

**Submission  
No 165**

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

**Organisation:** ACT Government

**Date Received:** 19 October 2023

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**Mick Gentleman MLA**

Manager of Government Business  
Minister for Planning and Land Management  
Minister for Police and Emergency Services  
Minister for Corrections  
Minister for Industrial Relations and Workplace Safety

Member for Brindabella

**Rebecca Vassarotti MLA**

Minister for the Environment  
Minister for Heritage  
Minister for Homelessness and Housing Services  
Minister for Sustainable Building and Construction

Member for Kurrajong

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The Hon Emma Hurst MLC  
Committee Chair  
NSW Legislative Council's Animal Welfare Committee  
[Animal.welfare@parliament.nsw.gov.au](mailto:Animal.welfare@parliament.nsw.gov.au)

Dear Chair

On behalf of the ACT Government we are pleased to make this submission to the NSW Legislative Council's Animal Welfare Committee in response to an inquiry into proposed aerial shooting of brumbies in Kosciuszko National Park.

The ACT Government commends the NSW Government on the proposed amendment to the Plan to authorise aerial shooting as a method to control feral horses to assist with the challenges of managing this animal in the Australian Alps.

The ACT Government has a zero-tolerance approach to feral horses and notes the severe environmental damage to Australia's most sensitive ecosystems that will be caused if feral horses remain uncontrolled.

The attached submission from the ACT addresses several key aspects of the inquiry into animal welfare related to the aerial shooting of feral horses within the park.

The ACT takes pride in its robust Animal Welfare Act, which stands as a testament to our commitment to maintaining the welfare of animals.

Yours sincerely

Mick Gentleman MLA

*18/10/2023*

Rebecca Vassarotti MLA

18 October 2023

## **ACT Government submission to the NSW Animal Welfare Committee inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park and surrounding areas**

### ***Terms of Reference:***

- (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.***

### **Introduction**

The ACT Government appreciates the opportunity to provide a response to the NSW Animal Welfare Committee inquiry regarding the proposed aerial shooting of feral horses. While we may not address all of the terms of reference in our response, we will focus on those that are most relevant and applicable to the ACT.

### **Background**

The ACT Government has made a submission to the proposed amendment to the Kosciuszko National Park (KNP) Wild Horse Heritage Management Plan by the NSW Department of Environment and Planning. The ACT supports aerial shooting as an available method to control feral horses. The ACT also agrees that the inclusion of aerial shooting is crucial to meet the legal obligation of reducing the wild horse population from an estimated 18,814 horses (November 2022) to 3,000 by June 30, 2027. This obligation is described in both the *Kosciuszko Wild Horse Heritage Act 2018* and the *Kosciuszko National Park (KNP) Wild Horse Heritage Management Plan*. The ACT Government are supportive of this amendment as it was identified as an issue in the ACT Submission to the Draft KNP Wild Horse Heritage Management Plan, November 2021.

The ACT Government also submitted in a response in April 2023 to the Senate inquiry into the impacts and management of feral horses in the Australian Alps. The ACT's submission identified that the impacts of feral horses on the environment and biodiversity in most cases is catastrophic. Feral horses damage and destroy vegetation, trample and compact soil, and compete with native wildlife for food and water resources. Feral horses may also spread weeds and alter fire regimes, which can negatively impact the survival of native or threatened species. Additionally, feral horses impact aquatic environments and species and create hardened trails which can expose/fragment ground dwelling fauna such as reptiles and small mammals, increasing predation risk and changing fine scale movements.

Within the ACT, feral horses have the potential to cause catastrophic damage to the high value biodiversity and sensitive sub-alpine wetlands in the National Heritage listed Namadgi National Park. This includes areas of the Cotter Catchment that supply water to Canberra and Queanbeyan. Namadgi National Park protects the [Ginini Flats Wetland Complex](#), the most significant intact [Sphagnum bog and fen community](#) in the Australian Alps which is listed under the [Ramsar Convention on Wetlands](#). With the highest feral horse density in KNP occurring immediately to the West of this wetland, feral horses are a significant and increasing threat. It is on this basis that the ACT adopts a zero-tolerance policy on feral horses.

The ACT also takes this opportunity to identify that there are concerns that other endangered species are likely to be impacted by feral horses, especially after the devastating 2003 and 2020 bushfires. These species include the Broad-toothed Rat, Verreaux's Alpine tree frog (both protected under the EPBC Act), dwarf violet (endangered listing underway), Kiandra Greenhood (EPBC listed), striped sun orchid (listed as vulnerable EPBC and threatened in Victoria), Namadgi tea tree (not listed however severely impacted by the fires 2003 & 2020), and daisy bush (not listed however severely impacted by the fires 2003 & 2020; may go through the listing process).

The ACT Government notes that state and territory governments have developed different laws, policies, programs, to manage feral horses in the Australian Alps. Due to the differences, there are inconsistencies and in some cases conflicts between the programs to reduce feral horse numbers. While some states have taken significant steps to manage feral horse populations, others have been slower to act. This has resulted in an increase on feral horse numbers and impacts on the environment. The ACT is resolute in its view that any plans or policies to retain horses in national parks including the Australian Alps, is counterproductive to conservation and the fight for survival for many endangered fauna and flora.

In recent years, there has been growing concern about the impact of feral horses on fragile ecosystems, including the loss of native vegetation, damage to water sources, and the displacement of native wildlife. Adequate laws, policies, and funding are essential to manage and control feral horse populations effectively and sustainably. This includes measures such as targeted culling programs, the use of new innovative methods, and the establishment of protected areas where feral horses are not allowed to graze.

## **Animal Welfare**

The ACT prides itself on its Animal Welfare Act that ensures the ACT has a best-practice, contemporary and an effective regulatory system that protects and promotes the welfare of animals, while preventing and deterring cruelty to animals. Feral horses are managed in the ACT under the [Namadgi National Park Feral Horse Management Plan 2020](#) (Plan). The Plan describes several best practice management strategies for managing feral horses in the Namadgi National Park, which includes population control through trapping, mustering and removal as well as the use of lethal control measures. The preferred and most ethical methods are via ground and aerial shooting. These control measures are endorsed by the RSPCA.

The ACT uses advanced thermal technology to assist in the detection of vertebrate pests including feral horses in remote and heavily forested areas of the ACT. Due to the density of horses on the ACT border, the ACT Parks and Conservation Service aerially surveys the border area using thermal imaging to detect horse incursions, and targets horses during aerial shooting operations. The ACT has also used remote cameras and remote trapping yards to monitor and prevent incursions.

Currently there are no established populations of feral horses in the ACT. A surveillance program is regularly undertaken of all feral vertebrate species including feral horses. Two horses have been

shot since 2020 within Namadgi National Park and ongoing monitoring continues to manage incursions quickly and humanely.

The ACT Government use of aerial culling combined with thermal imaging technology is an exemplary approach that merits recognition as a best practice in feral horse management. Considering the inquiry criteria related to the proposed aerial shooting of feral horses in KNP and surrounding areas, the ACT Government provides these key points highlighting the merits of this approach:

1. **Humane Vertebrate Pest Management:** The ACT's adoption of aerial culling and thermal imaging represents a humane and effective method for controlling vertebrate pests. This approach allows for targeted removal of pest species while minimising the suffering of animals involved. The ACT currently uses the Aerial shooting of feral horses (hor002) standard operating procedure to ensure best animal welfare outcomes.  
<https://pestsmart.org.au/wp-content/uploads/sites/3/2021/03/HOR002-SOP.pdf>
2. **Precision and Efficiency:** The thermal imaging technology the ACT Government uses enhances the precision and efficiency of aerial culling operations. It enables cullers to identify target species accurately, even under challenging conditions, reducing the risk of non-target animals being affected.
3. **Minimised Suffering:** The combination of aerial culling and thermal imaging ensures that the dispatched animals experience minimal suffering. Swift and accurate targeting results in humane euthanasia, in line with best practices for animal welfare.
4. **Reduced Environmental Impact:** The use of thermal imaging reduces the environmental impact of culling operations. It allows for selective targeting of pests, minimising disruption to non-target species and the broader ecosystem.
5. **Safety Considerations:** Aerial culling enhances safety for cullers by reducing the need for ground-based operations. This, in turn, contributes to safer working conditions and fewer risks associated with pest control.
6. **Conservation Ethics:** The ACT Government strives to strike a balance between the welfare of native threatened species and the ethical treatment of feral pests, considering both the intrinsic value of all animals and the need to protect biodiversity. An adaptive management approach is undertaken to continuously assess management strategies to ensure the well-being of all animals involved and the overall health of ecosystems.
7. **Data Collection and Research:** The ACT's approach encourages data collection and research to continuously improve pest management techniques. This commitment to evidence-based practices ensures the ongoing refinement of methods for optimal outcomes, including animal welfare.
8. **Public Awareness and Education:** The ACT continues efforts to educate the public about the importance of humane vertebrate pest management and the rationale behind these methods. An informed public is more likely to support such initiatives to result in better outcomes for the environment and animal welfare.
9. **Collaboration and Knowledge Sharing:** The ACT Government collaborates with other regions and organisations to share knowledge and expertise in the use of aerial culling and thermal imaging for pest management. This collaboration can lead to innovative solutions and improved practices.

The ACT Government believes that retention of feral horse populations within KNP poses an unacceptable risk to fragile natural environmental assets throughout the park and the Australian Alps National Parks and Reserves and would urge the NSW Department of Environment and Planning to consider additional amendments to improve the environmental outcomes for the Australian Alps. In conclusion, the ACT's use of aerial culling and thermal imaging for vertebrate pest management serves as a model for humane, effective, and environmentally responsible feral horse control.

The ACT Government encourages the NSW Animal Welfare Committee to recognise and promote these best practices as a benchmark for other regions to follow when considering wildlife management strategies. We thank the Committee for the opportunity to provide a submission which we agree can be made publicly available at the discretion of the Committee.