

Submission
No 153

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

Name: Name suppressed

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Partially
Confidential

NSW Inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park



SUBMISSION
13th October 2023



NSW Inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park

Animal Welfare Committee
Parliament of NSW

I am writing to comment on the NSW_Inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park

Foreword:

Before outlining my responses, I would like to remind the Committee, the purpose of a national park as defined by the National Parks & Wildlife Service:

“A national park is an area of land that has been reserved for the protection and conservation of biodiversity, Australian native plants and animals, ecosystems, places of cultural significance and natural or geological features. National parks also provide opportunities for the public to experience them and learn more about their importance.”¹

The National Parks Australia Council state:²

“Australia’s national parks and protected areas are a legacy for all Australians. National parks and protected areas are some of Australia’s most important public assets and have widespread community support and recognition.

They’re critical for protecting biodiversity and natural areas and are the cornerstone of conservation efforts across Australia. They contribute greatly to society and have significant economic values. They showcase our unique landscapes and wildlife to the world.”

There is no inclusion for the protection or conservation of feral (or introduced) animals within our National Parks system, other than the introduction of the ‘Kosciuszko Wild Horse Heritage Act 2018’ which directly contradicts the purpose of the national parks system and was implemented purely as a political tool by a politician who at the time was seeking to appease a set voting group in order to gain a seat in Federal Government.

The object of this Act is to recognise the heritage value of sustainable wild horse populations within parts of Kosciuszko National Park and to protect that heritage.

The day this Act was assented in Parliament is a blight on all the NSW Parliament as well as the people of NSW and a certain extinction promise to many of the region’s native plants and animals. The ecological equivalent of the genocide of species and plants that cannot be found anywhere else on the planet.

¹ <https://blog.nationalparks.nsw.gov.au/whats-a-national-park-and-why-does-it-matter/>

² [Victorian National Parks Australia Council](#)

Any heritage value from the original bloodlines is highly debatable given the number of additional released and escaped horses within the regions and the fact these horses were originally simple stock horses – genetically no different to those being used today by farmers across this country – as supported by the ‘Save the Brumbies:³

“Are Brumbies different from domestic horses?

Yes and no, being born in the wild Brumbies have a strong sense of ‘family’ or mob structure. There is a strict law of ‘pecking order’ and each horse has his definite place in the mob. His senses are highly developed, he is an intelligent, alert and thinking animal.

By tuning in to his natural abilities and showing him leadership but never domination, he will quickly become your friend and bond closely with you in a way domestic horses rarely achieve. His daily needs in captivity are no different from a domestic horse”.

Also:

*“The horses we handle are mainly **Galloways**. They are stocky and strong boned and can carry weight. Colours range the spectrum, bays and chestnuts are the most common, this being the strongest genetic gene however the renowned Guy Fawkes **palominos** and **buckskins** and the paint horses from the Oxley Wild Rivers, Northern Tablelands account for around 20% of our horses.”*

Clearly these are normal horses – not a specific or rare breed – **just FERAL horses**

It strikes me as hypocritical that so much attention is granted to feral horses when little attention or outcry is made regarding all other feral animals within the Australian Alps - deer, boar, foxes, goats, cats, black rats, house mice or European wasps.

Equally as hypocritical is the willingness to eradicate one of our native mammals - the dingo!

The dingo isn’t being eradicated because it destroys our native wildlife, or because it is a threat to human life – it is being eradicated by **THE MOST INHUAMNE** methods possible – poisoned by 1080 and live-trapped in

³ [Save the brumby](#)



Mountain pygmy possum. Photo: Australian Alps collection - Parks Australia

traps that incite great pain, suffering and there are zero concerns expressed about their animal welfare! But who gives a crap about them?

No-one it seems! Why? Because the dingo, or Bambi's mother or 'Wilbur's' ancestors simply are not as 'majestic' as a horse!

To quote Dr Michael Banyard, Conservation Biology Special Interest Group Representative, Australian Veterinary Association⁴:

"... the Kosciuszko Wild Horse Heritage Act 2018 has given a disproportionate weight to the heritage value of horses over obligations to protect native habitats, fauna and flora within the park."

This was the crux of his opening statement at the Senate Inquiry into the 'Impacts and management of feral horses in the Australian Alps' on the 23rd of August 2023.

To be clear - a feral animal is a feral animal - it has no place in a national park or wildlife protection area.

⁴ [Senate Inquiry into feral horse management- 23rd August 2023](#)

The Inquiry Terms of Reference:

That the Animal Welfare Committee inquire into and report on the proposed aerial shooting of brumbies in Kosciuszko National Park and surrounding areas, and in particular:

- (a) the methodology used to survey and estimate the brumby population in Kosciuszko National Park*
- (b) the justification for proposed aerial shooting, giving consideration to urgency and the accuracy of the estimated brumby population in Kosciuszko National Park*
- (c) the status of, and threats to, endangered species in Kosciuszko National Park*
- (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'*
- (e) the animal welfare concerns associated with aerial shooting*
- (f) the human safety concerns if Kosciuszko National Park is to remain open during operations*
- (g) the impact of previous aerial shooting operations (such as Guy Fawkes National Park) in New South Wales*
- (h) the availability of alternatives to aerial shooting*
- (i) any other related matters*

I will provide responses to only those aspects that I feel strongly about.

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

There is certainly some debate as to the accuracy of the methodology utilised by the different state & territory governments when seeking justification to carry out any cull – whether it be feral or native animals on the receiving end. There is clearly a great divide between those tasked by the government and their ‘method’ which is noted to have been drawn into question during other surveys of other animals, namely kangaroo populations.

In my opinion, there is little point citing statistics from 2022 when a new count has been promised by the Honourable Penny Sharpe (MLC).

I completely **support** the need for a new 'independent' count to be completed before any discussion is had regarding the method for culling the horses.

This new count MUST include a broader representation of pro-brumby, anti-brumby, environmental science as well as equine specialists (particularly reproductive & behavioural experts), in order to finalise and equalise the ongoing debate about numbers.

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

Throughout this submission are pictures of what you should be prioritising to protect.

As part of my research for this submission I contacted a friend who works within the region to gauge their opinion of the numbers of feral horses within the Park. They also put me in contact with a helicopter pilot who flies over the region on a daily basis.

Note: BOTH individuals asked me not to name them to protect them from the harassment they have personally witnessed of others in the region who have spoken out publicly.

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The pilot has lived in the area for the last 13 years and has seen the Park constantly change – for the worse in his opinion. He carries out tourist flights as well as having flown survey counters and some aerial shooters over that period. He offered to take me up to see the damage and the numbers of horses for myself if I was willing to. The only reason I did not was the cost of the helicopter itself (fuel etc).

Both people stated the numbers are greater than 3000 and both agreed they did not believe the numbers were as high as the higher estimates being stated.



Alpine spiny crayfish | Mark Jakobson | NatureMapr | CC BY 3.0 AU

Both stated the damage being done by ALL feral animals is huge and some areas will require a long period of 'feral-free' time to fully recover. I will elaborate more on their insights later in this submission.

(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'

In relation to Section 6.1 of the Kosciuszko National Park Wild Horse Heritage Management Plan, which includes but is not limited to:

Commonwealth

- *Australian Animal Welfare Standards and Guidelines: Land transport of livestock (AHA 2012)*
- *Model Code of Practice for the Welfare of Animals – Feral Livestock Animals: Destruction or capture, handling and marketing (SCAAHC 2002)*
- *Model Code of Practice Humane Control of Feral Horses (Sharp & Saunders 2014) and associated standard operating procedures:*
 - o HOR001 – Ground shooting of feral horses (Sharp 2011a)*
 - o HOR003 – Mustering of feral horses (Sharp 2011b)*

o HOR004 – *Trapping of feral horses (Sharp 2011c)*

o GEN 001 – *Methods of euthanasia (Sharp 2013)*

New South Wales

- *Prevention of Cruelty to Animals Act 1979*
- *Prevention of Cruelty to Animals Regulations 2012*
- *Prevention of Cruelty to Animals (Land Transport of Livestock) Standards (NSW Government 2013)*
- *Welfare scoring nutritionally deprived beef cattle, dairy cattle and their crosses, sheep and horses (NSW Department of Primary Industries 2013)*

I also note within this, the absence of:

- o HOR002 - Aerial Shooting of Feral Horses Standard Operating Procedure.

Aerial culling was included in earlier Plans prior to the year 2000 and was removed by Mr Andrew Refshauge the then Minister for Heritage and Deputy Premier, in 2000 following exaggerated media coverage of the Guy Fawkes National Park (GFNP) cull. (For more on GFNP see response to Terms of reference point (g).

HOR003 – Mustering of feral horses (Sharp 2011b) includes the use of aircraft for the purpose of mustering. Yet opponents to aerial culling claim the helicopter places a higher stress level on the horses – could someone explain how mustering horses, and traversing them over greater expanses by aircraft is not opposed, as compared to aerial shooting where they are shot in quick and short distances is opposed and claimed to be more stressful?

Mustering or ‘honey trap’ trapping – enticing horses into a trap utilising salt licks etc still results in the horses being stressed once the trap is closed. The horses do realise they are confined – and can be confined for many hours or even days while waiting to be assessed and transported. Transporting of these horses is opposed by most authorities and organisations due to its extremely poor animal welfare outcomes.

Horses deemed unsuitable for transport – whether that transport is to rehoming organisations or to abattoirs – are then euthanised in situ.



Broad-toothed mouse. Photo: [Catching the Eye](#) | Museum Victoria | CC BY 2.0

Many anti-aerial-culling opponents claim the herds are stressed watching their companions being shot, and realising the danger they are in. Yet how is this any different to those horses being trapped within a confined yard watching their companions being shot (one part of Ground shooting).

The only difference is if a vet is onsite and is euthanising by lethal injection and that difference is the lack of the sound of a gunshot.

(e) the animal welfare concerns associated with aerial shooting

Aerial culling animal welfare improvements.

Aerial culling is supported by most authorities on the subject under the proviso that the regulations governing it are improved. I note in HOR002 it states:

“Aerial shooting can be a humane method of destroying feral horses when:

- it is carried out by experienced and skilled shooters and pilots*
- the animal can be clearly seen and is within range*
- the correct firearm, ammunition and shot placement is used*
- wounded animals are promptly located and killed”*

Again, Dr Banyard’s testimony during the current Senate Inquiry states:

“The Australian Veterinary Association does support the use of aerial culling and ground shooting in the appropriate circumstances, if that method is justified and is used in connection with the most relevant, best practice standard operating procedures and codes of practice. The situation is that the humane assessment of the impacts of these methods depends on both the factors leading up to the euthanasia or removing of the animals and the procedure itself. Techniques which involve mustering, transportation and prolonged handling of the animals contribute significantly to the stress of those animals prior to the finality of the situation – what's chosen for them...”

Dr Dianne Evans, Senior Scientific Officer, RSPCA Australia also cited as part of the recommendations for the Senate Inquiry⁵ to consider:

“(recommendation 2): ... is to conduct comprehensive animal welfare assessments of the following procedures: aerial shooting; ground shooting “

(recommendation 3): ... recommending head shots as the primary shot for ground and aerial shooting ... and developing protocols for conducting animal welfare audits for ground and aerial shooting.”

A CSIRO report into the ‘**Assessment of animal welfare for helicopter shooting of feral horses**’⁶ found: ‘For all horses, the median Chase Time was 42 s, the median Time To Death was 0 s (median TTD for horses not killed instantaneously was 15 s), and median Total Time was 52 s.

At least 1% of horses were non-fatally wounded, Instantaneous Death Rate was 63% (60–66%), and 3% (2–5%) of horses were not shot in the cranium, neck or thorax. Shooter skill was the most important determinant of whether or not a horse had an instantaneous death.’

It concluded: *“Shooter skill was the most important determinant of whether or not a horse had an instantaneous death. The animal-welfare outcomes of helicopter shooting appear to be similar for feral horses and feral camels (Camelus dromedarius), the only other species that has been studied using these methods and could be refined by improving shooter skill.”*

This contradicts the claims that horses are chased over great periods of time, and where shooting includes the requirement for a second look and

⁵ [RSPCA testimony at Senate Inquiry](#)

⁶ [CSIRO REPORT for feral horses](#)

if the horse is not dead, a second series of shots are to be fired, contradicts 'animals may suffer for hours'.

I acknowledge that much of those claims are derived from accounts of previous aerial culls, which on the most part have been carried out by private contractors, and with no follow-up on animal welfare by designated officials. Most notably the botched and highly controversial cull at the NSW Singleton Army Base in 2018.

A CSIRO Report into the '**Animal welfare outcomes of helicopter-based shooting of deer in Australia**⁷' concluded: *"The best animal welfare outcomes were achieved when helicopter-based shooting operations followed a fly-back procedure and mandated that multiple shots were fired into each animal."*

Furthermore, it should be noted that while the helicopter is doubling back to confirm and ensuring the death of the horse – the remainder of the herd IS NOT being chased down incessantly and the chase only continues after the confirmation of death. One must also look at the times involved. Each kill takes approximately 52s from the time of the horse being selected. If a herd has an average of only 5 horses, then the overall chasing time is approximately 5 minutes. That is 5 minutes with a break in between each kill to secure a confirmed death. That is not 'hours of helicopter chasing as claimed.

The Independent Technical Reference Group (2010). Control method: Aerial shooting of feral horses. State of NSW and the Office of Environment and Heritage report ⁸s states aerial shooting is a **moderate overall impact** with the **duration of impact being only minutes**.

It went on to add: *"The wounding rate may be higher with aerial shooting (compared with ground shooting) because animals are shot whilst they are moving, however the range is likely to be much shorter and any wounded animals can be followed up quickly."*

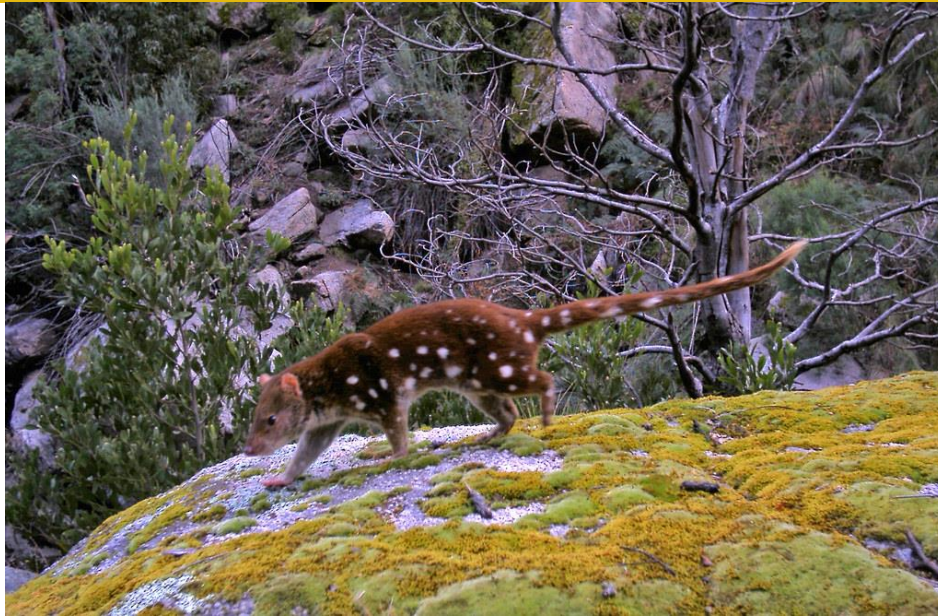
This quicker response to follow-up on a wounded horse is clearly of a greater animal welfare benefit.

Further to the support of aerial culling is the use of thermal aerial culling⁹ which assists in sighting animals in areas of dense habitat.

⁷ [CSIRO REPORT for Deer](#)

⁸ [ITRG report](#)

⁹ [Thermal aerial culling](#)



Tiger Quoll. Photo: Flickr

A study carried out in South Australia had the following outcome:

*“Thermal-imaging technology can increase detections in these conditions. We used thermal-imaging equipment with a specific helicopter crew configuration to assist in aerial culling for feral pigs (*Sus scrofa*) and fallow deer (*Dama dama*) in South Australia in 2021. Seventy-two percent of pigs and 53% of deer were first detected in dense canopy/tall forest habitat. Median time from the first impact shot to incapacitation was < 12 s. The culling rate (animals hour⁻¹) doubled compared to visual shoots over the same populations and the wounding rate was zero resulting in a incapacitation efficiency of 100%. The crew configuration gave the shooter a wide field of view and the thermal operator behind the shooter provided essential support to find new and escaping animals, and to confirm species identification and successful removal. The crew configuration allowed for successful target acquisition and tracking, with reduced target escape. The approach can increase the efficiency of aerial culling, has the potential to increase the success of programs where eradication is a viable option, and can **improve animal welfare outcomes** by reducing wounding rates and the escape of target animals.”*

The thermal aerial shoot includes the use of all thermal equipment and the animal is targeted via laser point to ensure an exact hit on the animal.

The helicopter flies between 50 & 100 metres above the ground and at 15-25 knots (between 28 to 46 kms per hour).

During the South Australian thermal cull incapacitation of animals had to be confirmed by both the shooter and the thermal operator and was based on cessation of movement and wound placement.

It concluded: *“ The ability to detect animals in difficult habitat, that are at low densities, or that exhibit avoidance behaviour, coupled with the ability of the thermal operator to track and monitor additional members of a group will improve the success of control and eradication programs and **ensure the best possible animal welfare outcomes.**”*

Therefore, while aerial shooting has not been practiced for wild horse control in NSW, Victoria or the ACT for over a decade, it remains the preferred control method for extensive populations in Queensland, WA and the NT, as well as in New Zealand, and parts of the United States

Aerial culling is already being used throughout Australia (including currently in NSW) for other large mammals – deer and camels (both ungulates) as well as foxes, boar, goats, cats, and dingo. It is used to control many feral animal populations around the World, including New Zealand, the United States (including Hawaii)

Considering all the above and most importantly the benefits of thermal aerial culling, in my opinion **the inclusion of aerial culling enhances the animal welfare outcomes** with the proviso that a review and implementation of ALL recommendations including the need to mandate multiple shot kills with follow through animal welfare checks is included.

Findings that aerial shooting provides for less animal welfare impacts is supported by multiple studies - it is supported by the science - not emotion.

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

Any removal of the requirement for the Park (or sections of the Park) to be closed for Ground Shooting is simply irresponsible.

I do support the addition of aerial culling to any section of the Park – again with the Park (or appropriate sections) being closed to the public, and any residents or private property owners being given satisfactory

advanced notice and reminders on the day before any shooting is to commence.

Notice MUST include a personal phone call as well as email or postal notification.

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

Aerial culling was included in earlier Plans prior to the year 2000 and was removed by Mr Andrew Refshauge the then Minister for Heritage and Deputy Premier, in 2000 following exaggerated media coverage of the Guy Fawkes National Park (GFNP) cull. A Draft Plan in 2016¹⁰ states the government would not include aerial shooting or roping as methods to be considered.

This despite a report by Dr Tony English¹¹ (Head of the Department, Veterinary Clinical Sciences, Faculty of Veterinary Science, University of Sydney) finding the *“use of aerial shooting in Guy Fawkes River National Park was an appropriate technique under the circumstances and that it was carried out in a humane way, under approved protocols”*.

The full report¹² was formulated from evidence provided at an Inquiry into the cull.

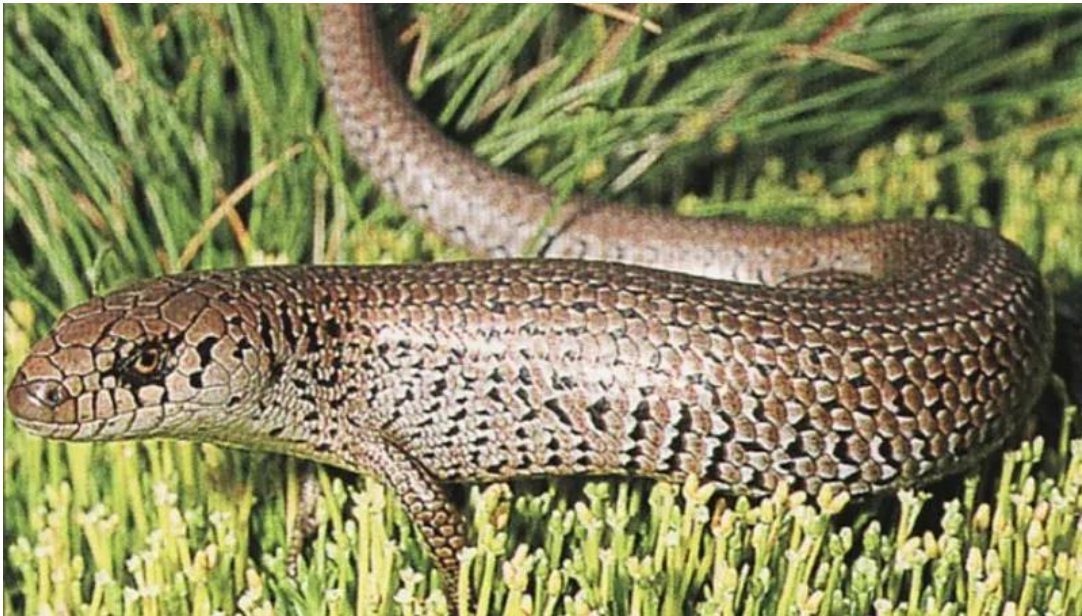
Ironically, the Inquiry Report also found the circumstances of drought within the GFNP had created a larger animal welfare outcome than the one horse out of 606 horses shot that did not die instantly due to faulty bullets. Why is that ironic? The World Meteorological Organization¹³ declares El Niño is underway, and Australians are even today being warned to prepare for longer, warmer drought conditions, as well as high fire dangers.

¹⁰ [2016 Draft Management Plan](#)

¹¹ [Dr Tony English Guy Fawkes Report](#)

¹² [Inquiry Report into Guy Fawkes cull](#)

¹³ [El Nino declaration](#)



Alpine she-oak skink. Photo: GeoffRobertson, NatureMapr | CC BY 3.0 AU

(h) the availability of alternatives to aerial shooting

There are the obvious alternatives to aerial shooting that have been promoted by different parties and organisations.

The most spoken about are Sanctuaries and rehoming.

Sanctuaries:

Privately run sanctuaries are well and good IF these sanctuaries are:

- Off crown land – on private property and are managed under all appropriate legislation, ie animal welfare/prevention of cruelty Acts
- Most sanctuaries, rescues, etc are currently not regulated in a manner that requires them to provide accountability, transparency and traceability, and this MUST change.

Government run ‘wild horse’ sanctuaries have a poor record elsewhere in the World – especially those created under the guise of “rewilding” former farmlands or parklands, predominantly due to mismanagement.¹⁴

Of particular note for failure is Oostvaardersplassen. If this Committee wants justification as to why the culling and/or removal of feral horses (and all other feral animals) from Kosciusko (and the Australian Alps) is necessary you just need to look at Oostvaardersplassen in all of its failed management and lack of action to control the species within the

¹⁴ [Rewilding Programs](#)

sanctuary.

“ In a blow to the rewilding vision of renowned ecologists, a special committee has criticised the authorities for allowing populations of large herbivores to rise unchecked at Oostvaardersplassen, causing trees to die and wild bird populations to decline.

It follows growing anger in the Netherlands over the slaughter of more than half Oostvaardersplassen’s red deer, Konik horses and Heck cattle because they were starving. After a run of mild winters, the three species numbered 5,230 on the fenced 5,000-hectare reserve. Following a harsher winter, the population is now just 1,850. Around 90% of the dead animals were shot by the Dutch state forestry organisation, which manages the reserve, before they could die of starvation.”¹⁵

Management changes within its oversight Committee and the recognition that animal numbers MUST Be controlled has seen the area improve¹⁶. The NSW Government must learn from this also and avoid allowing areas of KNP to be designated for horses. The feral animals ALL must be managed and the best method is their removal to privately run and owned facilities, sanctuaries and rehoming organisations.

Rehoming:

Currently the rehoming of feral horses is complicated by requirements set by the NPWS who have strict rehoming criteria, and will only rehome horses in groups of five or more.

Rescue organisations are usually the only ones that can take 5 horses at a time.¹⁷

This is compounded by the fact they must take the 5 on offer. The opportunity for new owners to choose their horses is not an option.

This has several consequences:

- While rehoming organisations will take as many as they feel they can accommodate, this minimum number means that individuals capable of taking in one or two at a time are not able to do so.

¹⁵ [Oostvaardersplassen](#)

¹⁶ [Improvement](#)

¹⁷ [NPWS Rehoming Guidelines](#)

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- Trapping is often done seasonally, adding pressure to those organisations who could take more throughout the year after they have trained the horses in readiness for more permanent homes.
 - By not allowing the choice of the horses places a higher animal welfare risks and risks to their new home providers. Many horses are not suitable for retraining as companion horses – wanted for riding etc – as they may be too small, have poor conformation, past injuries, not thriving or unsuitable temperaments.

The biggest barrier to individuals taking brumbies home is that most equestrians and experienced riders, do not have the facilities, skills, or experience to train their own wild horse. Riding and training horses are different skill sets - not everyone can do it. Experienced professionals using gentle training methods are needed to prepare these horses for their new home. This is time consuming and is not something that will provide a quicker resolution and I strongly doubt is even a viable long-term solution. Land sizes for housing are shrinking and the availability for people to take on and keep horses is shrinking with that also. It's a nice idea – it is not a practical long term solution.

Immunocontraceptive vaccines

Immunocontraceptive vaccines¹⁸ that have been used for fertility control in wild horses in North America have been touted as the solution to the problem – and this simply is not true for feral horse control in Australia.

Currently two vaccines are used which include the gonadotrophin releasing hormone (GnRH) vaccine, GonaCon, and porcine zona pellucida (PZP) vaccines.¹⁹

Administration requires injection as there is no effective oral vaccine. Injection requires either trapping horses and injecting them by hand, or darting them.

Additionally, to commence vaccinating at the lowest estimates almost 1,000 mares would need to be treated to have the desired impact on population growth – and it would still take 10–20 years before the population size was reduced substantially through natural mortality.

¹⁸ [CSIRO Immuno](#)

¹⁹ [Aust Brumby Alliance](#)



A herd of a dozen feral horses in waterways in the Park. The horses are not fleeing from the helicopter, used to take this shot and are clearly in a herd with more than the claimed 'average herd size of 4 horses'. Photo: Reclaim Kosci [website](#)

Administering the vaccines of 1000 mares is simply unimaginable given trapping enough horses would likely be impossible. Dart administration is a complex process and will not be possible for large numbers of horses in difficult, mountainous terrain – without aerial administration!

Staff must be extensively trained and licensed before they can administer darts. More importantly, darting can only be safely performed within around 40 metres of a stationary horse - ruling out the helicopters - and with a clear line of vision. This must be done accurately and without causing projectile trauma.

In other parts of the world where dart administration has been successful, they have been applied to horses that are used to people, allowing staff to approach horses on foot. This is a very different situation to the Australian Alps.

It would be close to impossible to identify and locate the same horses on multiple occasions, as required for booster vaccination injections.

That's right there is currently no one shot wonder – studies on white deer²⁰, badgers, and other captive-held mammals have currently failed to

²⁰ [White-deer](#)

provide a non-fertility period of greater than 5 years with ALL requiring a booster to extend the effects. These studies all involved captive animals regularly tested to ascertain the effectiveness of the vaccine. This type of monitoring will not be possible in a feral (wild – free running) horse population.

If you are going to need to trap or round-up the horses, then why not remove them at the same time? Isn't that more logical – as it would then save needing to continually repeat the process? Even the Australian Brumby Alliance lists the cons of this and the lengths required for it to be a success – one day – long into the future.

(i) any other related matters.

Social license:

The statement 'social license' has been used considerably throughout the ongoing debate about whether aerial culling is favoured by the public. Its use is questionable. The validity of the social license must include the sources of the outcry – namely pro-brumby and horse-loving organisations and individuals.

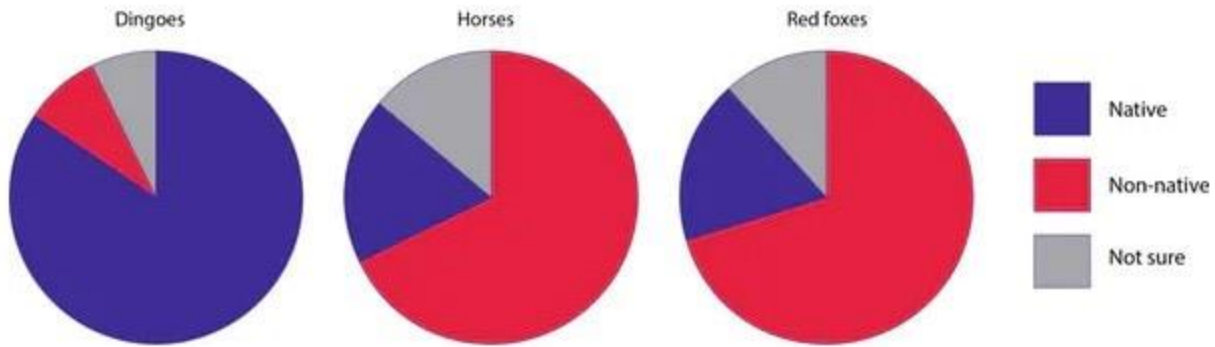
A survey conducted by the University of Sydney in 2017 found:

'people are more likely to disapprove of lethal methods for managing species they perceived to be native. In the same survey, we found nearly one in five Australians considered horses and foxes to be native to Australia.

This suggests either that a) people lack knowledge of Australia's natural history or b) people disagree with conservationists' definition of animal "nativeness".

What's more, non-native culling programs can be controversial when the animal is considered "cute" or "charismatic", or of cultural value.

Yet protecting introduced species in national parks goes against the very reason they were created – to conserve native ecosystems and species.'



Australians were asked if they considered dingoes, horses and foxes as native animals.²¹

Conclusion:

I strongly believe this is an opportunity for the Committee and this Government to correct the errors of previous Governments.

In my opinion 3000 horses remaining is still 3000 horses too many.

One-third of the National Park occupied by the horses is still one third too much.

Ideally it would be fantastic to see all the horses (and other ferals) eradicated from the Park – but that is not realistic.

The horses know no boundaries and will continue to wander into Kosciuszko from the ACT and Victoria. Without a national effort and a national program this debate will continue to exist.

Sanctuaries, or privately owned properties in and around the region that are not WITHIN the Kosciuszko National Park or other designated National Parks or Wildlife Protection Areas of the Australian Alps can quite satisfactorily represent any cultural/heritage value requirements, tourism requirements and so on.

It is NOT the government’s responsibility to ensure they are publicly funded.

What IS the government’s responsibility is to develop sustainable programs and provisions to ensure the continued removal of feral animals including feral horses from these protected, unique – found nowhere else in the world, environmental spaces.

²¹ Chart source: van Eeden et al (2020)

It is also vital that the government regulate all horse rescues, as well as those running Brumby Sanctuaries. These groups must be held to the same welfare standards that they advocate for and they are currently not required to report back on successful re-homing or the training methods used in order to 'companionise' the wild horses. We currently have no way of knowing what is happening to these horses.

The different iterations of the Department of Environment (or Heritage) and the National Parks & Wildlife Service have FAILED the region through mismanagement, and an unwillingness to just get in and do what needs to be done - no doubt also thwarted by political fear of vote losses.

If all the pro-brumby advocates stopped all their infighting and pooled their resources to crowd fund, they would be able to fund the necessary private land purchases to guarantee a small (manageable) herd of brumbies that could be used to recognise any heritage value claimed to exist.

Everyone continues to use animal welfare as the impetus for protecting the horses and yet few (other than a brief mention at the Senate Inquiry) are considering the greater animal welfare outcome for ALL would be the removal of as many horses (feral animals) as possible.

No ongoing need to trap, muster, bait, shoot, starve, endure extreme seasonal conditions for the feral species. No more having their habitat (homes), trampled, transformed, over-grazed, secondary-poisoned, and facing extinction for our native wildlife. **A far greater, far more important animal welfare perspective and reality.**

We are continually reminded that climate change will result in harsher realities of weather, of seasons, and of impacts on the environment creating far poorer animal welfare outcomes for all the animals - native and feral.

If the number is closer to 3000 this is our chance to amend the flawed Heritage Act and remove that legal requirement to retain ANY horses within the Park and is the prime time to remove the horses out of the Park and into a better animal welfare outcome. Providing a better animal welfare outcome for natives in the process.

We are continually encouraged to 'do our bit' to reduce omissions, our waste, our energy usage, environmental impact – our carbon footprint – and yet here we are debating whether because of a hoof print that is directly impacting on every aspect of Kosciuszko and the Australian Alps existence comes down to whether a bullet fired from a helicopter or one fired from the ground - both aimed at the same sections of anatomy, both with the exact same result, and yet because it's a popular hoof – we might renege on our ability to actually fix a problem those who came before us created!

There is a far greater animal welfare concern than just the 'stress levels experienced by some horses'.

Epilogue:

The pilot I spoke to relies on the continued existence of brumbies in the Park – at least as part of his income. Tourists are looking to see the brumbies – witness 'The Man From Snowy River' legends I real life; surveying – looking to count them; environmentalists & scientists seeking to gain a perspective of the damage being carried out.

For me, I find his need to protect his (very large) backyard from the horses – in fact he stated from all the feral species – is telling of a person who is regularly watching that backyard diminish in its beauty and uniqueness.

Not a person who would say what he thinks the NPWS would want him to say – especially given he knew I was seeking his honest opinion with a caveat and guarantee that I would not name him.

13 years living in that space certainly provides him with the credibility that I believe outweighs the many voices of those who have never been to the area – including my own.

Additional note:

This is a personal-opinion submission and is in no way reflective of any submission by the organisation of which I also represent.

The battle ground:



And the winner is?

To be decided by the umpire!

I would like to remind this Committee and the Hon. Penny Sharpe MLC of her statements in September 2018 ²² during an exchange in Parliament with the Hon Gabrielle Upton, then Minister for the Environment & Minister for Heritage. To Ms Upton:

"Why then did you pass the Kosciuszko Wild Horse Heritage Bill, given that both the corroboree frog, of which there are fewer than 50 in the wild in the park, and the mountain pigmy – there are fewer than 500 in the world – have been identified as being threatened? These are indigenous species that are also threatened by the burgeoning and very large number of feral horses in the park. How are you saving those animals when you are allowing them to be trodden to death?"

Ms GABRIELLE UPTON: – we can work and move forward. There was no pathway forward to balance those diverse wildlife features together – with the Kosciuszko brumby in place.

The Hon. PENNY SHARPE: Other than suspending the National Parks and Wildlife Act, which is what that bill does."

Hon Penny Sharpe, it is time you stand by your words – remove the horses and save the wildlife.

²² [Facebook statement](#)