

Submission
No 87

INQUIRY INTO PROPOSED AERIAL SHOOTING OF BRUMBIES IN KOSCIUSZKO NATIONAL PARK

Name: Public Service Association of NSW

Date Received: 11 October 2023

Inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park

Public Service Association (PSA) submission to the New South Wales Legislative Council Animal Welfare Committee Inquiry

October 2023

Introduction

For many years the number of feral horses has been increasing significantly, putting pressure on our fragile and delicate alpine environment and its flora and fauna. There is in the vicinity of 20,000 feral horses in Kosciuszko National Park (KNP) alone and 30,000 across the Australian Alps. Hence the majority of the feral horses reside in KNP.

Members of the PSA undertake the care, control, and management of the National Park. Whilst there would be close to 200 staff working in the park only a small group are involved in the feral horse control program (about 5-10 staff). However due to the controversy this program generates in the community all our members are in some way affected by the issues surrounding such a program.

Hence this submission by the PSA will provide some background on the issue and on the task of removing feral horses from the park. It will identify the threats to the park and how to mitigate such threats. It will also identify the numerous issues that complicate the removal of feral horses from the park.

Stewart Little
General Secretary
Public Service Association

Background - about the Australian Alps

- The Australian Alps National Parks and Reserves were listed as National Heritage in 2008 by Environment Minister Peter Garrett.
- They cover 1.6 million hectares of public land in eleven national parks and nature reserves across Victoria, New South Wales, and the Australian Capital Territory.
- The unique natural environment and indigenous cultural heritage of the Alps were integral to the [National Heritage](#) listing and the Alps are one of eleven sites recognised in Australia by the IUCN as a major world centre of plant diversity.
- Kosciuszko National Park is Australia's largest alpine park, spanning 690,000 hectares, and includes Australia's highest peak and rich Indigenous heritage. It is visited by more than **three million people a year**.
- The Alps protect the headwaters of the mighty Murray, Murrumbidgee and Snowy rivers, delivering almost **a third of the Murray Darling Basin's annual water yield**.
- Kosciuszko National Park is home to **53 nationally listed threatened species** and **4 nationally listed endangered ecosystems**, including the critically endangered **northern and southern corroboree frogs**, the **mountain pygmy possum**, the **stocky galaxias** and the **broad-toothed mouse**.

The feral horse threat manifests itself in several ways:

- Australia's **alpine plants and animals did not evolve with heavy, hard-hoofed animals** and there are **no natural predators** of feral horses in Australia (c.f. Driscoll et al, 2019).
- Streams that were once lined by precious sphagnum moss are now **scarred erosion channels**, the habitat of critically endangered species is being severely damaged, while rare alpine daisies and orchids that are found nowhere else in the world are directly at risk.
- Feral horses cause damage through **selective grazing, food competition, trampling, track creation, pugging, soil compaction, wallowing, dust bathing and preventing regeneration**, including after bushfires.
- Feral horses in the Australian Alps **threaten at least 35 state and nationally listed threatened species**, including the recently listed **mountain skink** (listed as endangered in August 2022), the **broad-toothed mouse**, the **northern corroboree frog** and the **mountain pygmy possum**.
- Feral horses are **damaging indigenous cultural heritage**, including threatening totem species, damaging archaeological sites, and altering cultural landscapes.
- Feral horses also pose **safety risks to motorists and campers, carry diseases** and are spreading to neighbouring private land.



Identify best practice approaches to reduce the populations of feral horses in Kosciuszko National Park and their impact on biodiversity; ecological communities; endangered species; indigenous cultural heritage and the headwaters of several streams rising in the park:

We can have healthy ecosystems, pristine waterways and abundant native wildlife in the Australian Alps, or we can have thousands of feral horses - we can't have both.

- The sensitive alpine ecosystems of the National Heritage listed Australian Alps, including Kosciuszko National Park in NSW and Victoria's Alpine National Park, are being rapidly degraded by exploding numbers of highly damaging feral horses.
- If we want to protect the Snowy Mountains, headwaters of the Murray, Murrumbidgee and Snowy Rivers and home to more than 50 threatened species like the corroboree frog and mountain pygmy possum, then we need to dramatically reduce these feral horse numbers now. **Unfortunately these headwaters are now heavily polluted from horse dung, etc and some streams have high levels of turbidity due to stream bank erosion and collapse.**
- The [latest government survey of feral horse populations in NSW](#)'s Kosciuszko National Park, using best practice scientific methods, found that the feral horse population has increased by 4,434 or more than 30% in just two years - from 14,380 in Spring 2020 to 18,814 in Spring 2022. This is up from ~3,000 in 2001.
- Without effective control the feral horse population grows at approximately 15-20% every year, meaning thousands of horses will need to be removed annually to stop the population from growing and reduce overall numbers.
- The numbers of feral horses being removed in both NSW and Victoria is well below the population growth rate and thus insufficient to control the growth or spread of feral horses.
- The status quo cannot be allowed to continue. We have a choice to make between urgently and significantly reducing the numbers of feral horses or accepting the destruction of the habitat of our native animals and subsequent decline in numbers. We can't have both horses and a robust and healthy National Park.
- **The removal of feral horses may not be a popular approach for some however culling of them by highly trained professional marksmen (both aerial and on ground) is the only viable way of rapidly and significantly reducing feral horse numbers in order to save the national park and its fragile flora and fauna. It is also supported by the RSPCA as a humane; effective; efficient and suitable control method for the removal of feral horses.**
- The PSA has a 'subject matter expert' on staff (ex NPWS marksman and navigator for aerial culling) who would be prepared to talk on this method of control to the Department if required along with other components of this submission).

- The evidence from other national parks strongly suggests that with the removal of grazing stock, given time degraded areas will naturally revegetate. However, in extreme circumstances, programs may need to be implemented to assist with both regeneration and habitat restoration to enable native species to repopulate these areas.

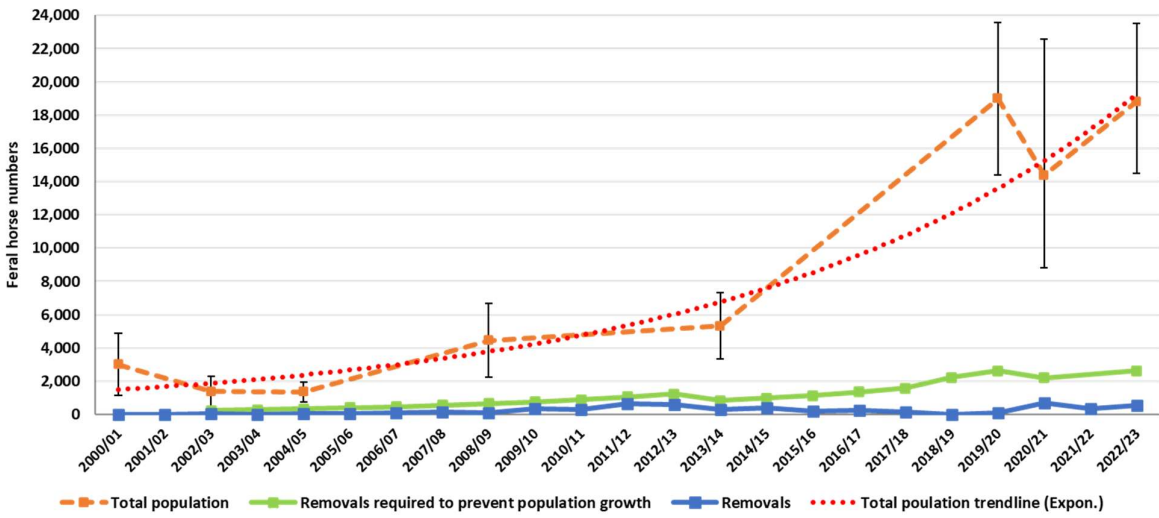


Compare the pair: Exclusion fencing reveals the extensive impacts of grazing by feral horses in Kosciuszko National Park - 2020

NSW numbers and government action

- In November 2022 a [NSW Government aerial survey estimated](#) **approximately 18,814 feral horses in Kosciuszko National Park** (with a 95% confidence interval range of 14,501-23,535). This was a **30% rise in two years** from approximately 14,000 feral horses in 2020 (with a 95% confidence interval range of 9000 – 22,500) and **up from ~3,000 in 2001**.
- After years of minimal activity to tackle the issue, the [Kosciuszko Wild Horse Management Plan was released by the NSW Government in November 2021](#), following extensive consultation. The plan:
 - a. sets a target for the reduction of horses in the park from over 18,500 now to 3,000 by 2027.
 - b. envisions 3,000 feral horses being retained in the park beyond 2027 in three “horse retention areas”, which make up 32% of the park - a level which will still see ongoing, unacceptable degradation of ecosystems and wildlife in the National Park.
 - c. includes a range of control measures, including ground shooting, but rules out the use of aerial shooting despite evidence it can be conducted humanely and safely.
 - d. was formed under the *Kosciuszko Wild Horse Heritage Act 2018* which explicitly prioritises the management of feral horses over and above the natural environment.
- From February to December 2022, [859 feral horses were removed](#) professionally and humanely by National Parks staff under this plan - well below the level required to reduce the population.
- A November 2022 [evaluation of animal welfare outcomes](#) of horse control operations found that animal welfare outcomes are prioritised, are better than predicted, meet all legislative requirements and there is no evidence of non-kill shots having been taken.
- [The review also found](#) “aerial shooting can have low negative welfare outcomes (i.e., good welfare outcomes) when conducted in accordance with best practice” and recommended it should be considered if the plan fails to meet targets.
- On 15 September 2022, the plan was undermined by the [sudden suspension of all feral animal shooting operations in NSW](#) National Parks, in response to coverage by Ray Hadley of allegations from brumby advocates that an aerial deer cull last summer occurred near park users.
- The pause applied state-wide and impacted all NPWS shooting operations, including both ground and aerial shooting and the culling of other feral animals such as deer and pigs. The NSW Government lifted the pause after 6 weeks on 28 October 2022 following community backlash.

Feral horse population vs removal, Kosciuszko National Park to Dec 2022



Commonwealth powers and responsibilities and the adequacy of existing state and territory laws, policies and programs and funding for the control of feral horses

There is opportunities for federal intervention under [Section 324Y of the Environment Protection and Biodiversity Conservation Act](#) (EPBC Act), the Environment Minister must make management principles for National Heritage places like the Australian Alps. The Minister could amend these management principles to add requirements for state governments to remove feral horses and other hard-hoofed invasive species. The EPBC Act then requires state governments to comply with the obligations imposed by the regulations.

It is worth noting that former Federal Environment Minister Susan Ley explored this option. In a [letter to NSW Environment Minister Matt Kean in June 2021](#) she wrote "*to notify you of my intention to enact regulations to address the damage caused by feral horses to the biodiversity and heritage values of Kosciusko National Park, a key component of the Australian Alps National Parks and Reserves National Heritage Place.*"

- Further, Minister Ley also said "*I consider the NSW Government is currently failing in its obligations to protect the National Heritage values of the Australian Alps National Parks and Reserves National Heritage Place from feral horse damage. For this reason, the Australian Government is considering the development of regulations under the Act that oblige protected area managers to take specific action on feral horses, including the responsible, evidence-based, and humane reduction and management of populations, to safeguard the unique biodiversity and heritage values of this nationally significant place.*"
- Minister Plibersek raised the NSW Government's inadequate efforts to control feral horses at the recent state and territory Environment Ministers' Meeting and also spoke about the threat of feral horses to Australia's Alpine region at the most recent National Landcare Conference.
- The Australian Alps have been listed as a [priority place under the recently released federal Threatened Species Action Plan](#).
- The federal government could also develop a National Feral Horse Threat Abatement Plan under the EPBC Act.

Additional resources required to control the feral horse population in KNP.

As indicated above, the current feral horse control program in KNP is chronically under resourced. Even with the recent announcement by NPWS that another 11 staff will join the program this is not adequate to manage the significant increase in feral horse numbers in the park. Hence it cannot reduce the feral horse population to manageable levels in any realistic timeframe to ensure the protection of the environment in the park.

Experience elsewhere has shown that on ground trapping and removal of feral horses is both ineffective and inhumane. There is considerable evidence which demonstrates high stress levels in horses during the processes of capture; transportation and relocation (c.f. Dobbie, et al, 1993; Driscoll et al, 2019; Kirkpatrick et al, 1979). These animals are wild and do not like to be contained. Hence they are stressed and damage themselves by charging up against enclosures in an attempt to escape. This is similar when they're in compounds and being transported. With a number dying in the process.

Instead funding needs to be redirected to a humane; effective and efficient control program including aerial culling and ground shooting. This is a far safer process for staff and more humane for the removal of feral horses from the park.

Any other related matters

Threats to PSA members

Unfortunately, due to the highly sensitive and emotional aspect of this issue some individuals have decided to take matters into their own hands and threaten members of the PSA/NPWS staff. Threats have included statements and images posted on social media; threats of violence to individual staff and the threat to firebomb the Jindabyne Visitor Centre and NPWS office and all staff therein.

Due to the seriousness of such threats NPWS managers have issued a number of memorandums indicating to staff how to stay safe and assessing threat levels to staff and buildings. In heightened levels of threat, security guards have been placed at NPWS buildings and emergency duress alarms have been installed at front counters of all NPWS offices in (and adjacent to) KNP. Also, staff have been directed, for their own safety, not to wear uniform outside of the workplace.

Economic impacts

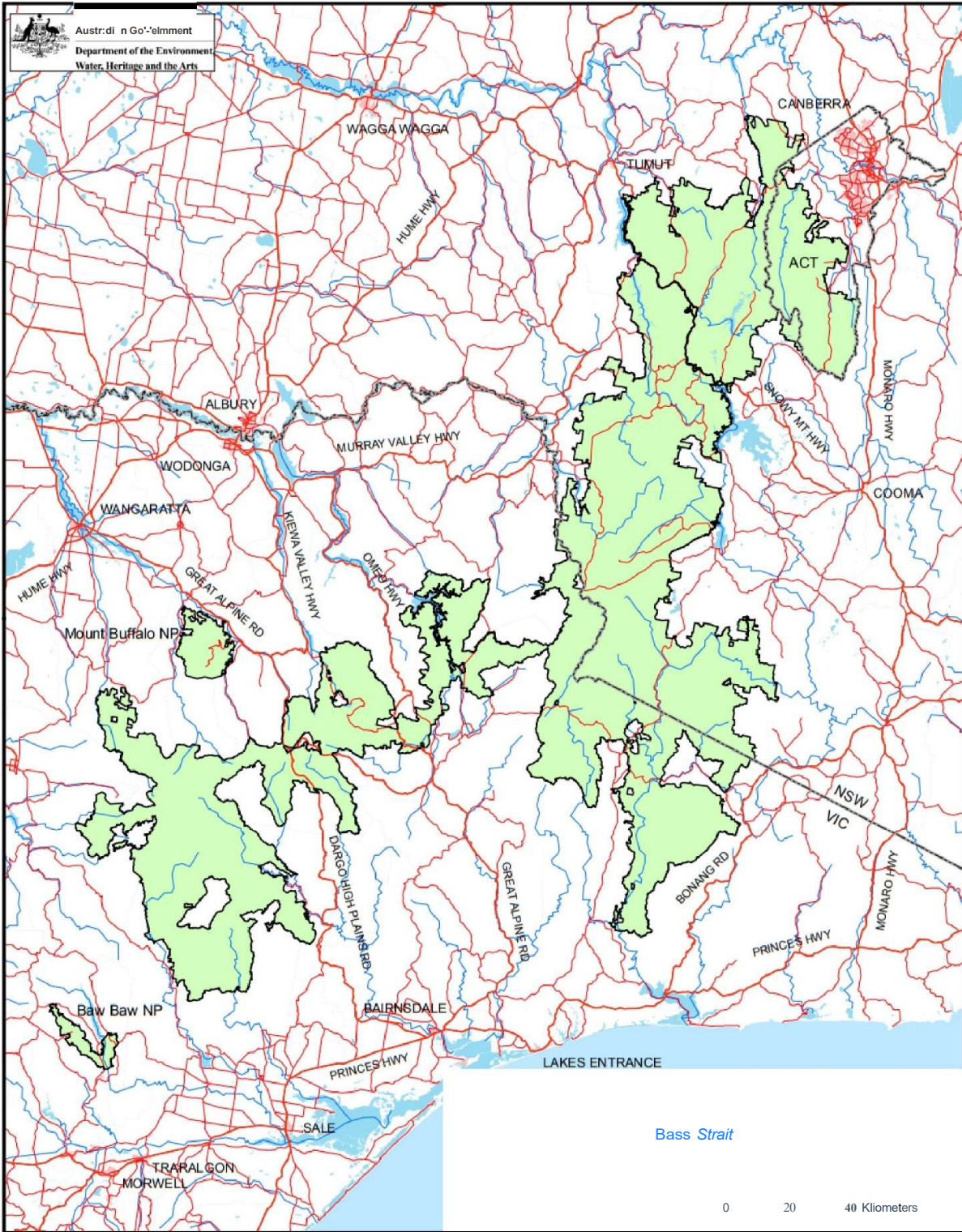
- In 2021, Frontier Economics produced a [report on the economic, social and environmental benefits of managing feral horses in Kosciuszko National Park](#). The report conservatively estimated economic benefits of up to \$50 million a year if the feral horse population is significantly reduced. This is in addition to the environmental benefits of action.
 - Key findings from the report include:
 - \$7-20 million a year from increased recreation and use of the park for activities such as camping, hiking and mountain biking.
 - \$10-28 million a year from improvements to riparian environments and water quality
 - \$2 million a year from fewer feral horse-related car accidents.

Community support

- A petition was tabled in the NSW Parliament February 2021 with over 15,000 signatures calling for the NSW Legislative Assembly to urgently act to reduce feral horse numbers in Kosciuszko National Park. This followed a similar petition with over 12,000 signatures in 2019 calling for the repeal of the *Kosciuszko Wild Horse Heritage Act*.
- A 2020 independent poll of residents in the Eden-Monaro electorate revealed 80% support for horse management, with 51% supporting a significant reduction in numbers and only 13% supporting no management.

We can have healthy ecosystems, pristine waterways and abundant native wildlife in the Australian Alps or we can have thousands of feral horses - we can't have both.





<p>LEGEND</p> <p>D Listed place</p>	<p>Australian Alps National Parks and Reserves</p> <p>National Heritage List - Inclusion</p> <p>Piece ID: 105891 File: 1108/28410028</p>	<p>Situ"Oes: RoadNet C<rnpehe.....-RO...; Roact;JIM Cc::np' rISMIII - Riwir cInd W:l.fllibodlftm: C12007.....,Oalo Soe..... Ply Ltd, PSMA A"r... *****toIton CQOo no 1:10Q)0Q C1 Coomaw.....1lof.....111a (GeosciMrc Austallal, 1990 Produced by: Flarltoge Oho.ion Prqecoon;G0194 Z-rie 55, Date; 7111f2008 Canbeua, © Commonwealth of Ausiala</p>
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RECOMMENDATIONS

1 that further consideration be given to the use of aerial culling as a humane and effective method of controlling wild horses in Kosciuszko National Park

2 that further work is undertaken on habitat restoration in areas significantly affected by feral horses when numbers of horses are significantly reduced.

3 that following habitat restoration consideration is given to the reintroduction of species under threat (both flora and fauna)

4 that both Federal and State Ministers consider the amending and strengthening of legislation and management principles governing the removal of feral horse populations in Kosciuszko National Park

5 that the necessary funds are provided for both the removal of feral horses from the park and the restoration of degraded habitats damaged by feral horses.

References

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