

Submission
No 96

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

Name: Name suppressed

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Partially
Confidential

Submission to NSW Legislative Council inquiry on proposed aerial shooting of brumbies in Kosciuszko National Park

Introduction

I worked as an ecologist and planner in Kosciuszko National Park (KNP) for the NSW State Government for many years. I have also spent a lot of time visiting and recreating in Kosciuszko National Park (KNP) over a period of 5 decades. Over that time, I have seen the number of feral horses, which used to be very few and in only a few localities, explode. Alongside this I have seen the damage to the Park that these introduced animals has done also increase to an extreme level.

Brumby is another name for a wild horse, or a feral horse, that has not been broken in, but the term brumby can be emotive. The wild horses in KNP are feral animals and a significant and highly damaging pest whose numbers have been allowed to rise to extremely damaging levels by a lack of proper control by State Government. In my submission I will use the more objective term, feral horse.

I urge the Committee to allow the best chance of slowing and then stopping the extensive damage to the ecosystems; native plants and animals, including threatened species; critical water catchment values; cultural values; visual amenity and beauty of the natural landscapes; and recreation opportunities of KNP which is being caused by these feral animals – that is to urgently to allow aerial culling of feral horses.

I understand that some people consider that feral horses should not be culled on animal justice grounds. I ask them to consider justice for the millions of native animals that are being killed due to the damage and loss of habitat caused by the feral horses in KNP. No-one likes to see the feral horses killed but the native animals have a higher right to a safe environment where their species has been living for thousands of years. For some species KNP is the only place they can live naturally and they cannot co-exist safely with the feral horses in this Park.

Horses as a species can and do live in other areas. KNP is dedicated to the protection and positive management for native species and communities and values, including, but not limited to threatened species; critical water catchments, indigenous cultural features; important geological and geomorphic features and for appropriate recreation in appropriate areas.

It is most just to protect the native animals and plants of Kosciuszko National Park from the large, heavy, hard-hoofed destructive feral horses. And aerial culling by professional shooters is the most humane way.

Response to Terms of Reference

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

The methodology used by the NSW NPWS to survey and estimate the feral horse population in Kosciuszko National Park is the best practice, sound and fit for its purpose. This is to

understand the population and distribution of these pests in the Park. It can be seen that the damage to the Park corresponds to the number of horses and to the sensitivity of the particular natural environment. Wetlands and water courses and areas recovering from bush fires are perhaps the most sensitive to being badly affected.

Attempts to discredit this method must not be used as a delaying tactic to stop the urgent introduction of a well-resourced program of aerial culling by professional shooters. There is absolutely no doubt that the numbers of horses currently in the Park are causing extensive damage.

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

The introduction of aerial shooting to control feral horses is highly urgent because the populations are increasing rapidly. This means damage to the natural and cultural environments of the Park is increasing and the number of horses that will subsequently need to be culled is increasing.

As stated above, the current methods for estimating the population of feral horses are sound.

Feral horses are listed as a key threatening process under NSW environment law. This means that the Government has a legal requirement to urgently and substantially reduce the numbers of horses.

The severe negative impacts of these feral animals on KNP are severe, and getting worse with the uncontrolled increases in populations. These impacts are well documented.

Some examples of documentation are listed below, with hyperlinks.

- [An Assessment of Feral Horse Impacts on Treeless Drainage Lines in the Australian Alps – 2015](https://theaustralialpsnationalparks.org/wp-content/uploads/2016/05/2015-feral-horse-impacts-report.pdf)

<https://theaustralialpsnationalparks.org/wp-content/uploads/2016/05/2015-feral-horse-impacts-report.pdf>

- [Revisiting Pest Horse Impacts to Australian Alps Catchments March 2020, Pulsford, I., Worboys, G.L. and D. Darlington \(2020\).](#)
- [Observations of Pest Horse Impacts in the Australian Alps, Worboys, G.L. and Pulsford, I. \(2013\)](#)
- Worboys, GL, D Driscoll and P Crabb (Eds) (2018) Feral Horse Impacts: The Kosciuszko Science Conference - Conference Abstracts
<https://www.science.org.au/news-and-events/events/feral-horse-impacts-kosciuszko-science-conference>

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

Threatened and endangered species include the critically endangered southern and northern corroboree frogs, the endangered mountain pygmy possum, the endangered Guthega skink and she-oak skink, the vulnerable broad-toothed rat, the critically endangered Kelton's leek orchid and blue-tongued greenhood, and the critically endangered stocky galaxias.

My great concern is also for the other native species that live in the Park and the many other values that are negatively impacted by the large numbers of feral horses.

I will leave others to expand on the status of threatened species consider below the threats side of this item.

Feral horses are listed as a key threatening process under NSW environment law. This means they are threatening native animals, plants and communities including endangered and threatened. Despite the fact the Government thus has a legal obligation to control these pest animals, effective control measures in the Alps have been stopped and actively thwarted in NSW for many years.

This has led to an unprecedented number of these hard hooved pest species running uncontrolled in KNP. Thus, the threats have been increasing.

Even a small number of feral horses wreck damage on critical habitats and ecosystems and the huge current populations of horses are, and have for years, been causing significant damage to habitats; compromising the economically invaluable water resources; and impacting all aspects of the natural environments including threatened species of the Alps.

Feral horses are also damaging important sites for Aboriginal people and destroying the natural beauty of the Alps.

The large numbers of feral horses are contributing to climate change because of the methane that they produce. In addition, it is inevitable that the damage to wetlands and grasslands caused by feral horses is reducing the ability of the natural environments in these areas to sequester Carbon, though I have not seen any data about this.

The activities of the feral horses encourage increased weed incursion and spread and change nutrient regimes by the large amount of dung they in defecated in the Parks. This affects native plants and animals. Sometimes people bring in feed for them which exacerbates this problem. The dung also increases the populations of flies, is unsightly and has a negative impact on recreational values as well as wildlife. These are also threats to endangered species.

Another threat to the native plants and animals of KNP is climate change. This cannot be underestimated. Climate change is already causing more and extended periods of hotter and drier weather, including droughts, and has increased the risk of bushfires. The stress from climate change is implicated in the massive increase in beetle damage causing die-back to snow gums in the Park. This will change the landscape of the Park forever.

We cannot immediately reduce the impacts of climate change on the threatened and endangered species in KNP but we have an obligation to reduce the threat from feral horses.

Another threat is the increased incidence of bushfires with increased drying and heating of our climate. After fires the land is much more sensitive to the impacts of feral horses and other feral animals. This increases the imperative for rapid reduction in numbers.

(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'

The current policy settings for the control of wild horse populations in KNP are patently inadequate.

Aerial culling must be permitted if there is going to be any effective control. Other methods have been trialled and this has only led to a dramatic *increase* in the number of feral horses because the number which have been removed has been negligible and far less than the numbers that have increased through breeding.

The introduction of the highly flawed and, I believe, politically motivated, *Kosciusko Wild Horse Heritage Act 2018* and the associated Plan have further allowed the number of wild horses to increase over the years that culling action in KNP was stalled by this legislation.

The current legislation allows immediate culling of horses in the Park. The only thing that needs to change in the short term is the misguided policy of not allowing aerial culling. I hope that this committee will recommend immediate introduction of aerial culling of feral horses in the whole of NSW for the reasons I have presented in this submission.

(e) the animal welfare concerns associated with aerial shooting

The NSW Government's own animal welfare review highlighted that aerial shooting is a humane way to reduce feral horse numbers when undertaken by highly trained professionals.

Trapping and transporting wild horses have been shown to be problematic for the horses and aerial culling is much more humane.

Aerial shooting must be done by qualified and experienced professional shooters. These can be government employees.

There are profound benefits for animal welfare too from using aerial culling because this can effectively reduce the numbers of feral horses, meaning that there will be a lower number to be culled in the long run.

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

Aerial culling and ground shooting of feral species is carried out in many areas in Australia and there are ways to safely manage this.

It may be appropriate to shut parts of the Park during culling operations, which is done in many areas.

There are significant human safety concerns if the feral horses are not urgently culled to far fewer number. These large wild animals present a real safety hazard to campers, walkers and motorists, especially in some locations where they are highly abundant. I have been

quite scared myself when camping in the Park by the presence of numbers of feral horses racing close to my tent, and by the sounds of two male feral horses fighting very close to my tent at night. Scary and very dangerous.

The sooner the horses are culled the more improved are the safety issues.

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

I understand that the equipment used in the Guy Fawkes NP case would no longer be used today. It is very unfortunate that this case has been irrationally exploited by vested interests to increase support to stall much needed culling in other parts of NSW, including KNP.

This lack of action for some many years has perversely lead to an increased need for culling as animals numbers have dramatically increased.

(h) the availability of alternatives to aerial shooting

There are no effective alternatives to aerial shooting as the most prominent method.

Ground shooting, and trapping and transport out of the Park have been used in KNP for the last couple of years. The numbers of feral horses which have been able to be removed by these measures have been negligible. The numbers of feral horses have continued to rise exponentially. The NSW Government has a target to reduce these pest animals to 3000 by 2027 and the only way this can be achieved is by the use of aerial shooting by professional shooters.

This can still be supplemented by ground shooting in areas that this is more appropriate. I personally can see no need for trapping and removal as this is a very slow and inefficient method which puts more stress on the individual feral horses.

(i) any other related matters.

Aerial shooting of feral horses in KNP needs to be urgently carried out and highly resourced to protect: the ecosystems; native plants and animals, including threatened species; critical water catchment values; cultural values; visual amenity and beauty of the natural landscapes; and recreation opportunities of KNP which are being damaged by these feral animals.

Aerial shooting will have positive animal welfare outcomes both for the feral horses and all the other native animal species which have been negatively impacted by these pests.

Human safety will be enhanced by significantly reducing the number of feral horses in the Park as they present a hazard to campers, walkers and motorists.

Human safety during culling operations would be well managed.

Aerial shooting is the only effective, and most cost-effective and efficient method to cull this feral animal. There would be cost savings and efficiency would be increased by including

aerial feral horse control with other aerial shooting programs in integrated pest management programs in the Park.

Most Australians understand the need for effective and humane culling of feral horses in all NSW national parks.

Conclusion

I urge the Committee to urgently recommend the use and substantial resourcing of aerial culling of feral horses in Kosciuszko National Park as the only effective and most humane way to protect the values and native species in the Park.

There must not be any more delays.

Feral horses also present a safety hazard for bushwalkers, campers and motorists. I have experienced these hazards myself.

13 October 2023