

Submission
No 47

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

Organisation: South Endeavour Trust

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Partially
Confidential

SOUTH ENDEAVOUR TRUST

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22 September 2023

By Email: NSW Legislative Council – Animal Welfare Committee

Dear Committee

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

South Endeavour Trust is a privately funded conservation land trust with 22 reserves in NSW and Queensland. This submission is based on:

1. Our experience as a conservation land manager including of large relatively inaccessible lands
2. Our experience of land management in the Kosciuszko high country with our Crooks Racecourse Reserve at Snowy Plains bordering the national park on three sides
3. Our experience with aerial shooting in managing horses and other feral animals on some of our other properties
4. My personal experiences over many decades as a multi-day user of Guy Fawkes National Park.

We wish to briefly address each of the Committees Terms of Reference in order.

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

The survey and statistical methods used to survey populations of both native animals and feral animals are very well established and have been in use for many many decades. We have read the horse number estimates for Kosciuszko and they are entirely unremarkable in terms of the survey methodologies and statistical analysis used. There is absolutely no scientific reason to question the results. That said it is quite common for people without a scientific or statistical background to question population estimates. For example to say “how could that animal be endangered, I see it all the time” or “why isn’t that animal endangered, I never see it”. When it comes to wildlife and feral animal population estimates, science trumps personal experience and views every time. Another example would be from our Rockview reserve in northern NSW. From field observation we thought that there were 20-30 goats on the reserve and probably the same on the neighbouring NPWS nature reserve. Together with NPWS we paid for a helicopter with marksman to do a feral animal shoot. Rather than 40-60, they shot 581 feral goats.

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

From our experience as a Park neighbour the need to control the exploding horse population in the Park is urgent and getting more urgent the longer nothing substantive is done. We are investors in biodiversity assets and at Crooks Racecourse we see our investment being threatened by the horses in the Park. We have spent of the order of \$81,000 on new fencing to try to deter horses from the Park entering our land and destroying the delicate habitats we have invested in. Our neighbours are spending an increasing amount of time having to shoot horses coming out of the Park. No one wants to have to do these things. We don’t know anyone that enjoys shooting horses and we certainly would much rather have left our land unfenced where it joins the Park.

The number of horses in the Park has been subject to repeat fully scientific counts. The numbers are outrageous for a conservation reserve. And it should never have been allowed to get to this situation. Had proper population control been allowed to occur over the period since the 2003 fires, when horse numbers were around 1000, maybe just a few hundred horses per year would have been required to have been removed from the Park. Today we are talking many many thousands per annum just to keep the population where it is and even more to get it down to the planned 3000. That is, the ongoing delays and protests have meant an explosion of the horse population, with the inevitable outcome that tens of thousands more horses will eventually have to be killed than would otherwise have been the case. In our experience of controlling horse numbers elsewhere, the ONLY method that has any chance of substantially and sustainably reducing numbers in the Park is aerial shooting.

We use aerial shooting in large remote areas for the control of pigs, deer, horses and feral cattle. It is the ONLY effective tool we have in our tool box for controlling numbers in such areas. Similarly NPWS uses aerial shooting as an essential part of its management work to control numbers of deer and pigs. It would require a bizarre twist of logic to think it is not needed for control of horses.

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

In our experience the amazing natural values of Australia are under threat like never before. Whole ecosystems are undergoing rapid change due to factors such as: invasive species; changed fire regimes; exceptional drought; and habitat loss. Once common species are now listed as endangered, for example the Koala and the Greater Glider. One event that helped bring this home for us as an organisation was the change in status last year of the most common arboreal possum on our reserves on the Atherton Tablelands. Until last year the Lemuroid Ringtail Possum was not even considered to be threatened. But last year it was fully documented that this animal has disappeared from most of its former range and only those at higher altitudes are left. The factor at work here are heatwaves. This animal cannot cool itself and dies if the temperature rises above a certain level for just a few hours. In a single stroke of the pen it went from being not threatened to Critically Endangered.

There are many once common species in Kosciuszko who are now under threat for all sorts of reasons, including the heavy hooves of horses trampling and destroying their habitat. Which is why we have spent so much of our scarce funds to seek to exclude them from Crooks Racecourse.

We are not entirely sure exactly what is being implied by this Term of Reference except to say that in our experience, the threats to the long term survival of our wildlife have never been greater, that the listing of species as threatened or endangered is way behind the reality of what is actually happening in the field, that there are very very few species for which the trajectory is one of improvement, and that feral animals are a major threatening process for many species. The presence of, and extraordinary increase in, horse numbers in Kosciuszko poses a major threat to many of the Park's already endangered ecosystems such as its bogs, fens, herbfields and heaths. As we degrade or lose these ecosystems we are also losing the threatened species that depend upon them such as the incredibly cute little *Mastacomys* that live in them.

(d) The history and adequacy of New South Wales laws, policies and programs for the control of wild horse populations etc

As far as we are aware, there is no significant population of wild horses in NSW that is being adequately managed or controlled. Certainly those in Kosciuszko and Guy Fawkes are out of control and doing immense damage to the environment. Given this, the laws, policies and programs in the State are grossly inadequate and entirely unfit for purpose. This situation has been made all the worse by the government decision in 2000 to ban the aerial shooting of horses in NSW national parks. The huge problems we are facing today stem directly from that decision. We repeat that in our experience as conservation land managers, the ONLY effective tool for the control of feral horses in large remote areas is aerial shooting.

We have read HOR002 and it fully accords with our experience in aerial shooting of horses as to animal welfare concerns, effectiveness, efficiency and safety. The only gap we can see relates to the safety of people on the ground who may be in the operational area. However, in reality and as the SOP states, you only shoot at what you can clearly see and, in our experience, those doing the shooting are so highly skilled that random shots and the like simply do not happen. We have

conducted mustering operations within a few hundred metres of aerial shooting operations without any concern for safety.

(e) the animal welfare concerns associated with aerial shooting

It would seem to us that most of the animal welfare concerns regarding aerial shooting are really from those who do not want horses culled full stop. That is, it is really the culling of horses that they are opposed to rather than aerial shooting per se. Our experience is that horses hate being yarded, they hate being put on trucks etc. The animal welfare experience of animals that are yarded and trucked anywhere, let alone to an abattoir, is not good. Rather it is our experience that the quickest and most effective means of culling a horse with the least animal welfare concerns is to shoot it in the field.

It is not nice, no one enjoys doing it, but that is what works and causes the least distress to the animal.

Further is also our experience that there are fewer animal welfare concerns with aerial shooting than ground shooting. The reality is that in the rare but occasional event that an animal is wounded rather than killed, it is far easier to follow it for a third shot when in a helicopter than being on the ground. (as a matter of practice and as per the SOP we use two shots in short succession each time we shoot a horse to secure a quick kill)

If it is accepted that horses need to be culled then our experience is that aerial shooting has the fewest animal welfare concerns.

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

Kosciuszko is a huge area and much of it is remote and rarely travelled and certainly very rarely travelled off the tracks and usual routes. There is certainly no need to close the Park in order to conduct shooting operations in sections of it. As stated previously, the SOP makes it very clear that you have to have a good clear view of an animal before shooting it. Our experience is that the marksmen conducting these operations are incredibly skilled. As such there should never be a danger to the public even if in the general vicinity. As previously stated we have conducted aerial operations with people working a few hundred meters away with no safety concerns at all. That said, obviously it would be preferable to close those areas where shooting is to occur. HOWEVER, in the current climate such notice would merely be an invitation to misguided activists to put themselves in the area to "save the horses". In other words, the safest thing to do would be to either provide no notice but eschew operations in a particular area if people were found to be present, or to provide notice and close quite large areas of the park such that those areas were so big as to provide no indication to activists as to where to place themselves. If the second option was to be chosen then it should be matched with quite severe penalties for anyone deliberately ignoring the said notice.

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

I regularly did Multi-day trips, whether walking, pack rafting or off-road mountain bike riding, in Guy Fawkes National Park during the period 1976 to 1990 and less regular trips thereafter. I have significant first hand experience of the severe damage horses have done to the park. I have been bailed up by stallions.

From first hand experience the horses in the park were starting to starve when the 2000 shoot occurred. Recollections of that event are so coloured by emotion and what people think they know rather than what really happened as to make it a very difficult event to analyse and comment on today. At the time I saw it as an essential management action to both protect the park and to prevent large numbers of horses from the horror of starving to death. The shoot in 2000 killed 606 horses. One of these was shot twice but survived to be euthanised two weeks later. It is clear that, in a few instances, the shoot could have been done better. I think it is also very clear that had the shoot not occurred then several hundred horses would have died in desperate circumstances starving to death. This is exactly what happened in 2019. With aerial shooting ruled out the park was at or beyond its grazing capacity when the 2019 drought hit. Everything was eaten. The Park's environment suffered

severe damage and then the horses starved. They fell and were too weak to get up again. Dying horses wore deep grooves in the ground in their struggle to stand. And then they died. The photos are too gruesome to share. This was the epitome of animal cruelty, bought about by policies based on sentiment not science.

If we are to learn anything from Guy Fawkes it is that good intentions and a reliance on emotion don't make good policy. Had there been follow up shoots in Guy Fawkes back in 2000 the remaining 100 of so horses would have been killed, the Park would have been given a chance to recover, and the appalling deaths of 2019 would not have happened.

(h) The availability of alternatives to aerial shooting

We are talking about 18,000 horses here, not 1800 or 180. In our experience the ONLY way to remove a substantial proportion of those horses is aerial shooting. Obviously it would be useful to back it up with ground shooting and trapping, but our experience is that aerial shooting has to be the mainstay of any serious control effort.

NPWS has tried all sorts of other methods. The fact that the horse population has grown from 1000 in 2003 to 18,000 today is all the proof that anyone should need that there is no other effective alternative.

(i) Any other related matters

We believe that it is worth making the observation that, by preventing NPWS from doing its job for so long, the abject failure of government policy on this issue will be the direct cause of tens of thousands of horses being killed that should never have been there in the first place. With so many foals being born each year it is not just a matter of killing 15,000 horses to get 18,000 down to 3,000 but rather a much larger number due to the time the control operation will take. The 2000 ban on aerial shooting has had a truly terrible legacy. Conceived with good intentions it's consequence has been and will be a trail of death that could have so easily been avoided.

Every delay now will only serve to INCREASE the number of horses that will have to be killed. It is simple mathematics.

The quicker this operation can be conducted, the fewer the eventual number of horses that will have to be killed. That is the sad brutal fact.

Tim Hughes
Director
South Endeavour Trust