

**Submission  
No 146**

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

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Dear Inquiry Committee

I am appalled and completely opposed to the massacre of our brumbies in the Kosciuszko National Park. Violence against animals is NOT acceptable. Aerial shooting is so cruel that instantaneous death rarely results with some horses suffering in pain for days before eventually dying.

I am disgusted that our NSW government resurrected this inhumane method of aerial shooting to deal with the supposed brumby issue. And that is what it is if we do not have accurate numbers of these animals to guide practice.

The state government used this LETHAL MANAGEMENT program because they felt brumbies were the only cause of the biodiversity loss in the KNP. It is apparent that the reason the NSW government chose aerial shooting is that it is the **cheapest way** to eradicate a perceived problem that belonged solely to the brumby.

Shooting is inhumane allowing the horse to bleed out and suffer over hours and days is cruel and a selfish method to use especially when there are community members willing to rehome these animals. The cheapest, and quickest option for the government is aerial shooting, as it indiscriminately kills and/or severely injures horses to suffer a prolonged cruel death on mass. The cruelty is also extended to pregnant mares and foals, and this is heartbreaking.

This is a knee jerk reaction by the government again to solve a problem with cruelty attached and to save money. THIS IS NOT ACCEPTABLE. The reasons are-

1. What about other feral animals that are involved. You MUST not solely lay the blame on the wild horses for damage done by other species! The government has also allowed further development of this region. Man's footprint also MUST be considered as with any development our native wildlife always suffer as their habitat is destroyed or adversely affected- example the Penrith kangaroos with the development on the University of Western Sydney grounds and the Campbelltown koalas regarding the Lendlease housing development!
2. Constant ongoing approvals at state and federal level is seeing fossil fuel expansion increasing despite the warnings of the Paris Agreement. Per capita we are a highly polluting country and NSW is responsible for these increased emissions leading to more natural disasters that destroy native wildlife habitat. Climate change is an induced man-made problem, and we are responsible for this habitat destruction because we still invest in fossil fuel. Intensive logging of our native forests has increased by Forestry Corp NSW and the **Labor government refuses to address this issue. The problem of biodiversity destruction in the Kosciuszko National Park is caused by this government.**
3. This government MUST be transparent, honest and manage the issue with integrity and empathy because of the sensitivity of the issue and the fact that horses are of course sentient beings. This is now scientifically very well established. This government ignores animal sentience because it is convenient. Conversely if they accept animal sentience it could interfere with their further development plans for the KNP. Animal sentience must be accepted by the NSW government. The ACT have already passed a bill recognising animal sentience. As such humane non-lethal methods must be adopted to align with animal sentience.
4. **Flawed Survey Methodology:** In 2021 **biostatistician Claire Galea** who was involved in the 'Kangaroo Inquiry into the Health and Well-being of Kangaroos and other Macropods' in NSW, along with Penny Sharpe, now the environment minister **both** expressed concerns about the counting methodologies for kangaroos. Why hasn't Penny Sharpe reflected these same concerns now in the brumby count as it uses the same methodology that was used for kangaroos that she opposed two years ago?
5. **Implausible population estimates** show that in a peer review of the 2019 population survey, by St Andrews University Scotland, these brumby population increases were well beyond the usual published population increases for these animals. Equine science expert Joanne Canning noted up to 41% annual increases in brumby populations in some parts of the park were described as biologically impossible for this species that in favourable conditions will only increase to a max 20% per annum.
6. The government numbers of wild horses in these alpine regions are grossly over estimated because it is based on the Cairns methodology which has been proved to be flawed. 'Distance Software' was applied to elevate these numbers even higher to justify a massive cull of brumbies! Using the software to estimate these numbers is not working. **The results are not biologically possible and therefore this should have been taken to realise that these surveys are not working as they are not scientifically sound.** *All surveys conducted with helicopter would involve double counting because, for the most part, horses will most*

*certainly run from one transect to another.* Joanne Canning studied the numbers and found that in 2014 NPWS actual headcount was 1637, and they used a total aerial estimate of 3255 which was an increase by the computer software of 970%. Then in 2020 NPWS actual headcount of 2468, led NPWS to make an estimate of 12511 which was an increase by the computer software of 1630%. This is not valid or reliable and represents illogical numbers.

Calculations were also made by Montague Drake starting with the results of the 2005 survey and then using a realistic scientific wild horse population increase per year of 17% to 2023. Their figures included the continued culling of populations each year to reach a park estimate of 1285 brumbies in 2023 that does not include the 2023 culling figures. This is well under the 3000-threshold set by the government. So, the number of brumbies in these alpine regions is much lower than the numbers the government cites are there.

7. The government are not listening to scientists on the issues of fauna and flora risks in the area. One example is the Corroboree Frog whose threats are chytrid fungus, climate change, droughts, floods, wildfires, and predation by carnivores. Egg, tadpole, and adult frog survival rates is severely impacted by natural disasters. Climate change exacerbates natural disasters and is caused by man. Horses are herbivores not carnivores, so they do not affect the Corroboree Frog regarding predation, and the final threat the fungus, is spread by a species living alongside the Corroboree Frog, the Common Eastern froglet. This species appears to sustain high infection levels but does not develop the disease itself but allows transmission to the Corroboree Frog. **The government MUST start to look at holistically all the threats to our endangered wildlife in this region, and not singularly cast the blame to the brumby to eradicate as the solution. Specific solutions for each species with a proactive recovery plan and appropriate funding attached is recommended. This is how you will solve the fauna and flora crisis in the KNP. But government commitment and financial funding is lacking.**
8. **Humane non-lethal methods must be adopted.** *There are other strategies that can and must be used like removals for rehoming to horse sanctuaries with appropriate government funding attached, relocating brumbies to less sensitive areas, and contraceptive population control. This is more humane and will reduce foal births as well as solve the problem of removing dead horses from the KNP.*

In Europe, they have used a special vaccine called PZP to control the population of wild horses. 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 as opposed to the group that did not receive the vaccine their pregnancy rate was 81.5%. This vaccine can control fertility.

**It is extremely disappointing that this Labor government do not even want to consider or listen to the clear reasoning of ridiculous numbers used in the Cairns methodology and the distance software used.** Instead, they continue with their plans with no discussion to implement lethal shooting methods of control instead. We are also environmentalists, but we believe all facts MUST be considered fairly to make an informed decision and not a biased decision against the brumby and blame everything on this animal. This is a complex issue that needs a multi- faceted approach with specific solutions to address this problem. **A brumby massacre will not solve this issue. Using humane methods as cited above, to control brumby numbers is the course to follow but also assess accurately the real numbers of brumbies in the park.** Using flawed methods to justify your actions will only anger the public.

**The NSW government must have an immediate moratorium for new counts to be undertaken in the Kosciuszko National Park with stakeholder involvement.** Do not use distance modelling because this does not give accurate numbers. Ground quotas would be much more reliable and could be taken from those people that live near the Kosciuszko National Park, hikers, and recreational users of the park. Stakeholder involvement is encouraged for transparency.

We encourage the Labor government to not be biased against brumbies but look at the data gathered by equine scientist Joanne Canning in her paper on the "Impacts and management of wild horses in the Australian Alps." Environmental scientist, Frankie Seymour, described the Government's plan of aerial shooting as "*short-sighted, environmentally counterproductive, and extremely cruel. The government appears to have decided to ignore the humane alternative options while also declining to address any of the other human-based activities that are damaging the biodiversity of the Snowy Mountains like land clearing, roads, weeds, ski resorts, the long legacy of grazing sheep and cattle, and natural disasters such as fires, droughts, and the many recreational users and rising snowlines driven by anthropogenic climate change.*"

There are many factors that are attributed to declining environmental values in the KNP. Government building approvals for more accommodation must be viewed cautiously as this leads to more roads, more land disturbance and of course more people causing further biodiversity loss.

Visitors, agriculture, construction, climate change and natural disasters are all affecting the biodiversity in KNP. Don't vilify brumbies as they also have a place in this region. Obtain accurate numbers on these wild horses to guide your action so that it is the right action, and this will show the public that you have genuinely listened to them.

Your sincerely,

Ruby Hardie