

Submission
No 82

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

Name: Name suppressed

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Partially
Confidential

Submission to Animal Welfare Committee inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park and surrounding areas.

Introduction:

As a frequent visitor to KNP (for 20 years) and a Northern KNP neighbour, I speak from lived experience of the Northern end of KNP and have witnessed the change in vegetation and wildlife over that time. Since the removal of stock (cattle and sheep) the brumbies have maintained the vegetation but in the last decade with the unnecessary and drastic removal of brumbies, the vegetation is dangerously overgrown and impenetrable where there used to be open plains. This is and will continue to present a severe fire hazard for the wildlife, neighbouring property and Canberra (again!) and has resulted in fewer native wildlife frequenting these areas, in fact more pig and deer are observed now that brumbies have been removed.

I have rehomed four KNP brumbies and although I have trained many horses, I am amazed at how trainable brumbies are, which explains why their ancestors were sought after working / war horses and why they should be valued uniquely Australian heritage horses.

I am appalled at NSW even contemplating aerial culling, given the state's dark history with the cullings in Guy Fawkes National Park which is saw the use of aerial culling banned in NSW for good reason. It proved that it is NOT possible to abide by the standard operating procedure for aerial culling.

The brumby rehome networks of which I am part strongly believe that a managed but sustainable population of brumbies should be conserved in the Park for future generations. The network also considers that passive trapping and rehoming is the most humane method of management of brumby numbers in the Park, with many hundreds of brumbies being successfully trapped and removed.

The current KNP Wild Horse Management Plan was developed through a long consultation process to strike an appropriate balance between protecting the fragile areas of the Park and supporting conservation of a sustainable number of heritage brumbies in identified retention zones. It clearly ruled out aerial culling in response to the views expressed through that consultation, and previous experience with aerial culling in NSW.

It must NOT be amended in a way which:

- Allows aerial culling or
- Moves away from the commitment to retain at least 3,000 brumbies in the Park.

Responses to the terms of reference follow:

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

Equine scientists including Dr Joanne Canning and Claire Galea have pointed out the flaws of the methodology underpinning the estimates. It is clear that these ludicrous estimates are biologically impossible, given horses only reproduce once a year. And the estimates simply do not align with actual physical counts undertaken in the Park by NPWS or by independent community members.

Given the actual head count within North KNP in 2020 was 2468 ¹, and most (approximately 85%) of brumbies are estimated to be in this area, the current estimates are extrapolating almost 6 times the actual brumby sightings, it is clear that a false methodology is being used which has also been used to negatively impact Kangaroo populations (Penny Sharpe brought to light the flawed methodology in relation to the Kangaroos, yet seems to think it is not flawed as it relates to brumbies??). Using known flawed data to produce a gross over estimate of brumby populations is deliberately misleading the public. This is a violation of public office and tax payers money.

There are definitely concentrations in some locations – but this does not mean that horses need to be brutally culled across the Park. Those of us who have visited the Park over years know that the numbers there now are significantly lower in most areas than in the post bushfire period.

Recommendation – An immediate, independent recount needs to be undertaken with input from Dr Canning and Dr Galea and all control methods should cease to be used until this recount is done.

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

Brumbies have been unfairly scapegoated for too long. There are more significant threats to threatened species as shown in the Snowy Hydro 2 environmental assessment reports, as well as the damage from tourism/ski resort developments and human damage caused by 4WD and boats along the dam edges.

The brumbies have been peacefully co-existing with native species for nearly 200 years. In fact, since well before the area they run in was declared a National Park. Whilst their numbers have been and should be humanely managed, the urgency to decimate the population, and the extent

¹ Canning, J., 2022, Brumbiesforever.org

of the urgent cull proposed in a short period of time is not justified, given the brutal impact on animal welfare this would entail, and the loss of important gene pools within the population.

As outlined below, removal of brumbies will not suddenly reverse the threat to species about which there is concern. Implementing high volume, urgent culling using lethal means when there is serious community doubt about the inflated nature of estimates, could result in decimation of the brumby population to an unsustainable number. This could result in in-breeding, and loss of the unique and highly valued features of Kosciuszko brumbies.

As evidenced in two recent NPWS authorised brutal shooting sprees (May 2023 - 67 brumbies shot and left at public campgrounds & September 2022 - 11 brumbies shot in Kiandra, in a RETENTION zone of the plan!!), NPWS can't even conduct ground shooting humanely with many horses suffering multiple gut shots which is not acceptable according to the standard operating procedures - which stipulates a head or chest shot is necessary for a 'clean kill'. If ground shooting is not conducted according to operating standards then I have NO CONFIDENCE that aerial shooting will be conducted according to the SOPs

Recommendations – given evidence that the SOPs are not adhered to, there is no confidence [SOP HOR002](#) will be abided by and with a genuine consideration of animal welfare - aerial culling can NOT BE JUSTIFIED.

As per the [NPWS November 2022 evaluation/review](#) of the current plan of management stating "*the current rate of removal is sufficient to result in positive effects on land values*" - THERE IS NO JUSTIFICATION FOR AMENDING THE PLAN TO INCLUDE AERIAL SHOOTING !!!

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

If the problem genuinely is threatened species, and not an ideological push to remove brumbies from the Park, a holistic and balanced approach which addresses all causes, is needed. For example, the critically endangered galaxias fish for which the horses are being blamed, are threatened because it is eaten by introduced (feral/introduced) trout which continue to be released into rivers and dams in the area, as acknowledged in the recent report of the Threatened Species Commissioner. In addition, the Snowy Hydro 2 works has bulldozed across Tantangara Creek - the last remaining known population of galaxias fish lived their in harmony with brumbies prior to that man-made destruction.

The ACT Government boasts having zero tolerance for brumbies, and the local population were all shot about 30 years ago. One would expect therefore, to see wildlife utopia in Namadgi National Park – however their Corroboree frogs are struggling as much as they are in other area of the Alps, the koala population has never returned, and bushfires have decimated the local population.

The Australian Brumby Alliance has undertaken research showing that in most areas the density of brumbies is not sufficient to negatively impact threatened species, and in fact have

significant positive impact – this includes reducing risk of bushfires. It is known that the areas the brumbies inhabit in North Kosciuszko, and the animals who share these areas with them were less impacted by the 2020 Black summer fires.

Recommendations

1- a holistic, integrated approach to supporting threatened species is pursued, which acknowledges the impact of humans, ski fields, Snowy 2.0, and other feral animals, including introduced trout on these species.

2 - produce a map showing the location of these threatened species in relation to the brumby populations - similar to the mapping of species and fauna for the Snowy Hydro 2 environmental assessment reports - to identify the harmonious co-existence of brumbies and native wildlife

(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 Wild Horse Heritage ACT of 2018 is an essential recognition of the cultural and heritage value of the brumbies running wild in Australia's high country. This legislation is a balanced approach to managing a sustainable population and the heritage and cultural values of the brumbies who inhabited the high country long before it was gazetted 'a park' and who should remain as part of Australia's future. This legislation also recognises a significant part of Australia's pastoralist and war history of these heritage horse bloodlines - important to many rural communities including Ngarigo and other Indigenous communities.

The current Wild Horse Management Plan acknowledges the heritage value of these heritage horses, recognising 3,000 brumbies are to be retained in identified Retention zones, prioritising rehoming as the method of control and promising NOT to undertake aerial culling (which is banned in NSW!). In return concessions were given to management in fragile zones, including ground shooting where essential.

But this current amendment is a breach of this balance in animal welfare by shifting towards aerial culling.

Aerial culling is an unspeakably cruel way to kill horses. Previous efforts have illustrated the cruelty of attempting to shoot horses from helicopters. After the Guy Fawkes National Park cullings in the late 80s, one examination of the skeletons of a sample of 52 of the shot horses showed a large number died from bullets to the pelvis or stomach – a painful death. Only one died from a clean shot to the head².

² Keenan, M In Search of a Wild Brumby, 2002

This shows it is highly unlikely to get a clean kill from a helicopter, and typically, the approach is to simply keep chasing the horses till they are exhausted. The terror of horses killed this way is appalling. Australia can do better than this!

In terms of the Standard Operating Procedure - A major flaw with HOR002 is that it assumes the only value of feral horses is by way of pet food or export for European human consumption. It fails to acknowledge the deep heritage value and the high importance many Australians place on this unique breed of horses. RSPCA appears to have missed this point.

The SOP itself states that it is not humane or safe to use aerial culling as a method:

- if there is bad weather
- if the terrain is difficult, wooded, near waterways and
- if foals are present

If a humane shot is not probable

This would seem to wipe out the use of aerial culling for the majority of days in a year in KNP, given the unpredictable weather in winter and the long foaling season from spring through to Autumn, and the rugged and wooded terrain that would mean shot/injured animals are unable to be found and suffer a long and painful death.

Referring to the diagrams in the SOP, it is obvious that it is extremely unlikely a “clean shot” to the head or chest of a moving animal can be made on the first attempt, resulting in repeated attempts, multiple shots, all the while causing terror to the animal who is fleeing for its life. This is of the highest animal welfare concern.

Both the ground and aerial SOP states that shooters are to hold the appropriate licences - where is the proof that the NPWS staff or contractors have the adequate training, or licencing before such programs are conducted?

Recommendation: Retain the Wild Horse Heritage Act as legislation in maintaining a sustainable population of heritage horses. Prioritise rehoming as a control method over any lethal control methods especially aerial culling.

(e) the animal welfare concerns associated with aerial shooting

From an animal welfare viewpoint, the fact the SOP requires a ‘flyback’ to finish off horses who are suffering on the ground and did not receive a kill shot, is an appalling acknowledgement of the inaccuracy of an initial shot attempt. The procedure also does not recognise or acknowledge the absolute terror that horses experience in the minutes before they are killed through this procedures.

As the history would demonstrate, the animal welfare concerns of aerial culling far outweigh any perceived benefits in terms of urgency and scale. Australians have previously vehemently expressed their opposition to killing horses in this manner, hence aerial culling wild horses is BANNED.

The RSPCA charged NPWS for accounts of animal cruelty based on aerial shooting in the Guy Fawkes National Park - this sets a precedent that aerial culling is an animal welfare concern. Veterinary oversight is also meant to be provided for animal welfare, who are the vets that check on the shot animals and where are their reports from the recent ground shooting operations? Again evidence shows that this practice is NOT followed, highlighting that animal welfare is not a concern of NPWS or the NSW Government.

Recommendation: As per recommendations of the [NPWS November 22 evaluation/review](#) report, it states "*Standard invitation to the RSPCA Chief Inspector to visit ground shooting and other operations continue*" - request the RSPCA reports of the recent ground shooting incidents to identify how animal welfare issues are being managed.

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

This is a significant issue from both a physical and emotional perspective.

NPWS has a legal responsibility for the safety of recreational users and as a frequent visitor to the park, I FEAR FOR MY SAFETY AND THAT OF OTHER VISITORS if the areas in which shooting takes place are not closed.

There is already a publicly known incident of recreational users nearby being shot at by Parks contractors in a wild horse shooting operation when the park was not closed - this was raised in the Senate Inquiry and is publicly recorded. It is grossly irresponsible of NPWS to continue this practice. The general public would not expect ground or aerial shooting to be conducted in areas that are not closed, especially in RETENTION zones identified in the plan.

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

The Guy Fawkes shootings caused repercussions around the world. Australia was internationally and domestically shamed, and NSW was seriously criticised for enormous cruelty to over 600 heritage horses. A large proportion of the voting population has not forgotten this.

The Parks are for all Australians to enjoy, including those who value seeing brumbies roaming free. The backlash to previous aerial shooting operations is an indication of the diversity of users, their interests and the heritage and cultural values of these horses to many, including Indigenous communities.

As stated above, the RSPCA brought against NPWS animal cruelty charges as many of the horses were shot inhumanely and suffered. This is evidence that aerial culling operations are

NOT SUCCESSFUL from an animal welfare perspective and therefore should not be adopted as a control method.

(h) the availability of alternatives to aerial shooting

As someone who has rehomed four KNP brumbies, I can attest to their trainability, trust and adaptation to a domestic environment. There are myths being circulated that they are difficult to transport, untrainable or that they are stressed in a domestic environment.

Having taken brumbies to field days, local shows, and rally events evidences their trainability and ability to be rehomed successfully.

Rehoming is a viable alternative to aerial shooting. Many of the rehomers are keen to work with NPWS to manage sustainable rehoming practices as the preferred method of control.

Recommendation: include more rehomers on the NPWS Wild Horse Community Advisory Panel and work more closely with rehomers to make this option more successful to avoid the need for lethal control methods.

(i) any other related matters.

Thank you for undertaking this inquiry. Please consider Australia's future conservation (refer to [ReWilding Europe programs](#)) and preserving Australia's unique heritage horse gene pool in making any short term decisions.