Submission No 142

INQUIRY INTO PROPOSED AERIAL SHOOTING OF BRUMBIES IN KOSCIUSZKO NATIONAL PARK

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

Introduction

I am a protected area specialist, formerly with the NSW Government, with over 40 years' experience in the conservation and management of threatened species, ecosystems and protected areas throughout south eastern NSW including Kosciuszko National Park (KNP).

The feral horse population control measures undertaken to date have been unsuccessful in controlling the growth in the wild horse population which is devastating many species and other outstanding natural and cultural values of Kosciuszko National Park.

A significant and rapid reduction of the number of feral horses in KNP is urgently required to help protect the Park's threatened species, ecosystems, Indigenous heritage and critical water catchment values.

I therefore strongly support the inclusion of aerial shooting as the most appropriate, humane and effective method for the control of wild horses. Indeed, this is the only way that feral horses can be adequately controlled and the only way the Government's target of 3,000 wild horses in the KNP by 2027 can be met.

Comments on specific Terms of Reference

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

The methodology that has been used by the NPWS to survey and estimate the feral horse population is sound and utilises the best practice scientific methodology.

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

Impacts of feral horses

Together with a team of scientists and students from the Australian National University I have monitored the impact of both feral horse and deer populations in Kosciuszko National Park, and especially in the white cypress pine and white box communities in the Byadbo and Pilot Wilderness areas, since 1984. This woodland is a component of the White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grasslands complex that is nationally listed as a Critically Endangered Ecological Community.

Our research shows that both wild horses and deer are reducing ground cover vegetation causing widespread erosion on steep slopes that is slowing the recovery of these highly altered ecosystems from the impacts of over 140 years of grazing by cattle and sheep and altered fire regimes since European arrival in the area in c1834 (Pulsford 1991; Ward-Jones et al. 2019).

Impacts of feral horses are also severe in many other areas of KNP, especially in wetter higher elevation habitats including upland grasslands, sub-alpine bogs, creeks and fen wetlands and where horses congregate to feed and cross formerly pristine fragile mountain streams and wetlands (Worboys and Pulsford 2013; Pulsford et al. 2020).

Wild horses are listed as a **key threatening process** under the NSW *Biodiversity Conservation Act*.

Wild horses and their wide-ranging negative impacts threaten the Park's status as a National Heritage listed property under the *Environmental Protection and Biodiversity Conservation Act 1999*.

For these reasons these animals must urgently be culled.

In summary, feral horses already exist in unprecedented high numbers, are causing immense damage to the values of KNP and, due to a very high reproductive rate and ineffective culling, are increasing rapidly in numbers.

The wild horses must urgently be culled in KNP to the Government's current target level of 3000 by 2027.

Aerial shooting using professional shooters is the only effective method to undertake the urgently needed culling exercise.

Aerial culling is also the most humane and cost-effective method.

The current methods of survey are best practice and fit for purpose. Even without this it is clear from my on-the-ground observations over many years that the numbers of and damage from wild horses has increased to a completely unacceptable level.

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

As stated above, feral horses are damaging the nationally listed Critically Endangered Ecological Community of White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grasslands complex.

Wild horses are listed as a key threatening process under the NSW *Biodiversity Conservation Act*.

There are many endangered species threatened by feral horses in KNP, as will be described in other submissions. However, all of the native species and communities in KNP are of extreme value and some cannot live anywhere else.

Other key threats to endangered and other species and communities are the impacts of climate change (eg increased warming and dryness and increased extreme weather events); the related increased incidence of bush fires; and the impacts of other feral animals and weeds to name but a few.

The addition of the impact of feral horses increases all of these problems.

(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'

For many years, wild horses were routinely shot in KNP. This kept the numbers down although they have been in damaging numbers for years. In fact, it only takes a small number of horses to create a lot of damage to the natural environment, eg through moving, trampling, grazing and biting of plants, and defecating.

The feral horse population control measures undertaken in KNP for many recent years have been unsuccessful in controlling the growth in the wild horse population, which is devastating many species, including endangered species and communities, and other outstanding natural and cultural values of Kosciuszko National Park.

The recently used methods of trapping and homing, with limited ground shooting have been of negligible impact, with the increases in numbers of horses from breeding far exceeding the numbers of horses which have been removed or culled.

The ban on carrying out aerial culling of horses by NSW NPWS has been a big factor in undermining effective control measures.

The introduction of the *Kosciusko Wild Horse Heritage Act* 2018 (KWHH Act) also set back control measures of feral horses in the Park by many years as no culling at all was done for a number of years. Prior to the introduction of this Act, a Wild Horse Management Plan had been agreed which would have at least started some active control measures but these were delayed by the introduction of this Act and the period required to finalise the Kosciuszko Wild Horse Heritage Management Plan.

In addition, The KWHH Act seriously undermines the purpose for which the National Park was created. KWHH Act and the Kosciuszko Wild Horse Heritage Management Plan override and create inherent irreconcilable conflict of objectives with the NPW Act (1974) and the NSW *Wilderness Act 1987* on two counts:

1) Biodiversity protection of the Park should always prevail above the protection of a common introduced species (wild horses);
2) giving preference to the retention of wild horse populations in wilderness areas cannot be considered as being consistent with the Objects and Management Principles of the NSW *Wilderness Act 1987.*

In the very short term, the policy of banning aerial culling must be scrapped, and a well-resourced program to cull the wild horses using predominantly aerial culling must be urgently commenced. Feral horse culling should be included in integrated pest management program are essential.

(e) the animal welfare concerns associated with aerial shooting

It is imperative that the numbers of feral horses are quickly reduced, and aerial culling by professional shooters is an humane way of doing this.

In addition, quickly reducing the overall numbers of horses that will require culling in the long term, which can only be done by including aerial culling, will greatly improve animal welfare outcomes for both the feral horses and all native species. This includes a great reduction in the numbers of horses that die from disease and the extremely cruel deaths that occur with the inevitable onset of drought. And a fewer number that will need to be culled in the future.

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

Any human safety concerns can easily be managed in KNP using standard procedures. This may include closing areas from time to time, which would be an overall benefit to users.

Any residual risk would be far less than the human safety concerns of not culling these animals. The wild horses present a serious and increasing safely hazard to motorists, walkers, campers and recreational horse riders.

I believe there has not been enough attention in the media over the serious human safety concerns of the large numbers of horses in KNP.

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

The reported issue in Guy Fawkes NP was a very long time ago and procedures and equipment has improved greatly since then, so it is of no consequence to the current discussions.

(h) the availability of alternatives to aerial shooting

There are no effective alternatives to a well resourced aerial shooting program by trained shooters as the primary method to reduce the numbers of feral horses in the KNP. This should be supplemented by ground shooting in some circumstances.

Measures such as ground shooting, trapping and live transporting feral animals out the Park have been shown to be completely ineffective and far less humane. The large number of wild horses that have been allowed to increase in the Park means these are no other viable population reduction alternatives.

(i) any other related matters.

Aerial culling is the only effective and the most cost-effective method to reduce the numbers of wild horses in the KNP.

In addition, the use of aerial shooting would greatly improve the efficiency and cost-effectiveness of other important feral animal control programs in the Park by enabling the implementation of an integrated pest management program.

The effective culling of feral horses, which can only occur by using aerial shooting, would also reduce the cost of rehabilitation programs by reducing future damage to the Park.

It would also reduce the total numbers of wild horses that would require culling in the longer term so would have animal welfare benefits.

For all of these reasons, aerial shooting will greatly reduce the cost burden to the government and better allow ecosystem and catchment functions to be restored.

Conclusion

Failure to control numbers of feral horses over the last 30 years has resulted in massive impacts to the ecosystems, threatened species, indigenous values and critical water catchment values of KNP as well as resulting in much greater numbers of wild horses that have to now be reduced.

Aerial culling by professional shooters is the only effective, most humane and most cost-effective method.

The urgent addition of aerial shooting as an option to control wild horses is necessary in order to:

1) enable the NPWS to better meet its statutory obligations to protect natural and cultural heritage values of the Park, including but not limited to threatened species and communities, in accordance with the Kosciuszko National Park Plan of Management;
2) greatly improve the ability of the NPWS to meet the Government's target to reduce the population of wild horses to 3000 by 2027;
3) greatly improve the efficiency of feral animal control programs in KNP by enabling the implementation of an integrated pest management program. This will greatly reduce the cost burden to the government in the medium and long term and allow ecosystem and catchment functions to be restored.
4) reduce the overall numbers of horses that will require culling in the long term, improving animal welfare outcomes for horses and all native species. This includes a great reduction in the numbers of horses that die from disease and the extremely cruel deaths that occur with the inevitable onset of drought.

Ian Pulsford
13 October 2023

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