

Submission
No 79

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

Name: Name suppressed

Date Received: 9 October 2023

Partially
Confidential

Submission to Animal Welfare Committee inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park and surrounding areas.

I am appalled at NSW even contemplating aerial culling, given it has been proven to be enormously cruel way to kill horses in the cullings in Guy Fawkes National Park. While it is possible to kill a horse humanely from a helicopter, it is very unlikely. Certainly not the quick and humane death that it is supposed to be.

Passive trapping and rehoming is the most humane method of management of brumby numbers in the Park. And I oppose lethal methods of management in the identified Retention zones of Kosciuszko Park.

The current KNP Wild Horse Management Plan was developed through a long consultation process to strike an appropriate balance between protecting the fragile areas of the Park and supporting conservation of a sustainable number of heritage brumbies in identified retention zones. It clearly ruled out aerial culling in response to the views expressed through that consultation, and previous experience with aerial culling in NSW. It must not be amended in a way which:

- Allows aerial culling or
- Moves away from the commitment to retain at least 3,000 brumbies in the Park.

Further comments on the specific terms of reference follow:

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

Equine scientists including Dr Joanne Canning and Claire Galea have pointed out the flaws of the methodology. The estimates simply do not align with actual physical counts undertaken in the Park by NPWS or by independent community members, or biological capabilities of horses.

The 18-23,000 figure which is being promoted, is not qualified as an estimate – it is perpetuating a myth. Given the actual head count within North KNP in 2021 was just over 3,000, and most (approximately 85%) of brumbies are estimated to be in this area, the current estimates are extrapolating almost 6 times the actual brumby sightings, using methodology used for other animals. Brumbies are not difficult to see – it would be reasonable to estimate that up to half might not have been seen. But this is a gross over estimate, and is misleading the public. Many of us are aware that an independent physical count which took place in June found less than 700 horses in North Kosziusko.

A recount should be done with input from equine scientists.

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

Given the flawed estimate of numbers there is no urgency to decimate the population, and the extent of the urgent cull proposed in a short period of time is not justified, given the brutal impact on animal welfare this would entail, and the loss of important gene pools within the population. .

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

If the problem genuinely is threatened species, and not simply the push to remove brumbies, a balanced approach which addresses all causes, is needed. Need to also acknowledge the impact of humans, ski fields and Snowy 2.0.

The Australian Brumby Alliance has undertaken research showing that in most areas the density of brumbies is not sufficient to negatively impact threatened species, and may have significant positive impact – this includes reducing risk of bushfires. It is known that the areas the brumbies inhabit in North Kosciuszko, and the animals who share these areas with them were less impacted by the 2020 Black summer fires.

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 current Wild Horse Management Plan offers a balanced and fair approach to brumby management in many ways. It acknowledges the heritage value of the horses, offers a promise to retain at least 3,000 brumbies in identified Retention zones, commits to discontinuing the practice of trucking trapped horses to knackeries or abattoirs and promises NOT to undertake aerial culling. In return concessions were given to management in fragile zones, including ground shooting where essential.

But this current amendment is a breach of this balance in animal welfare by shifting towards aerial culling.

Aerial culling is an unspeakably cruel way to kill horses. Previous efforts have illustrated the cruelty of attempting to shoot horses from helicopters. After the Guy Fawkes National Park cullings in the late 80s, one examination of the skeletons of a sample of 52 of the shot horses showed a large number died from bullets to the pelvis or stomach – a painful death. Only one died from a clean shot to the head.

It is possible, but not likely to get a clean kill from a helicopter, and typically, the approach is to simply keep chasing the horses till they are exhausted. The terror of horses killed this way is appalling. Broken legs and foals left to die without their mums is horrific.

In terms of the Standard Operating Procedure - A major flaw with HOR002 is that it assumes the only value of feral horses is by way of pet food or export for European human consumption. It fails to acknowledge the deep heritage value and the high importance many Australians place on this unique breed of horses. RSPCA appears to have missed this point.

A reading of the Procedure itself would suggest that it is not humane or safe to use aerial culling as a method:

- if there is bad weather
- if the terrain is difficult, and
- if foals are present

This would seem to wipe out use of aerial culling for the majority of days in a year in KNP, given the unpredictable weather in winter and the long foaling season from spring through to Autumn.

From an animal welfare viewpoint, the fact the procedure requires a 'flyback' to finish off horses who are suffering on the ground and did not receive a kill shot, is an appalling acknowledgement of the inaccuracy of a flyover. The procedure also does not recognise or acknowledge the absolute terror that horses experience in the minutes before they are killed through this procedures.

The animal welfare concerns associated with aerial shooting

As the history would demonstrate, the animal welfare concerns of aerial culling far outweigh any perceived benefits in terms of urgency and scale. Australians have previously vehemently expressed their opposition to killing horses in this manner.

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

The Guy Fawkes shootings caused repercussions around the world. Australia was internationally and domestically shamed, and NSW was seriously criticised for enormous cruelty to over 600 very beautiful horses. A large proportion of the voting population has not forgotten this.

The availability of alternatives to aerial shooting

Rehomed brumbies are highly adaptable and trainable in a domestic environment. Any suggestion that they are difficult to transport, untrainable or that they are stressed in a domestic environment, is complete rubbish. They have natural curiosity in humans, and a propensity to trust us which is remarkable.

In summary, there is no justification for immediate and drastic reduction of brumby numbers in KNP as the current estimate is significantly flawed. Aerial shooting has proven to inflict enormous and sustained cruelty and is a severe transgression of animal welfare standards. Brumbies have an inherent value and can be retrained and live in a domestic environment. Please stop aerial culling.