

**Submission
No 538**

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

Organisation: Snowy Brumby Photography Adventures

Date Received: 20 March 2024

Submission
Snowy Brumby Photography Adventures
with Michelle and Ian Brown

Cooma NSW

**The Wild Horse Management Plan
Introducing: Aerial Culling Management Amendment**

BACKGROUND OVERVIEW

One of the world's great national parks, and the largest in New South Wales, Kosciuszko National Park covers 690,000 hectares. The park contains the highest mountain on mainland Australia, the famous Snowy River and all NSW ski fields. Its many and varied attractions include walks through alpine herb fields; spectacular caves and limestone gorges; scenic drives; and historic huts and homesteads. KNP also contains the Alpine Brumbies that are intrinsically linked with our heritage; the Brumbies made immortal by Banjo Patterson and Elayne Mitchell. These Brumbies have roamed many regions of KNP for up to 200 years and have strong links with our sense of nationhood and our national identity. This was demonstrated by the performance at the opening ceremony of the Sydney 2000 Olympics, incorporating Brumbies and our Australian way of life.

NPWS commissioned Context to undertake a review of the Brumbies cultural and heritage significance. This review was completed and provided as a supporting document of the Draft Plan. The document shows that Brumbies of Kosciuszko National Park have cultural heritage significance across almost every one of the listed criteria. This is reflected in the Vision in the Draft Plan statement which states that the cultural and social heritage values of the Kosciuszko National Park Brumbies should be acknowledged yet seems to be directly ignored in the Draft Plan itself. The National Parks Act has two overarching principles; to protect the native flora and fauna contained within the park and to protect the social and heritage values contained within the park. Brumbies are clearly linked to and part of our post settlement history. They're entwined with our culture and our national sense of identity. As such, the National Parks Act requires that they be protected.

In 2016, a Draft Plan of Management for the Kosciuszko Brumbies was released, calling for a 90% reduction of Brumby numbers to as low as 400 - 800. Such a low population would leave the Brumbies of Kosciuszko National Park at high risk from any bushfire or any extreme weather event, effectively wiping out the entire population. This Draft plan created outrage in the wider community, mobilising advocates and politicians alike, to speak up to keep a sustainable number of Brumbies in Kosciuszko. This resulted in the Kosciuszko Wild Horse Heritage bill

being passed into legislation. This bill calls for sustainable, humane management of Brumbies, with a Community Advisory Panel overseeing such management.

Amendment to Introduce Aerial Culling

The following information explains that Aerial culling cannot achieve the kill shot required to humanely control wild Horse populations within the National Park especially Kosciusko National Park due to its terrain.

“AERIAL CULLING BRUMBIES – THE FACTS YOU SHOULD KNOW”

INTRODUCTION.

Aerial culling is a method, whereby Brumbies are shot from a helicopter as a means of population reduction or extermination. By its very nature, it is a highly emotive subject, but is it really all that bad?

This factsheet has been researched using information from gun, warfare and shooting experts as well as veterinarians who have been personally involved in aerial culls of Brumbies. As its title suggests, it contains facts.

BASE ASSUMPTIONS.

The weapon: 7.62mm (.308) calibre semi-automatic rifle, we note that the Army now uses a .50 Calibre Rifle

The Target: Is a horse's heart for the purposes of obtaining what is referred to as an 'instant kill'. Of course, a bullet to the heart doesn't kill instantly, the target animal will only become insensible or die when oxygenated blood flow to its brain ceases – not 'instantly'.

THE VARIABLES.

The variables that collectively and individually make it impossible for aerially culling to be conducted humanely.

The Ammunition: The .308 is a Military Round that is commonly used for Target Shooting and Hunting of Large Game. It has a reasonable flat trajectory and variance (drop) at 300 metres can be around 30 cm at the target. At more extreme ranges the drop can be more significant.

Factory ammunition is either a Soft Point Round or ex-military ammunition known as “full Metal Jacket” (FMJ). The FMJ has significant problems as it is very accurate but was designed as an “anti-personnel round” and therefore tends to pass through soft-bodied game without causing death.

FMJ is preferred by many shooters as it is less expensive, (80%) but is less effective.

The Rifle: Shooting over long distances is often done using a scope or a bipod to improve accuracy and stability. Neither of these tools is useful in a Helicopter where the movement of the transport can make it difficult to hold as target.

The use of open rifle sights is preferable as it gives the shooter less variables and a better field of vision but reduces the range at which accurate shots can be made.

The Australian Army used to define the following ranges for the 7.62mm round:

- 300 Metres Accurate Fire whilst a sniper is required to make a “head shot” at this range.

- 600 Metres – Harassing fire and a Sniper is required to make “body shots” (to the torso) at this range.

This accuracy is further affected by the rate of fire because, as the barrel heats up from the shooting (3-5 shots will suffice), the steel distorts and expands due to the heat, this further diminishes accuracy. Whilst the military are less concerned about such issues, it does affect the ability to shoot horses at the ranges likely to be encountered in the field.

The Animal: Not only are they firing at a moving target the size of a football (a Horses Heart), but the frightened animal is moving at 60km/h over broken ground (making it move up and down and side to side) but the Shooter may be equally moving. A group of horses, under stress may “mill around” or behave as a mob when under fire. This may mean that the shooter does not get a clear shot with horses moving around or in front of a designated target. This increases the risk of a shot “going wrong” and not hitting the animal in the heart and a secondary animal being severely wounded.

If the pilot is pursuing the Horses, then the shooters range is variable making it more difficult to judge each shot.

Now the shooter is aiming at a moving target at increasing range whilst seated on an unstable platform.

The Helicopter: Using a helicopter as a platform for fire introduces another set of variables for the shooter. A helicopter constantly moves in the air, it moves backwards and forwards, side to side and up and down, particularly in the variable winds of the high country.

The shooter is now seated on a moving platform and will constantly have to make adjustments to their fire at targets that will be 100 to 500 metres away and moving at high speed.

Downdraft: A shooter, firing from the Helicopter, is firing into a downdraft, caused by the Helicopter’s Rotors. This variable wind will therefore cause variable deflection of any bullets fired from the Helicopter, thus diminishing the possibility of accurate fire at a small and moving target.

Ground and Wind Conditions: Most rifles are “zeroed” under specific “range” conditions.

This creates a further variable to accuracy is the environmental conditions, in particular wind will change in different locations and over different ground (open vs. hillside or timber) thereby causing inconsistent behaviour in the bullet’s flight.

In the same context of the above, the thermal conditions over this ground can cause minor variance in the bullet’s path.

Buck Fever: Many shooters suffer diminished judgement under live fire conditions. This is caused by the increased adrenaline under the situation. This often called “buck fever”.

PHOTOS.

The photos below show Brumbies shot in the neck, the hind quarters and the gut – all ‘non target’ shots, made under the above conditions and stressors by highly

competent marksmen. Also shown is the 'collateral damage' – a foal who has not been shot, standing by its dead mother. This foal will die a protracted and very painful death.





CONCLUSION.

Combination of a shooter firing at a scared group of animals from a rifle that has limited effective range and diminishing accuracy that is then fired from an unstable platform into variable environmental conditions at a moving target introduces too many variables to ever be effective.

THE RESULTS

Simply put, aerial culling cannot be conducted to a standard that can be viewed as either humane or acceptable. This method is a knee-jerk, short-term reaction to a long-term management issue. It fails to consider many issues, those outlined above are just a start. The presentation of a huge amount of food source to introduced predators, the resulting population spike of those predators (pigs, wild dogs etc), the failure to address long term management of all overabundant species.

Any management of any species, native or introduced requires careful study and understanding of the target species as well as an understanding that long term strategies will produce the best results.

References:

- *Helicopter Shooting of Animals; a Technical View*. Clive Edwards and Tim Johnson, ex Australian Defence Force, Snowy Mountains Horse Riders Association. February 2007.
- Advice by Sheila Greenwell BVSc, Wild Horse Expert, member Pest Animal Control Ethics Advisory Committee, Dept of Agriculture WA.
- *Assessment of the Humaneness of Feral Horse Helicopter Shooting Operations in the Northern Territory: Tempe Downs, May 2013* Dr Jordan Owen Hampton, Ecotone Wildlife Veterinary Services. 1st August 2013.

Current amendment being put forward for change October 2023

Kosciuszko National Park Wild Horse Heritage Management Plan – draft amending plan 2023

Draft amendment

This draft amending plan proposes to remove certain existing text in the Kosciuszko National Park Wild Horse Heritage Management Plan and replace with updated content and add new content not currently in the Kosciuszko National Park Wild Horse Heritage Management Plan. The proposed changes should be read in conjunction with the adopted plan, which is available on the department's website.

Proposed amendments to the Kosciuszko National Park Wild Horse Heritage Management Plan are described below.

Amendment 1. Executive summary

Amendments to the plan

Plan reference: page 2, first paragraph after first 2 dot points

Replace:

Preparation of the plan has been informed by advice from the Kosciuszko Wild Horse Community Advisory Panel established under the Kosciuszko Wild Horse Heritage Act. Advice from the Kosciuszko Wild Horse Scientific Advisory Panel has also been considered, as has information from Aboriginal stakeholders and a range of relevant sources.

With:

Reason:

To highlight that information about consultation will be adjusted to take account of the current amendment process.

Amendment 2. Matters considered.

Amendments to the plan

Plan reference: page 3, second last paragraph

Replace:

The plan has been prepared after considering advice from the Kosciuszko Wild Horse Community Advisory Panel constituted under the Kosciuszko Wild Horse Heritage Act. Relevant advice provided by the Kosciuszko Wild Horse Scientific Advisory Panel has also been considered.

With:

Reason:

[text about consultation will be adjusted following completion of the proposed amendment process]

[text about consultation will be adjusted following completion of the proposed amendment process]

1

Kosciuszko National Park Wild Horse Heritage Management Plan – draft amending plan 2023

To highlight that information about consultation will be adjusted to take account of the current amendment process.

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:

Reason:

To update information about the wild horse population.

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:

- HOR001 – Ground shooting of feral horses (Sharp 2011a)
- 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:

- HOR001 – Ground shooting of feral horses (Sharp 2011a)
- HOR002 – Aerial shooting of feral horses (Sharp 2011d)
- HOR003 – Mustering of feral horses (Sharp 2011b)

Reason:

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

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).

2

Kosciuszko National Park Wild Horse Heritage Management Plan – draft amending plan 2023

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

With

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

For use in any area of the park.

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).

Ground shooting

Reason:

Kosciuszko National Park Wild Horse Heritage Management Plan – draft amending plan 2023

Amendment 6. Minor amendments

Section 8 Community and stakeholder involvement

Plan reference: page 22, third paragraph under the heading 'Community and stakeholder involvement'

Replace:

In recognition of the importance of having a range of different perspectives about wild horse management, implementation of the plan will also be informed by advice from time to time

from a wild horse advisory body comprising both community representatives and scientific experts. The wild horse advisory body members will be appointed as soon as practicable after the adoption of the final plan.

With:

Reason:

To reflect that the Kosciuszko Wild Horse Community Advisory Panel has been appointed.

References

Amendments to the plan

Plan reference: page 22, second reference source under the heading 'References'

Replace:

Cairns S 2020, *The results of a survey of the wild horse populations in the Kosciuszko National Park, October-November 2020*. G.E and S.C. Cairns Consulting Pty. Ltd. Armidale. <https://www.environment.nsw.gov.au/research-and-publications/publications-search/kosciuszko-national-park-wild-horse-populations-survey-2020>

With:

Plan reference: page 23, in alphabetical order under the heading 'References'

Add:

In recognition of the importance of having a range of different perspectives about wild horse management, implementation of the plan will also be informed by advice from time to time from a wild horse advisory body comprising both community representatives and scientific experts.

Cairns S 2022, *A survey of the wild horse population in Kosciuszko National Park, November 2022*. <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Pests-and-weeds/Kosciuszko-wild-horses/kosciuszko-national-park-wild-horse-population-survey-2022.pdf>

Evaluation of the implementation of the Kosciuszko National Park Wild Horse Heritage Management Plan (2021) 2022. <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Pests-and-weeds/Kosciuszko-wild-horses/kosciuszko-national-park-wild-horse-heritage-plan-2021-evaluation-report.pdf>

Kosciuszko National Park Wild Horse Heritage Management Plan – draft amending plan 2023

Plan reference: page 24, in alphabetical order under the heading 'References'

Add:

Reason:

To provide updated references to relevant supporting documents.

Sharp T 2011d. *Standard Operating Procedure HOR002: Aerial shooting of feral horses.*
Invasive Animals Cooperative Research Centre.

Following Photographs show the current ground culling method used in KNP over the winter period 2023. Please note the captions above photos of what would have taken place during this time.

Lung shot cause the horse to bleed out.

Please note the head tilting back onto its shoulder this was a long and painful death sustained by this horse you can see the bullet entry.





Top: Australian Alps walking Track KNP, October Long weekend 2023. A Lung shot.

Bottom: Currango Plain KNP, October Long weekend 2023. A Lung shot.





Top: Long weekend October 2023 Currango Plain. Horse gasping for air as it painfully bleeds out.

Bottom: Currango Plain Long weekend 2023.





Top: No Alpine dingos/wild dogs to clean and reduce the carrion left to rot. Due to increased 1080 baiting across Kosciusko National Park
This horse has been shot in the last week as the gases have not ruptured the stomach wall.

In Summary

These photos have shown not one Brumby has been killed by a clean KILL SHOT. All the horses are a different stage of decomposition due the increased 1080 baiting of wild dogs and alpine dingos who are very beneficial to the environment in reducing and cleaning up carrion.

I believe that ground shooting is inhumane due to the bullet hole locations on each horse and to introduce aerial culling when the practise of ground shooting is not achieving the humane clean shots required for an instant kill of the wild horse. Horses are a flight animal and when ground shooting occurs, and they are startled this leads to panic and disorientation and if the horse is shot and not killed instantly it will suffer for days bleeding out. It is also stated that wild horse carcasses don't pose a threat to the general public or the environment if left alone, but it will certainly leave the general public that frequent the National Park with lasting scares and the inability to comprehend what they have witnessed as an act of barbaric cruelty.

