

**Submission  
No 50**

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

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## **Submission to NSW Senate Animal Welfare Committee**

by

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### **My Background**

I have spent my life obsessed by horses from my earliest memory, learning to ride at the age of five. My passion has always been retraining 'ruined' (desensitised) horses and dressage (classical, not modern). I have successfully retrained an ex-polo pony and several ex-racehorses for dressage. I have not trained a Brumby, but friends who have done so are amazed by how gentle, willing and sensible they are. There is definitely a place for them as companion/riding horses.

In 1975 I graduated from the University of New England as B.Sc.Ag(Ed) and became a Science and Agriculture teacher which I combined with a life on the land.

Since retiring, I have devoted my life to horse welfare, in particular, racehorse welfare since The Final Race (7.30 report 17/10/2019) and humane management of our Heritage Brumbies since the Guy Fawkes River National Park aerial shooting fiasco 20-23/10/2000.

I would like to thank the Animal welfare committee for giving me this opportunity to make my submission.

### **Animal Welfare Concerns Regarding the Current Management of the Brumbies in Kosciuszko National Park.**

These include the following:

- ◆ Aerial shooting
- ◆ Ground shooting

- ◆ Passive trapping.

Other concerns include:

- ◆ The use of **flawed counting methods**
- ◆ Wrongly attributing the demise of endangered native plants and animals to justify lethal management of the brumbies
- ◆ The failure to humanely manage other introduced species
- ◆ Environmental concerns over failure to correctly dispose of carcasses.

### **Aerial Shooting**

Aerial shooting has been proposed as a management tool by Environment Minister Penny Sharpe, National Parks and Wildlife Service Management and members of the Invasive Species Council, purporting it to be humane. It can neither be considered humane nor acceptable in the area that they propose to use it as the following articles show:

**NB:** I have added the below links to remind the committee of the shocking cruelty exhibited in what became known as the 2000 Guy Fawkes Massacre where 240+ of the 600 horses destroyed were left to die in agony over hours, days and sometimes weeks; left to drag themselves about with shattered limbs, broken backs, gut shots, broken jaws and mouths shot off so they could not eat.

<https://australianbrumbyalliance.org.au/reviewing-the-october-2000-aerial-shooting-of-guy-fawkes-brumbies/>

[https://australianbrumbyalliance.org.au/wp-content/uploads/2012/12/ABA-Guy-Fawkes-2000-review-20\\_Oct\\_2014-Final.pdf](https://australianbrumbyalliance.org.au/wp-content/uploads/2012/12/ABA-Guy-Fawkes-2000-review-20_Oct_2014-Final.pdf)

Faced with incontrovertible evidence of this cruel slaughter that shocked and horrified the public, the Environment Minister of the time, Bob Debus declared that aerial shooting must never again be used in NSW to control Brumby numbers.

Observation records have shown that at least **three bullets** were required for each horse, yet more than a third of them died cruel, lingering deaths. That is either atrocious marksmanship

or the process is inherently flawed, completely inhumane and should not even be contemplated for use as a management tool.

Horses only have a small area where a shot will kill them. To shoot accurately a fast-moving target from a moving platform with the kinds of difficulties presented by forested, mountainous land requires a precision that is impossible to achieve under the conditions and which obviously the shooters do not have.

**The Standard Operating Procedure** (see link below) for aerial shooting of horses and large animals states the conditions under which the operation can be considered humane and those under which it is considered inhumane and not to be used. The vegetation and terrain of the Australian Alps fall into the latter category. I quote from the **SOP** (link below):

'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.

- Shooting must be done in a manner that maximises its effect, thus causing rapid death. This requires the use of appropriate shot placements, appropriate firearms and ammunition as described below.
- Only head (brain) or chest (heart/lung) shots must be used. Shooting at other parts of the body is unacceptable.'

<https://pestsmart.org.au/wp-content/uploads/sites/3/2021/03/HOR001-SOP.pdf>

Evidence collected from aerial culls has shown that these conditions have not been followed and that the manner of shooting is, in the words of the document, unacceptable. As mentioned earlier, the horse has only a very small area in which a shot will result in a humane death as shown in the link below. Chest shots, if not accurate to a small area behind the elbow will result in the horse bleeding out in a slow and painful death.

[https://www.business.qld.gov.au/industries/farms-fishing-forestry/agriculture/animal/health/humane-killing/horse-goat#:~:text=The%20recommended%20ways%](https://www.business.qld.gov.au/industries/farms-fishing-forestry/agriculture/animal/health/humane-killing/horse-goat#:~:text=The%20recommended%20ways%20)

This method cannot in any way be acceptable as a management tool in the conditions prevailing in the Australian Alps. Therefore, it cannot possibly be considered 'best practice'.

### **Other welfare Concerns:**

The fear and stress induced by being chased and shot at from a helicopter is horrendous, unimaginable and completely unacceptable as a management tool, causing:

- ◆ Mares to abort as they lay injured and/or dying; allowing predators to attack and brutally maul the helpless foal;
- ◆ Extreme distress at seeing their family members fall around them and thrash about;
- ◆ Foals to be separated from their mothers and left to die of starvation.

### **Ground shooting of the Kiandra Greys.**

The Kiandra Greys were, arguably, the best known iconic Heritage Brumby family of the Kosciusko National Park and were shot in September 2022. They had a Facebook, Instagram and Twitter following of hundreds of thousands of people across the globe – people who are still grieving their deaths. They represent our Heritage icons that were showcased to the world in our 2000 Olympics. Many of us were, and still are, greatly distressed by their loss.

Most of these horses were not shot cleanly but were left to bleed out slowly; to die painful, lingering deaths. One horse was found several kilometres away, having run until it died from blood loss. A dying mare was left to abort a foal which then had its nose chewed off by foxes/wild dogs while still alive. This is unconscionable and a long way from 'best practice'.

It should be noted that these horses were shot against protocol in a wild horse retention zone.

<https://aboutregional.com.au/wild-horses-killed-in-a-place-where-they-were-supposed-to-be-protected/>

### **Ground shooting of 67 Brumbies on Snowy Plain**

I am disgusted by the killing of 67 brumbies on the Snowy Plain near Davies hut in the Kosciusko National Park in May 2023. As with the Kiandra Greys, there were several gut-shot, shoulder-shot and neck shot, left to die painful, lingering deaths. Against the SOP directives, there were foals at foot also killed the same way. This is un-Australian and an

indictment on our government. It is also very far from the ideals of compassionate conservation being adopted around the world.

### **Environmental Concerns.**

Environmentally, there is the issue of dead bodies left in the waterways and around 30 tonnes decaying flesh in one area, not to mention the population explosions in pigs and carnivorous predators, or the feelings of visitors and hikers faced with masses of stinking remains rotting in the park.

The '**horse head incident**' that so horrified NPWS was not the action of a pro-brumby fanatic but a person outraged by the resulting environmental pollution. If NPWS can be so horrified by a horse head, why are they not upset by the 67 others they failed to dispose of according to government directives?

I have included **ground shooting** to show that even this method has not been used humanely, according to the **SOP**. If these so-called marksmen cannot shoot cleanly and humanely from the ground, how are they going to manage it from a moving platform?

### **Flawed Methodology Used to Survey the Brumby Population**

NSW National Parks and Wildlife Service appear to be intent on destroying the descendants of our Waler horses bred for WWI, using over-inflated figures obtained by flawed science as an excuse for aerial shooting in Kosciuszko National Park.

### **Lack of Transparency**

The NSW NPWS 2022 survey was difficult to access: After phoning both the offices of Tanya Plibersek and Penny Sharpe without success, I called the Environment Office twice before I was connected and given an email address which yielded the links below:

<https://www.environment.nsw.gov.au/topics/animals-and-plants/pest-animals-and-weeds/pest-animals/wild-horses/kosciuszko-national-park-wild-horse->

[management/](#)

<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Pests-and-weeds/Kosciuszko-wild-horses/kosciuszko-national-park>

<http://distancesampling.org/dbib.html>

### **Misleading References**

There were 1570 references on the page for their sampling technique (Line Transect Sampling with distance software), so I trawled through them. They ranged from surveying elephant droppings to Minke whales but there was only one reference to horses – which they had done themselves! My points being that:

- ◆ This smacks of an allegedly wilful and deliberate attempt to mislead the public; and
- ◆ NSWNPWS seem to be the only government body in the world to have attempted to justify the use of this flawed and inaccurate model for estimating horse populations.

### **Line Transect Sampling Assumptions**

The methodology of Line Transect Sampling is invalid to estimate horse populations because it assumes:

- ◆ Random distribution;
- ◆ Animals are detected at their initial location;
- ◆ That they can't move fast enough to be counted on other transects or the same transect twice.

None of this is true for horses which are nomadic; move in family groups; avoid rocky ground and areas of unpalatable feed; are selective grazers and can travel fast enough to be counted several times on the same and different transects. This results in **grossly over-inflated numbers** which NPWS refuses to acknowledge and needs to be held accountable for.

According to NPWS the Cairns count has a '95% confidence range' of 14,501 – 23,535 which is very wide. According to forensic accounting standards the wider the confidence range the less accurate are the figures.

The **2022 Survey** flew adjacent transects in the smaller blocks 24hrs apart (p5) for greater accuracy. (I had to read this 3 times before I could believe what I was seeing!) How could this possibly be achieved given the distances horses can cover during such an interval?

Helicopters are normally used to make animals move. What makes NPWS think KNP brumbies will be any different and stand to be counted? More particularly, stay in the same spot for 24 hours?

### **Experts Find Flaws in Brumby Count**

Both the British Equine Scientist Joanne Canning and Australian Biostatistician Claire Galea ,who was an expert witness in the 2021 NSW Kangaroo Inquiry, have pointed out the flaws in the Cairns count and have recommended an independent recount using more accurate methodology such as drone technology.

Significantly, St Andrews University, the software developers, have **refused** to peer review Cairns's latest estimate, saying the increase in numbers is '**biologically impossible.**'

### **Threats to Endangered Species Erroneously Blamed on Brumbies.**

The **Corroboree Frog** is threatened by Chytridiomycosis caused by the amphibian Chytrid fungus which has wiped out susceptible species all over the world.

<https://cwhl.vet.cornell.edu/disease/chytridiomycosis>

<https://veterinaryresearch.biomedcentral.com/articles/10.1186/s13567-015-0266-0>

<https://www.environment.nsw.gov.au/topics/animals-and-plants/native-animals/native-animal-facts/frogs/threats-to-frogs/frog-chytrid-fungus>

The **Corroboree Frog** is also threatened by feral pigs who destroy their environment and eat their eggs.



<https://pestsmart.org.au/toolkit-resource/feral-pig-biology-ecology-and-behaviour/#:~:text=Reproduction%20%26%20lifecycle%3A&text=Favourable%20con>

I quote from the above document:

'Feral pigs have relatively high protein requirements and will eat the eggs of ground-nesting birds, reptiles and amphibians and directly prey upon lambs, frogs and marine and freshwater turtles<sup>2,3</sup>.'

'Favourable conditions allow feral pigs to reproduce all year round and at a rapid rate, akin to rabbits. Sows can breed once they reach about 25 kg or six months of age and can potentially produce two litters of 4–10 piglets in a year.'

Shooting the horses and leaving their bodies to feed wild pigs, cats, dogs and foxes will only result in a population explosion of these predators, inflicting more damage on small, endangered and sensitive wildlife. Carcasses left to rot will spread flies, disease and damage the 'pristine' value of the area for a long time as fully grown Brumbies weigh about 400 kg.

The **Stocky Galaxias** fish is not threatened by the brumbies but by a virus carried by introduced trout.

<https://invasives.org.au/blog/trout-are-putting-australias-little-fish-at-risk-of-extinction/>

The **Broad-toothed Rat** is not harmed by horses. In fact, their nomadic, mosaic-style grazing patterns ensure areas of long grass essential for the survival of these small animals. It is feral pigs, cats and foxes that threaten this at-risk species.

The **Mountain Pygmy Possum** habitat is not in an area frequented by the brumbies. This native species is threatened by climate change; the diminishing availability of a major food source: the Bogong moth; and preyed upon by feral cats and foxes.

### **Humane Alternatives to Aerial Shooting**

Methods include:

- ◆ Trapping the horses and handling them enough to safely remove them from the Park for rehoming.
- ◆ Trapping as above and removing the horses to an alternative sanctuary or reserve.
- ◆ The use of chemical contraceptives such as PZP which can be administered via darting. This is reported to be working successfully with the American Wild Horses – much better in the wild than in scientific trials.

In Australia, Dr Andrea Harvey has been conducting research into this method and assessing Brumby welfare:

<https://horsesandpeople.com.au/research-into-the-welfare-of-wild-australian-brumbies/>

[https://digitalcommons.unl.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=2274&context=icwdm\\_usdanwrc](https://digitalcommons.unl.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=2274&context=icwdm_usdanwrc)

Increased funding for both trapping and chemical contraception will see much improvement on current results.

These are best practice management tools and the only humane options.

### **Animal Welfare Issues with Passive Trapping**

Passive trapping where gates automatically close have welfare issues because they can separate mares and foals, causing death or stunting of foals; members of family groups; stallions from their herd; disrupting family groups and causing stress and hardship. Horses bond closely to all members in their family group and become extremely distressed by separation.

That horses can suffer emotionally has been scientifically validated by Dr Andrea Harvey et al in 2023. This factor must be taken into consideration because it renders passive trapping unsuitable for use as a management tool.

## **Horses as Fire Preventers and Preservers of Ecosystems**

It is a known fact that the areas grazed by horses and/or cattle were not as seriously affected by the 2020 bushfires as were areas with higher levels of combustible material. This was also true of the deadly 2009 bushfires in Victoria. In the grazed areas the fires moved at walking pace and people were able to escape. In ungrazed areas, the fire was so hot and fast-moving that both people and animals perished. This is a lesson that, sadly, NPWS seem to have failed to learn.

A common argument against wild horses is that Australian soils are fragile and not adapted to hoofed animals. This is untrue because Australia once had its own megafauna, one of which was Procoptodon, a giant kangaroo with a single toe claw, similar in size and shape to a horse's hoof.

<http://www.prehistoric-wildlife.com/species/p/procoptodon.html>

Megafauna are essential to preserve ecosystems and in Europe, horses are being re-introduced to conservation areas to maintain their ecological balance.

## **Is Reduction in Numbers Necessary?**

With mounting evidence that the brumby number estimates are flawed and over-inflated and that the true count is far less than the 3,000 required by the Wild Horse legislation, there may be no necessity at all to reduce brumby numbers at this point in time. Only a credible recount will tell.

## **Both a Human and Animal Welfare Issue**

As well as the very real human safety issue presented by aerial shooting as described by terrified visitors to the park (15<sup>th</sup> February 2022), there are many people, including myself, who become distraught over cruelty to animals. We spend hundreds of hours researching; trying to find humane answers to management problems and suffer stress-related issues from

witnessing cruelty to animals. I would also mention that the shooting of the Kiandra Greys after they had survived the bushfires added suffering and distress to people who had barely survived themselves and were still suffering from PTSD.

## **Conclusion**

There is no doubt that Aerial shooting poses a significant animal welfare issue with the fear and stress of the chase and, historically, more than a third of horses not shot cleanly and left to suffer and die slowly. It cannot, in all conscience, be considered as a management tool.

## **References**

S. C. Cairns 2022 A Survey of the Wild Horse Population in Kosciusko National Park

Joanne Canning 2023 Submission to Senate Inquiry into Impacts and Management of Wild Horses in the Australian Alpine National Park.

C. C. Downer Wild and Free-roaming horses and burros of North America. Factual and sensitive statement – how they help the ecosystem. *Natural Horse* 2005 7(3) 10-11

Claire Galea 2023 Independent Biostatistical Report on the Brumby Population in the Australian Alpine National Park

Andrea M. Harvey, Ngaio J. Beausoleil, Daniel Ramp, David J Mellor. 2023 Mental Experiences in Wild Animals: Scientifically Validating Measurable Welfare Indicators in Free-roaming Horses.

B. Owusu 2019 An Introduction to Line Transect Sampling and its Applications.

NSW DPI Fact Sheet

Animal Carcass Disposal

[https://www.dpi.nsw.gov.au/\\_\\_\\_data/assets/pdf\\_file/0003/1299603/animal-carcass-](https://www.dpi.nsw.gov.au/___data/assets/pdf_file/0003/1299603/animal-carcass-)

[disposal.pdf?fbclid=IwAR0mKBZEeTr8biqrCMXO5vhls8rtWm7hleYkPMSmXosq6EndVT](#)