

**Supplementary
Submission
No 125a**

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

Organisation: Animal Care Australia

Date Received: 24 January 2024

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



Animal Care Australia Supplementary Submission



CONTENTS

ACA Background 2

Opening statement..... 2

Terms of reference: 2

Why ‘Brumby Wonderland’ deserves the Committee’s serious consideration 3

How Brumby Wonderland addresses the current issues raised in this Inquiry: 5

 Through Rewilding 5

 Brumby Rehoming:..... 8

 Education & Veterinary Centre:12

 Tourism.....13

 More questions than answers.....15

In conclusion: 17

Additional references: 20

ACA Background

Animal Care Australia Inc. (ACA) represents the interests of all hobbyist and pet animal keepers nationally. Our members are comprised of most major animal keeping representative bodies including those representing dogs, cats, birds, horses, small mammals, reptiles, fish and exhibited animals. Some individual members also work in the rescue, care, and rehabilitation sectors.

In general, government policy dealing with native wildlife and/or feral (introduced) animals sits outside of Animal Care Australia's purview until or unless those animals are brought into the ownership of the public as a pet or companion or animal living in captivity.

At all times, Animal Care Australia will respond to matters directly associated with poor animal welfare outcomes, especially where other available options are not being considered or utilised or implemented in an acceptable manner.

Opening statement

Animal Care Australia would like to thank the Animal Welfare Committee for the opportunity to provide testimony at the Inquiry.

While Animal Care Australia did not request to take any Questions On Notice, this supplementary submission has been provided to expand on the points of our testimony and to provide further feedback to the questions raised during our testimony and the Inquiry itself.

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

Why ‘Brumby Wonderland’ deserves the Committee’s serious consideration

The name ‘Brumby Wonderland’ is tongue in cheek and in reality, we expect it would be named with a more significant title, such as the ‘Ngarigo Brumby and Wildlife Conservation Centre’.

At this point, Animal Care Australia acknowledges the Ngarigo people, their elders, past, current and emerging, as the traditional owners of the land, and acknowledge their community efforts to put forward a viable solution in 2022 for a place where the Brumbies could be managed, preserving their heritage value, protecting their genetic uniqueness, while also managing the conservation of the park.

Unfortunately, Animal Care Australia learned of the Ngarigo Nation Indigenous Corporation’s *Community Ngarigo Brumby Survey Report*¹ after we sent in our primary submission, and we are disappointed to learn that their proposal was not provided the appropriate merit at the time.

Animal Care Australia is pleased to see how closely our Brumby Wonderland proposal aligns with the proposals made by the Ngarigo Community, and how similar our suggested solutions are, despite the different backgrounds and reasons for coming to the same conclusions. The Survey report made the following recommendations:

Recommendation 1

Request a partnership with the NSW National Parks and Wildlife Service in the management of brumbies on Ngarigo Country

Recommendation 2

Develop a Ngarigo wild brumby contract service. Stress free control, capture, handling, relocation and destroying of animals if required and training and verification of NPWS contractors.

Recommendation 3

Investigate and develop a Ngarigo tourism strategy that would include brumbies.

¹ [Ngarigo Brumby Survey Report](#)

Recommendation 4

Develop and implement education programs.

Recommendation 5

Scope and develop Ngarigo brumby commercial business opportunities.

Recommendation 6

Develop and implement Ngarigo brumby management plan.

While Animal Care Australia notes the Survey Report is statistically overwhelming, we support the 6 recommendations.

Despite not putting forward a public submission to this Inquiry, we hope the Committee will consider inviting Ngarigo Nation representatives to speak at the next hearing about their 2022 proposal and provide an opportunity for them to explain why it was abandoned. Animal Care Australia hopes to work with the Ngarigo people on this project going forward with the support of this Committee.

Our version that, for the time being, will continue to call Brumby Wonderland is a long-term solution to a multitude of issues that will benefit the park, local residents, indigenous community, native wildlife, brumbies, tourism, science, technology, education, the veterinary industry and more. The reality remains that this proposal addresses most of the issues raised so far during this Inquiry, and additionally other Inquiries that Animal Care Australia has submitted to recently, such as the Veterinary Shortage, the Pounds, and Animal Welfare Act Reform Inquiries.

In order to move forward, this project requires bipartisan support, and the commitment of government to bring together and support those that will take the project to fruition.

Animal Care Australia does not propose that the government fund this project.

This begins with this Committee including Brumby Wonderland's 4 departments within aspects of your recommendations.

Why?

Brumby Wonderland provides:

- higher welfare outcomes for horses and wildlife exceeding the standards of the Kosciuszko Wild Horse Heritage Act 2018 ²
- emphasis on native wildlife protection and environmental regeneration
- educational opportunities for scientists, veterinarians, horse owners, wildlife carers, special interest community groups, as well as the general public

² [Kosciuszko Wild Horse Heritage Act 2018](#)

- ethical employment opportunities across a broad range of industries for the local community, including the Ngarigo people as well as many student and volunteer placements
- complete transparency and accountability by welcoming relating industry professionals, academics, community, and general public to visit and be involved in all areas of the project

Brumby Wonderland has 4 separate departments that interlink, and overlap: Rewilding, Brumby Rehoming, Education & Veterinary Centre, and Tourism. Please see our primary submission (from page 8) for a general overview of how the complex would operate, and why all departments are necessary for the project to be successful.

Animal Care Australia envisages the location of Brumby Wonderland to be within the 32% of the national park outlined in the Kosciuszko National Park Wild Horse Management Plan.

How Brumby Wonderland addresses the current issues raised in this Inquiry:

Through Rewilding:

Meeting the *Kosciuszko National Park Wild Horse Heritage Management Plan*³:

3,000 horses would, as soon as is practicable, be moved to temporary location/s to be preserved. This is already a requirement under the Plan. These horses would then become the key grazers of the rewilding program.

It is Animal Care Australia's position that prior to the recent October 2023 amendment of the Plan, very little had been enacted or appropriately implemented. A notable exception being the formation of The Wild Horse Community Advisory Panel.

However, Animal Care Australia notes, minutes of the Panel's meetings since mid-2023 have not been published raising questions as to whether the proposed 3 meetings during that time were actually held? What has the Wild Horse Community Advisory Panel had to say about the original announcement to resume and subsequent resumption of aerial culling?

Brumby Wonderland does not conflict with the Kosciuszko Wild Horse Heritage Act 2018 or the Kosciuszko National Park Wild Horse Heritage Management Plan in any way, and no changes would need to be made in order for the government to commit to the Brumby Wonderland project.

The 3,000 horses protected under the Kosciuszko Wild Horse Heritage Act 2018 MUST be retained first.

³ [Kosciuszko National Park Wild Horse Heritage Management Plan](#)

With a potential variation of 12,000 or more horses in the latest count, no further aerial or ground shooting operations should occur UNTIL the 3000 horses have been safely and securely retained and relocated to a designated section of the Park/Brumby Wonderland project.

Further culling could be wiping out the entire population before actually meeting the legally required population numbers.

Testimony within the Inquiry clearly exposed the high probability that the recent count at the end of 2023 had massively inflated numbers with no supported accuracy.

Following the relocation of the said 3000 horses any additional horses should be removed from the Park through rehoming, and if numbers are genuinely excessive, then through passive trapping, shooting (single head shot), and removing all carcasses from the Park.

Managing the semi wild horses:

Animal Care Australia stresses that neglecting any animal long term and then mass culling them is NOT an acceptable animal management policy. Animal management means knowing exactly how many animals you are caring for, what their needs are, ensuring they are fed and watered without taking resources away from native wildlife, treating illness or injury as it arises, and humanely euthanising when necessary. NONE of this is currently occurring.

Using the horses to rewild degraded areas that need attention gives the horses an appropriate place in the ecosystem, where they can serve a useful purpose and be valued not just by horse lovers, but also environmentalists and land managers.

Rewilding is not an ideological concept, but a scientific program. This project must have oversight from animal welfare scientists, animal behaviourists (horse and native wildlife), veterinarians, agronomists, environmentalists, regenerative agriculturists, first nations people's experience and local community input.

Given the clear lack of an understanding of brumby behaviour and obvious misinterpretation of what constitutes humane animal welfare outcomes the RSPCA has no place within this project.

Regenerating the Wild Horse Retention Area:

Currently the National Parks & Wildlife Service (NPWS) approach to animal and land management is simply neglect. Not only are animals left suffering, but weeds are allowed to take over, and waterways are permitted to become contaminated, often by NPWS's own aerial shooting programs that leaves carcasses to rot where they fall. This is not good management. If we left our gardens overgrowing with weeds, with fallen trees across the footpath, and swimming pools full of debris, and brown water, the local council would send a letter ordering you to rectify the neglect or pay a hefty fine, and they will follow up to ensure this is done!

Yet NPWS are permitted to neglect entire National Parks, contaminate them further with carcasses of various animals, and call it 'management'. How has NPWS been permitted to be worse at managing land than a local council?

Rewilding refers to the method of thoughtfully planning and managing grazing animals in a contained area to restore abused and neglected land to its native and natural state. Wild horses are the ideal intermediate animal for this purpose and are well adapted to the local environment.

This allows certain areas to be earmarked for rewilding, the horses are allowed to graze there, locally sourced native grass hay is fed as supplementary feed, and the horses are gradually moved on to new areas as the native flora re-establishes itself. The grasses and plants are not permitted to be overgrazed. The rewilding team monitors the grazing areas, and rotates the horses when conditions are right. As the area becomes more naturalised, the horses will be allowed in those spaces less, and they will be used to initiate rewilding in other areas in need. Of course, native grazers such as kangaroos and wombats would likely take over as more of the native grasses return.

These areas are monitored and managed over time to improve the native landscape and should be researched for peer review and independent oversight of the program.

Managing the brumby population:

Gelding existing band stallions will help control herd numbers and keep family groups together. This reduces unnecessary stress on the animals and minimises any possible injury to the horse management team.

Having the horses contained to more accessible areas nearby training facilities with veterinary care on hand will be beneficial in aiding to maintain a manageable population. The horses would never be neglected again or allowed to starve during drought or after bushfires or floods.

Trialing Immuno-contraceptives:

With a retained and contained herd of horses, it would then be very easy to trial equine immuno-contraceptives, and other alternatives within a controlled and managed environment where the horses become accustomed to human interaction and are handled quietly and in a species appropriate way.

While Animal Care Australia recognises the use of immuno-contraceptives as a method of population control, Animal Care Australia has concerns with the recent publicly stated proposal to dart the horses with an immuno-contraceptive from a helicopter. It is our view that this is no different to the circumstances required to culling (shooting) them from a helicopter. The successful darting of the horses would require the helicopter to chase or pursue the horses, which as has already been testified to by multiple parties does not provide the best welfare for the horses. Additionally, the use

of helicopters would require a ground team to collect 'spent darts' from the field - so why not utilise the ground-based teams in the first place?

Currently, the recommended immuno-contraceptive for equines is the porcine zona pellucida (PZP)⁴ vaccine, and this requires at least one additional booster to secure a full effect. While it is promising to read a longer-term (possibly one-use) vaccine is being developed it is as of yet not proven via the appropriate research methods. Additionally, neither of the vaccines have been researched in Australia to test the repercussions and implications on our native wildlife.

Animal Care Australia acknowledges the current trials and research for immuno-contraceptives on macropods (kangaroos) however while similar, they are not the same. The two types of contraceptive vaccines trialed on macropods, are ZP (zona pellucida) vaccines and the GnRH-based vaccine, GonaCon⁵. Multiple doses of Porcine ZP vaccine successfully caused infertility in Tammar Wallaby and Eastern Grey Kangaroo females which raises concerns if the same chemical is being used on horses within the national park? The macropod vaccine also contains a derivative of a vaccine used on Brush-tail Possums.

Animal Care Australia is also aware GonaCon is used for targeting the oocyte growth factor⁶ and is being used on wild horses⁷ – however our research shows it has an effectiveness of 4-5 years and requires the horses to be held for 30 days following the initial shot for a booster to be administered.

Without the appropriate research within Australia on the high probability of native wildlife coming into contact with any remnants of contraceptive residue, perspiration or contaminated water supply, and given the extremely similar and yet presumably higher dosage levels required for horses, it would be irresponsible of the government or this Committee to blindly recommend this method of control. The potential animal welfare outcomes for our native wildlife are as yet unknown and concerning.

The ability to take advantage of trialing and researching immuno-contraceptives within the Brumby Wonderland controlled and contained population is highly beneficial.

Brumby Rehoming:

Improve rehoming rates:

Once the retained herd is separated, and contained, the removal via humane methods of the remaining horses from the Park can be addressed.

One of the primary obstacles to rehoming brumbies is the impossible to meet rehoming process NPWS has instated. Their process is so difficult and nearly impossible for private individuals to

⁴ [Equine immuno-contraception](#)

⁵ [Macropod immuno-contraception](#)

⁶ [Targeting the oocyte](#)

⁷ [GonaCon use on wild horses](#)

participate in and denies any individual selection of horses to ensure they are even suitable to go to new homes. That gamble (risk factor) alone is just too great for most people, and as a result, on paper it is continually claimed that brumbies are in low demand.

One reputable rehoming group who have rehomed brumbies over the years, has reported lodging their paperwork with NPWS to rehome horses over a year ago, and despite following up multiple times, they have had no response to their application. Why are they being prevented from rehoming horses? How many horses could this one group have rehomed in the last year? How many other groups have been stalled or denied in the same way?

The Brumby Wonderland **Rehoming Centre** would see a passive trapping program utilised to collect horses for assessment on-site. Additionally, its tourism activities will require its own horses and many could be reassessed and then rehomed to other nearby tourism operators. Rehoming prepared horses could be purchased by private owners.

Bachelor bands are easy to identify. Having people on the ground getting to know and understand the herds would make it easier to move such bachelor groups to nearby facilities for passive trapping, gelding, and prepared for rehoming. Geldings are in high demand.

The Rehoming Centre would initially assess horses that have been trapped from the excess horse numbers still found within the Kosciuszko National Park after the 3000 horses are retained and then later from the retained herds within the program.

The horses will be handled, health checked, and prepared up to a level that would allow the individual animals to be rehomed. Those not able to be rehomed quickly would continue to be educated until they can be placed in a suitable home. The more education a horse has, the higher the value of the horse. Most horse owners don't have the skills to train their own horses.

Educated horses could be rehomed to private buyers, through regulated rehoming organisations or utilised for on-site tourism. Horses retired from the tourism activities would be returned to the rehoming centre as these horses usually find homes quite easily, given they are experienced and 'proven safe' or if deemed unsuitable for rehoming they could even be returned to the rewilding herds.

A full-time management team would oversee the training programs and we recommend science-based, modern training methods are utilised. The old days of 'breaking' horses' spirits are long gone - although these methods do still exist in some places.

Special interest groups such as youth programs, prison vocation training, and NDIS programs could all be involved in the Rehoming Centre to learn valuable life skills working with and around animals. Student placements and work experience could also be included.

The Rehoming Centre has the potential to be utilised by the racing industry to retrain and rehome ex-racing horses as well as to educate the racing re-trainers and re-homers, which would help fund the project.

Brumbies are in high demand! They have a good resale value, well above meat \$/kg value. A professional and low stress rehoming centre, close to where horses have been trapped would improve their welfare outcomes enormously and guarantee better homes for them.

Eliminate Transportation Injuries:

By doing all initial handling of the wild horses on-site, the horses are easier and safer to transport via normal equine floats or trucks, instead of using cattle transport.

All States across Australia have been updating their horse transport standards in recent years to meet a new *National Standard for transporting of horses*.⁸ No other horses are permitted to be transported the way brumbies currently are.

The Rehoming Centre is essential to provide the initial basic handling and loading experience to bring the welfare of brumbies up to the minimum standard of all other equines transported in Australia.

During the current Inquiry, Steve Coleman CEO of the RSPCA NSW testified that these '*wild animals are kicking and screaming throughout their capture and transport*'⁹. This is very disturbing to hear. Under most circumstances, horses are generally very quiet animals and tend to stay quiet even when frightened. Horses, even wild horses, will remain quiet if you treat them quietly and kindly.

If there was kicking and screaming in the yards it is usually because multiple bands that are unfamiliar with each other have been forced together into a small area where stallions end up in close proximity and rivalling each other. This too can be overcome by limiting the mixing of the different bands. Any individual with experience in equine behaviour would know this and take the appropriate steps to alleviate such circumstances.

Perhaps Mr Coleman made these comments because he has only seen it done very badly by people not competent to handle horses. This thought is even more concerning, as the head of the RSPCA, we would have expected him to intervene, and not allow horses to be treated in such a cruel manner while he watched them screaming and kicking and did nothing.

Brumbies are usually packed fairly tightly when trucked, it is literally standing room only with no room to move. This is deliberate to prevent horses falling over or jumping out during transport.

⁸ [National Standards for transporting horses](#)

⁹ [Mr Coleman testimony – page 51 of UNCORRECTED transcript](#)

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



The photos above were taken by Livestock Transport Australia and show wild brumbies on their first time loaded up for transport. Note that not one horse has its mouth open (screaming) or is kicking (the photos are clear of blurs from movement). One horse is showing signs of fear (showing whites of the eyes and raised head), but they all are quiet and still and watching (with their ears, as horses do) what is going on around them. They are worried, but they are not panicking. Even the horse in the first photo, whose face is away from the camera, has his ears fixed on the person taking the photo, but is not attempting to turn around or kick out.

These photos show NORMAL wild horse behaviour in a scary new environment. If horses are kicking and screaming to the extent Mr Coleman described, there is something very seriously wrong with the process, methods, or the people involved.

Education & Veterinary Centre:

While the trapping of brumbies would be coordinated through the Rehoming Centre animals that are in poor health, suffering from new or old injuries or too distressed to be handled safely would be transferred to the **Veterinary and Education Centre** where on-site equine vets would assess the horses. This may be to determine whether they could be rehabilitated or not, and then returned to the Rehoming Centre, or added to the rewilding herds, or provide needed veterinary care.

Any injuries or illness occurring to the horses in the rehoming program or the tourist areas could be seen and treated quickly as the vets are nearby.

Eliminate or reduce slaughter and euthanasia of brumbies:

Horses in excess of the 3000 to be retained can be trapped, assessed and, where not able to be rehomed, can be euthanised on-site in a species appropriate and stress-free approach.

Animal Care Australia doesn't see that there is realistically a need for horses to be transported to a knackery when capabilities already exist for a mobile abattoir/s to be brought in – should that need arise. Animal Care Australia notes this would require some government intervention as existing mobile abattoirs are not permitted to butcher horses in NSW. These abattoirs would remove the need for horses to be transported interstate.

Animal Care Australia does not support wasting large amounts of free, healthy and clean pet food meat to rot on the mountain as is currently the practice.

Additionally, some euthanised horses can be used for research and education purposes in the education centre or donated to other educational facilities, such as universities.

Wildlife Rehabilitation Centre and Sanctuary:

Adjoining the Veterinary & Education Centre would be a wildlife rehabilitation centre and sanctuary for rescued local wildlife that need more time to recover in a safe place or cannot be released. The sanctuary would have areas for those under vet care, those transitioning out of care and back into the wild – where appropriate.

Wildlife Care Education:

With its attached Wildlife Rehabilitation Centre and Sanctuary as described above will be the ideal place to train the veterinarian industry in wildlife emergency care for their clinics, as well as train wildlife rehabilitators and rescuers and provide additional educational courses for licensed native animal keepers.

The public would also be able to sign up for basic animal first aid courses on what to do and more importantly, what not to do, if they find injured wildlife etc.

Equine Care Education:

The Equine Education centre would be linked to the Rehoming Centre to run courses for prospective brumby buyers/owners, teach horsemanship skills, animal first aid courses, and equine specialist veterinary courses.

Animal Research:

Currently there appears to be a complete lack of scientific expertise involved in the management or culling of brumbies in Kosciuszko National Park.

How is government paying for advice, publishing reports, and running research projects with no scientific qualifications or equine expertise involved? How has this been allowed to happen for so long?

In contrast, Brumby Wonderland would encourage research and education and transparency on the projects run there and provide space for academics and veterinarians to visit and conduct research.

As highlighted above, the most urgent research would be an equine immuno-contraceptive trial and what impact it may have on the unique native wildlife in that region and then more broadly throughout NSW, the Australian Alps, and other National Parks where wild horse populations exist.

Researchers would be able to monitor the outcomes of the rewilding program over time, and to study the local flora and fauna in their own habitats, to monitor the wildlife rehabilitation programs and track the rewilding program success from a native species perspective.

Tourism

Animal Care Australia is aware that there will be some who will object to the idea of brumby and wildlife-based tourism, however it is the final essential leg for our Brumby Wonderland to stand on.

Tourism is Education:

We could simply propose a museum including indigenous history, the brumby story, and the local area, but tourism and education are more intimately linked than just reading about history. It's about engagement and interaction.

When we meet a cute animal for the first time – we connect to that animal on an emotional level that cannot be taught from books or posters. The depth of that connection, even a temporary connection,

remains with us, and influences how we feel about those animals. Can you remember the tiniest little dog you've ever seen? Did you even get to pet that dog, or get close to it? Or did you just walk past? You remember it fondly, though, right?

When we engage with animals we learn empathy, kindness, respect for others, and unconditional love. All things the world needs a lot more of. Animal interactions improve those qualities in our community, and in turn improve our communities. Engagement with animals is key to ensuring good care for animals.

“ There was also strong support for Ngarigo involvement with a Tourism operation with brumbies.”

“... Indigenous tourism with the aspect of place, story, history, culture, and tradition is very popular and the Ngarigo brumbies and beauty of the landscape has an appeal and market within the tourism industry.”

- Community Ngarigo Brumby Survey Report ¹⁰

Tourism ensures transparency:

Public visitors to all aspects of Brumby Wonderland ensure high standards are continually met and keeps the project transparent and accountable.

Welcoming the public to experience interactions with brumbies, visit the rewilding herds (brumby spotting), visit the wildlife rehab centre, have a tour of the rehoming centre and the vet centre, the public not only become invested in seeing the good work continue, but they also hold the entire project accountable.

Transparency has been seriously lacking in 'brumby management' to this point. The more transparent and open, the higher the standards and outcomes of the whole project, to the benefit of not just the horses, but our native flora and fauna and the people who will dedicate their lives to this project.

This is what OneWelfare is all about – not just recognising that the world and the creatures that live on it are interconnected, but that we all need each other to survive.

Tourism brings in funding

The tourism operators running trail rides and school camps, the dining and accommodation, the museum, the stores – they are necessary to help fund the whole project.

¹⁰ [Ngarigo Brumby Survey Report](#)

Some aspects, like the rewilding program and wildlife sanctuary, have no way to generate income, except by donations or tourist tours, but are the elements that will have the most significant environmental and animal welfare benefits. We need to be pragmatic and support the other departments to help fund the greater good.

Private operators will work 10 times harder to make this project succeed than any government department, especially when their livelihoods depend on it. With a little commercial investment, we can capitalise on this to guarantee Brumby Wonderland's success. Expecting government funding will mean no Brumby Wonderland at all.

Animal Care Australia has proposed Brumby Wonderland as not needing government funding, and that's true – but this means supporting tourism.

More questions than answers

Testimony provided to date (as of 24th January 2024) has raised more questions and instilled a greater level of concern for an extremely apparent lack of expertise from the individuals and organisations 'charged with the responsibility' of overseeing and coordinating the continued existence and animal management control of the Kosciuszko National Park, its native wildlife and the brumbies.

Testimony from Atticus Flemming of NPWS and Penny Sharpe stating that RSPCA NSW was their expert advisor, while Steve Coleman CEO of RSPCA NSW denied such a role, stating *"Any submission that's provided, be it by RSPCA NSW or RSPCA Australia, is theoretical in nature, based on references"*, then immediately followed by RSPCA NSW Chief Inspector Scott Myers confirming that the aerial culling report actually contained his personal opinions that wild horses don't have a foaling season has not only left Animal Care Australia shaking our heads in disbelief, but many other people as well.

Contrary to Mr Myers personal opinion, wild horses do have a 'breeding season' that aligns with delivering their young at a time of the year/season where the environment is more likely to have better weather conditions and a plentiful food source for nourishment for the young and adult herd to thrive without competition. The season will vary slightly depending on their location in the world, but with all horses, wild or not, breeding cycles are triggered by the length of daylight periods, and as a result, ensures that foaling occurs at the same time the next year. This is always around Spring. August through to November. With Mustangs in the US, it is March through to June.

It is disturbing that someone who claims to have knowledge and experience in the breeding and handling of Quarter Horses spanning 3 decades, has a problem being able to identify a foal from a weanling, especially given he states that he has seen foals all year around. Foals are certainly not being born all year. There is a considerable difference between newborn foals and weanlings, not to mention the struggle a newborn foal has trying to keep up with a running herd being chased by a

helicopter. This is how foals were and are left behind and why the SOP clearly states the preference not to cull during foaling season.¹¹

The Animal Welfare Assessment of Feral Horse Aerial Shooting report¹² on the trial aerial culls held in November 2023 clearly states at least two young foals were seen abandoned and were subsequently killed.

Animal Care Australia questions why the observers (including Mr Myers from the RSPCA) did not call an immediate end to the cull once there was the realisation that there were young foals. The three observers were all present to represent and report on the efficacy of animal welfare outcomes and SHOULD HAVE held animal welfare at the forefront of their minds. The report goes on to contradict itself by expressing a likelihood that the foals fell subject to a behaviour found in other ungulates, especially deer, and then states that behaviour is not known in horses?

Mr Myers' personal opinions on whether horses were deceased on the ground from his view in a helicopter were also taken as fact and included in the same report.

While the physical injuries inflicted on the horses by bullets were described in great detail, there was no mention of other injuries being recorded. How many had broken legs or necks from falling prior to death? How many had lacerations or other contusions from running into obstacles or stumbling? These injuries were obviously ignored.

This is not the data expected – or lack there-of – from an expert. This is not reliable or unbiased testimony in any sense of the term.

Where were the actual experts?

Why was the RSPCA NSW engaged for advice instead of actual, qualified animal welfare scientists or at least one of the three observers an equine behaviourist? Since the trial why has an equine behaviourist not been consulted by the government?

It is apparent the 'trial aerial cull' was run as a research project, and yet no researchers were actually involved? Mr Coleman stated that the RSPCA has no advice to give other than theoretical references from someone else. So why did he accept this request to participate when the RSPCA NSW has no expertise – just theoretical references - to offer? Why did NPWS turn to RSPCA to be so heavily involved, especially given the circumstances following Guy Fawkes?

Incidentally, the Australian Defence Force (ADF) make the exact same claims about RSPCA NSW to defend their actions after aerial culling 235 brumby ponies in 7.5 hours on Singleton Army Base on

¹¹ [SOP HOR002](#)

¹² [Animal Welfare Assessment of Feral Horse Aerial Shooting](#)

the 21 December 2018.^{13 14}

During this current Inquiry Mr Coleman stated ‘*no aerial culling has occurred in the last 20 years*’ (since the disastrous Guy Fawkes cull) and yet he appears to have forgotten that he personally and publicly defended the aerial cull at Singleton as humane and appropriate. This was despite the fact that the cull took place on a hot day with high humidity, right before Christmas. Pregnant mares and young foals were also killed. Additionally, the ponies had competent re-homers ready and willing to take the ponies in, and it is claimed by advocates the RSPCA NSW refused to assist with negotiations to rehome the ponies.¹⁵

The testimony, clear contradictions, lack of understanding of animal behaviour and the adamant viewpoint that 7.5 to 15 bullets to put an animal down is good animal welfare, highlights the RSPCA NSW is unable to determine what good animal welfare is.

Not only does this not pass the pub test – it raises greater questions as to the relationship between the RSPCA NSW and the NPWS.

The Invasive Species Council publicly applauded the RSPCA’s work to endorse and approve the aerial cull at Singleton Army Base and published a press release claiming ‘*the RSPCA developed the animal welfare protocols that were followed by the ADF, and any other viewpoint on aerial culling was misinformation*’.¹⁶

Did the RSPCA NSW develop those protocols? If so, how is it Mr Coleman claims the RSPCA has taken a different viewpoint since Guy Fawkes? How is it Mr Coleman thinks it’s been more than 20 years since there has been an aerial cull of horses in NSW when it has only been 5?

So many questions! So many more answers are needed!

In conclusion:

The debate on what should happen to the brumbies is becoming more divided over time. This recent testimony in this Inquiry is doing nothing to appease the debate and is raising more questions than answers.

Animal Care Australia feels that this provides the foundation for the Animal Welfare Committee to include our Brumby Wonderland project throughout its recommendations.

A unified centre that improves the welfare of all the animals involved, benefits the well-being of the humans who engage with them and appropriately protects the landscape for the future is surely something that everyone could support.

¹³ [Federal Parliamentary Questions on notice and answers – Singleton Aerial Cull](#)

¹⁴ [Statement on the control of feral horses in the Singleton Training Area](#)

¹⁵ [Alternatives for the Singleton ponies](#)

¹⁶ [Invasive Species Council media release](#)

**NSW Inquiry into the proposed aerial shooting
of brumbies in Kosciuszko National Park –
Supplementary submission**



The solution is remarkably simple, and would be feasible, with some community and industry involvement, and positive leadership from government.

Again, we thank you for this opportunity and welcome the opportunity to provide further information should you require it.

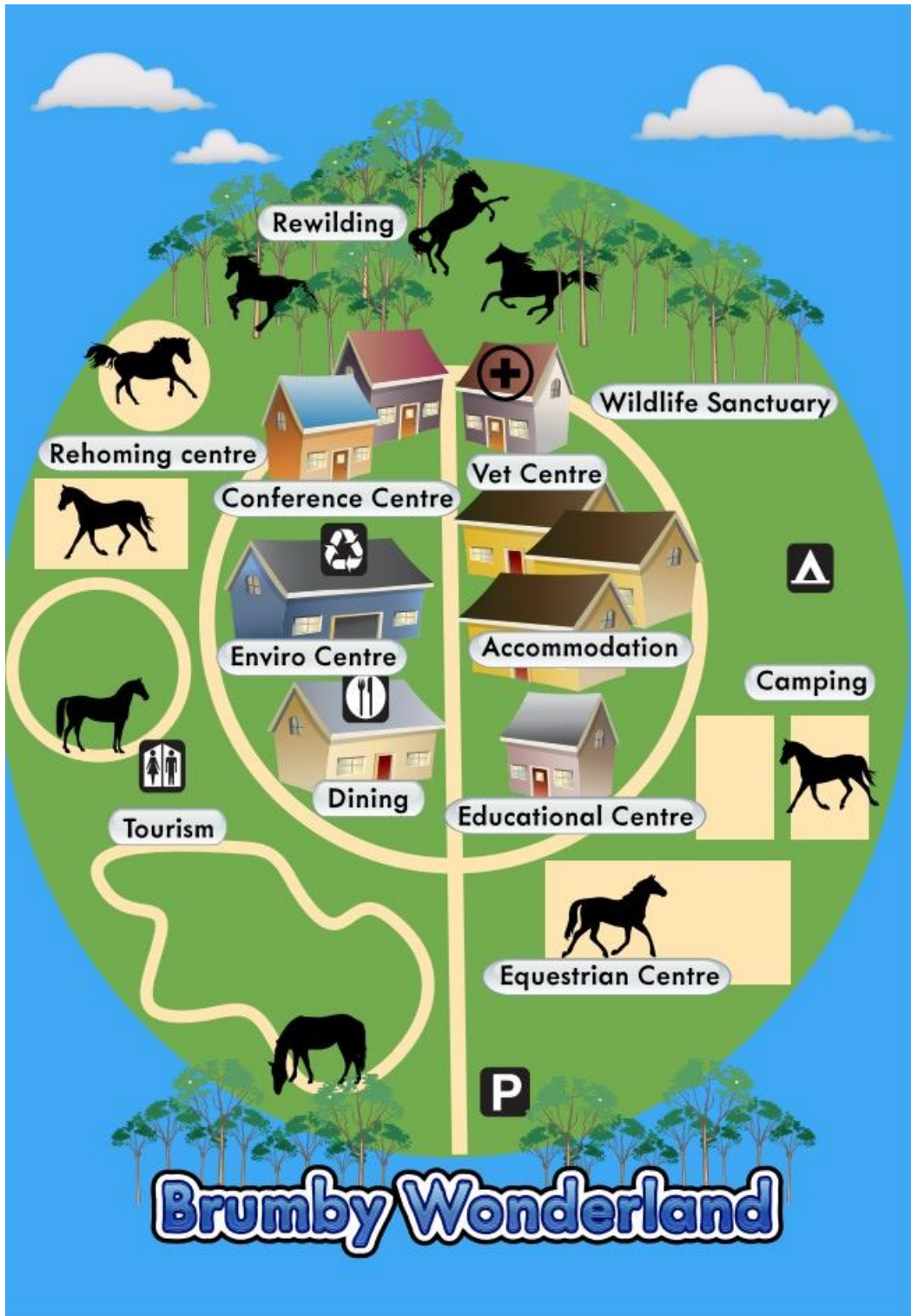
This submission can be publicly listed.

On behalf of the Animal Care Australia Committee,

Karri Nadazdy

Assistant to the President and ACA Horse & Livestock Representative.

Brumby Wonderland:



Additional references:

- [1] NPWS Wild Horse Team (2023). Domestication (rehomeing) guidelines For wild horses removed from National Parks and Wildlife Service estate. Published online at <https://www.environment.nsw.gov.au/topics/animals-and-plants/pest-animals-and-weeds/pest-animals/wild-horses/managing-wild-horses/kosciuszko-national-park-wild-horse-management/rehome-a-wild-horse/rehomeing-requirements>
- [2] Mills, D.S. McDonnell, S.M (2005). The Domestic Horse. The Evolution, Development and Management of its Behaviour, Cambridge University Press, [page 84](#)
- [3] Linklater, W.L. Cameron, E.Z. (2002). Escape behaviour of feral horses during a helicopter count, Wildlife Research 29(2) 221 – 224.
- [4] Garcia Pinillos, R et al (2016). One Welfare – a platform for improving human and animal welfare. Veterinary Record, October 2016, page 412-413
https://www.onewelfareworld.org/uploads/9/7/5/4/97544760/vet_record_paper_in_full.pdf
- [5] The Knepp Castle Rewilding Project, UK, established in 2002. <https://knepp.co.uk/rewilding/>
- [6] Wicken Fen nature conservation project, UK, established 1903, with Konik ponies introduced in 2001 <https://www.nationaltrust.org.uk/visit/cambridgeshire/wicken-fen-national-nature-reserve/our-work-at-wicken-fen-national-nature-reserve>