

Submission
No 158

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

Name: Name suppressed

Date Received: 13 October 2023

Partially
Confidential

Kosciuszko National Park Wild Horse Heritage Management Plan amending submission

I am writing this submission as the information about the amount of Brumbies in Kosciuszko National Park is incorrect and i am completely disgusted by the fact that people think that culling and especially shooting the brumby's is in any way acceptable.

Amendment 3. Updated population size information Section 5 Protecting wild horse heritage values while maintaining other environmental values

Plan reference: page 8, first paragraph under the heading 'Wild horse impacts'

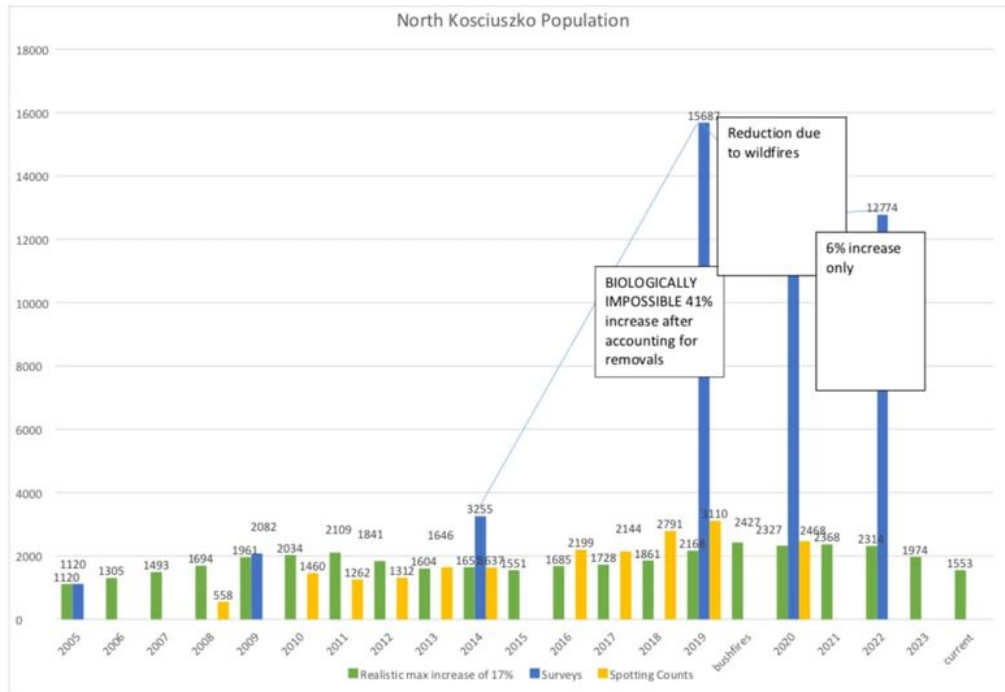
Replace: As of November 2020, there were an estimated 14,380 wild horses in the park, with the 95% confidence interval for the estimate being 8798–22,555 wild horses (Cairns 2020).

With: As of November 2022, there were an estimated 18,814 wild horses in the park, with the 95% confidence interval for the estimate being 14,501–23,535 wild horses (Cairns 2022).

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

(b) the justification for proposed aerial shooting, giving consideration to urrency to the accuracy of the estimated brumby population in Kosciuszko Natioinal park

The Cairns method used to count the Brumby's is completely incorrect and it isn't biologically possible for 18,814 horses to exist in KNP. as someone who has spent a lot of time in KNP looking at Brumbies it isn't possible for there to be this many horses as you don't always see them and often only a small few, if there was 18,814 there would be no need for anyone to trek large distance into the mountains or plains looking for them. As shown in the graph below it shows the biologically impossible method of cairns used to *estimate* the amount of horses in KNP in blue. The yellow is headcounts done by National parks and wildlife services and the green is an estimate done using equine science with maxim increases. As shown in the data below the estimated 41% increase through the Cairns method is scientifically impossible and if the same method was used to calculate the population of Australia our population would be 370 million people instead of the accurate 25.69 million.



For the amendment plan to be accurate a head count is necessary, not a computer generated guess. A head count should be done with video footage so there is actual correct evidence of how many horses are in KNP, which is drastically below the current estimate. The brumby need to be physically seen in the video to prove its accuracy as the estimated amount is completely untrue and biologically impossible.

Equine scientist joanne Canning discovered that in the government calculating of wild horses in KNP they didn't take into account the number of horses that have been removed from the park each year. She said the increase of 41% in the official count is impossible and a scientific maximum is about 20% per annum in good conditions. This method is again flawed as it fails to take in the natural disasters that have occurred over the past few years such as bushfires, where there were many mobs of brumbies lost.

<https://regionriverina.com.au/call-for-npws-to-stop-brumby-cull-in-face-of-flawed-population-count/37704/>

Will address amendment 4 and 5 together

Amendment 4. National standard operating procedure Section 6.1 Animal welfare Plan reference: page 18, third dot point, under the heading 'Commonwealth'

Replace: • 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)

With: • 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 HOR002 – Aerial shooting of feral horses (Sharp 2011d)

o HOR003 – Mustering of feral horses (Sharp 2011b)

Reason: To include reference to the national standard operating procedure for aerial shooting of feral horses

Amendment 5. Wild horse control methods Section 6.2 Capture and control methods that are available for use in the park Plan reference:

page 20, in the table titled 'Control methods', in the row for 'Ground shooting'

Replace: Ground shooting For use in areas of the park which have been closed to ensure safe implementation of ground shooting.

With: Ground shooting For use in any area of the park.

Reason: To clarify the example application for when ground shooting may be used.

Plan reference: page 20, in the table titled 'Control methods', after the row for 'Ground shooting' and before the row for 'Reproductive control'

Add: Aerial shooting For use in any area of the park.

Reason: To include aerial shooting as one of the available control methods in the plan. Plan reference: pages 20-21, under and including the heading 'Aerial shooting'

Delete: Aerial shooting Animal welfare assessments advise that, if undertaken in accordance with best practice, aerial shooting can have the lowest negative animal welfare impacts of all lethal control methods (Kosciuszko Wild Horse Scientific Advisory Panel 2020; ITRG 2015).

However, there is a significant risk that the implementation of an aerial shooting program will result in a loss of the social licence to remove wild horses from the national park. In addition, government policy since 2000 has been not to undertake aerial shooting of horses in national parks. Taking these factors into account, this plan does not provide for aerial shooting. Reason: The text is no longer required as aerial shooting will be included in the table of control methods (see amendment above)

(G) the impact of previous aerial shooting operations (such as Guy Fawkes national park) in new south Wales

Aerial shooting should never be considered due the catastrophic event that happened in Guy Fawkes National Park NSW in the year 2000, where Brumby's were culled aerial, where many horses suffered non kill shoots and died slowly and painfully as witnessed by local grazier Greg Everingham who said he seen horses shot through mouth, legs, stomach and when they hovered back around and tried to finish them off they only hit them again in the mouth and nose not killing them. At the time of the mascara Brian Gilligan the director of National Parks and wildlife services said in a tv interview " what we are acknowledging is aerial culling of horses is unacceptable to a significant portion of the community and we respect that and therefore won't be used."

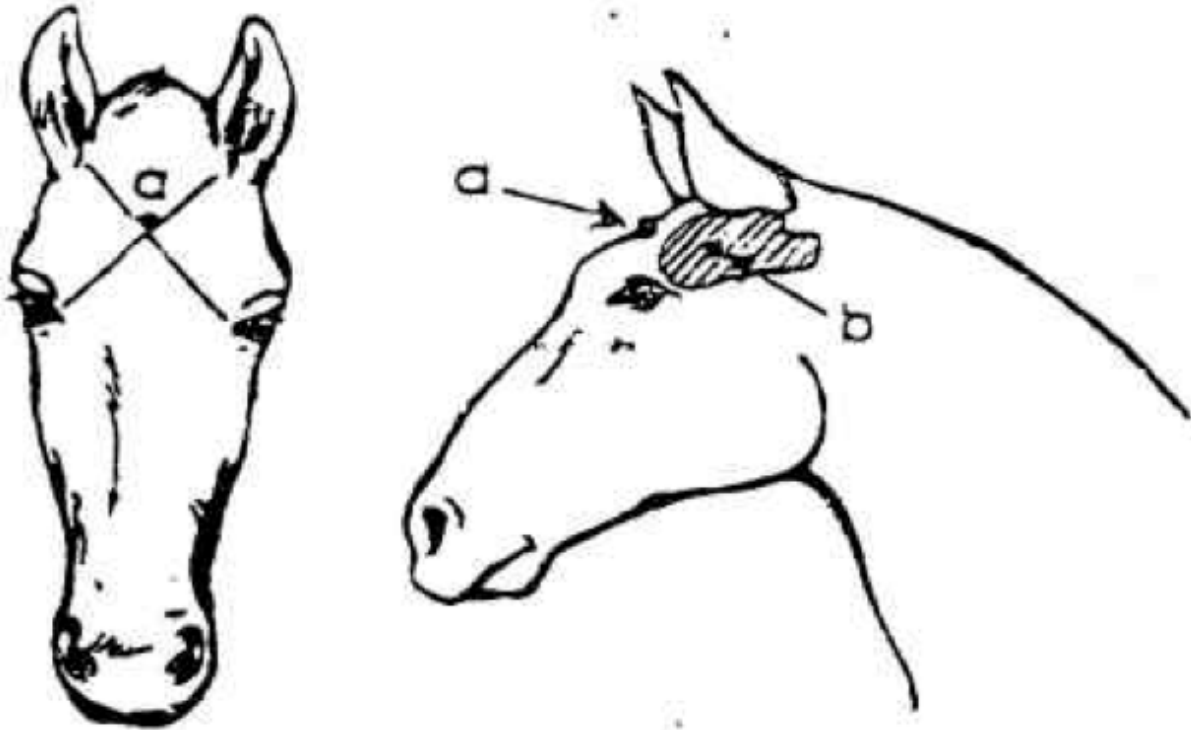
<https://snowybrumby.wordpress.com/guy-fawkes-brumby-slaughter/>

This is the reason that amendment 5 pages 20-21, **should not** be changed. What happened in Guy Fawkes was inhumane and we cannot let history repeat itself. As letting horse die in pain for any amount of time especially days like in Guy Fawkes is completely inhumane and unacceptable.

Amendment 4 page 18 adding culling to the controls methods

(E) the animal welfare concerns associated with aerial shooting

For the horse to be humanly destroyed the shooters must get the correct shot, for horses not to suffer this must be done through a head shoot to render them unconscious immediately so they don't suffer. As shown in the diagram below For this to be achieved it will be extremely hard for the shooters, as horse are prey animals meaning they are flighty. So things like a helicopters which are loud and unusual will cause the horse to take flight and run making them hard target which then increase error, which can end in a Brumby getting injured by a non kill shot leaving them die slowly and painfully which was seen in Guy Fawkes. The terrain in KNP would also make a kill shot hard with thick bush which is known by anyone who has spent time in KNP. As seen early in the year in May when nearly 70 KNP Brumby's were mascaaed and then when the park was shut during winter 2023 over a hundred horses with many horse suffering by being shoot in the stomach or having to take multiple bullets before they died painful suffering, while many mares aborted their foals. If a cull can't be humanly completed from the ground how can anybody possibly manage to humanely cull Brumby's from a helicopter. The RSPCA definition of humane killing is "when an animal is either killed instantly or rendered insensible until death occurs, without pain, suffering or distress".



<https://aboutregional.com.au/grisly-discovery-of-67-wild-horses-shot-in-kosciuszko-national-park/423977/>

<https://kb.rspca.org.au/knowledge-base/what-does-the-term-humane-killing-or-humane-slaughter-mean/>

(f) the human safety concern if kosciuszko National Park is to remain open during operations

In February 2022 two hiker where out in KNP when they suddenly had to seek shelter from a helicopter performing aerial culling on deer. They then had to wait over 45 minutes before the cull was ceased, during this time the hikers were petrified and had to hide under a tree where just five meters away shots were being fired. The public were not informed about this cull which is a extremely dangerous and they are very lucky that these two hikers or anyone else in the park wasn't killed.

<https://www.2gb.com/freeze-on-snowy-mountain-culls-afterhikers-brush-with-death/>

A similar incident happened recently in SA, where the helicopter was culling deer on a private property that they didn't have permission to be on, where there was hunters that did have permission and they had to run away from the helicopters so that they weren't shot or killed. So how can the government guarantee the safety of visitors to the park when there have already been two reported incidents of people nearly been seriously injured and one where people were on private property.

This is why it cannot be safe for these operations to be performed while the park is open to the public, it's extremely dangerous and could end with someone being seriously injured or killed. It is also an area where large numbers of people and families with young children go camping and it is unacceptable that these families and young children should see the brumby's shot. Especially when these operations are planned to be done from a helicopter where a kill shot isn't guaranteed and then they will see these brumby's suffering and dying slowly. When these culling operations are performed there is no way that the parks visited safety can be guaranteed, so people will visit the park less and it is ours to enjoy but culling the Brumby's destroys an Australian icon and threatens the safety of Australians. If amendment 5 page 20 is changed that shooting can be completed without shutting the park cause a great safety risk to the public. A lot of people use the park and don't need to be worried about getting shot when they are just trying to enjoy KNP.

<https://www.abc.net.au/news/2023-09-08/aerial-deer-cullingrecreational-hunting-incident-callendale/102828626>

(h) The availability of alternative to aerial shooting

Aerial culling is an extremely cruel practise that in this time should be banned. It is extremely inaccurate and a cruel method of culling animals, if you don't have a kill shot no animal should be shoot, which in aerial culling is extremely hard to achieve especially considering the structure of a horses head. It is disgusting that the government thinks this practise should happen in KNP and brumby's should be left to suffer dying slowly in extreme pain.

Brumby's Don't need to be removed from the Kosciuszko National park as there is nowhere near the amount that this is estimated, they are an Australian icon and a major part of the history that the mountains and Australia is built on.

However if some people belief that the need to be controlled then rehoming is the most suitable method. There are many people willing to take these horse and the government needs to make a better effort in helping the rehoming easier and possible. Initiatives like equamillion for off the track thoroughbreds can be implemented for brumbies to show the diversity that brumby's have. Horses are also used as therapy animals the government could use this initiative in helping find them homes. There are many children and adults that could benefit from therapy which we would be possible through the brumby's. For example place like riding for the disabled could use brumby's as part of there therapy. Veterans who suffer from PTSD are also people that could benefit from therapy through horse which could easily be accomplished through the use of brumby's.