

**Submission
No 58**

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

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Inquiry into the proposed aerial shooting of brumbies in Kosciusko National Park (KNP)

Dear Animal Welfare Committee,

Thank you for the opportunity to make a submission to this enquiry. Please see below my response to the terms of reference:

a) The methodology used to survey and estimate the brumby population in KNP

Outdated technology to conduct population counts has led to exaggerated brumby numbers and fails to take into consideration the wildfires of 2019/2020 that reduced populations in the Park by at least 35%. Computers used to generate population numbers are unsuitable, and alternative methodology that is now readily available of drone and camera, must be used.

In her press release of 22/5/23, Minister Penny Sharpe insisted the NSW National Parks and Wildlife Service (NPWS) was under a legal obligation to reduce horse numbers in the park from an estimated population of more than 18,000 to 3000. But this count of "more than 18,000 brumbies" is based on the greatly flawed Cairns methodology that governments have used for years, for both kangaroos and brumbies, including the now Labor Government. This methodology is not only greatly flawed, but also outdated and archaic.

Minister Sharpe goes on to say in her press release that despite increasing the rate of removal, the targeted reduction of the horse population to 3000 by June 2027 was not on track and was, in fact, increasing. How can Minister Sharpe claim this when an independent, unbiased, brumby count hasn't been done?

"... the Distance software (applied by Cairns) have produced estimates that are biologically and scientifically impossible for brumbies. For instance, the supposed annual increase of 37% which in actual fact is 41% after accounting for removals) in the North Kosciuszko area between 2014 – 2019, is approximately DOUBLE the accepted scientific maximum! This was pointed out in the peer review by St Andrews. Yet no feasible explanation was ever given, because there isn't one."

This was taken from a submission to the "Draft Kosciuszko National Park Wild Horse Heritage Management 2021" by Joanne Canning, BSC Equine Sports Science, HND Equine Sports Coaching, BHSII

Here's what Minister Sharpe said in 2018 as then Shadow Labor Environment Minister:

"Having spoken to other brumby advocates, we accept that their remains an ongoing issue about the count of the number of horses in the park. We have committed to a scientific count of those

horses with key stakeholders. We need to put this issue to bed once and for all. When we take a lot of the emotion out of this debate, a lot of the toing and froing is about if we have got the numbers right. Labour is determined to get to the bottom of that"

<https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/HANSARD-1820781676-76718/link/121>

This excerpt clearly shows that she had committed Labor to getting the brumby numbers right, yet instead she had done completely the opposite, and in fact has simply increased the shooting of brumbies.

And this summary of the current brumby counting method, taken from report of 23/5/23 by Claire Galea, biostatistician, titled "Independent biostatistical report on the Brumby population in the Australian Alpine National Park", also brings into question this methodology. In her summary she says: *"There are concerning flaws in methodology and statistical modelling of the population estimates of wild horses in the Kosciuszko. Based on this analysis it is impossible to have any confidence in the population estimates provided"*.

And Claire's Key Findings:

The survey methodology contains significant flaws that put in question the counting of wild horses. Insufficient numbers of wild horses were seen to apply statistical modelling techniques to estimate populations. For example: Values from surveys conducted in 2014 and 2019 were combined together as insufficient numbers were seen and population estimates done from this one single value which means that population estimates over time are fundamentally flawed

Video of lies relating to brumby numbers

https://m.youtube.com/watch?v=d4tshwsaEl4&fbclid=IwAR2WAojh-ALc9fZkd_3ru6kur1sFcKel-Usp570I_iPgusplJ-f8P0yBolg&mibextid=Zxz2cZ

More brumby counting lies – refer link to this video below

[Numbers Lies and Broken Promised..Updated](#)

- In beginning of June 2023, over a 2 day weekend, 70 volunteers descended on the northern end of KNP and did their own count, and only counted 653 horses –



Di Hardley

Admin · June 21 · 🌐



We can announce today

The community count done on the 2nd 4th of June in the high horse density area of the Northern end of Knp Was 653 now of cause we didn't count every single horse but even if we double what we saw which is very very generous But I will leave it to karen Summers will explain in more depth the count and data

But Now we have now confirmed what we already knew well under 3000



Since then hundreds of brumbies have been cruelly shot. Even about a couple of months ago, 10 trucks each containing up to 30 brumbies were sent to the knackeries to be made into pet food. KNP has been closed for 4 months, so imagine how many brumbies have been shot during this time?

b) The justification for proposed aerial shooting, giving consideration to urgency and the accuracy of the estimated brumby population in KNP

There is no justification for Labour's proposed aerial shooting of the few hundred brumbies left in the park. The fact Minister Sharpe agreed a couple of months ago to a discussion on getting an independent brumby count done in October 2023, and yet refused to get a moratorium on shooting of brumbies at that time, is a travesty, and contravenes the current 2021 Brumby Management plan which says culling of brumbies can get to 3000, yet Penny Sharpe knows there is not the ridiculous and biologically impossible brumby numbers she's claiming there are as she did a fly over at the beginning of the year, and when asked how many she saw, she refused to answer, because she knew there were not even 1000 brumbies left then. And yet she is continuing to kill the brumbies and in fact since she was elected in March 2023, has deliberately and spitefully increased the killing of brumbies, especially over the past 4 months when KNP was closed.

c) **The status of, and threats to, endangered species in KNP**

There is no peer reviewed science that proves brumbies cause damage to the Australian Alps. Instead the Government should consider the environmental value of nomadic herbivores, which the brumbies are. They should look at the international studies on the benefits of rewilding with nomadic herbivores. For more info you can go to <http://brumbiesforever.org/page1.html> and you will see just how beneficial wild horses are to supporting Australia's natural ecosystems.

Brumbies aren't feral as they are a keystone species so they actually work **WITH** nature, not against it. Conservation biologists have classified equines as one of the keystone species which is critically important in the regeneration of the Earth. Scientists believe evolution gave horses the ability to modify their environment to suit their species, and in doing so, they will benefit numerous plants and animals who share their ecosystem. Rewilding or species reintroduction is increasingly being seen as a valuable tool for saving species from extinction, and for reintroducing locally extinct species. Click on this link to learn more <http://theveonline.com/ecological-impact-horses-keystone-species-critical-regeneration-earth/?fbclid=IwAR06lFYv11jPSCwbT8eG2dnQirprASM4UKPolqnR8ngg-H3eJbflAdZRVB8>

What is causing the damage to the Australian Alps is the following:

Land-clearing and man-made developments, human activity, is the biggest driver of environmental destruction of the Park, along with the effects of climate change. Native flora and fauna are being killed by other factors, not the brumbies. Examples of environmentally destructive man-made developments include:

- The Snowy Hydro project in KNP
- Ongoing building of Alpine ski resorts
- Ski fields
- Four-wheel drive tracks
- The encroachment of holiday homes
- Hundreds of camp sites
- Several caravan parks
- Bike and walking trails
- Millions of tourists that traipse through the park every year

Here's a video of how man-made developments, not Brumbies, are destroying the park <https://m.youtube.com/watch?v=GXprxgvfNzQ&feature=youtu.be>

- What is causing the decline to the **Corroboree frog** is not the brumbies, but chytridiomycosis, the disease associated with amphibian chytrid fungus. https://m.youtube.com/watch?v=HFUA_i16QpU&feature=youtu.be
- The brumbies aren't killing the **pigmy possums** in the Australian Alps, there's not enough bogong moths due to climate change <https://www.google.com.au/amp/s/amp.theguardian.com/environment/2019/feb/25/decline-in-bogong-moth-numbers-leaves-pygmy-mountain-possums-starving>

- What is causing the decline of the **Smokey Mouse** - major threats to the species include predation by introduced carnivores, habitat changes due to altered fire regimes and dieback caused by the Cinnamon Fungus, and loss, modification and fragmentation of habitat due to road construction and intensive timber harvesting. As quoted from the Government's own website - *"Major threats to the species include predation by introduced carnivores, habitat changes due to altered fire regimes and dieback caused by the Cinnamon Fungus, and loss, modification and fragmentation of habitat due to road construction and intensive timber harvesting"* Not anywhere is wild horses listed as being responsible for the demise of the Smokey Mouse.

<https://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10686>

In addition to the above, the NSW Environment website lists threats to the fauna from humans, human development, climate change, weeds, fires, ski runs, ski resorts, roads. Not because of brumbies.

<https://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10510>

- As already mentioned, native fauna are being killed by other factors, not the brumbies - refer this video to see this
<https://m.youtube.com/watch?v=5JQva3v5d08&feature=youtu.be>
- Humans are destroying **peat moss**. And fires are destroying heaps of it. Here's an extract from ScienceDaily

New research from McMaster's School of Geography and Earth Sciences, led by Gustaf Granath (now of Uppsala, Sweden) and James Michael Waddington (who goes by Mike) shows that peat mining for horticulture and fuel, drainage for agriculture and construction, and overall global warming have made a growing number of the world's bogs dry and vulnerable to fire that can burrow deep into the ground and burn for months, even through the winter, only to re-emerge. "People don't think about a fire going down into the soil. They think about it going across the landscape," Waddington says.

Peat mining in Europe and drainage to plant palm-oil plantations in southeast Asia are the sources of the greatest vulnerability, and have already helped to propagate fires that have caused massive destruction and death.

[From fire breaks to fire hazards: Human activity, climate change are transforming the world's peatlands -- ScienceDaily](#)

Wild horses actually have a positive impact on the environment, if they are left to be nomadic herbivores. To give you an example, taken from the below article, the end result of their high quantity diet is lots of quality manure. It includes the seeds of whatever wild plants they are eating, and it enhances soil fertility because it contains a high level of nitrogen. As wild horses roam, they deposit manure all over their territories and it encourages the growth of vegetation. Some research has discovered horse-grazed sites

show better grass cover and species richness. When they are fenced or held by humans in too small an area, they can damage their environment. So far, there is no proof free-roaming horses have ever damaged the ecology of their environment. On the contrary, if they are allowed to roam freely in enough space, they will enhance their environment. For more info click on this link

<http://theveonline.com/ecological-impact-horses-keystone-species-critical-regeneration-earth/?fbclid=IwAR06IFYv11jPSCwbT8eG2dnQirprASM4UKPolqnR8ngg-H3eJbflAdZRVB8>

And I came across this article by American wildlife ecologist Craig Downer on how wild horses can make valuable contributions to the Australian ecosystems in many different ways, as per the below:

Dietary benefits, buildings, dispersing viable seeds

Equids possess a caecal, or post-gastric, digestive system. This enables them to take advantage of coarser, drier vegetation and, through symbiotic microbial activity, to break down cellulose cell walls to derive sufficient nutrients from the inner cell without overtaxing their metabolism. In drier regions, this can give equids a distinct advantage.

Consumption by equids of coarser, drier vegetation can greatly benefit sympatric, pre-gastric (ruminant) herbivores, and energize and enrich the ecosystem as a whole. By recycling chiefly the coarse, dry grasses as well as other dry, withered herbs, forbs and bush foliage, the horses and burros expose the seedlings of many diverse species to more sun, water and air, thus permitting them to flourish. The latter can then be consumed by ruminants (see R.H.V. Bell 1970).

Refer this link for more info

<https://www.horsetalk.co.nz/2018/06/04/brumbies-useful-australian-ecosystem/>

Results from surveys did not reveal a significant effect of wild horse grazing on plant community composition, species richness, diversity, evenness, or dominance. In fact plant species richness was higher in horse grazed areas compared to un-grazed areas. Butterfly and bumblebee habitat use, as well as feeding and resting activities were also higher in horse grazed areas. This is very significant, and once again shows that brumbies, as a keystone species, actually work with nature, not against it.

- d) The history and adequacy of NSW laws, policies and programs for the control of wild horse populations, including but not limited to the adequacy of the 'Aerial shooting of feral horses (HOR002) Standard Operating Procedure'**

And

- e) The animal welfare concerns associated with aerial shooting**

The current methods used by NSW Parks and Wildlife (NPWS) of trapping and shooting horses, and the proposed aerial shooting of brumbies by Labor, is barbaric, especially when

there are humane alternatives out there. Luring mobs of brumbies including pregnant mares and foals into cruel one-way steel traps is completely cruel.

Both ground shooting and aerial shooting can never be humane, and no one can guarantee a 100% kill shot where the animal doesn't suffer.

Aerial shooting from a distance at a group of galloping horses, will never guarantee death at first shot and so they will end up suffering.

Pestsmart advise aerial shooting from a moving vehicle for horses is "not recommended". It's obvious why, because horses bolt, and many will receive numerous body shots, up to six according to reports, and will not die instantly. Foals will be crushed in the stampede. If stallions go down first, mares will be confused and likely stampede further. This cruel lethal killing method must not take place.

An assessment conducted on aerial shooting in Alice Springs, found that only 63% of horses shot from a helicopter displayed a rapid death, which means 37% of horses lingered with multiple wounds. This is a damning number and indicates cruelty and an inhumane approach to managing brumby populations.

There are humane alternatives to culling of the brumbies, like rehoming and fertility control

It is absolutely cruel to lure mobs of brumbies into a large steel trap using the inducement of Molasses when one understands that often a section of the Mob are trapped, and at times some of those brumbies held in the trap are injured as part of the slamming shut of the trap door, and/or are injured when one or more of the brumbies within the trap becomes frantic and results in injury to either that brumby and/or to the other brumbies trapped. And sometimes these injured Brumbies are held/contained within these traps in agony for hours, and at times days until such time as the Trap is emptied by NPWS employees.

There are signs all around the traps about not taking any photos. This is because NPWS would know the public would be horrified if they witnessed what had happened inside these cruel Traps.

Trapping is random, causes either physical or psychological injury to the brumby and their family who are either inside the trap or on the outside looking in and witnessing the horror unfold. The fact these brumbies are destined to be slaughtered after suffering in these traps is even worse. More horses are shot than are rehomed.

In a recent ground shooting of brumbies, most of them were not shot in accordance with the obliged 'Standard Operating Procedures' [or SOP's] that ensures humane treatment of the target animal.

The fact Minister Penny Sharpe and the NSW ALP Government now want to add aerial shooting to slaughter the last few hundred brumbies left is an absolute disgrace.

Anyone with any understanding of the cruelty that is always inflicted upon the target animal of any aerial shooting will know just how barbaric this method of killing is.

The Labor government need to go back to the past and look at how horrific the massacre was of brumbies in Guy Fawkes National Park, for evidence on how absolutely cruel aerial shooting is. There is no place for such a heartless method of killing.

Aerial shooting should never occur, especially as brumby numbers don't need to be managed because we are lucky if there are even 100 brumbies left, based on the numbers of brumbies killed in the past five months.

f) The human safety concerns if KNP is to remain open during operations

There are hundreds of campsites in KNP, several caravan park sites, several bike and walking trails. In fact millions of tourists traipse through the park every year. These shootings when the park is open could result in accidental killing of a human/s, and is another reason why shooting of brumbies shouldn't be allowed. The fact the shooting has occurred during 2023 when the park was open is an absolute disgrace, and shows a complete disregard for human safety

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

Clearly the Labour government have ignored the cruelty and horrific massacre that happened in Guy Fawkes National Park all those years ago, and the hundreds of slaughtered brumbies who lay where they were shot, having suffered in excruciating pain. To even consider re-introducing aerial shooting in light of what happened on previous occasions is a disgrace.

h) The availability of alternatives to aerial shooting

The government needs to do more in getting brumbies rehomed. Do advertising on rehoming opportunities, to advertise on social media, in newspapers, reach out to sanctuaries, to individual registered rehoming organisations. And provide financial aid to rehoming organisations to take brumbies as it's very expensive to transport them, feed them and agist them.

The government should implement a fertility control program. For example they could use Porcine Zona Pellucida, or PZP, which is a fertility-control vaccine given to female horses that has been adopted in the US very successfully.

i) Any other related matters

Any shooting of our beautiful brumbies is inhumane – please refer to the below shooting methods proving this

GROUND SHOOTING is inhumane and causes horses to panic and many are not killed instantly. Ground shooting will immediately cause massive panic among the horses. When they gallop off, this can cause serious injury, and mares will get separated from their foals. When injured, they will end up going off and dying a slow, horrible death.

AERIAL SHOOTING from a moving vehicle will cause horses to bolt, many will receive numerous body shots, up to six according to reports, and will not die instantly. Foals will be crushed in the stampede. If stallions go down first, mares will be confused and likely stampede further. This is another cruel lethal method that must not take place.

As already mentioned, but to reiterate here, there has been no assessment conducted about ground shooting, therefore there will be no means to satisfy standard operating procedures. An assessment conducted on aerial shooting in Alice Springs, found that only 63% of horses shot from a helicopter displayed a rapid death, which means 37% of horses lingered with multiple wounds. This is a damning number and indicates cruelty and an inhumane approach to managing brumby populations.

SHOOTING IN TRAPPING YARDS is also inhumane and causes horses to panic and experience immense fear and be subjected to crush injuries. Not to mention the psychological distress that these horses who have a strong sense of family, will experience when they see their family members shot before their very eyes.

It's alarming that there is a complete disregard of the 2018 Brumby Heritage legislation where the intent was to stop the brumbies being killed and managing their numbers through passive trapping and rehoming. It was never intended that they would be killed

TRANQUILISING IN TRAPPING YARDS followed by euthanasia via a captive bolt or lethal injection is another inhumane way to manage the brumbies. Horses will experience intense fear and alarm when they witness their family members dropping to the ground and dying. And a captive bolt to the head? You only need to watch [The Final Race](#) to see how cruel and painful this method can be.

In conclusion, the NSW Government must immediately put a moratorium on killing of brumbies until an independent, unbiased count can be done, and then it will be proven that there are not the exaggerated numbers of brumbies the government claim, and therefore no culling program should continue, because the brumbies are not in plaque proportions, and they are not destroying the alpine vegetation.

The NSW Government needs to act with a moral compass and do the right thing. Brumbies are part of our heritage. They deserve to not be persecuted relentlessly, especially when they are not to blame for anything at all.

Thank you for reading my submission.

Yours faithfully,

Simone Cooper