

**Submission
No 65**

INQUIRY INTO PROPOSED AERIAL SHOOTING OF BRUMBIES IN KOSCIUSZKO NATIONAL PARK

Organisation: Heritage Horse and Environment Protection Alliance

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Submission on behalf of the Heritage Horse and Environment Protection Alliance

The Heritage Horse and Environment Protection Alliance is a group which combines concern for the natural environment and protection of native species with valuing Australia's heritage horse, the brumby. These horses have been fundamental to the development of modern Australia and play a central part in our culture and literature. Given this they have the right to humane treatment and appropriate management.

TERMS OF REFERENCE

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

The methodology currently used to establish brumby numbers is deeply flawed. The current approach does an aerial survey of one particular site and then multiplies the number of horses in that site to the entire site under consideration. This is not an approach which would have credibility in any legitimate research. Horses panic when a flyover takes place increasing the difficulty of an accurate count. To then extend this potentially inaccurate number to a wider area is problematic in the extreme.

I draw attention to a recent academic article (Harvey A.M, Ramp D, Mellor D.J. 2023). The authors of this article review global research with particular focus on 'free-roaming wild horses'. They argue that detailed information this sort 'serves as a useful, holistic, multidisciplinary summary and point of reference for anyone wishing to assess equine welfare. Importantly, the information on free-roaming horses ... may be utilised to provide a better understanding of the impacts of human interventions on the welfare of horses in domestic situations' (p26). That is, their findings have value to the wider equine community. Many of their findings have particular relevance to the focus of the current inquiry.

The authors draw attention to the impact of catastrophic environmental factors, such as the recent bushfires in the High Country, on population numbers:

'[C]limatic events such as drought, storms, heavy snow, extreme cold, thunderstorms, lightning strikes and fire have all been reported to cause mass mortalities in wild horse populations' (pp13-14).

They also document the average size of groups of wild horses:

'The social unit, known as a band, usually consists of one or more stallions, one or more mares, 1–2-year-old horses of both sexes that have not yet dispersed, and foals. Mean reported band size is 4–12.3 horses' (p19).

In reference to population growth they found that 'in three different wild horse populations in the Australian Alps only one of these populations was found to be increasing whilst the other two were stable '(pp21-22).

In terms of reproduction their research shows that although mares 'are capable of foaling every year ... most commonly they raise one foal every two years '(p23).

This is the first study of its type and the extensive and very detailed analysis of the data paints a very different picture to that conveyed by those in support of mass culling. These researchers found that wild horse populations are devastated by events such as bushfires, that group size is small, that population numbers are, on the whole, stable and that mares only foal every second year.

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

The brumby population count is inaccurate. There is total disregard for impact of other species such as deer, wild pigs and human activities such as dirt bike and four wheel driving. There is no attempt to document native species numbers or environmental damage before and after brumby culling. Given this there is no justification for the proposed aerial culling. A study (Berman, D. 2023), found that the cumulative impact of deer, feral pigs, fire and humans was far more significant than that of brumbies. Removing these horses while ignoring both the impact and rapid increasing populations of deer and pigs will do little to protect native species or the environment.

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

An article (Williams, R. pp167-207) on bio-diversity loss in the Australian Alpine area argues that attempts to prevent this have been ineffectual because of a lack of appropriate information and monitoring. Given the lack of reliable data collection on native species numbers pre and post mass culling of brumbies there is no evidence to support the current approach. The impact of other factors such as climate change, commercial development, increased tourism and other invasive species is ignored. If we are to reverse or even slow the rate of decline of native species, a simplistic approach which focuses on solely on the impact of wild horses is both inadequate and foolish.

- **(d) the history and adequacy of New South Wales 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'**

The Aerial shooting of feral Horses Standard Operating Procedure (HOR002) specifies the use of highly skilled shooters and that only head (brain) or chest

(heart/lung) shots are to be used. On the ground evidence supported by photographs is that this is not the case when brumbies are shot from a helicopter. Dead and dying horses have been found in national parks in Victoria with multiple bullet wounds in different parts of the body.

The procedure further specifies that horses can only be shot if they can be clearly seen, there are no foals and the shooter is within the required range to ensure an immediate kill shot. This is not possible with aerial shooting. Horses panic at the sound and sight of a helicopter. They flee and again evidence from Victoria confirms that many are injured and left to die in agony. Mares have been found dying in the process of giving birth. In one particularly distressing case, again with photographic evidence, a foal was found next to the mare, having been torn to pieces by wild dogs. Shooters are also restricted to areas which offer clear sight of the brumbies. That is, shooting is not to occur on mountainous areas, on rough ground or where there is tree cover. If this requirement is to be followed, aerial shooting is not possible in the vast majority of the Alpine areas under consideration. A final requirement is that of 'fly-back' in which the helicopter is required to go over the kill site to ensure that horses are not left to suffer. That this is a requirement both calls into question the notion of an immediate kill shot and shows a total lack of understanding of the reaction of a wild horse to injury. A panicked horse will flee for some distance even when seriously injured. The requirements as specified in the standard operating procedures and the reality of aerial shooting are totally incompatible.

- **(e) the animal welfare concerns associated with aerial shooting**

The RSPCA defines humane killing as 'when an animal is either killed instantly or rendered insensible until death ensues, without pain, suffering or distress'. This is not possible when wild horses are killed by aerial or ground shooting. Horses fleeing in wild terror in reaction to gunfire are not dying 'without pain, suffering or distress'. Horses found with multiple bullet wounds, having died days after being shot, have not been 'killed instantly'. To believe that aerial shooting is anything other than inhumane and immensely cruel is to deliberately choose to ignore the readily available evidence to the contrary.

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

Verbal evidence was offered at the recent Senate Inquiry into the Impacts and management of feral horses in the Australian Alps as to the experience of a walker in a Victorian national park where he had been forced to take cover because of overhead gunfire. He reported ringing a friend in great fear to describe what was happening and asking for help if he did not make contact later in the day. Walkers have also reported their distress on finding rotting bodies of mares and foals close to popular walking tracks.

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

In 2000 aerial shooting was used to kill 600 wild horses in the Guy Fawkes River National Park. That this approach does not in any way meet the RSPCA requirements for humane killing is evident in that wounded horses were found having died in great pain almost two weeks after having been shot. Foals had died of starvation standing next to their dead mothers. As a twelve charges of animal cruelty were made. Facing court action and increasing public condemnation the National Parks Authority chose to plea bargain the twelve cruelty cases, accepting responsibility for one extreme cruelty case. That is, they formally acknowledged the failure of this approach.

- **(h) the availability of alternatives to aerial shooting**

There are alternative approaches to population management of wild horses which are used successfully in other parts of the world. These include relocation and rehoming using passive trapping as the kindest and least stressful approach to capture. If rehoming is to be both successful and sustainable, there needs to be appropriate central management and financial support, including funding for the development of sanctuaries where horses can be worked with prior to rehoming.

Fertility control through darting mares with PZP is used successfully in both the USA and in England. Numerous studies have demonstrated its effectiveness. The efficacy rate is 95-97%, and research in the US has found that a mare who has been treated for 5-7 years will self-boost and no longer require additional treatments.

Protection of sensitive environmental zones through appropriate fencing to exclude all invading species should also be considered.

The current adversarial approach is problematic. Wild horse advocate groups, such as the Heritage Horse and Environment Protection Alliance, are ready and willing to work with government and national parks to resolve this issue in ways that are both humane and effective. This requires an openness to alternative views and the establishment of effective communication between groups. The aim for our group is the maintenance of sustainable and protected numbers of wild horses in appropriate areas AND the preservation and protection of native species and the environment. If a way can be found to work together, we believe that this is both possible and achievable.

- **(i) any other related matters.**

There are two other issues which deserve consideration by this inquiry. **The first** is that of the relationship between our national horse, the Australian Waler and the wild brumby. The Australian Waler horse is currently classified as rare and endangered. It is our heritage horse, the Australian equivalent of the American Quarter Horse, and

must not be allowed to disappear. The bloodlines of this rare breed are held within the brumby population. Once gone, they can never be replaced.

Horses arrived in Australia with the First Fleet and 'over the following years a large number of horses were imported ... [and] ... from this widely diverse pool of horses, a distinctive type started to emerge, ... shaped by the unique Australian environment ... only the strongest and toughest survived the trip ... [and] the developing Australian horse breed was based on the very toughest genes '(Pickerel 2011 p.105).

The breed became known as Walers, a term being used in 1840s, meaning a horse bred in the colony of NSW, and was used in reference to horses sent overseas as remounts for the British armies in China and India, and for Indian regiments. Advertisements for Australian Waler horses can be found in newspapers of this time from British India, *The Pioneer* 1877 and *The Civil and Military Gazette* 1886, for example (Allen, 1977). Walers were highly regarded throughout the world as a 'superior saddle horse ... [with a] great reputation as a cavalry remount '(Ballantine 1976 p. 27). Thousands of horses were exported during this time with 169,000 used in World War 1 alone. The 4th Light Horse Brigade's charge at Beersheba, one of the last cavalry charges in warfare, is well known (Ballantine 1976). The export trade flourished from the 1840s to the 1930s with thousands of horses leaving Australia each year. Many properties were devoted to horse breeding, with owners choosing to run their horses in the wild as brumbies, through this process developing the toughness and intelligence for which the breed was renowned.

Throughout Australia, Walers were the all-purpose horse. The saying was that a Waler would work the stock, pull a plough, carry the children to school and take the family to church on Sunday. They played an essential role in the development, history and cultural identity of Australia and 'the horse is owed a debt '(Ballantine, 1976 p. 7).

When horses were no longer needed, they were released into the wild and have become the brumbies with which this inquiry is concerned. The Australian Waler is now classified as rare and endangered but the breed has survived in the brumby population. Since the 1980s efforts have been underway to re-establish and protect the Waler with particular focus on preservation of the foundation bloodlines. Extensive and ongoing DNA testing through the University of Texas as part of the Global Equine Genome Project is being used to confirm the status of the breed as 'the old bloodlines of the Waler cannot be reproduced once these have been lost '(Khanshour, Juras & Cothran, 2013 p. 357).

Brumbies remain key to the re-establishment and preservation of the Australian Waler because 'we cannot recreate the Water with modern blood '(Crispin 2011 p.6). All horses recognised as Foundation Walers have been wild caught. That is, they were running as part of a mob of brumbies and, to quote Janet Lane, a leading authority on the breed, 'sourcing old bloodlines from wild populations would greatly assist in securing a future for the types we once had '(<https://walerdatabase.online/>).

Brumbies offer the opportunity to re-establish an iconic breed. Given this they deserve to be offered appropriate protections and regarded very differently to wild pigs, cane toads and blackberries.

The second issue is the potential of our wild horses to be a valuable tourist attraction - think of the Icelandic pony, the horses of the Camargue and the New Forest Ponies. These horses are protected and valued. The same should be done here.

The brumby is an essential part of Australian history and deserves to be a part of the future. Given this we ask that consideration be given to the preservation of a sustainable number of brumbies managed through a carefully considered combination of environment protection, relocation, fertility control and rehoming. Brumby advocate groups stand ready and willing to work co-operatively with other bodies to make this possible.

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