Submission No 35

INQUIRY INTO PROPOSED AERIAL SHOOTING OF BRUMBIES IN KOSCIUSZKO NATIONAL PARK

Name: Ashley Fuller

Date Received: 6 September 2023

Submission to the Inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park

Terms of Reference

(a) The methodology used to survey and estimate the brumby population in Kosciuszko National Park.

- The number of wild horses cited in NSW NPWS documents – 18,814 - is based on estimates gained from aerial survey and the amalgamation of numbers of clusters of horses. The numbers are just estimates with wide error bars. Aerial counting may be subject to double counting as horses run from aircraft into nearby areas and over-estimation as clusters of horses are duplicated. This method of counting is not an accurate measure of the actual number of horses.
- There is wide disparity between the number horses estimated by NPWS from aerial spotting and the observations of local people who recognise particular mobs of horses and say that mobs they have seen in the past are no longer there and that it is generally more difficult find horses today than in the past.
- Whilst personal observations might be classified as anecdotal, this significant disparity between on-ground observations and aerial spotting is reason enough to gain a more accurate number of horses before the extreme measure of aerial shooting is considered.
- Without on-ground validation of horse numbers, decisions are being made on modelled assumptions drawn from less than accurate aerial spotting.
- Determining the degree of control of wild horses required while achieving conservation objectives should be based on data gained from on-ground monitoring and assessment of the relationship between horse density and environmental impact.

RECOMMENDATION:

- **It is recommended that the Animal Welfare Committee consider the following method for determining wild horse numbers in the Kosciuszko National Park:**
    - **On-ground method proposed by Berman et al (2023).** ***Use of density-impact functions to inform and improve the environmental outcomes of feral horse management.***
    - In summary: this method seeks to determine:
    - The horse density per square kilometre (or other unit); and
    - The percentage of environmental impacts over that same area.
    - Dung pile counts are used as surrogates for the number of horses, but must include consideration of defecation rate, dung decay rates, and other parameters to derive a realistic translation from dung pile counts to horse numbers of a specific period of time.
    - Impacts on vegetation and soil are recorded in transects (on foot) as well as signs of cause – which may be horse, deer, pig, native animal, human).

(b) The justification for proposed aerial shooting, giving consideration to urgency and the accuracy of the estimated brumby population in Kosciuszko National Park.

- Further to my comments addressing Term of Reference (a) on the methodology used by the NPWS for estimating wild horse numbers - aerial spotting - the justification for proposed aerial shooting is based on flawed modelled assumptions about the population of wild

horses which undermines any perceived urgency to reduce numbers. Aerial spotting is subject to double counting as horses run from aircraft into the trees and enter other areas. At best it can only be an estimate. Inaccurate data input results in flawed model outputs.

- The significant disparity between on-ground observations of local people who are familiar with mobs of horses in areas they visit and the large numbers estimated from aerial spotting, is reason enough to exercise restraint in adopting extreme control measures such as aerial shooting.
- Methods for controlling wild horses (or other introduced species) should be based on data gained from on-ground, targeted monitoring programs and indicators to determine whether management interventions are warranted.
- Furthermore, the management of wild horses to reduce their direct impact is unlikely to be beneficial without complementary management to reduce the effects of feral deer, feral pigs, fire, and humans. The greatest challenge to the Park is from climate change, specifically the increased frequency and intensity of wildfire. The horses are scapegoats – 'low hanging fruit'.

(e) The animal welfare concerns associated with aerial shooting; and

(g) The impact of previous aerial shooting operations (such as Guy Fawkes National Park) in NSW

- The proposal to control wild horses In the Park by aerial shooting is not an acceptable method. It is not humane despite the literature cited by the NSW NPWS Wild Horse Management Plan with the euphemistic title "Model Code of Practice Humane Control of Feral Horses" (Sharp & Saunders 2014) and Sharp (2011b).
- The reality is that it takes an extraordinary marksperson to shoot a running horse from the air and kill it in one shot, or even two shots. For an instant kill, the shot needs to be through the head or heart/lungs. What transpires is wounded, terrified horses crashing through vegetation, further injuring themselves and dying in agony. During this terrified flight, other horses, pregnant mares and foals are injured.
- Analysis of wild horse skeletons from aerial culls in Guy Fawkes National Park shows many horses would have died painfully from bullets to the pelvis, back, legs, and stomach.
- Aerial shooting cannot be described as 'humane' – it is not. The RSPCA defines humane killing as "when an animal is either killed instantly or rendered insensible until death ensures, without pain, suffering or distress".
- To assume, as the Wild Horse Heritage Management Plan - draft amending plan does, that if aerial shooting is undertaken in accordance with 'best practice' it "<u>can</u> have the lowest animal welfare impacts of all lethal control methods". Aerial shooting is justified in the context of "all lethal methods". Place it in the context of a suite of alternative control methods and it cannot be justified on animal welfare grounds.
- Furthermore, the notion of "best practice" is bandied around as if it is the highest level of efficiency – it's a hackneyed phrase that is not underpinned by proven standards and is used to give standing and acceptability to practices that, under scrutiny, are not accountable or measurable against any established high standards.
- The introduction of aerial shooting of wild horses in the Kosciuszko National Park is a retrograde step for the NSW Parks Service and for the NSW Government and will indeed result in, as foreshadowed in the Wild Horse Heritage Management Plan, the "loss of social licence to remove wild horses from the national park".

(h) The availability of alternatives to aerial shooting.

RECOMMENDATION

- **That the Animal Welfare Committee consider the following humane alternatives to aerial shooting:**
    - passive trapping and re-homing – there are organisations who have experienced personnel willing to collaborate with these activities;
    - Fertility control delivered by dart gun. This method is proven to be effective in other jurisdictions e.g. the United States over 40+ years and the UK for more than 10 years.
    - The cost of fertility control by dart gun is around $35AUD per dose – a small price to pay for a humane solution to controlling wild horse numbers.
    - The cost of humane methods would be offset by the minimal animal welfare impacts, reduction in social division over the issue, and an improved relationship between the NSW NPWS and stakeholders.

Thank you for the opportunity to make a submission

Ashley Fuller

6 September 2023