

Submission
No 147

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

Name: Name suppressed

Date Received: 13 October 2023

Partially
Confidential

Dear Committee

This Inquiry on the brumbies in the Kosciuszko National Park includes counting methodologies, non-lethal controls as well as aerial killing.

The people of NSW do **not** support aerial killing, shooting, and trapping and killing of brumbies. This inhumane treatment inflicted on these brumbies has been singled out because they are considered pests and have destroyed the environmental values of this national park. This will be mentioned further on in my submission.

This cruelty has gone on for far too long. Only as recently as a few weeks ago the Labor government and Minister Sharpe overturned a ban on the aerial shooting of brumbies that was established in 2000. This ban was imposed because the public at the time expressed their outrage over the suffering of the wild horses in Guy Fawkes River National Park. Now 23 years later, the government has already **committed this same carnage** in the Park. NSW Environment Minister Penny Sharpe proposed an amendment to the Kosciuszko National Park Wild Horse Heritage Management Plan (KNP WHHMP), to allow aerial shooting as an additional option for wild horse control alongside the existing methods of trapping and rehoming, and ground shooting that still continues. The wider community are opposed to the inhumane treatment of brumbies, and this has NOT changed, in fact our expectations are higher as more research and science is released on more humane methods to deal with this 'supposed' problem. I say supposed because the government has used flawed methodologies to provide a licence and a reason that the ban on aerial shooting had to be overturned. As usual the government do not listen to the community or to the 'science' on this issue, the same is applied to the ongoing slaughter of our kangaroos in NSW.

What is important is that accurate numbers MUST be established first. The government failed. Secondly if the numbers indicate that brumbies need to be controlled then to align to raised community expectations on standards of animal welfare ground shooting and aerial shooting must be banned completely. These points will be explained further.

1. Ascertain accurate numbers on the brumbies.

Flawed Survey Methodology has been used, the same that was revealed in 2021 by **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 (member of the opposition at that time). **Both** expressed concerns about the counting methodologies for kangaroos. Minister Sharpe's concerns then should also be reflected in the brumby count now as it uses this same incorrect methodology. The government uses aerial sightings and takes averages across a few areas to calculate numbers. The government focuses on budgets; hence it is the cheapest, most cost-effective way for this government to gain data but it is **not** accurate. Claire Galea's independent report exposed significant flaws in the survey methodology which **means it is impossible to have any confidence in the population estimates.**

Parks managers relied upon scant science and population surveys. **The method's inadequacies are underscored by the fact that the numbers from 2014 and 2019 were simply combined due to insufficient horse sightings.** Such manipulation raises serious questions about the validity of the reported numbers. Combining numbers of brumbies from 2014 and 2019 will not provide valid or reliable data to make an **informed** decision on this issue. It is imperative that the numbers are correct, and the methodology used is accurate as we could be culling a population much lower than 3000, the government's threshold, that could wipe out almost entirely the brumbies in this alpine region. Stuart Cairns himself author of the Cairns methodology, in his reports for both kangaroo and wild horse counts, said that "we need to see a minimum of 60-80 clusters of animals to undertake any reliable monitoring". Ms Galea suggests horse cluster numbers for 2014 and 2019 were combined to meet the minimum quantity as there were not the required cluster numbers available separately in a single year. 2014, saw 20 clusters in the northern part of KNP and in 2019 there were 43 clusters. Both were well below the minimum benchmark, at both times, the necessary 60 level to do any reliable statistical modelling. However, combined there were 63 clusters just making the minimum level even combining the 2 years. In the Snowy Valleys in 2014, there were 10 clusters and in 2019, there were five clusters. There were insufficient numbers to do population estimates. Ms Galea said in the absence of any imagery of the horses, photos, or video footage, there also was no way of knowing whether the animals had been **counted twice** thereby increasing the estimates even further.

"If we look at North Kosciuszko for the wild horses and go with these population estimates, a mare will have to produce seven foals a year," Ms Galea said. This is an implausible population increase. We need reliable evidence; hence **we need an independent (not government) statistical investigation with videographers of these wild horse**

numbers. This has been opposed by the government. Brumbies are regularly culled with ground shooting, but aerial shooting can kill on mass many more. **Because of this questionable accuracy on numbers there must be a moratorium on the cull of brumbies.**

Equine scientist Joanne Canning with 50 years' experience with brumbies, who has dedicated three years to researching this one topic alone also agrees.

The implausible population estimates above occur because the population modelling techniques are flawed. We therefore consistently have implausible increases in population estimates. This casts doubt on the accuracy and reliability of the data being used to justify the aerial shooting proposal. Estimates have been said to be between 14,500 and 23,500 horses estimated across the park. This is a huge range, almost like numbers have been 'plucked out of the air'. They are estimates and this government must have accurate numbers, otherwise the population could be so affected by this widespread aerial shooting few remain, and the population never recovers.

These ludicrous estimates by the government using surveys of 2014 & 2019 and combining these figures indicates that annual increases do not even account for removals and recalculated takes the figure to 41% - double the scientific max (20%). The government also uses inaccurate software to count the numbers of brumbies which inflates the figures even more.

Equine science expert Joanne Canning noted this 41% annual increase in brumby populations in some parts of the park were described as biologically impossible for the species. Her argument was based on biological science that in perfect ideal conditions, horse populations only increase to a max 20% per annum. She wrote to every minister and the National Parks and Wildlife Services only to be ignored. The government is encouraged to listen without bias to those with the experience and knowledge in the field, otherwise community scepticism and distrust will result. The community are already questioning the real motives behind the massacre of these brumbies. Is it to wipe them out completely? Is it to deflect attention away from the real causes of biodiversity loss in the park- man's negative footprint on the environment led by government policies? It is disgraceful that pride and arrogance interferes with proper reasoning and science and the collateral damage is always the voiceless animal in any decision governments make.

2. Inhumane Treatment

Brumbies have suffered **inhumane treatment** because they have been unfairly scapegoated for too long. Environmental damage in Kosciuszko National Park cannot be solely attributed to brumbies; there are numerous contributing factors, including Snowy 2, increased tourism development, 4-wheel driving, and agricultural runoff.

Recent incidents have highlighted the brutality brumbies face. In September, the Liberal-National Government shot an entire herd of brumbies in Kosciuszko National Park, causing immense trauma to the community. Many horses suffered slow and agonising deaths, including mares killed with their orphaned foals who were left to die of starvation or predation and pregnant mares being shot. This is not humane. In May of this year, 67 horses in Kosciuszko National Park met a similarly brutal fate, shot in their necks, and left to bleed out. Horses severely injured who do not die instantly, some have had their jaws or faces injured where they retreat to die over hours and days in horrific pain. Brumby shooting on the ground and aerial shooting along with the trapping program are **not** humane methods. It is NOT humane when the brumby dies an agonising slow painful death. Is it morally and ethically right to inflict intentionally this inhumane suffering on an innocent animal who is not killed instantly in the aerial shooting operation? Does this course of action promote NSW as a state with appropriate animal welfare standards in place? These are questions that must be asked, and the government is accountable to answer this to the public.

There are other strategies that can and must be used like-

- removals for rehoming,

-relocating to less sensitive areas,

-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. This was very different from the 81.5% pregnancy rate in the cohort 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 but still the fertility rate dropped to the 14.6%. This study showed that using the PZP vaccine to stop horses from producing offspring is effective. I believe the government should consider this option through robust research and development. This is the way of the future, and this method of population control would be supported by the public. The government is encouraged to stop using past outdated cruel inhumane methods of control and be more progressive in their thinking. You will then be able to control brumby numbers that protects the biodiversity of this region but in a more humane way.

3. Biodiversity loss in the KNP

Environmental scientist, Frankie Seymour, described the Government's plan to reintroduce 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 increasing natural disasters induced by the government's continued investment in fossil fuel industries and increased logging of our native forests exacerbate more climate change affects, are all affecting the biodiversity in KNP.

One species as an example doing it tough to survive in the KNP is the Mountain Pygmy-Possum. This is due mainly to dwindling supplies of Bogong moths its main diet. These moths have plummeted in numbers due to man induced climate change with protracted droughts (lack of rainfall) and the use of pesticides by man. This moth was added to the IUCN's red list of threatened species in 2021. The Mountain Pygmy-Possum is also a victim of predation by feral carnivore species introduced by man including cats and foxes, certainly not the brumby who is a herbivore. Climate change is also resulting in drought, degraded habitat, and reduced snowfall that is needed for the pygmy possum's hibernation. Their population decrease is also because of habitat fragmentation caused by tourism development in this area that is approved by the state government.

At a federal level on the dceew.gov.au (Department of Climate Change, Energy, the Environment and Water) website the threats do **not** mention brumby control. The threats are predation by cats and foxes, loss and fragmentation of habitat referring to connectivity and restoring fire affected habitat, reduced food availability- the Bogong Moth, severe bushfires driven by climate change that reduces food supply even more, and climate change that reduces snow cover and increases feral animals more and finally weed invasion including exotic grasses used on ski runs for tourism. It appears that all these issues that affect the Mountain Pygmy-Possum are man-made related. The biodiversity crisis is also a result of government inaction to support species recovery with recovery plans that are implemented and enforced with proper funding.

In conclusion 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. If it was wrong then, it is wrong now. *Community resentment will only increase towards the government if they do not cease inhumane aerial shooting and ground shooting. Flawed methodologies and questionable numbers do NOT support this aggressive brutal treatment of the brumbies. The community want humane methods to control brumby populations if warranted by reliable data gathering. The biodiversity crisis cannot and must not be blamed solely on the brumby as there are many reasons why this crisis is occurring and sadly this is man's behaviour and footprint on the landscape through alpine developments, increased tourism, and inaction by governments to tackle climate change that increases natural disasters that fragments and destroys species habitat.*

Your sincerely