in those who step into this trap.⁶ This is incredibly detrimental to individuals, but expanded onto a social scale the consequences of denying shame can be catastrophic.

With *Dark Side of the Dream*, Bob Hodge and Vijay Mishra proposed a new way of envisioning Australian identity. Using an essay of national literature to reach their diagnosis, Hodge and Mishra posited that the Australian psyche is a fractured, schizophrenic mess of paradoxical denials and guilts. As they would have it, when divested of its myths and conscious self-delusions, Australian identity is not only unstably insecure, it is all but impossible. Hodge and Mishra seemed to be making confronting and radical claims, but their thesis found abutment and a comfortable theoretical home amidst the mass of existing discourses portraying 'white' Australia as a nation of perpetual insecurity. Discourses most classically championed by critics such as A.A. Phillips, who labelled Australia a nation suffering from an acute case of 'cultural cringe' calling it the 'disease of the Australian mind',⁷ or Tom Griffiths who described the 'silence and suppression' which pervades Australia's historical heritage.⁸ With critical deconstructions of zealous 'patrio-classic' 'white' texts, to the works of overlooked, forgotten and unknown Aboriginal writers, Hodge and Mishra reached a conclusion that unless the fragmentation at the heart of our national psyche was acknowledged, our culture would remain 'incomprehensible'.⁹

An essential element of the derivations in *Dark Side of the Dream* is the 'bastard complex'. Hodge and Mishra's 'bastard complex' finds the fragmentation and paradoxes within the psyche of 'white Australians' can be traced to a deep-seated and profoundly repressed feeling of illegitimacy stemming from the invasion of Aboriginal Australia by British colonisers. Essentially it is the conscious abnegation of the genocidal and ultimately shameful nature of 'white' Australian history by 'white' Australians. Here, again, we are talking about the avoidance of shame, and in bringing shame avoidance into discussion, we are talking about more than 'white guilt', we are discussing something more productive, more interesting and, perhaps somewhat optimistically, something less ideologically entrenched.

Of course, this is not to exclude or downplay the concept or consequences of guilt in any form, or to seek to extricate it from the bounds of shame discourse.

Clearly, shame and guilt are linked—and indeed the distinctions are often so vague in certain commentaries and critiques as to be obsolete. However, despite continuing squabbles over the borderlines of accepted difference, shame is not guilt. Whatever the difficulty in arriving at a concrete conceptual distinction, there are very real implications for discussing shame rather than guilt. As Probyn notes, guilt is mired and divided into a polar split of complex ideologies with unshakable persistence and acceptance:

For instance, ‘Middle Australia’ is said to be against guilt, while the ‘Chattering classes’ (intellectuals, inner city ‘radicals’, and so on) are said to be mired in it. This produces a situation in which those who disagree with aspects of the past and present government cannot admit to any national pride, and those who disparage any admission of guilt become flag wavers of pride.¹⁰

In this light, re-imagining shame becomes a much more interesting and optimistic proposition than returning to the intensely futile trenches of guilt, and is of course an entirely distinct operation. Perhaps the most obvious distinction between the two concepts is that guilt can be absolved. In Probyn’s words, ‘guilt is easier to get rid of, and once dealt with is forgotten whereas shame lingers deep within the self’.¹¹ Guilt is ‘cured’ by forgiveness. Shame, on the other hand, cannot be cured and demands a decisive reaction; either painful acknowledgment or vigilant and forceful denial, and it is the denial to which we now turn.

The negation of a shameful past, of a continuing and compounding shame, is an operation of immense denial that is, in Australia’s case, anaesthetised by an ‘image’ of ‘false’ legend, through—according to Hodge and Mishra—representations of an ultimately ridiculous ‘Australian stereotype’. This image is the Australian legend, a mythical male figure that is not only loaded with racist and sexist connotations, but excludes all but a tiny minority of those in Australian society. This mythical figure was perhaps first set out by Russel Ward in *The Australian Legend*, describing him as ‘rough and ready in his manners and quick to decry any appearance of affectation in others’.¹² Hodge and Mishra added to this assessment, noting that the figure is always a ‘Caucasian adult male, an itinerant rural worker of no fixed address’.¹³ ‘He’ is a robust figure that dominates immutably, forcing all other representations aside and relegating them to abject silence and ridicule. He is

the 'touchstone of Australian identity' and representative of 'Australian authenticity'.¹⁴ Despite his dominion, he is not meant to be taken literally. In fact, Hodge and Mishra claim the "real Australian" is not the person who is like the legend, but the person who has the right attitude to the legend'.¹⁵ In essence, all it takes to be 'True Blue' is to ignore the irony.

The unique perversity of this image is the unspoken understanding of its production, the consciousness of its fallacy, in those who benefit most from its maintenance and mythological integrity. However, conscious or not, this insidiously schizophrenic illusion is not self-sustaining, it requires continual reinforcement. Fundamentally inherent to this process is the maintenance of hegemonic constructions of masculinity, which in turn are justified and strengthened by the mythological force and celebration of our fatuous 'legends'. This synergetic symbiosis leads to an understanding of identity that cannot be anything other than almost exclusively male. As R.W. Connell points out:

It is now a familiar observation that notions of Australian identity have been almost entirely constructed around images of men—the convict shaking his shackled fist; the heroic explorer facing inland; the bushman plodding down a dusty track; the digger scrambling up the slopes at Gallipoli; Bradman and McCabe facing the bodyline attack; Midget Farrelly swooping down the wave-face; front bars, shearing sheds, the Glenrowan Hotel.¹⁶

To Connell's list we may add the Man from Snowy River, *Crocodile Dundee* or even Kenny. The latter two examples are problematic in a sense, as they are presented as parodies, and in many ways they expose the dreaded excesses that the legend is constructed to repress. Of course, if the machinations of this process were not adaptable to such exposures, its repressive persistence and power would be impossible. As Gemma Blackwood points out, it was comedian Paul Hogan who 'translated and commodified' this stereotype into an iconic marketing tool of global tourism and, in the process, updated the representation with his own contributions—the 'put another shrimp on the barbie' tourist campaign and the 1986 film *Crocodile Dundee*.¹⁷ Further to this, Blackwood explains that even Mick Taylor, *Wolf Creek's* ostensibly subversive perversion of the Mick Dundee type, serves paradoxically to reinforce and contemporise this national character

construct. In Blackwood's words, the psychopathic figure of Mick Taylor 'might just represent the ongoing survival of this mythos'.¹⁸

To witness this adaptation in action one may merely consider the romanticisation that supposed parodies such as *Kenny* invoke in their audiences. Even the excess of Kenny 'glorified turd-burglar' Smyth, fits easily into the shifting renegotiations of this mythical figure—oozing 'Aussie bloke' from every pore and orifice. Besides, as long as the joke is not on us, we're happy to laugh at ourselves or, as John Hirst puts it, 'Australians are often sending themselves up even when they seem to be taking themselves most seriously; the terse, ironic comment is as much a feature of pub conversation as of Australian poetry'.¹⁹ According to Hirst, it is apparently in this spirit that 'Australian jokes about, for example, Jews or women might shock an outsider as being unforgivably vicious or obscene, whereas an Australian would see its blatant viciousness and obscenity as part of its humour'.²⁰ To this analysis, I would like to add that as much as we love to dish out that 'ironic' cruelty, the thought that we might be getting laughed at sends us flailing into indignation. This tendency was the problem with Steve Irwin.

Irwin was a problematic bastard from the beginning. Here was a beefy bloke who wore stubbies, sauntered through the harsh and legitimising outback wrestling crocodiles with that bursting, undeniable Australian 'white' male vitality. He could have been a contender—a real life Crocodile Dundee—but for Christ's sake, did he have to be so obscenely exuberant, so goddamn goofy? True, he was by no means the most excessive figure Australia has produced, much less so than the anxious, twittering Norman Gunston who insisted on appearing before American celebrities in an unthinkably embarrassing state of excess, but there remained a clear distinction. In Gunston's case, we were in on the joke—it wasn't really at our expense. It could be said we were laughing at ourselves and, in doing so, denying others the opportunity. We were beating them to the punchline, an operation that Nathanson points out is common in attempting to 'minimise the toxicity of shame'.²¹ What became clear, as Irwin appeared on American talk shows such as Oprah Winfrey's, dropping spiders and saying 'crikey' to the delight of the audiences, was that we were being laughed at. That it was an approving laughter, that the American audiences seemed to genuinely like Irwin, didn't matter; our insecurities were raw as ever, and Irwin's appropriation into the mould of Aussie icon could not be

achieved. Instead he stood as almost anathema to the almighty Australian legend, showing that for all this image's boundless robustness and laconic dignity, the legend is ultimately a fatally flawed fantasy of refusal. Irwin shamed through his excess and exemplified Probyn's statement that the 'color, the place, the history of bodies all come alive in shame'.²²

In an article for the *Age* written two days after his death, Leslie Cannold gave her own analysis of the Irwin problem. According to Cannold, 'the subdued response some Australians had to the Crocodile Hunter compared with the untrammelled celebrity he enjoyed in the US' was born from fear:

Wild, larger-than-life characters such as Irwin—hyper-extroverts—are unpredictable ... They could ask you for something you don't want to give, or beg conflict by saying something you don't want to hear. They must be subdued through ridicule or marginalisation, or frozen out completely to manage our collective fear of the awkward moment. Americans have no such fear, and this may partially explain their unequivocal hero-worship of Irwin.²³

Here we see Cannold describing the fear of excess and humiliation that the iconic Australian mythology is constructed to repress. In fact, Cannold even describes the process—the 'ridicule and marginalisation'—that it engenders. Even more revealing is the following passage:

Irwin frankly acknowledged the embarrassment he caused his compatriots. 'I'm embarrassing', he explained because 'there's a little bit of me in everybody'. In addition, what Irwin called the 'yeah, take it or leave it' attitude of Aussies to everything, made them uncomfortable with his passionate embrace of everything.²⁴

Perhaps the degree to which Irwin stands out as a figure of embarrassment, head and shoulders above figures of parody and self-deprecation such as Les Patterson and even Irwin-parody Russell Coight, is his veneer of authenticity. Much of this can be linked to the stylistic approach of his shows, which, as Jonathan Rayner points out, combined the forms of 'the video diary and the wildlife documentary' with a 'highly theatrical style of live performance'.²⁵ Further to this, Rayner posits that it was in this inherently contradictory and paradoxical combination that Irwin's 'star quality' was both constructed and revealed.²⁶ 'Star quality' as Rayner sees it, is based

on a 'schizophrenic' conception in the minds of the audience in which 'credible performance' is validated by existing 'persona' and, if continued, actively eliminates the recognition of performance and instead insists upon an almost complete congruence between performer and character. In consuming these 'star images' viewers pervert the standard 'doublethink' expectations required by any engagement with the 'cinema apparatus' and accept as real the 'contrived identity construct'.²⁷ This process allows audiences to 'consume and validate ideological, moral, gendered and national (even nationalized) images'.²⁸

Of course, as I have mentioned, Irwin's crime of linking embarrassment to national image was absolved at the moment of death, and as an untrammelled icon he was reborn. In this transcendence, somehow so natural and predictable, Irwin was hailed from every possible figure, his death lamented in the teary-eyed homeland that had been so 'subdued' to him in life. It was undeniable, bizarre and almost morbid the degree to which the tide of public opinion changed its flow. Cannold too, commented on this:

In the rush to eulogise him, several explanations of what he meant to Australia and Australians have been served up. According to the Opposition Leader, Irwin was the 'quintessential Aussie Battler' who was a 'terrific exponent of Australian larrikin values'. Those in the tourist trade—at times seeming sadder about the loss of a product than a person—proclaimed him the 'ambassador' for Queensland and Australia.²⁹ Reflecting on these claims, Cannold describes this kind of rhetoric as 'rubbish'.³⁰ She does however, concede that for all his imperfections, Irwin was the figure that many, including herself, 'couldn't help but feel terribly fond of ... He was one out of the box and I know I'm going to miss him like hell.'³¹ Despite these moments of concession, Cannold's eulogy was one of the least ostentatious of the deluge that followed Irwin's demise. In even acknowledging the problematic nature of Irwin's relationship to Australian culture, it came very close to breaking the golden rule of Australian public discourse: *Nil Nisi Bonum*.

When the vitriolic Stan Zemanek died, there was an outpouring of grief for a man that had made a career of being a figure that 'Sydney talkback listeners ... so often loved to hate'.³² He was eulogised as 'larrikin Aussie icon, always argumentative, sometimes infuriating but with a caring and gentlemanly side'.³³ The

media gave countless sermons of this nature, and there was a showing of outrage when fellow broadcaster Mike Carlton said he would only go to Zemanek's funeral 'to check he was dead'.³⁴ The explosion of bombastic castigation that was turned against Carlton was an effusive attempt to shame through disgust, and his steadfast refusal to acknowledge any wrongdoing escalated the public repulsion.

The attacks on Carlton were not merely a media deployment to defend one of their own. I recall sitting in a Merrylands pub and listening to a group of men seething into their schooners that Carlton 'should rot in hell' for his *faux pas*, for his thoughtless and ultimately 'Un-Australian' indiscretion. They were defending the belief that it's shameful to speak of the dead with disrespect, and if it is not specifically an Australian 'virtue' then it is at least one that many of us continue to maintain. Even figures of public shame and disgust are often delegated off-limits post-mortem. Let's not forget the demise of Christopher Skase, at one point the most hated man in current-affair-regulated Australia, a man *Today Tonight* called a 'liar, cheat and thug'.³⁵ Unfortunately for the makers of the film *Let's Get Skase*, who sought to turn the nation's loathing into a comedy caper, the fun of chasing Skase wore off around the instant he was pronounced dead and the whole shameful existence of our righteous, raging indignation was flushed out of sight. There was, too, more than a little shame in the unspoken concession that perhaps Skase was a little unwell after all.

Affect is used in discursive operations to enforce this amnesiac tradition, with the media conveniently abandoning and abrogating any hint of former disgust, anger or shame towards the dead. The fact that Irwin was bombarded with anger and shamed by the media for the 'baby dangling incident', in which he fed a crocodile with one arm while holding his baby in the other, was not just forgotten, it became taboo after Irwin's death. Any mention of this not-so-distant outrage would have constituted something equivalent to an assault on a mourning family's right to grieve, to a lack of common morality. Those prepared to break this rule were labelled disgusting, traitorous and contemptible. Of course, this was the designation Germaine Greer was framed with in the days following Irwin's death, when she committed just such an offence, saying of the 'dangling' incident in her article for the *Guardian*:

The adoring world was momentarily appalled. They called it child abuse. The whole spectacle was revolting ... Irwin's response to the sudden outburst of criticism was bizarre. He believed that he had the crocodile under control. But he could have fallen over, suggested an interviewer. He admitted that was possible, but only if a meteor had hit the earth and caused an earthquake of 6.6 on the Richter scale. That sort of self-delusion is what it takes to be a 'real Aussie larrikin'.³⁶

Statements such as these were framed as assaults void of all decency. Being a woman, an intellectual, and one who had a history of taking issue with her former home at that, Greer's framing as a bitter old bitch who hates Australia, an 'oppositional enemy' to the hegemonic narrative surrounding the death of Irwin, was almost too easily achieved. In an article titled 'Feminist Greer Slams Steve's Antics' the *Daily Telegraph's* Fiona Hudson opened her story as follows: 'As glowing tributes and praise for Steve Irwin filled newspapers and television screens around the world, fellow Australian Germaine Greer launched a distasteful tirade on the much-loved Crocodile Hunter yesterday.'³⁷ The *Sydney Morning Herald* carried a story that began, 'Expatriate Australian academic Germaine Greer should "back off" and keep her "stupid" comments on Steve Irwin to herself, Queensland Premier Peter Beattie says'.³⁸ The *Herald* article ended with a quote from Beattie expressing his desire to raise the taxes on Greer's rainforest property in retaliation for her comments, saying, 'If I could do it I would double it or triple the taxation on it.'³⁹

Greer's criticisms, that Irwin embarrassed millions of Australians and disrespected wildlife, though made often enough by many commentators during Irwin's life, were seen as something close to blasphemous in the light of his death. Worst of all, it was felt that Greer must have predicted the inevitable backlash that would result from her comments, and this perceived shamelessness made her detractors all the more frenzied in their response.

Although examples such as the post-mortem glorification of Ronald Reagan demonstrate that this is not specifically an Australian pastime, there is nevertheless some degree of implication for our haunted conception of identity in the desperate shielding and blind praise this habit implies. Perhaps the silences and denials that shadow our past have some immutable connection to our imposition of immaculate respect for the deceased. Just as we are forced to summon illusionary images of

impossible icons into being to blanket the illegitimacy and inhumanity of our collective history, we are compelled to lay similar veils of transcendence over the lives of our public idols. Whether these two compulsions are part of the same drive or not, I think that it is worthy of consideration, and that whatever the motivation, the shifting of discourse after Irwin's death was not only profound in its possible implications for Australian identity—but that the importance of this loss was implicit in the visceral shock that resonated around the nation.

Despite Greer's protestations, many in the media described this shock as 'something akin to Princess Diana's passing'.⁴⁰ As Cannold put it,

the news of Steve Irwin's death caused a Diana moment: the molasses, freeze-time moment of shock that sears whatever one was doing—going to lunch, cleaning the fridge, having a shower—on one's consciousness forever. I sat at my computer and cried.⁴¹

Regardless of what many of us thought about Irwin, there was simply no denying the deluge of affect surrounding his death. For many of us there was a sudden, disorientating shock. This feeling, and an inability to articulate it, inferred an exposure to unfamiliar territory. No set script or words exist that can fulfil the task of describing the ambiguous stasis of that fleeting event. It is this very ambiguity that encapsulates the death of Irwin more than anything, and it is essential to an understanding of his role as public image. The implications of Irwin as cultural figure are grounded in his shimmering contradictions. Rayner captures this well, saying:

Irwin was the media-savvy innocent; the purveyor of a hands-on wildlife spectacular which was used to promote the preservation of and respect for wildlife; he was a globally recognized superstar conservationist with evident right-wing allegiances. His stardom was a brand of highly refined national 'ordinariness' which was also simultaneously 'excessive': loud, hyperactive, boyish and superficially immature but at the same time hyper-masculine, exhibiting an unalloyed conviction, self-assurance, even self-righteousness.⁴²

In facing Irwin we are confronted by a mass of paradoxes, and it is perhaps in this sense that he represents the fractured, denied, conscious construction of the Australian stereotype, that morpheus and impossible legend, more than any figure

before him. Irwin's insistently inconsistent image provides an uneasy reflection of the issues charging Australian identity, stretched as it is in so many divergent directions, branded with so many different ideologies and invested with so much emotional weight. We are faced with an image of intense entanglements and lucid distortions that, above all, embodies of our nation's awkward groping for identity, and is testament to the ideas and cautions in *Dark Side of the Dream*.

The first anniversary of Irwin's death served to remind us of the continuing challenge Hodge and Mishra presented to all Australians—a challenge to emancipate ourselves from the repressive walls of silence in our national psyche's cultural compartmentalisation. Fundamental in meeting this challenge is the understanding that the frontiers between dominant and subordinate social constructions of identity are not shaped merely by ideology, 'They are organised by affective relations'.⁴³ And as Nathanson points out, 'Powerful affect modulation scripts always underlie deep divisions in systems of belief'.⁴⁴ In essence, confronting the mythical fallacies that guard repressive silences is an inevitably futile endeavour without engaging the affect investments sustaining them. Beneath Australia's unyielding succession of schizophrenic constructions lies the paranoiac principal of shame avoidance. Only by embracing the human necessity of this maligned affect can we dispose of our deep delusions and denials.

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- ³ Elspeth Probyn, *Blush: Faces of Shame*, UNSW Press, Sydney, 2005, p. 40.
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- ¹⁰ Probyn, p. 46.
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- ¹³ Hodge and Mishra, p. xv.
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- ²⁴ Cannold, p. 15.
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- ²⁸ Rayner, p. 109.
- ²⁹ Cannold, p. 15.

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