

Submission
No 68

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

Name: Name suppressed

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Partially
Confidential

Submission to the N.S.W. Senate Inquiry – Aerial shooting of feral horses

I would like to thank the senate committee for the opportunity to comment on yet another inquiry into the control of an invasive species of significance and in particular the use of aerial shooting as a means of control. It is somewhat disingenuous of the Honourable chair to refer this matter to an inquiry only now when horses are threatened. Aerial shooting of other invasive species has been ongoing for many years without similar attention from the honourable member. It has been an effective means of control in areas where other means would not be possible. This inquiry also duplicates information provided at the Federal Senate inquiry currently sitting and places an additional burden on staff of the National Parks and Wildlife Service (NPWS) to provide information and comply with the obligations of the current plan of management for control of feral horses.

To address the terms of reference;

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

It appears to me this point of reference directly relates to a dispute over the Stuart Cairns method of distance sampling brought about by people with a personal agenda who have presented a rebuttal by another biostatistician with a known bias.

While the rebuttal may or may not be valid, I doubt those on the committee would fully grasp the discrepancies put forward by a person whose expertise is in counting microbiological samples. Stuart Cairns is a renowned and often cited expert in counting wildlife (among other accomplishments) and his method has been reviewed and tested by other esteemed academic authorities. If the committee seeks to challenge this it should do so with a truly independent authority. The single 'authority' quoted by the Honourable Chair in Hansard is not independent nor is she qualified in this field. Her vested interest determines her rational and while this may align with the interests of the Honourable Chair it may not serve the interests of the Parliament or this inquiry to determine the truth. I will discuss the truth about numbers next.

(b) The justification for proposed aerial shooting, giving consideration to urgency and the accuracy.

With regard to the current KNP Wild Horse Management Plan (the Plan), the numbers of horses within areas designated as exclusion is irrelevant. That number has been determined to be zero. The Plan has stated horses can occupy 32% of KNP in specifically defined areas and the total number of horses in retention areas is not to exceed 3000. Horses are recorded in 53% of KNP so there is 21% of the park where horses are not supposed to be at all. It is my view control of horses should be concentrated in that 21% as well as ensuring no

new populations form outside that area. There is no need for a count in exclusion areas unless it is for operational purposes. The plan provides a legal requirement and a time frame for the government to achieve the objective and to date passive methods of control have not been able to achieve a removal rate that will meet the objective or keep up with the annual population increase.

Aerial and ground shooting is the only way to effectively reduce numbers to a point where passive methods would become effective. This provides the justification. Of greater importance is the urgency.

I have heard many utterings from advocates of the feral horse who state 'horses do not damage the environment'. The catch phrase currently is that horses live 'symbiotically' with the other creatures in the park and it is the pigs and deer causing all the damage. The manner this term has been used suggests horses provide a benefit to the other creatures that is essential to their survival and in turn receive a mutual benefit. This is not actually what happens. There is some level of competition for resources throughout any biodiversity but this has developed over considerable time. The introduction of heavy and hard footed animals with European settlement brought with it the destruction of a natural environment that evolved over thousands of years. Natural selection determines those animals more suited will survive and survival is a continuing battle for all species but it is not fair to introduce a domesticated animal (with a known ability to adapt) into a biodiversity and then give the introduced animal legislative protection to the detriment of those creatures which have evolved there and expect those creatures to survive.

I don't argue pigs and deer cause damage and it is clear NPWS are taking proactive steps to manage these pests but management of horses is continuously hampered by legal action, protests, petitions and inquiries while the actual damage caused by horses is explained away. Urgent action is needed. My recent trips to the alpine areas has confirmed the damage caused by horses alone is considerably more than pigs, deer or rabbits combined although damage from all was observed. By not including aerial shooting of horses the government will not be able to reduce horse numbers to a level where the environment can maintain its current status and far from any level needed for it to recover. Is it urgent? Every action that delays effective control of horses increases the recovery time tenfold so I would say urgent is an understatement.

Horses are gregarious as well as territorial. They mark and defend their territory which will undoubtedly include a reliable water source. Mobs will vary in number but usually will be less than twenty horses including dependent foals, yearling (immature) males and females. This number of horses is enough to cause permanent damage to water courses where the horses cross as seen in the photo below.



This damage was caused by a mob of between 10 and 20 horses and similar damage was observed in other parts of the stream nearby. Times this by 1000 to have any idea of the devastation being caused by feral horses in Kosciuszko.

(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.

(e) The animal welfare concerns associated with aerial shooting

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

These terms of reference should be linked as speaking to one speaks to the other. I am not entirely sure why the Senate committee has bothered asking these questions as all have been answered time and time again. The information available is enormous. Reports have been written by State and Federal agencies on this matter. Some are decades old and are still relevant but in current times we continue to talk about the same things and a small group of people are trying to stop any meaningful action to protect sensitive biodiversity. It is shameful. I read the Hansard from current sittings and see some honourable members seeking moratoriums on action against horses and more discussion to determine numbers, the extent of the problem or how horses actually affect the environment. This is all known so I can only assume the tactic is to stall what must eventually occur if the environment has any chance of recovery.

A number of detailed reports are available regarding the impact of shooting feral horses in Guy Fawkes National Park as well as the impact of those horses on the environment. The fact that 606 feral horses were shot in only three days speaks to its effectiveness. The

impact of this aerial shooting was exaggerated by media and those supporting horses to the extent aerial culling of horses was banned by the government (The Hon B. Debus) but the investigation into the shooting failed to find any evidence of inhumane acts.

A field investigation was carried out on 2 November, and again on 10 November. A total of 27 horses were examined on the first visit, and 12 on the second. There was no evidence to support a claim that the horses had not been killed humanely, and no evidence of indiscriminate targeting away from the killing zone. A local veterinarian who looked at 67 horses on behalf of the RSPCA indicated that he had come to the same conclusion, in a discussion concerning our findings. We had agreed that we would work together in this way. This total number of horses examined provided a valid sample of the animals that were shot, selected at random as they were.

Much has been made about the subsequent court proceedings by feral horse advocates who claim a victory against aerial shooting but the comments of the magistrate Grahame Hanson in accepting one guilty plea from the NPWS are rarely spoken of because they destroy the credibility of their argument. The NPWS pleaded guilty to one charge of unintentional cruelty to one horse due to an anomaly with a number of rounds fired into a mare. The ammunition failed but not the shooter. A conviction was not recorded and the magistrate summed up in precise terms;

“while people felt revulsion for the cruelty, all the evidence pointed to the culling being carried out professionally by officers of the NPWS.”

“Like all activities, an inevitable risk which is least desired . . . may come to pass,”

The NPWS must, in all its endeavours to control feral and invasive species, seek to do so with the utmost care to ensure animals are treated humanely and given the ever increasing spotlight on its operations I am convinced it does just that. I do not believe anyone involved in the lawful destruction of a feral animal gains any satisfaction from the killing apart from knowing it will work toward the protection of the environment that animal is destroying. None would want animals to suffer either. All staff involved in this action were highly trained but it was suggested in the media otherwise. It was also dramatized in the media to suggest shots were fired indiscriminately and some members of parliament have politicised this incident and provided a provocative and misleading account of what actually happened. The truth was overshadowed by the misinformation. The senate inquiry should seek out the factual record of this matter instead of relying on misinformation from those with a purposed agenda.

The impact of the aerial culling ban (for horses only) in NSW was to take a population in Guy Fawkes National Park estimated to be 100 after the cull to a population estimate of 1800 in 2020. That number is considerably more than the total number in 2000 when it was considered necessary to reduce horse numbers quickly. Passive trapping and rehoming has continued in Guy Fawkes NP which demonstrates conclusively passive control is not enough to manage feral horse populations.

The standard operating procedures developed by Pestsmart for aerial shooting of any vertebrate and adopted by the majority of authorities throughout Australia are essentially the same when it comes to the impact of aerial shooting on the target animal. Horses are the same biologically as any other vertebrate and their size allows for better shot placement to ensure a humane kill when compared to pigs or goats. This fact alone makes aerial culling of horses more effective which was demonstrated at Guy Fawkes which achieved more than 99% efficiency.

(h) The availability of alternatives to aerial shooting

The alternatives to aerial shooting have also been discussed at length and it has been demonstrated how ineffective the more passive methods are at controlling numbers. Passive trapping would be effective when numbers have been reduced to a more sustainable level. Mustering and trapping also places considerable stress on wild animals and there is the potential for lactating mares to be separated from foals. These methods are also time consuming and more expensive. Trapping cannot be conducted in areas where transportation is not feasible.

Brumby running and roping is also stressful on animals and has never been shown to reduce population sizes. This practise is considered more of a sport where young animals are run until exhausted and then dragged onto a stock crate to provide some small change when gentled or broken.

Fertility control of horses in Australia has been studied at length and it has been determined to be of little use due to the method of delivery and the need for repeated treatments. Horses in the wild can live for a very long time and even if follow-up injections were administered, the animals are still in the environment causing damage. Without going into great detail in this submission, it is easier for the committee to review the expert opinion found here: <https://www.publish.csiro.au/wr/pdf/WR17136>

(i) Other related matters

It would appear obvious from the tone of my submission that I am somewhat annoyed and with good reason. It appears the survival of a feral species that is domestically plentiful is more important to some than the survival of a dozen species and the degradation of the

headwaters of our river systems. I am sick and tired of writing submissions only for nothing to be done. While I understand the convening of this inquiry was to bring attention to what some think is an inhumane process, I consider it reprehensibly inhumane to allow the slow extinction of precious vertebrates which have evolved and lived in this environment for thousands of years in order to preserve an animal introduced by European man for profit and reward.

My comments will be disregarded by all who consider feral horses worth saving and I will be branded a 'greenie'. Perhaps I am but I am also a former Jackaroo, Stockman and Agricultural Scientist who has been involved with horses for almost fifty years. I live in the High Country and currently own four horses which are very dear to me as is the mountains I see being destroyed by this invasive species.