

**Supplementary
Submission
No 100a**

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

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As a concerned animal lover I oppose the NSW Government's proposed amendment to the Wild Horse Management Plan to include the aerial shooting of brumbies in Kosciuszko National Park ("KNP"). Aerial shooting has not been an authorised control method for over 20 years and I strongly believe that it must not be reintroduced to the Plan.

I have outlined some key reasons why I oppose aerial culling below.

1. Concerns regarding the inaccurate population estimates.

To date the Minns Labor Government have relied on a survey undertaken by the NSW National Parks and Wildlife Service (NPWS) in November 2022, which estimated 18,814 brumbies remained in KNP. This boasts a 95 per cent level of confidence that the population is between 14,501 and 23,535 horses – an obviously huge variance and gap by anyone's standards. Then, this NPWS survey found brumby numbers had increased by 31 per cent in the past two years, up from 14,000 horses in 2020. The survey doesn't appear to have taken into consideration the death of KNP brumbies during the NSW bushfires or the actual breeding cycles and capacity which dictates wild horse reproduction. The gestation period for horses is 11 to 12 months and foals are weaned at around 9 months old.

I am, therefore, deeply concerned with the flawed methodology and statistical modelling used to estimate the population numbers of wild horses in KNP. Others have raised these concerns and they have not been adequately addressed. It is critical that any decisions be supported by facts and independent scientific evidence.

2. Welfare concerns for the brumbies. The government banned aerial culling in 2000, RSPCA is opposed, shooting from a helicopter is inaccurate, proposed increase in baiting of dingoes.

I firmly believe that the NSW Government should not backflip on the aerial shooting of brumbies ban that was introduced in 2000. It is my understanding that following the infamous 2000 Guy Fawkes River National Park aerial shooting of over 600 brumbies, which left many suffering for days afterwards, the then NSW Minister of the Environment issued a ban on the practice. The aerial shooting of brumbies was revisited and refused in 2016, as it should be today. The current Plan states that "there is a significant risk that the implementation of an aerial shooting program will result in a loss of the social licence to remove wild horses from the national park", and I could not agree more. The NSW National Parks and Wildlife Service also initially refused to consider resuming aerial shooting in 2023, and I support their original stance. The RSPCA also does not recommend aerial shooting, due to a lack of research in its 'humaneness' and due to the significant and adverse animal welfare implications and immense suffering it causes.

I firmly believe that aerial shooting is a controversial method and cannot be considered a "humane" death. Helicopters are affected by light winds, updrafts, and turbulence and do not provide a stable enough platform to be able to accurately or humanely shoot a moving target. It is incredibly difficult for a shooter to achieve a headshot and even if it is executed, it still does not guarantee an instant kill. Accounts from shooters admit their inaccuracy and the inhumane nature of shooting from helicopters. They recalled "often they [the shooters] ended up missing the horse's brain, taking out its jaw or something else instead. The consequences of which was often seriously

maimed horses escaping into tree cover where they would later die a slow and painful death.” Unweaned foals can also be left to fend for themselves and potentially starve to death or face attack from predators.

The last time aerial shooting was considered was in 2000, due to a drought and wildfires affecting the well-being of wild horses. In October 2000, over three days, 606 horses were shot in an infamous program in Guy Fawkes River National Park. Even though a review of the shooting found it was carried out appropriately, it shocked and outraged the Australian public, myself included. One horse was found alive days after being shot twice. This event caused significant public distress and anger and resulted in the complete NSW prohibition of using aerial shooting as a lethal control method for brumbies.

I am concerned that the killing of brumbies will increase the lethal control of other animals, particularly the native and ecologically important dingo. The NSW Government proposal states that some horse carcasses will not be removed and that they will undertake “enhanced and targeted” control of dingoes. I am aware that 1080-baiting programs are already used to target dingoes in Kosciuszko National Park. 1080 poison is known to cause severe and prolonged suffering, so the proposal to increase the killing of brumbies will also increase the suffering in other species, too. This is not how I want my public money used – to cause extensive and extended animal suffering.

1080 poison does not work. Despite continuously being targeted, studies from the 1980s on show that 1080 baiting simply isn't working on dingoes. Two studies in KNP confirmed that non-target animals were taking the bait instead. One study found that out of nine dingoes, only one was killed in a 1080-baiting program. In another, only one out of eight dingoes was killed. Overall, baiting only reduced the number of dingoes by 22%. It is time for the government to implement other, non-lethal methods, and invest in research and development to humanely manage animal populations.

3. Concerns for threatened species: acknowledge your concerns for threatened species, and raise issues of human activity.

I understand this amendment was proposed due to concerns for threatened species in KNP, however, I am outraged that horses are being blamed while other adverse impacts caused by human activity are ignored. Human activities, such as the creation of dams and the Snowy Hydro Scheme, the use of 1080 poison, horse riding tours, tourism (building infrastructure, snow sports, bike riding), and illegal hunting all impact native species.

While the NSW State Government claims to be focussed on protecting native species, the factual record is a disgrace, with 1,043 species listed as endangered/threatened in NSW. The lack of meaningful actions by the NSW Labor Government only further diminishes its ‘environmental’ credibility.

4. I support alternative, non-lethal methods, such as fertility control.

I support the use of alternative, non-lethal control methods, such as fertility control using vaccines, which have proven effective in other countries. The vaccines affect their hormones or important proteins, stopping animals from releasing eggs, producing sperm, and having offspring. People against the use of fertility control often focus on how much work it takes, especially in large areas. Yet, the same kind of criticism can be said about lethal control, including shooting. In Australia, the standards for shooting horses both on the ground and from the air agree with this concern. They specifically say that shooting from the air requires even more work than shooting on the ground because it involves a helicopter, pilots, and shooters. Other complaints about the use of fertility control argue that people need to get close to horses to give them the vaccine. Yet, people who shoot animals also need to get close, and just like giving vaccines, their success depends on their skill and the range of their guns. The public support effective and humane options, not cruel lethal methods.

In Europe, they used a special vaccine called PZP to control the population of wild horses in a place called the Romanian Danube Delta. 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. Also, it's important to note that 44% of the horses didn't get the second vaccine. This 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.

5. Community expectations: Australians are concerned about the welfare of animals and expect animals to be treated humanely. Aerial shooting does not align with these values.

I, like all Australians, expect all animals to be treated humanely. It was evident in 2000, that the Australian public perceived aerial shooting to be cruel and incompatible with both good animal welfare and community expectations. Since then, public expectations regarding animal welfare have only increased.

As a voting member of the public, I expect elected government members and political parties to declare openly and honestly their policies, positions and intentions ahead of elections, not after results have been concluded. It is very distressing and disturbing to me that the Chris Minns minority Labor Government has only now, post the March 2023 state election, introduced a proposal to recommence aerial shooting to manage the wild horse populations in KNP.

I want to thank you for acknowledging my submission.

I ask you to reject the amendment.