

**Submission
No 162**

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

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To the Members of the Animal Welfare Committee Inquiry,
Ms Emma Hurst MLC, Committee Chair,

Aim: To Inquire into and report on the proposed aerial shooting of brumbies in Kosciuszko National Park

Terms of Reference

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

This is just one of many concerns. **My research discovered evidence that strongly suggests there are many question marks regarding the way Cairns methodology is used and that it should be discontinued.** These question marks over flawed methodology are SO concerning they have already been raised in parliament by Emma Hurst MLC and Rod Roberts MLC. Rod Roberts has flown over the park himself to observe first hand.

The Kangaroo Inquiry NSW 2021 also discovered many flaws with the counting methodology used on kangaroos and there was recommended change. **I have found evidence of similarities between what has happened to kangaroos and brumbies as far as counting methodology** and believe some of the recommendations made in the kangaroo inquiry could equally apply to the brumby population. These recommendations would be priorities for the brumbies as well: Recommendation 8: That the Dept. of Planning, Industry and Environment investigate new technologies for counting brumby populations such as the use of infrared and other camera drone technology.

Recommendation 9: Use video imaging of populations when surveying populations from aircraft and make this footage publicly available on its website.

The kangaroo inquiry also revealed knowledge regarding counting methodology from an independent biostatistician Claire Galea. On May 24 2023 a report titled, "Independent biostatistical Report on the brumby population in the Australian Alpine National Park " was released by Claire Galea. From the summary of the analysis:

1. There are concerning flaws in methodology and statistical modelling of the population estimates of wild horses in the Kosciuszko.
2. Based on this analysis it is impossible to have any confidence in the population estimates provided.

Furthermore a **recommendation was made to have an immediate moratorium** on all the killing of wild horses in KNP **and an independent investigation** into all population trends and subsequent control needs, to be **urgently** undertaken.

A community count was organized in June of this year (2023) assisted by advice from Claire Galea and also using the scientific skills of Karren Summers (Bsc Env; MAniSc Equine), with members of the public. The 72 participants of this count were given strict guidelines to follow over the 2 days of the weekend so as to be as accurate as possible. Much of the Northern Block was covered by the count - either foot, horseback or car. The total number of horses sighted collectively over a huge area of this block was 653. I took photographs of nearly every horse I saw as a participant and have kept them as photographic evidence. Other participants also kept photographic records.

Spot flight counts have also been undertaken by NPWS over the years with results obtained under GIPA, showing the headcount of actual brumbies to be far closer to what Rod Roberts and the Community Count June 2023 had deduced to be. There are **massive discrepancies between these results and the results of NSW NPWS surveys that NPWS staff have actively promoted to politicians**, a fact, as I have listened to this happen in budget estimates, where excessively large figures from their surveys were given to the minister without any further explanation of limitations of these types of surveys or revealing that spot counts had also shown far less horse numbers.

I believe this to be a deliberate cover-up by some who have idealized ideas of what they wish the park to look like and be. For example, horse count flights were undertaken over June 26 -27 in 2020. The total count was 2,468 horses. Then “A Survey of the wild horse population in KNP November 2022 was undertaken by NSW NPWS which states that in the Northern Block there were 12,774 horses My personal experience after travelling through the Northern Block knows that this figure can not even be remotely close to accurate. The figure today is far more likely to be closer to 1,000 horses remaining, if that, given the large amount removed in various ways from the park, either through rehoming, knackery or killing directly. This to me, is clearly in breach of legislation currently in place to protect the heritage of the horses, as authorities do not have an independent count done yet and are knowingly using highly flawed data. Instead they expect the public to believe these highly unbelievable numbers, that are clearly biased in nature.

The next issue I have regarding this population counting is that NPWS do not have any photographic record of these supposed large herds of horses. There is no identification done of herds to justify the large numbers being killed. No proof, no images, no video. That would be because the horses are not there in the numbers sprouted. If we do see pictures from the media of the horses it is often the same old footage that was taken years ago. It would not be hard to have up to date video and or photographic proof of 12,000 living horses, surely. Without evidence that satisfies the public, the public can not have trust in what the government does.

Joanne Canning (BSc Equine Sports Science, HND Equine Sports Coaching, *BHS11*), is another suitably qualified person to comment on numbers and flawed methodology and she has made an open video letter to share. The link is here: <https://www.youtube.com/watch?v=Gg6v-bM9Wk0> As well as producing this she has all the details necessary to read on her web page: <https://www.brumbiesforever.org/> and has written extensively on numbers in her submission to the draft Wild horse Management plan 2021. I will attach it to this document. Joanne Canning is a valuable source of factual information and her advice needs to be heeded not ignored, given the considerable community anguish about shooting and removing brumbies, and her qualifications.

As well, I have written an email to ecologist Wayne Linklater, who is referred to in the Final Report of the Independent Technical Group 2016, referenced on p46 and by NPWS themselves, 2022. I showed him a Cairns report. My reply given, from the evidence I gave him, was that, although the method used was rigorous, his criticism was that, “they run adjacent transects in sequence. Although they claim that they are far enough apart to minimize horses being moved into subsequent transects, **they have no proof that the spacing between transects is sufficient.** We found that horses moved up to 2.75 km before leaving the observers view, still running. Thus, **the spacing might not be sufficient to prevent double counting,** especially if the horses are afraid of helicopters because they have experience being chased and mustered by them in the past.

It would be better if they flew the transects in a random order or increased the spacing between transects (and reduced their number [that would save time and money too]). The line-transect, DISTANCE method they are using does not need such a lot of transects that are spaced regularly and parallel, and flown sequentially, across the area. Indeed, it is better that the transects be randomly placed and flown.

If horses are moving from one transect to another in sequence, as they are flown, then density may be over-estimated.”

Wayne Linklater also reported in his study, “Estimating Kaimanawa feral horse population size and growth” on page 14 states that helicopter counts are more designed to “census” the population rather than to estimate population size. We think it is a mistake to attempt to obtain absolute population numbers by counting from a helicopter where it cannot be demonstrated that the flight response of horses is negligible. Absolute counts require low flying and intense coverage of the landscape that are more likely to cause horse flight and therefore, double counting.”

The Final Report of the Independent Technical Reference Group 2016 noted that horse populations where demography has been well studied tend to show a range of population growth rates (per horse per annum) from $r = 0.043$ to $r = 0.188$ (Table 5). On changing decimals to percentage, I interpret that as 4.3% to 18.8% rates. This would be backed up by the Scientific Advisory Panel that stated on page 22 that a rate of increase in north KNP from 3,255 in 2014 to 15,687 in 2019 at 37% “is above the biologically possible rate of reproduction”(Garrott et al.1991). Again, the likely reason being “there is considerable movement of horses between surveyed and unsurveyed areas that is not accounted for in the survey methodology (Cairns 2019).

Michelle Dawson has also reported on population growth in her document, “The Population Ecology of Wild Horses in the Australian Alps” in which it is reported that, “The maximum rate of increase observed for any wild horse population to date is 30% per year (Duncan 1992), however values of 21% per year are more common (Garrott et al. 1991).”

b) the justification for proposed aerial shooting, giving consideration to urgency and the accuracy of the estimated brumby population in Kosciuszko National Park.

There is absolutely **no justification** for either aerial or ground shooting in KNP given the extremely **low numbers of horses** I believe to be currently in the park. So absolutely zero urgency as well, given the fact we are now entering a dangerous bushfire season and that the horses ability to help reduce fuel loads may be an asset not a problem. I know the same old people in Australia, always argue they make no difference or may worsen the situation but I have the opinion the case for this is weak. My reason for this is, in many countries around the world horses have been reintroduced, along with other large herbivores, to the role of firefighters. **Not just one country, but many different countries around the world, all with different landscapes.** Information on this can be found on these sites links below, which are just a couple of many examples with this type of information. All just totally ignored by our NPWS. Yet, what if they are wrong? I don't want to take that risk for the sake of our native animals. It is far too high a price to pay.

<https://www.wildhorsefirebrigade.org/resources>

<https://www.positive.news/environment/spains-latest-weapon-against-wildfires-wild-horses/>

An independent count is needed, preferably by a biostatistician and other means of counting should also be considered as was already suggested by the Scientific Advisory Panel formed to give advice on the plan previously. Given the huge cost of living pressures many Australians are currently under, I find it astonishing that so much time, energy and money is devoted by certain lobby groups, particularly the Invasive Species Council and some politicians, to ridding an

animal that is a cultural icon. How can people go ahead and shoot these animals that give such joy to some, as well as being historically and culturally important throughout the European history of this country? This has already been proven in other reports and is why legislation was passed. How can any government go ahead shooting **without knowing all the facts**, not just given to them from the self-interest of NPWS and the pest industry lobbyists? Especially when there is **so much controversy and distrust** from the public who advocate for these animals.

The NPWS may be trying to protect their own jobs and ideology? Evidence of this is seen in the way they have handled the Wild Horse Issue since 2016. There has been a downward spiral since the efforts to bring in the draft 2016 plan occurred. The public managed to bring to the table so much information that the 2016 plan had to be scrapped and a new plan brought out. As an advocate I began writing submissions back then. I was one of many relieved when we finally had the Kosciuszko Wild Horse Heritage Act 2018, made in good faith to protect the heritage values of these horses. However, I now feel the spirit of the act is not adhered to as it should be. Legal speak rules like tyranny. Community relationships have declined to the extent that it is almost impossible to give input to a community panel that is nameless, other than the chair. There is scant transparency or communication. Information is redacted and hidden and often a GIPA request is needed.

Quite frankly the situation from where I sit is infuriating. There are no assurances that the heritage value of any brumby is being valued. This was evidenced by the trapping of most of the Peppercorn horses (known as The McDonald Silver and Taffy horses), that were mentioned by the Community Advisory Panel (CAP) in their report for the latest plan on p16, to be of heritage value. They advised it was important to retain representative populations of each typology of horse. This has not occurred. There are no assurances from anyone on the latest secretive panel that they even have the knowledge needed about heritage. Why not? Reports back to the community have been almost non-existent. Why has the advice of the Scientific Advisory Panel(SAP) and the CAP not been heeded in many aspects of the new plan? Why was a family of loved Kiandra Greys shot and killed. How much more sadness do brumby advocates need to endure and for what? There are no guarantees the environment will be better off when they are gone.

Below are a couple of examples never mentioned by NPWS in the new plan, given as solutions to issues raised in the SAP report:

1. SAP Report page 38 “**There are a reasonable number of studies that have found positive impacts of wild horses overseas** (Soriano 1991; Zalba and Cozzani 2004; Loydi and Zalba 2008) and in Australia (Wild and Poll 2012, Williams et al. 2014) and there are theoretical reasons to expect positive impact at moderate grazing density (Connell 1978). Experimentation measuring impact at a variety of densities is required to prove or discount the presence of any positive impact.”

I am now only aware of one study, by David Berman that has examined impact, paid for out of necessity by a few brumby advocates to gather evidence either for or against. Berman concludes, “The combined impacts associated with the sign of deer, feral pigs, fire and humans were large compared to that of feral horses. Management of feral horses to reduce their direct impact is **unlikely to be beneficial** without complementary management to reduce the effects of these other agents of impact.”

Obviously this does not justify massacre by aerial or ground shooting. The human impact is SO large in KNP now due to the human impact of the development of Snowy 2.0 that it would be extremely unlikely that a slaughter will miraculously improve the environment and be worthwhile doing.

2. SAP Report page 39 “It is assumed that horses have the same impact as cattle in that by eating predominantly grass they increase the number of flammable shrubs. Where has this happened and has it been documented? Presumably, there should be a correlation between horse density and increases in shrub density and then fire frequency or severity. Include other studies such as the report on fires in the Alps (Zylstra 2006) that suggests that the increased burning by European settlers changed the vegetation to make it more fire-prone not the influence of introduced ungulates. Furthermore, Walter (2003) found that horses were not congregating in unburnt areas after the 2003 fires. **A better understanding of the relationship between bush fires, horses, and horse impacts will help inform the proper response to bushfires.**

One of the main issues I have is that decisions should not be based on assumptions, political ideology or pseudoscience undertaken by the pest industry but rather facts. There is much evidence there is little research done on wild horses in Australia, perhaps due to the prevailing influence of the pest industry lobbying heavily with politicians. In her Reference document titled, ‘The Blame Game and the Science’, link below, Joanne Canning also writes about this issue and discusses the many problems with this approach.

<https://www.brumbiesforever.org/theblamegame.htm>

Additionally I am concerned about the efforts put in by some politicians to make decisions like shooting brumbies, when they have clearly demonstrated that the knowledge they have on the issue is minimal. How can 2 politicians fly over exactly the same country and come away with 2 completely different interpretations of what they see? One will use strong language and say they see ‘destruction’ of riverbanks and vegetation and another will not notice any destruction other than that of humans caused by the Snowy 2 scheme and all the large transmission lines running through the park. This highlights how divisive the issue is.

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

Joanne Canning has again much information on her web page about the problems and issues there have been with some of the supposed evidence blaming horses for environmental damage.

There has been much research from advocates on the threats to endangered species and in nearly every case the threats have been exaggerated. There are ridiculous claims made about horses trampling with their hard hooves killing frogs and the like, when there is always a logical explanation why the species is threatened, which does not involve horses. Corroboree frogs are a perfect example. The chytrid fungus, climate change and bushfires are the biggest threat.

(e) The animal welfare concerns associated with aerial shooting or any shooting for that matter. I am including the following photos and video link taken on the October long weekend by people I know. Says it all. Dying in agony. Shots not often to head. Distressing for tourists. Makes a mockery of the 2021 plan Appendix A p26 1c) Fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation.



Mother dying on top of baby foal. Foal would have suffered. Photo clearly shows a horse in the stream that leads to a dam. A video of this section taken by the public reveals this clearly, not included here due to my time limitations.



SHOOTING SHOULD generally take place in the LEAST ACCESSIBLE areas first. Both of these points were breached in the Kiandra shooting last September when 11 or so very ICONIC horses were shot very close to the highway and with NO public notice given! The NPWS own recommendations were ignored!

Another point is concerning public perception regarding shooting operations. It is stated that "concerns do indicate that there are risks associated with ground shooting in terms of the social license to conduct operations". This point most certainly has not been adhered to. NPWS are

aware of 'public perception' attitudes towards the unnecessary massacres that have happened in the Park over the last 12 months yet push for it anyway regardless. Tyranny.

Additional Info

The potential to attract people into the park simply to see brumbies is enormous. Bus tours for this purpose could be organised, walking tours and photography tours. What has occurred in recent weeks has been heartbreaking and a deterrent to many to ever visit the park again. Supporting ethical ecotourism options creates local jobs and supports regional tourism.

The management of NPWS service needs reviewing as instead of bringing the community together working for the good of the environment it is divided. There are strange links between the pest industry, NPWS, some politicians and the killings. This is not about the environment when the public come across dead horses in streams and 1080 poison heavily distributed at the same time, threatening the health of our top apex predator. I believe ICAC should be investigating the links and the money trail.

An interesting find I made to conclude and think about is this, “Aboriginal people hold an affinity with animals generally, as part of their world view, thus don’t like to see any animals including horses suffer in any way.” This quote came from a report done by NPWS titled Aboriginal Cultural Values on Wild Horse Management Plan. It was interesting to see views expressed in this report were quite varied.