

**Submission  
No 86**

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

**Name:** Colleen Krestensen

**Date Received:** 11 October 2023

---

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

### **Introduction:**

Thank you for the opportunity to provide a submission on this issue.

My interests in the inquiry are as follows:

- I live in the Monaro area of NSW – south of Queanbeyan
- I have rehomed and have trained two lovely and very content Kosciuszko brumbies from the Long Plain.
- I am a co-administrator of the Canberra, Queanbeyan and Region Brumby Network, which connects local folk with an interest in brumbies, their rehoming and ongoing training and care.
- I am appalled at NSW even contemplating aerial culling, given the state's dark history with the cullings in Guy Fawkes National Park which is etched deeply on the memory of the community. Yes it is possible to kill a horse humanely from a helicopter – but it is not likely.
- Whilst the focus of this review is on animal welfare, I am deeply concerned at the deep emotional distress, loss and trauma being experienced following recent shootings by the many folk in the region and beyond who value these horses, particularly those who walk among them regularly. The trauma is not dissimilar to that I have seen among people impacted seriously by bushfires and natural disaster.

I, like a large proportion of NSW animal-loving folk, deeply value the Kosciuszko brumbies. They are unique, they are a part of our heritage, having been in the Alps long before the National Park was declared, and when passively trapped and removed from the Park, they adapt well to domestic living.

The local rehomers' network of which I am part strongly believes that a managed but sustainable population of these Heritage brumbies should be conserved in the Park for future generations. The network also considers that passive trapping and rehoming is the most humane method of management of brumby numbers in the Park. And we 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 now 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.

My comments on the specific terms of reference follow:

**(a) 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 underpinning estimates. It's clear to those of us that have watched these estimates magically double, triple, and quadruple over recent years, that these increases are biologically impossible, given horses only reproduce once a year, and given the removal of thousands by trapping. And the estimates simply do not align with actual physical counts undertaken in the Park by NPWS or by independent community members.

The 18-23,000 figure which is being promoted, is not qualified in public documents 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 developed for other smaller animals. Brumbies are not difficult to see – it would be reasonable to estimate that up to half might not have been seen. But the 18 – 23k estimates are 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.

There are definitely concentrations in a small number of locations which need to be targeted– but this does not mean that horses need to be brutally culled across the Park. Those of us who have visited the Park over years know that the numbers there now are significantly lower in most areas than in the post bushfire period.

***Recommendation – A recount should be undertaken with input from Dr Canning and Dr Galea – in the meantime any public use of estimates must make it clear that this is not an actual number.***

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

The brumbies have been peacefully co-existing with native species for nearly 200 years. In fact, since well before the area they run in was declared a National Park. One has to ask, why the sudden rush, and why just focus in a singular way on brumbies, not other known more direct causes of risk to the environment? Whilst their numbers have always been and should be managed, the 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. Already we are seeing the peppercorn chestnuts disappear from Long Plain.

As outlined below, removal of brumbies will not suddenly reverse the threat to species about which there is concern. Implementing high volume, urgent culling using lethal means when there is serious community doubt about the inflated nature of estimates, could result in decimation of the brumby population to an unsustainable number. This could result in inbreeding, and loss of the unique and highly valued features of Kosciuszko brumbies.

**Recommendation** – a true cost benefit analysis of a rushed, approach to culling thousands of brumbies, informed by inaccurate numbers, the impact of other causes on the problem of threatened species and genuine consideration of animal welfare could not justify aerial culling.

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

If the problem genuinely is threatened species, and not an ideological push to remove brumbies from the Park, a holistic and balanced approach which addresses all causes, is needed. For example, the critically endangered galaxias fish for which the horses are being blamed, are threatened because it has been eaten by introduced trout which continue to be released into lakes in the area, as acknowledged in the recent report of the Threatened Species Commissioner. The ACT Government boasts having zero tolerance for brumbies, and the original local brumby population were all shot about 30 years ago. One would expect therefore, to see wildlife utopia in Namadgi National Park – however their Corroboree frogs are struggling as much as they are in other area of the Alps, the koala population has never returned, and bushfires have decimated the local population.

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.

**Recommendation** – a holistic, integrated approach to supporting threatened species is pursued, which acknowledges the impact of humans, ski fields, Snowy 2.0, and other feral animals, including introduced trout on these species.

**(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'**

At the outset I wish to emphasise that in my view, 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 proposed 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. <sup>1</sup>

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. Australia can do better than this!

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 procedure.

#### **(e) 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. Have we deteriorated so much as a nation that now it is simply reasonable to do this, simply to deliver on a KPI based on false estimates, and an urgency driven by ideology?

---

<sup>1</sup> Keenan, M In Search of a Wild Brumby, 2002

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

This is a significant issue from both a physical and emotional perspective. Many people, myself included, seek out the brumbies to walk among them, photograph them or simply watch them. All these folk would be exposed to physical risk if shooting were to commence while they were there.

However I have a professional background in mental health and wellbeing, and I am equally concerned at the emotional impact on folk who come across the bodies of shot brumbies. I have had involvement with supporting folk after bushfires and other natural disasters, including people who have lost livestock or pets. A number of individuals who saw some of the 200 brumby stallion, mare and foal carcasses in KNP after the gates opened recently have been showing significant signs of trauma, grief and loss. The broader sector of brumby rehomingers have been similarly distressed.

It is of concern to me that the emotional impact of cullings, but also of this entire debate on a section of the population is being ignored in a jurisdiction that prides itself on its focus on mental health and wellbeing.

**(g) 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.

My above answers address my concerns with the cruelty of these shootings.

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

Passive trapping and rehoming remains the most humane method of management by far, and is viable, even in the current unsupported program landscape. As someone who has rehomed two KNP brumbies, I can attest to their trainability, trust and contentment in a domestic environment. There are myths being circulated that they are difficult to transport, untrainable or that they are stressed in a domestic environment. This is absolute rubbish. Transporters such as Breez Brumby Transport speak to how well they transport, as well as they are transported with other brumbies when first removed. They have natural curiosity in humans, and a propensity to trust us which is remarkable.

Knowing how well my two Long Plain peppercorns have adapted to life with us, and the joy they bring us too, it is abhorrent to me to think they may have been shot or sent to slaughter had they been in the hills this year, not last.

Thank you for undertaking this inquiry. Please do not make this a token activity