

Submission
No 46

**INQUIRY INTO PROPOSED AERIAL SHOOTING OF
BRUMBIES IN KOSCIUSZKO NATIONAL PARK**

Name: Name suppressed
Date Received: 19 September 2023

Partially
Confidential

Submission to Animal Welfare Committee

- Regarding Inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park.

Dear committee members, **I am strongly opposed to the proposed plan to introduce aerial shooting of Brumbies in KNP** and put forward the following comments for your consideration.

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

The methodology used in November 2022 to estimate the population numbers has been shown many times to be flawed. It has never been explained how an actual sighting of less than 1,500 horses was then calculated for a best estimate of over 18,000 with a 95% confidence interval that at least 14,501 to 23,535 horses occur in the park. That is a huge variance in numbers.

Even 14,501 horses would be very hard to hide in the park let alone 23,535! If there are in fact over 14,501 horses in the park then photographic evidence needs to be provided to demonstrate it. Using a methodology that has been previously disputed during its use to calculate native animal numbers is not proof of its accuracy!

To then state there has been an increase of more than 4,000 since the 2020 survey is beyond comprehension.. This is ignoring the fact that in the 3 years since the survey the park has been subjected to drought and major bushfires along with the trapping and removal and ground shooting of the horses. It also implies that it is believed ALL the horses in the park are able to produce foals and bare more than one foal per year with none of the foals dying!

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

I do not believe the stated justification for conducting aerial shooting is valid given that the survey numbers are highly disputed and it is not known exactly how many horses remain in the park following the extensive trapping and ground shooting that has occurred during 2023.

If there are in fact already 3,000 or less horses in the park then aerial shooting does not need to be added to the management plan at all.

(c) the status of, and threats to, endangered species in the Kosciuszko National Park.

The threats to native, endangered species within the park is clearly very low considering no animal or plant species has become extinct within the park the whole time the horses have been there.

The threat to endangered species is perceived and not actually based in fact. For example, the study 'Feral-horse impacts on corroboree frog habitat in the Australian Alps' C.N. Foster, B.C. Scheele. This study simply relied on the use of replicated horse enclosures in their study to conclude that because the

litter depth was deeper within the enclosure zones the horses would be a threat to the frogs. No direct evidence was provided of the horses actually impacting on the survival of the corroboree frog! In fact their conclusion states: 'Our study has **presented experimental evidence** that horse grazing and trampling reduce breeding-habitat quality for *P. pengilleyi*, **which could result** in reduced reproduction success.'

<https://bioone.org/journals/Wildlife-Research/volume-46/issue-2/WR18093/Feral-horse-impacts-on-corroboree-frog-habitat-in-the-Australian/10.1071/WR18093.short>

Ski resorts have been established within the habitat of the Pygmy Possum which has impacted on their ability to survive along with environmental issues such as the reduction of their main food source, the Bogong Moth. Their habitat is boulderfields in high elevations which is not the habitat of the horses! The horses have not impacted on the possums and I have not seen any evidence to show they have!

There is now also the major threat to Kosciuszko National Park by Snowy Hydro II being granted permission to bulldoze large areas to build overhead powerlines within the park. How many of the native species in the park will be impacted by this? The horses are being made a scapegoat for the human damage being done to the park.

I have seen some questionable environmental groups publish pictures of what they claim is horse damage to the waterways which I know for a fact are 4WD crossings and have watched 4WD's using them! Some of these groups have even gone so far as to blame the horses for a decline in butterflies!! Yet these same groups are very silent when it comes to proposals to cull native wildlife such as Dingoes or Wombats.

(e) the animal welfare concerns associated with aerial shooting.

I have many concerns regarding aerial shooting of the horses. It has been demonstrated just how inaccurate aerial shooting of horses is by the events that occurred during the 2000 Guy Fawkes National Park cull where horses were left injured but not dead days after the shooting.

Chasing wild horses via a helicopter causes a high level of stress to the animal. They are being run at full pace for extended periods of time. This is particularly of concern for pregnant mares and young foals who are at a high risk of injury.

As stated in the 'Aerial shooting of feral horses (HOR002) Standard Operating Procedure', *'the pilot should aim to provide a shooting platform that is as stable as possible. Shooting from a moving platform can significantly detract from the shooter's accuracy'*. As a hunter I know it is near impossible to perform an accurate and deadly shot to a moving target from a moving platform. There is a significant chance that horses will not be shot in the target areas and will be left to suffer in pain.

Even ground shooting horses that are grazing requires more than one shot to kill outright. This has been demonstrated during the ground shooting of the horses in KNP during 2023 where horses were shot at least 3 times but blood trails were left by survivors who were not located and would have died a very slow death from their injuries.

'Aerial shooting should not be done if the nature of the terrain reduces accuracy resulting in too many wounding shots and prevents the humane and prompt despatch of wounded animals' The heavy bushland, uneven ground and above ground powerlines would make it extremely difficult to obtain an accurate shot and is extremely likely to leave horses to suffer for a considerable time before they are finally killed. There is also a real danger of the horses falling on the uneven terrain and suffering considerable pain, particularly pregnant mares and foals who are being pushed by a helicopter.

There is also concern for livestock on properties neighbouring the park. Domestic animals are prone to panic when hearing gunshots and seeing helicopters, how would this be monitored during shooting to ensure the welfare of those animals? And, would property owners be compensated for any losses?

(f) the human safety concerns if Kosciuszko National Park is to remain open during operations.

I do not see how public safety can be assured if the park remained open during aerial shooting.

I notice that the introductory documents to the proposed amendment to the current wild horse management plan state that *'specific plans would be implemented to protect the public and ensure visitor and neighbour safety. That would include notifications and closures of areas to public access while operations are under way'*, but this is not detailed in the proposed amendment to the plan and actually proposes to add *'For use in any area of the park'* to both ground AND aerial shooting!

During the ground shooting of the horses in 2022 and 2023 there was no notification at all that shooting was to occur and this was happening during the time of year when people are in the park and in the areas where the shooting was taking place. It is pure luck that no one was shot! I have zero confidence that public safety protocols will be followed.

Noting that not everyone listens to the media or uses the main entrances to the park, exactly how would they guarantee public safety? There are many people, bushwalkers/campers and photographers who enter and use the park, how would they be contacted if they are already in the park when the proposed aerial shooting is to be conducted? There has already been a reported incidence of tourists being caught up in aerial shooting where they were lucky to escape injury!

(g) the impact of previous aerial shooting operations (such as Guy Fawkes National Park) in New South Wales

The human impact of previous aerial shooting has been immense to those who value the horses, seek to preserve that heritage for future generations and photographers and biologists who have studied the horses for many years.

I was utterly disgusted and distressed watching the footage of the Guy Fawkes National Park cull in 2000 on television. To this day, I cannot watch any of that footage again... To see horses shot in the mouth, in the gut and at least one horse who having a leg shot out from under it somehow managed to continue to run. Watching horses shot and hit the ground still alive and struggling only to have the horses running behind run into and over them was extremely distressing. And then to hear of how many survived the shooting and suffered for days wounded before finally dying and young foals left to

starve beside their dead mothers utterly disgusted me.

Nothing that happened during the Guy Fawkes National Park cull complied with the 'Aerial shooting of feral horses (HOR002) Standard Operating Procedure'. I have no confidence that an aerial cull conducted in KNP will be any different.

And it was all for what? Is the Guy Fawkes National Park now pristine? Is it now a better park without the horse providing their manure to fertilised and provide food for the native birds and plants? No, just senseless and inhumane killing..

The recent cull of desert horses in the Northern Territory reached an international audience and was condemned after New Zealand writer and photographer Kelly Wilson, posted on FaceBook about the killing of the entire herd she had photographed and documented in her book 'Wild horses of the world'. Although this was not in New South Wales it demonstrates the international interest in Australia's wild horse population and the interest in them being treated humanely and preserved.

(h) the availability of alternatives to aerial shooting

Given the huge amount of public money it would cost to conduct aerial shooting of the horses in KNP, surely that money could be better put to use supporting the rehoming process. It could be used to implement hormone control to regulate the numbers and/or set up a system similar to that in the States where the Bureau of Land Management have holding areas for the horses and conduct a rehoming process giving all horses time to be adopted.

(i) any other related matters

I am seriously disappointed with and have no confidence in the Environment Minister or NPWS and do not believe they have the best humane intentions for the horses in mind and in fact their aim is to totally annihilate the wild horses before any re-count can be performed. A moratorium should be implemented immediately to ensure they have not overstepped their control requirements.

The proposed amendment to include aerial shooting in the wild horse management plan is ill planned and does not set out how it would be implemented to adhere to animal welfare and aerial shooting protocols or ensure public safety.

The proposed plan also proposes to change the control method of ground shooting from '*for use in areas of the park that have been closed to ensure safe implementation of ground shooting*' TO '*for use in any area of the park*' removing any requirement to ensure the safe implementation of ground shooting! It also proposes the same wording for the implementation of aerial shooting! This inclusion in the amendment is not mentioned anywhere else and can be easily missed. Why has it been included??

There is the statement '*Regardless of control methods, carcasses will not be left in major waterways. To the greatest extent practicable, carcasses will not be left within 400 metres of busy visitor areas such as campgrounds*' During the ground shooting of the horses in 2023 it was brought to light that

dead horses were left lying in waterways and close to campgrounds and trails but no effort was made by NPWS to rectify this. I have no confidence that the above statement would be adhered to.

Given that it has now been brought to the attention of the public and the Environment Minister that there are serious questions regarding the accuracy of the last wild horse count and that there is likely to be less than the legal requirement of 3,000 horses remaining.. why has trapping and removal and ground shooting continued? And why is it being reported that the trapping has in fact been increased since the announcement of a new count? It can only be supposed that the Minister knows there are already less than 3,000 horses remaining and is attempting to reduce the numbers further before being instructed to stop!

There is also the question of just how many of the horses, and how many heavily pregnant mares, have been trapped and sent to the abattoir? It is known from Freedom of Information requests that during the period November 2022 to August 2023 that 765 of the horses were trapped and removed and that 527 of the horses were ground shot. I also note that the ground shooting of those 527 horses was conducted with no public notification or closure of the park putting the public in direct danger of being shot. I have no confidence that NPWS will adhere to 'specific plans' as stated in the proposed amendment to the plan, (whatever those specific plans may be as it is not detailed!), to protect to the public and ensure visitor and neighbour safety. They haven't done so in the past so why would they do it now?

I have totally lost any confidence in what the Environment Minister and NPWS say, they have repeatedly made false statements concerning how many horses are in the park and their impact on native species. They have shown no concern whatever for public safety and no concern for ensuring their requirement to retain 3,000 of the horses in the wild is met. They appear to be more interested in the total annihilation of the horses than meeting their requirement to recognise the heritage value of sustainable wild horse populations in the park!