

**Submission
No 148**

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

Name: Ms Lucia Smith
Date Received: 13 October 2023

Dear Inquiry Committee

I welcome the opportunity to express my views relating to the Brumbies in the Kosciuszko National Park. As a concerned citizen, I opposed the NSW Government's recent proposed amendment to the Wild Horse Management Plan to include the aerial shooting of brumbies in the park which has already occurred. The visual images were very distressing, not to mention the community and tourists that see these dead decaying carcasses left on the landscape. This is a bitter reminder that this government inflicted cruel suffering on these innocent animals when it was not even warranted. I have outlined some key reasons why I oppose aerial and ground shooting or any inhumane method to cull these wild horses.

1. Concerns regarding the inaccurate population estimates.

To date the Minns Labor Government have relied on a survey undertaken by the NSW National Parks and Wildlife Service (NPWS) in November 2022, which estimated 18,814 brumbies remained in KNP. The population is between 14,501 and 23,535 horses – an obviously huge variance and gap by anyone's standards. Then, this NPWS survey found brumby numbers had increased by 31 per cent in the past two years, up from 14,000 horses in 2020. The survey doesn't appear to have taken into consideration the death of KNP brumbies during the NSW bushfires or the actual breeding cycles and capacity which dictates wild horse reproduction has a long gestation period- 11 to 12 months and foals are weaned at around 9 months old. Equine science expert Joanne Canning noted a 41% annual increase in brumby populations in some parts of the park provided by the government were described as biologically impossible for the species. Her argument was based on biological science that in perfect ideal conditions, horse populations will only increase to a max 20% per annum. The number of brumbies estimated by the government is illogical. **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. The method of counting from the air (a moving helicopter) is flawed and so are the estimates and the software, that inflates these estimates even higher.**

I am, therefore, deeply concerned with the flawed methodology and statistical modelling used to estimate the population numbers of wild horses in KNP. It is critical that any decisions be supported by facts and independent scientific evidence.

2. Welfare concerns for the brumbies. The government banned aerial culling in 2000, RSPCA is opposed, shooting from a helicopter is inaccurate, proposed increase in 1080 baiting.

The current plan stated that "there is a significant risk that the implementation of an aerial shooting program would result in a loss of the social licence to remove wild horses from the national park", and this is exactly what has happened. The Labor government banned aerial shooting in 2020 because of community outcry against this method and the degree of cruelty involved. The NSW National Parks and Wildlife Service also initially refused to consider resuming aerial shooting in 2023, and I support their original stance. The RSPCA also does not recommend aerial shooting, due to a lack of research in its 'humaneness' and due to the significant and adverse animal welfare implications and immense suffering it causes. Regardless the government did not consider any of these valid recommendations and went ahead regales with this inhumane slaughter of brumbies only a month ago.

I firmly believe that aerial shooting is a controversial method and cannot be considered a "humane" death. Helicopters are affected by light winds, updrafts, and turbulence and do not provide a stable enough platform to be able to humanely shoot a moving target. It is incredibly difficult for a shooter to achieve a headshot and even if it is executed, it still does not guarantee an instant kill. Even shooters admit they are prone to inaccuracy in a helicopter. They have recalled that "often they end up missing the horse's brain, taking out its jaw or something else instead. The consequences of which was often seriously maimed horses escaping into tree cover where they would later die a slow and painful death." Unweaned foals can also be left to fend for themselves and potentially starve to death or face attack from predators.

I am concerned that the killing of brumbies will increase the lethal control of other animals, particularly the native and ecologically important dingo. The NSW Government proposal states that some horse carcasses will not be removed and that they will undertake "enhanced and targeted" control of dingoes with the 1080-baiting programs that are already used to target dingoes in Kosciuszko National Park. 1080 poison is known to cause severe and prolonged suffering, so the proposal to increase the killing of brumbies will also increase the suffering in other species too and this could include our native animals. Predatory native birds who eat rodents who have consumed this poison will also die. This is not how I want my public money used – to cause extensive and extended animal

suffering. These non-target animals will be affected causing population declines. The government thinks that they solve a perceived problem created by the brumbies but create another problem with dingoes where native wildlife takes the bait instead. It is time for the government to implement non-lethal methods and invest in research and development to humanely manage brumby populations only if that is needed but use a more reliable method to ascertain more accurate data.

3. Concerns for threatened species and human activity and government failures.

I understand this amendment was proposed due to concerns for threatened species in KNP, however, I am outraged that horses are being blamed while other adverse impacts caused by human activity are ignored. Human activities, such as the creation of dams and the Snowy Hydro Scheme, the use of 1080 poison, horse riding tours, tourism (building infrastructure, snow sports, bike riding), more infrastructure- roads, accommodation and illegal hunting all impact native species. To cast the sole blame onto brumbies is to draw attention away from the real issue of man's footprint and how this negatively impacts the environment.

While the NSW State Government claims to be focussed on protecting native species, the factual record is a disgrace, with 1,043 species listed as endangered/threatened in NSW. The lack of meaningful actions by the NSW Labor Government only further diminishes its 'environmental' credibility, as well as its poor action to address climate change when they invest heavily in fossil fuel expansion.

4. I support alternative, non-lethal methods, such as fertility control.

I support the use of alternative, non-lethal control methods, such as fertility control using vaccines, which have proven effective in other countries. The vaccines affect their hormones or important proteins, stopping animals from releasing eggs, producing sperm, and having offspring. People against the use of fertility control often focus on how much work it takes, especially in large areas. Yet, the same kind of criticism can be said about lethal control, including shooting. Shooting from the air requires even more work than shooting on the ground because it involves a helicopter, pilots, and shooters. Other complaints about the use of fertility control argue that people need to get close to horses to give them the vaccine. Yet, people who shoot animals also need to get close, and just like giving vaccines, their success depends on their skill and the range of their guns. The public support effective and humane options, not cruel lethal methods.

In Europe, they used a special vaccine called PZP to control the population of wild horses in a place called the Romanian Danube Delta. 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 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. This study showed that using the PZP vaccine to stop horses from producing offspring is effective. I understand that these vaccines are not approved for use in Australia, however, I believe the government should consider this option through robust research and development.

5. Community expectations are not being met by the government. Australians are concerned about the welfare of animals and expect animals to be treated humanely. Aerial shooting does not align with these values.

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.

As a voting member of the public, I expect elected government members and political parties to declare openly and honestly their policies, positions, and intentions ahead of elections, not after results have been concluded. It is very distressing and disturbing to me that the Chris Minns minority Labor Government has only now, post the March 2023 state election, introduced a proposal to recommence aerial shooting to manage the wild horse populations in KNP. This was a deceitful action. I encourage this government to ban aerial shooting, obtain more accurate data on the correct numbers of brumbies. The communities in these alpine areas could assist with volunteers to count from the ground given specific areas in a coordinated response and then collaboratively plan to use non-lethal humane methods only if needed like removal of brumbies for rehoming and providing appropriate funding to expand this area, relocating brumbies to less sensitive areas, and contraceptive population control. There are better ways to

handle this problem if it is a problem. Taking the quickest, less expensive way is always preferred by governments but in this case, it is not the right way to go. Get the accurate numbers of brumbies and if needed humanely solve with community support and other stakeholders collaboratively. This will mean that the disposal of dead brumbies and the 1080 baiting will not be necessary and will protect other wildlife from this poison.

Your sincerely

Lucia Smith