

**Submission
No 89**

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

Organisation: Bushwalking NSW Inc.

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Bushwalking NSW

Bushwalking NSW Inc. PO Box 3008, Uki NSW 2484

W: bushwalkingnsw.org.au

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SUBMISSION - INQUIRY INTO THE PROPOSED AERIAL SHOOTING OF BRUMBIES IN KOSCIUSZKO NATIONAL PARK

Dear Committee Chair

Bushwalking NSW Incorporated is the peak body for bushwalkers in NSW and the ACT. It represents the interests of over 11,000 bushwalkers from over 70 bushwalking clubs throughout the state and territory, and provides a united voice to local, state and federal government agencies and other bodies on issues affecting bushwalkers.

Our affiliated clubs and their members have been enjoying Kosciuszko National Park for generations and it is widely considered one of the premier bushwalking destinations in the country.

We despair at the lack of effective reduction in feral horse numbers, especially in the NSW-managed portion of the Australian Alps. Bushwalking NSW has been active in providing submissions on feral horses to the NSW Government for many years now. We have grown increasingly frustrated at the slow pace of reduction in horse numbers and the failure of Government to follow through on the actions proposed in various management plans over the last 10-15 years. If action had been taken years earlier to reduce the number of horses, then we would not be now facing the significant challenge in reducing an even larger feral horse population.

We now comment on the Terms of Reference of the Inquiry.

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

Bushwalking NSW considers that the population surveys undertaken on behalf of the National Parks and Wildlife Service are sound and provide valuable information on feral horse numbers in Kosciuszko National Park. Organisations and individuals that have challenged the surveys appear to have not proposed any alternative surveys that would be scientifically credible.

Regrettably, it would also appear that challenging the results of the population surveys is a tactic to delay taking effective action to reduce the numbers of horses.

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

Bushwalking NSW considers that significant reduction of the population of feral horses in Kosciuszko is now urgent and that existing culling methods have proved to be ineffective in reducing this population.

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

Kosciuszko National Park was gazetted, in part, to conserve populations of endangered native fauna including the Broad-toothed Rat, Corroboree Frog and Stocky Galaxias. The survival of these species is being threatened by feral pest species including horses.

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We would hope that the welfare of native animals is rated as highly as the welfare of other animal species. This consideration is often omitted in commentary on the management of feral horses in Kosciuszko National Park.

- (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'

We make no informed comment on the adequacy of HOR002 except to note that if NPWS had been properly enabled to embark on effective culling programs from the early 2000s onwards, then the challenge of eradicating large numbers of feral horses would not be of the scale it is now.

Bushwalking NSW considers that the enactment of the Kosciuszko Wild Horse Heritage Act 2018, was poor policy by the previous State Government and has hindered effective management of the feral horse population in Kosciuszko National Park. Our view is that the Act should be repealed.

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

We consider that aerial and ground shooting is the most effective and humane method of controlling feral horse numbers. We reiterate the importance of native animal welfare.

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

NPWS regularly conducts aerial shooting of pest species across much of the National Park estate. I have personal experience of bushwalking in Warrumbungle National Park during aerial shooting of goats and by following the instructions of NPWS staff, we always felt safe during our stay in the park. NPWS has the expertise and capacity to conduct aerial shooting in Kosciuszko while keeping parts of the park open where shooting is not occurring.

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

Unfortunately, media reporting of aerial shooting elsewhere in NSW does not appear to have been always accurate. This includes the incident in Guy Fawkes in the early 2000s.

- (h) the availability of alternatives to aerial shooting

Bushwalking NSW considers that aerial and ground shooting is the most effective method to reduce the feral horse population in Kosciuszko. Other methods including those used to date have not proved effective.

- (i) any other related matters.

The tragic reality is that we have a choice to make between urgently reducing the numbers of feral horses in Kosciuszko or accepting the destruction of sensitive alpine ecosystems and habitats, and the decline and extinction of native plants and animals that occur nowhere else on Earth.

Every year that Governments fail to take effective action will mean that more horses must be removed, the damage to ecosystems, threatened species and Indigenous heritage will increase and the cost to taxpayers will rise.

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We strongly support action to rapidly reduce the number of feral horses in Kosciuszko National Park to help protect threatened species, ecosystems, river catchments and Indigenous heritage.

Ground and aerial shooting are humane and effective control options, and the RSPCA has stated that, depending on circumstances, both ground and aerial shooting can deliver better animal welfare outcomes than trapping followed by transport to a knackery.

Finally, Bushwalking NSW remains hopeful that effective management of feral horses (and other pest species) is not beyond the capacity of our governments.

Thank you for the opportunity to provide comment.

Yours sincerely,

David Bell
President
Bushwalking NSW Inc
11 October 2023