

**Submission
No 95**

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

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Dear Members of this Inquiry

Despite huge community outcry about the proposed Kosciuszko National Park Wild Horse Management Plan, the NSW Government has already pushed ahead with a horse massacre. Horses have been shot with the Government even rejecting plans to implement non-lethal methods. This is not acceptable, and it is not a humane method to deal with a perceived problem. Community expectations have changed over the years and consequently the government must adjust to what the public expect of our government, which is to handle any animal welfare issues with humane standards in place. The brumby culling using shooting that NOT always involves instantaneous death is outdated and cruel. The government is strongly urged to rethink how they solve this problem in ways that align with the public's viewpoint, and actually listen to what the public want and what is acceptable now in 2023. This government MUST be transparent, honest and manage the issue with integrity and empathy because of the sensitivity of the issue and the fact that horses are of course sentient beings. People around the world through research are now recognising animal sentience in animals. The ACT have just passed a bill recognising animal sentience. It is time that the NSW government do the same!

I blame this government for NOT listening to the public who are apposed to this animal cruelty, not using more humane methods, not listening to the alpine communities that see fewer and fewer brumbies, not using more reliable data but using flawed methodologies to sanction these culls, not listening to science regarding contraceptive controls, not planning ahead and instead using knee-jerk reactions and not looking at other reasons mainly government policies and their own actions that cause directly and indirectly biodiversity loss in the KNP.

I am strongly opposed to the way brumbies have been demonised, treated cruelly and inhumanely, and blamed for a loss in environmental values. These issues are discussed below.

1. **Inhumane treatment and cruelty. Adopt non-lethal methods of control.**

The government claims that it used aerial shooting of brumbies to protect native wildlife and the biodiversity of the Snowy Mountains specifically in the **Kosciuszko National Park**. The LETHAL MANAGEMENT program to kill brumbies indiscriminately from the air was used by the NSW government because it is easier and cheaper. But it is so cruel. **Aerial shooting is ruthless and inhumane – a heartless approach that should never be an option.** Many horses do not die instantly, some have their jaws or faces injured where they retreat to die over hours and days in horrific pain. This inhumane method allows horses to bleed out and suffer over a long time. This cruelty is also extended to pregnant mares and foals, and this is heartbreaking. Foals still dependent on their mother who has been shot and killed; suffer and die within a few days because of this dependency and additionally risk death by predation. And this government thinks that this is an acceptable humane way to control a species. The government must re-evaluate this method before they alienate the public completely! If any action is required, the use of ONLY non-lethal methods MUST be employed because of animal sentience and changed community expectations that reflect humane animal welfare outcomes.

I strongly support **non-lethal methods only** to be used if the population of brumbies needs to be controlled.

These methods include-

- removals for rehoming-give those involved like brumby sanctuaries the time and government financial support attached to rehome humanely these brumbies. Redirect the money spent in aerial shooting and helicopter usage to these rehoming sanctuaries.

-relocate brumbies to less sensitive areas.

-contraceptive population control is a method that is **more humane and will reduce foal births as well as solve the problem of removing dead horses from the KNP and abandoned foals.**

An overseas study showed that using the PZP vaccine to stop horses from producing offspring is effective. I understand that these vaccines are not approved for use in Australia, however, I believe the government should consider this option through robust research and development and advocate the federal government to approve this vaccine. In one study, they gave the PZP shot to some female horses and after one year, half of them received a second shot. In the following year, only 14.6% of the female horses who received the vaccine became pregnant. This was very different from the 81.5% pregnancy rate in the group of horses that didn't get the vaccine. This vaccine has

proved to be successful. This is the way of the future, and this method of population control would be supported by the public and brumby numbers would be kept more sustainable without having to resort to the aggressive action of shooting either from the air and ground. The government is encouraged to stop using past outdated cruel inhumane methods of control and be more progressive in their thinking and plan ahead instead of always waiting for problems to surface. That is what make a good government!

2. Man's footprint in the KNP and Government policies.

Protecting our native flora and fauna is needed particularly now as nature faces worsening climate change and increased natural disasters that has damaged the land and waterways. Blaming all the problems on the brumby regarding biodiversity loss is not backed up by evidence. Instead, we know that natural disasters do take a heavy toll on native wildlife and destroy their habitat, along with continual logging of our native forests. Climate change caused by the government's fossil fuel expansion policy, and the resulting increase in natural disasters along with extensive logging by Forestry Corp NSW are man-made problems caused by government policies that prioritise industry over the environment. **Our government has caused biodiversity loss in the KNP.** Additionally, the NSW government has directly developed these alpine regions with more extensive infrastructure that has led to more people and tourists leaving their footprint and damaging nature even further. The NSW government is continuing to approve massive fossil fuel projects like the Narrabri coal seam gas project with 850 wells in the Pilliga Forest, and extensively logs our native forests especially within the proposed boundaries of the Great Koala National Park affecting koala survival. So, government action is causing a biodiversity crisis. Blaming the brumby for biodiversity loss is wrong and is not helpful. The government's own actions are the cause of biodiversity loss! Environmental scientist, Frankie Seymour, described the Government's plan to shoot brumbies as *"short-sighted, environmentally counterproductive, and extremely cruel. The government appears to have decided to ignore the humane alternative options while also declining to address any of the other human-based activities that are damaging the biodiversity of the Snowy Mountains like land clearing, roads, weeds, ski resorts, the long legacy of grazing sheep and cattle, and natural disasters such as fires, droughts, and the many recreational users and rising snowlines driven by anthropogenic climate change."* There are many factors that are attributed to declining environmental values in the KNP. Government building approvals for more accommodation must be viewed cautiously as this leads to more roads, more land disturbance and of course more people causing further biodiversity loss.

3. The real truth behind biodiversity loss

Species threatened in the KNP include the Northern Corroboree Frog that is susceptible to the disease chytridiomycosis (chytrid fungus) which is spread by a species living alongside the Corroboree Frog, the Common Eastern froglet. This species appears to sustain high infection levels but does not develop the disease itself but allows transmission to the Corroboree Frog. Climate change, droughts, floods, wildfires, and predation by carnivores (which does not include horses) such as feral animals are the other threats. Egg, tadpole, and adult frog survival rates is severely impacted by natural disasters. Climate change exacerbates natural disasters and is caused by man.

There is a single population of Stocky Galaxias known to exist in Kosciuszko National Park. The larger distribution of this native fish species fell victim to the introduction of predatory feral trout through man's interference again. The Mountain Pygmy-Possum another species struggling to survive is starving. This is due to dwindling supplies of Bogong moths its main diet. These moths have plummeted in numbers due to man induced climate change with protracted droughts (lack of rainfall) and the use of pesticides by man. This moth was added to the IUCN's red list of threatened species in 2021. The Mountain Pygmy-Possum is also a victim of predation by feral species including cats and foxes. Climate change is also resulting in drought, degraded habitat, and reduced snowfall that is needed for the pygmy possum's hibernation. And finally, their number decrease is also because of habitat fragmentation caused by tourism development that is approved by the state government.

The government MUST look at holistically all the threats to our endangered wildlife in this region, and not singularly cast the blame to the brumby to eradicate as the solution to solve the biodiversity crisis. Specific solutions for each species with a proactive recovery plan and appropriate funding attached is highly recommended. The NSW Department of Planning and Environment must start to prioritise the environmental values in KNP. This is how you will solve the fauna and flora crisis in the KNP. But government commitment and financial funding is lacking.

Limited funding with ineffective recovery plans will not address this issue of threatened species recovery in the KNP, and neither will eradicating the brumby, as it is not the single issue of cause for biodiversity loss! Government

inaction on climate change, development causing habitat loss, visitor increases, agriculture, construction, feral animals (pigs, dogs), and natural disasters are all affecting detrimentally the biodiversity in KNP.

4. **Reliable, valid data is needed to make informed decisions. Independent moratorium for new counts.**

The government is strongly urged to study the actual numbers of brumbies first and obtain reliable and correct data to ascertain whether any action is even required in the first place, to reduce numbers but **ONLY** using humane animal welfare methods that do not involve shooting.

Images of the brumby cull in recent days in the alpine regions were absolutely distressing. This cull was not even justified because of the ridiculous numbers that were merely estimates of brumbies in the Kosciuszko National Park (KNP).

Flawed Survey Methodology was used to warrant these brumby culls. In 2021 **biostatistician Claire Galea** who was involved in the 'Kangaroo Inquiry into the Health and Well-being of Kangaroos and other Macropods' in NSW, along with Penny Sharpe, our environment minister now, were **both** expressing the same concerns about the counting methodologies for kangaroos. The Cairns methodology was the same counting method used for the kangaroos and the brumbies. Yet Minister Sharpe did not reflect these same concerns in the brumby aerial count. Politicians must be consistent in their views to maintain credibility with the public, and not change to reflect whether they are in opposition or in government.

The government numbers of wild horses in these alpine regions are grossly over estimated because it is based on the Cairns methodology. 'Distance Software' was also applied to elevate these numbers even higher to justify a massive cull of brumbies! Using the software to estimate these numbers is not working. **It is extremely disappointing that this Labor government do not even want to consider or listen to the clear reasoning of ridiculous numbers used in the Cairns methodology and the distance software used.** Instead, they continue with their plans with no discussion to implement non-lethal methods of control instead. The population modelling techniques employed over the many years have consistently yielded implausible increases in population estimates. This casts doubt on the accuracy and reliability of the data being used to justify the aerial shooting proposal. Estimates have been said to be between 14,500 and 23,500 horses estimated across the park. This is a **HUGE** range and indicates that the government are just 'plucking numbers out of the air.' They are estimates and this government must have accurate numbers, before they even consider a massacre of brumbies. **All surveys conducted with helicopters would also involve double counting because, for the most part, horses will most certainly run from one transect to another. The NSW government must have an immediate moratorium for new counts to be undertaken in the Kosciuszko National Park with stakeholder involvement.** Do **not** use distance modelling because this does not give accurate numbers. Ground quotas would be much more reliable and could be taken from those people that live near the Kosciuszko National Park, hikers, and recreational users of the park. Stakeholder involvement is encouraged for transparency.

Implausible population estimates show that in a peer review of the 2019 population survey, by St Andrews University Scotland, population increases were well beyond the usual published population increases for these animals. Equine science expert Joanne Canning noted up to 41% annual increases in brumby populations in some parts of the park were described as 'biologically impossible for this species' that in favourable conditions will only increase to a max 20% per annum. Inflating numbers to justify a massacre of any animal is wrong morally and ethically. **The results are not biologically possible and therefore this should have been taken to realise that these surveys are not working as they are not scientifically sound.** Joanne Canning studied the numbers and found that in 2014 NPWS actual headcount was 1637, and they used a total aerial estimate of 3255 which was an increase by the computer software of 970%. Then in 2020 again NPWS actual headcount of 2468 made an estimate of 12511 which was an increase by the computer software of 1630%. This is not valid or reliable and represent illogical numbers.

Calculations were also made by Montague Drake starting with the results of the 2005 survey and then using a realistic scientific wild horse population increase per year of 17% to 2023. Their figures included the continued culling of populations each year to reach a **park estimate of 1285 brumbies in 2023** that excluded the 2023 culling figures. **This is well under the 3000-threshold set by the government. So, the number of brumbies in these alpine regions is much lower than the numbers the government cites are there.**

A brumby massacre will not solve the biodiversity crisis in KNP. Using humane methods only as cited above, to control brumby numbers is the course to follow but FIRST assess accurately the real numbers of brumbies in the park. Using flawed methods to justify your actions will only anger the public.

We encourage the Labor government to look at their own actions in contributing to biodiversity loss and not be biased against brumbies. Study the data gathered by equine scientist Joanne Canning in her paper on the "Impacts and management of wild horses in the Australian Alps."

Don't vilify brumbies as they also have a place in this region. Obtain accurate numbers on these wild horses to guide your action so that it is the right action, and this will show the public that you have genuinely listened to them and their pleas to let common sense prevail. Assess fairly and without bias the real causes of biodiversity loss and promote the humane treatment of brumbies.

Yours sincerely
Martin Derby