

Submission
No 138

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

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There is already huge community outrage for aerial culling of brumbies from past history that occurred at Guy Fawkes .

<https://youtu.be/XzaZtnWbqcU?feature=shared>

The proposal has no place in our society where such abhorrent cruelty is inflicted in the most heinous of ways. It is appalling that the Government is proposing to re introduce a control method that was pulled as it was found to be cruel and it did not represent what is acceptable by the greater community both here and internationally .

Why such drastic measures when Brumbies are not the exclusive threat to native flora and fauna?

The Threatened Species Recovery Hub six-year research program was completed in 2021. \$32 million of funding through the Australian Government's National Environmental Science Program (NESP), and matched by contributions from 10 of the country's leading universities and the Australian Wildlife Conservancy.

These are the top 10 worst invasive species that were identified in the study and the number of native species they are impacting on. This was also published in <https://www.publish.csiro.au/PC/PC18024>

Australia's 10 worst invasive species

European rabbit 321

Phytophthora plant disease 236

Feral pig 149

Feral cat 123

Feral goat 116

European red fox 95

Lantana 95

Blackberry 47

Black rat 42

Feral cattle 39

There is no mention of the Brumbies so why such drastic measures as aerial shooting?

To be focusing on a falsely manufactured set of numbers of brumbies to determine the health of the National Parks is very dangerous and misleading to the public. Government funded academics has given a number of 18,814K brumbies in the KNP. A very impressive number that suits the narrative of the government and its supported agencies that want to eradicate and kill the brumbies. In all the counts no one can tally up more than about 1180 brumbies in KNP. Author of the survey, Dr Stuart Cairns from the University of New England himself could not clear up the large discrepancies of numbers counted to what was then extrapolated in a preposterous number. There is a fuzzy set of numbers being reported and they are simply not true and even physically impossible for a horse to

be breeding at the rate mentioned. Estimates show computer generated annual population increases of 41% and even 95%. The scientific accepted maximum being 20% but mostly go off 6% to 14%.

The International Journal of Ecology 'science works best when research is open' and works on the premise that 'management plans should be based on a known initial population'. What the current management plans are working off is grossly exaggerated and unsubstantiated

Before writing this submission, I wanted to go and see first hand the state of the KNP and the numbers of brumbies I could sight in 5 days of camping out. From Long Plain, Kiandra, Tantangara, Peppercorn Plain, Mt Selwyn and all in between I was lucky to count approximately 400 brumbies. I was with locals that are saying that there are areas that there used to be hundreds of brumbies in an area but are now pretty much gone.

I saw the grasses were in full cycle and have gone to seed - in fact locals are saying they have never seen such height of grasses in the KNP – a severe fire hazard. The upper Murrumbidgee River was crystal clear and the sound of frog life was evident. What was obvious is the threat on the health of the KNP was the impact of Snowy2 site. The immense devastation and threat that it has on the ecological health of the Australian Alps national parks and reserves is the white elephant in the room that no government or agencies such as Invasive Species are wanting to talk about. Forever changing the ecological character of the Alps is this development. Snowy2, that is the most detrimental factor in the demise of KNP. Not the Brumbies.

The headwaters of the Murray, Murrumbidgee, Snowy and Cotter Rivers, including their hydrology, water holding capacity, water quality, habitat integrity and species diversity;

Unfortunately due to the mass destruction and interference by snowy hydro 1 and 2 these water systems will never be reinstated. The hydrology and water holding capacity was never the way a river system was intended by nature.. Rivers were made to flow and meander, now these are forever altered and where the systems are failing is being blamed on Brumby presence.

There was a deliberate environmental trade off on the threatened species for dollars on the broad tooth rat – it is common knowledge that poison baits were put out at Tantangara to get rid of a mouse problem – that mouse problem was the Broad tooth, Rat. "Some impacts cannot be avoided but we will provide an offset strategy for other Park activities.

Facts about the threatened species that Brumbies are blamed for

The Southern Corroboree Frog

'The primary cause of decline of the Southern Corroboree Frog is chytridiomycosis, the disease associated with amphibian chytrid fungus (*Batrachochytrium dendrobatidis*). This fungus has caused the disappearance of many species around the globe, especially in Central America and eastern Australia.

Studies show that the pathogen was not present in the Corroboree Frog population before the declines in the 1980s. The arrival of the fungus in disease-free populations has shown the devastating impact on this species.

The spread and persistence of chytrid fungus in the population is facilitated by a species living alongside the Corroboree Frog, the Common Eastern Froglet (*Crinia signifera*). This species appears

to sustain high infection levels, but doesn't develop the disease. As a result, it acts as a reservoir host, sustaining the disease in the ecosystem and allowing transmission to other species.

An additional threat to the Southern Corroboree Frog is climate change. Reduced precipitation and warmer temperatures are likely to eventually affect breeding pools and vegetation around them. Droughts already result in egg and tadpole deaths, and as the frequency of droughts increases with climate change, the capacity for the Southern Corroboree Frog to recovery greatly reduces.' The Conversation.

FACT #5: Key threat: disease caused by the amphibian chytrid fungus.

<https://www.corroboreefrog.org.au/biology/fast-facts/>

NOT THE BRUMBIES

Mountain Pygmy Possum (*Burrumys parvus*)

Only occurs in alpine and subalpine areas on the highest mountains of Victoria and NSW. In NSW the entire range is in a 30 km by 8 km area of Kosciuszko National Park between Thredbo and Kerries Ridge, where it occupies less than four square kilometres of habitat. The total population size is less than 500 adults. Two of the four main sub-populations in NSW are found within ski resort areas.

NO WILD HORSES OCCUR IN THESE AREAS

Threats include -

- Loss, degradation and fragmentation of habitat from anthropogenic disturbances.
- Predation from foxes and feral cats.
- Mistaken identity - confused for vermin when they enter ski lodges and other buildings.
- Fire damage to mountain plum-pine and other shrub cover.
- Impacts on bogong moths from drought, agricultural practices and chemicals in the winter breeding grounds.
- Global warming reducing rainfall and snow cover, affecting food resources, increasing competition and predation in mountain pygmy-possum habitat.
- Genetic loss and small populations.
- Weed invasion.
- Habitat degradation by feral rabbits and deer.
- Predation from the European red fox.

<https://www.environment.nsw.gov.au/threat.../profile.aspx...>

Stocky Galaxias as supplied by Karren Summers

RATS, REEDS, FISH & BRUMBIES

ABC Four Corners Brumby Debate needs some clarification on a few points!

3. Stocky Galaxias - Galaxias tantangara

The Stocky Galaxias is a newly described small fish which grows to a maximum of 103mm long. It is only known to occur in the headwaters of Tantangara Creek, upstream of the Tantangara Reservoir in NSW. Very little is known about the ecology and environmental requirements of the Stocky Galaxias.

The small native fish inhabits ~3,5 kms of Tantagarra Creek above a waterfall in the northern end of KNP. The fish are limited in distribution due to the INTRODUCED predatory trout & redfin perch that occurs below the waterfall. Another related native fish species, climbing galaxias, is a threat.

John Harris, UNSW Sydney, Mark Lintermans, University of Canberra stated that... "the project [Snowy Hydro] threatens to devastate aquatic life by introducing predators and polluting important rivers. It may even push one fish species to extinction." They went on to say "an invasive native fish, the climbing galaxias, lives in the Talbingo reservoir (it was introduced from coastal streams when the original Snowy project was built). Water pumped from Talbingo will likely transfer this fish to Tantangara." Snowy Hydro has applied for an exemption under NSW biosecurity legislation to permit the transfer of the climbing galaxias and two other fish species: the alien, noxious redfin perch and eastern gambusia.

Mark Lintermans, a fisheries ecologist with the university made these statements. He said invasive trout had reduced the galaxias' range to a short stretch of the creek. Over the last century or more, the species has seen off threats from predatory trout, storms, droughts and bushfires. Snowy 2.0 is the latest danger. The 2019 bushfires also impacted parts of the fish's habitat.

When they're reintroduced to the wild, the sites must be free of trout, and other invasive fish like climbing galaxias. Natural or artificial barriers should be in place to prevent invasive fish invasion.

He went on to say, "In late March I finally got back to the stocky galaxias' stream to see whether they'd survived. At the lower stretch of its habitat, the fire was not severe and the STREAM HABITAT LOOKED GOOD, with only a small amount of ash and sediment. Upstream, the fire (2019/2020 bushfires) had been more severe. At the edge of the stream, heath was razed and patches of sphagnum moss were burnt. Again, SEDIMENT in the stream was NOT too abundant. But fish numbers were lower than normal, suggesting some there had not survived [the fire]." Professor Mark Lintermans final statement was "The biggest long-term threat to the species is the Snowy 2.0 pumped hydro development."

Redfin perch compete for food with other species and produce many offspring. They are voracious, carnivorous predators, known to prey on smaller fish. Redfin perch also allow the establishment of a fatal fish disease – epizootic haematopoietic necrosis virus – or EHN. This disease kills the endangered native Macquarie perch, the population of which below Tantangara is one of very few remaining.

The galaxias fish were only described in 2014 so prior natural history is unknown. Trout were released into the mountain waterways as early as 1889. Like many introduced species to Australia, brown trout ova were brought over from England to make Australia feel more like home for new settlers. According to fish ecologists, their adaptation has disrupted the delicate balance of Australia's ecosystem by harming native species.

So, the true threats to the native fish in the mountain creeks & rivers is due to the spread of introduced fish species, spread of disease & the environmental & ecological impacts from Snowy Hydro construction at Tantangara Reservoir.

IN COMPARISON, THE (SUPPOSED) THREAT FROM BRUMBIES PALES IN SIGNIFICANCE.

<https://theconversation.com/.../snowy-2-0-threatens-to...>

<https://fishesofaustralia.net.au/home/species/5131>

<https://theconversation.com/double-trouble-this-plucky...>

I have spent many years some 23 in equine welfare in executive roles which I still hold. Personally I have witnessed many horses being euthanised , have lost count. But unless that horse is head shot accurately it is not a clean kill.

I wrote this for the Brumbies.

Welfare Implications of Brumby Management -written by Renee Neubauer

It is of paramount importance that whatever label you give horses, be that Australian Wild Horses, Brumbies, pest animals or Feral Horses, should the need arise to manage their population or their welfare , it must be done with the consideration that they're a horse first and they are a sentient being. Therefore it's imperative that there are no breeches of welfare matters when discussing eradication and reducing numbers in management plans.

Unfortunately, in the area of pest animal control, much of the data that is needed to objectively assess welfare is lacking or

still to be researched. This means that where there are huge voids in our knowledge. Another problem is that there are different codes of practices for different labels given to a horse i.e. domestic , meat, feral etc.

Brumbies that live in our State or National Parks are under The Wildlife Act, 1976, is the principal national legislation providing for the protection of wildlife and the control of some activities that may adversely affect wildlife. This means that under this legislation Parks are the custodians of all animals within the park introduced or native.

So where does this leave the horse that lives it's life in a park? It can leave them in a vulnerable position where their welfare can be compromised. How do we define welfare? Dawkins (2006) states that "good animal welfare" involves physical health and positive emotions, such as pleasure and contentment. Fraser (1993) prefers to use the term 'well- being' to refer to the state of the animal and uses 'animal welfare' to refer to the broader concept that includes social and ethical

issues. an animals' state as regards its attempts to cope with its environment (Broom, 1999). Welfare includes the extent of any difficulty in coping or any failure to cope; it is characteristic of an individual at a particular time and can range from very good to very poor. Pain and suffering are important aspects of poor welfare, whereas good welfare is present when the nutritional, environmental, health, behavioural and mental needs of animals are met. When welfare is good, suffering is absent (Littin et al., 2004).

In this document the term 'animal welfare' will mean a complex description that includes both objective and subjective aspects of the physical and mental state of the animal. More importantly new laws are to be enacted in NSW , protecting animals' mental and physical health and recognising them as sentient beings. With this insight, treatment of horse's within parks need to have the same application of protection.

Various control methods are implemented by cost effectiveness, efficiency and humaneness - in that order of priority. NPWS has the power to do all things that are necessary or convenient to be done for or in connection with the achievement of its objects and the performance of its functions.

Aerial Culling

Horse aerial culling is illegal in NSW

RSPCA Victoria are agreeable to use aerial culling as a means to control population.

Aerial shooting of horses – there are no actual figures on accuracy rates, the effect of helicopter on behaviour and physiological responses of horses in the short term is unknown

- (A model for assessing the relative humaneness of pest

animal control methods Second edition June 2011 by Trudy Sharp and Glen Saunders .Vertebrate Pest Research Unit – Industry & Investment NSW)

Below are some of the Minimum Standards as Published by the Department of Jobs, Precincts and Regions, April 2019 . POCTA cannot be enforced in our State or National Parks by RSPCA. Here's lies the state of limbo to consider the horses welfare.

S20.1 Euthanasia or slaughter must be performed humanely. The person responsible for the animal must ensure that the method results in immediate death or immediate loss of consciousness followed by death while unconscious. How is this practical or achievable with aerial culling ? Guy Fawkes aerial culls as listed 31-Oct-2000 [Hansard p9387] witnesses stated that days after the cull horses were still found severely injured by numerous body and leg shots suffering trauma , even as long as 10 days after . Breach of Welfare.

S20.2 Euthanasia or slaughter must be performed only by persons competent in the method used and licensed where appropriate. Not followed in Guy Fawkes The ammunition they purchased was military ammunition—it was jacketed military ammunition; it was not soft-pointed ammunition. If they had used the ammunition as described in the report, the bullet would have entered the beast,

penetrated no more than nine inches, and would not have killed it. The ammunition they used passed straight through the animal. Breach of Welfare.

S20.3 A person humanely destroying an animal must take

reasonable action to confirm the animal is dead or to ensure death. How does the shooter ensure this happens ? They're in a helicopter. It is impossible to guarantee instant death and yet this was seen as a humane and only viable option. Breach of Welfare .

Clearly the welfare of the horse is not viewed as being important with aerial culling , there's much evidence that supports it being rejected by the greater community and numerous horse advocacy groups . This type of killing needs to be stopped at all costs as this practice fails and breeches all welfare considerations from the overhead chasing, the separation of mares and foals, the relentless state of exhaustion from being chased, the aggravated cruelty of injuries inflicted through the chase and finally the bullet that doesn't guarantee a quick kill. The welfare of the animal is very poor before death.

often for a prolonged period as the chase is relentless .

A new report prepared by independent biostatistician Claire Galea has found there are significant flaws in the survey methodology being used to count the number of brumbies.

- There were insufficient horses seen in the raw count, so the number of horses sighted in both the years 2014 and 2019 were simply added together. This is not statistics, it is simply lies.

- The population modelling techniques used have often resulted in implausible population estimate increases.

- What we need is an urgent and independent recount on the number of horses in the park and proper consideration of humane options.

- Aerial shooting is ruthless, and inhumane. This is a shockingly cold-hearted course of action which should never be considered by this Government.

Aerial Culling is the most inhumane of all methods and should not be used .

Breach of Welfare.

I say no to Aerial Culling.