

13th October 2023

Animal Welfare Committee - NSW

E: animalwelfarecommittee@parliament.nsw.gov.au

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

Animal Care Australia (ACA) is a national incorporated association established to lobby for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

Animal Care Australia supports the protection of native flora and fauna above that of introduced species – including humans. However, Animal Care Australia believes that good animal welfare must always be prioritised before cost and convenience, and we therefore oppose aerial culling of horses, and do not support the reintroduction of aerial culling into Kosciuszko National Park.

- **Animal Care Australia strongly supports a new independent head count of horses in Kosciuszko National Park, as assured by the Hon. Penny Sharpe MLC**
- **Animal Care Australia objects to aerial culling as a method of dispatching animals**
- **Animal Care Australia does NOT oppose ground shooting; but does oppose the removal of safe implementation of ground shooting or aerial shooting**

However, Animal Care Australia does not believe that nothing should be done. Animal Care Australia have concerns that little to no attempt has ever been made to appropriately manage the brumbies in Kosciuszko National Park.

Animal Care Australia proposes the NSW Government adopts a One Welfare model - recognising that animal welfare, biodiversity and environment are connected to human wellbeing – and assist in the establishment of a multi-faceted environmental centre, brumby sanctuary and outdoor adventure activities - all open to the public.

This centre would manage nature conservation through rewilding, with a wildlife hospital (and attached veterinary and animal care educational facility), brumby rehoming centre, museum and tourism outdoor adventure activities, as well as accommodation and dining.

This centre would solve many of the current conflicts with environmentalists and brumby advocates, and provide a safe and contained place for the brumbies to exist and be appreciated, as well as engage with community outreach programs. Animal Care Australia has a broad model for how this could be funded and established.

Animal Care Australia would like to thank the Animal Welfare Committee for the opportunity to respond to this Inquiry and looks forward to an opportunity to discuss our submission further with the Committee at the Inquiry.

This submission can be publicly listed.

Kind regards,



Karri Nadazdy

Assistant to the President and ACA Horse & Livestock Representative.

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Animal Care Australia submission

Approved: 13th October 2023
“Animal welfare is animal care”



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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 seeking consultation on the management of feral horses within the Kosciuszko National Park and welcome the opportunity to provide feedback.

Animal Care Australia supports the protection of native flora and fauna above that of introduced species – including humans. However, Animal Care Australia does not believe that convenience or economics should ever be prioritised above good animal welfare outcomes, even when dispatching pest species.

Animal Care Australia supports the removal of horses from protected, or at risk, areas of the Park and does not object to complete removal of the horses from the Park.

That said, Animal Care Australia recognises that the brumbies have unique qualities that cannot be replicated, giving them historical, tourism and community value, which is worth investing in to preserve them in a coordinated, and humane way.

Societal expectations are that animals in Australia will be responsibly managed, cared for, and humanely euthanised when necessary. It is clear community response to aerial culling of pest species, particularly horses, has lost its social license to operate in Australia, as it has in other parts of the world.

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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

Several line items within the Terms of Reference fall outside of Animal Care Australia's purview and accordingly our response is limited to areas of animal welfare, alternative measures and general comment.

Responses to Terms of reference:

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

Animal Care Australia has found it very difficult to confirm or deny the claimed numbers in the Park. The survey estimates are unrealistic, being extrapolated figures from line transect surveying, and not from actual head counts. While clustered animal numbers are provided for deer and pigs, no raw count figure is provided for horses, only density numbers. With an estimated 18,814 horses in 419 "clusters" this would mean each cluster contains an average of 44 horses. This is out of line with recognised horse herd behaviour, where it is rare for feral horses to live in groups of more than 12,

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and most commonly feral horses live in groups of 3 to 5. Horses within sight or smell of each other will fight or flee. [2] [3] [4]

The surveys conducted over several days, with transect intervals of 1.85-2.63km is inadequate to prevent double counting. Feral horses in Australia have been monitored travelling an average of 15.9km per day, with some up to 55km per day.

Australia is regularly quoted as having exceptionally high herd numbers when compared to counts in other countries (based on actual head counts), despite being the same species exhibiting the same behaviours. While not impossible, this seems unlikely.

This highlights to us the lack of competent management of the animals in Kosciuszko National Park by NPWS.

Brumby supporters conducting their own count through a coordinated ride of volunteers through the park found only 854 individual horses.[5] Even if they failed to identify half the herds in the region, this is a significant difference to government estimates, and is well below the number of 3000 animals proposed to be sustainable by the Kosciuszko National Park Wild Horse Heritage Management Plan.

Due to this significant discrepancy, Animal Care Australia believes an independent count is necessary to verify the actual number of horses in the park.

This count should be completed by independent sources or overseen by a committee comprised of a cross-section of stakeholders including pro-brumby and anti-brumby advocates to ensure full transparency and with the hope of ending or diminishing the ongoing debate about numbers.

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

Better control methods already exist and the entire brumby population could be eradicated within 2 or 3 years if the government were willing to invest resources to this purpose while ensuring high welfare outcomes are maintained. Claims that past management of the park have failed are simply untrue as to date, the horses have never been managed. Neglecting to manage them, and then mass culling them cannot be described as “management.”

Therefore, given the debate over the numbers of the brumby population is still to be resolved, and the ongoing ground shooting which is being carried out irresponsibly, Animal Care Australia cannot find justification to resort to or recommend aerial culling.

(e) the animal welfare concerns associated with aerial shooting

Animal Care Australia does not support any euthanasia program that inflicts unnecessary injuries on animals when more humane options are readily available.

Long legged species such as horses, deer and camels are often pursued by helicopters for hours. Marksmen are very quick and accurate to shoot their target – but only once they have chosen the target individual. The helicopters are deliberately frightening the animals to drive them out from under tree cover and are running in groups – shooting them all takes time and is not at all quick. As animals tire, they are more prone to trips and falls, sustaining serious injuries. It takes many hours to round up and dispatch entire herds. [6] [7]

For equine species, the most reliable and humane method of euthanasia is a bullet to the brain – there is a 3-inch triangle on the horse's forehead that will achieve an instant death, with the horse completely unaware of what has happened. [8] [9]

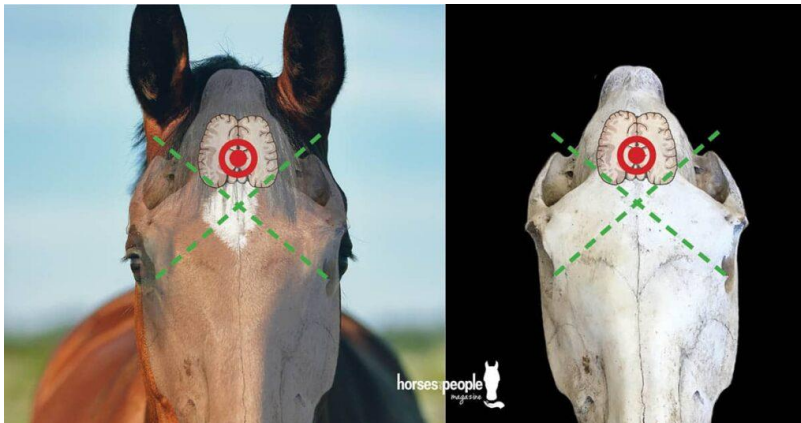


Photo credit: Horses & People Magazine 2020

With domestic horses this is done in a quiet, familiar environment, while the horse is happy eating its favourite, and last, meal. The horse is not shot in sight of other horses. Many in the horse industry have preferred this method of euthanasia for horses over other options, including lethal injection, as it is the quickest, kindest, and least distressing method for the horse. Objections to using guns to euthanise horses are unfounded, but they must be used to best practice standards, and by someone licensed and experienced to ensure accuracy. [9]

Aerial culling simply cannot meet these standards. The required level of accuracy is simply not possible to achieve through aerial culling, and once shot in the chest or side, as per the Regulations, the animals fall whilst still fully conscious, resulting in unnecessary additional injuries, pain, and distress. [7] Horses still running are fully aware that their herd mates are falling and dying and this

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adds to their distress, panic, and speed. The shot animals then die slowly over minutes or potentially an hour or more.

This is simply not humane. Societal expectations are that animals will be responsibly managed, cared for, and humanely euthanised when necessary. It is obvious from the community response to this Plan, that aerial culling of pest species, particularly horses, has lost its social license to operate in Australia, as it has in most parts of the world.

(f) the human safety concerns if Kosciuszko National Park is to remain open during operations

For public safety, accountability and transparency, areas where ground or aerial shooting is occurring should be closed or access severely restricted.

(h) the availability of alternatives to aerial shooting

Animal Care Australia does not object to ground shooting of excess animals that cannot genuinely be rehomed. Animal Care Australia would prefer to see this done through trapping programs in conjunction with mobile abattoirs to ensure that no carcasses are left behind in the park, and to not make waste of the meat for pet food.

Animal Care Australia objects to wild horses being transported long distances to abattoirs, due to the distress caused to the animals, and the resulting injuries occurring during transport.

Animal Care Australia supports an active management program, which restricts the horses' access to only certain areas of the park specifically for the purpose of "rewilding" former farmland and includes trapping of excess animals to rehome as domesticated riding horses and companion animals.

Currently rehoming horses is exceedingly difficult – not due to a lack of demand for these horses by the horse industry – but due to the impossible to meet requirements set by the National Parks & Wildlife Service (NPWS) for those seeking to rescue and rehome. [1]

Presently NPWS has strict rehoming criteria, and will only rehome horses in groups of five or more, and the opportunity for new owners to choose their horses is not an option.

This has several consequences:

- While rehoming organisations will take as many as they feel they can accommodate, this minimum number means that individuals capable of taking in one or two at a time are not able to do so via NPWS. Trapping is often done seasonally, adding pressure to those organisations who could take more throughout the year after they have trained the horses and moved them on to more permanent homes.

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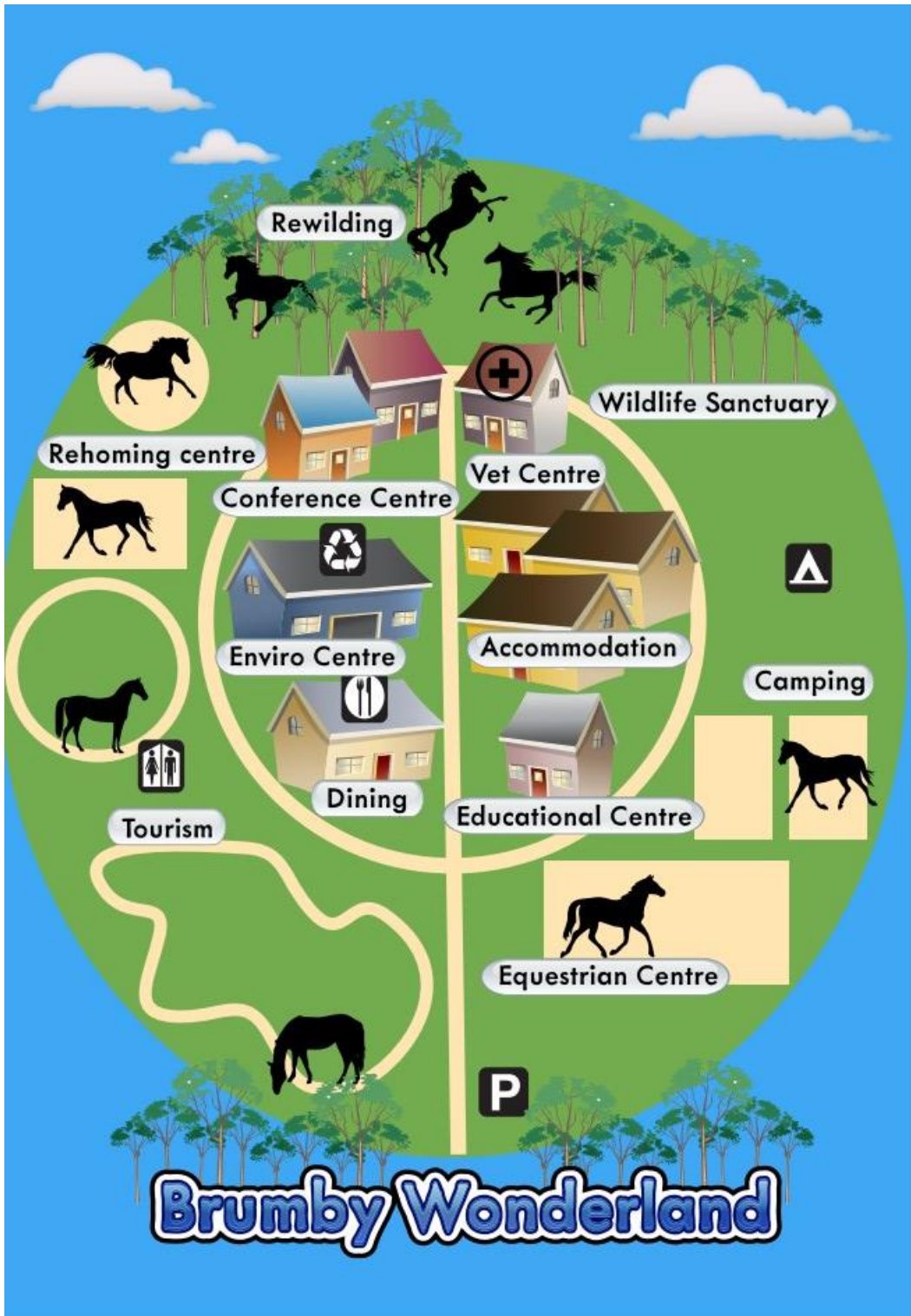


- By not allowing rehoming organisations or individuals to choose the horses they take home, which will include many horses that are not suitable for retraining as riding or carriage horses (too small, poor conformation, past injuries, not thriving or unsuitable temperaments), complicates the timeframes and processes for rehoming as those horses can only be successfully rehomed in sanctuaries with limited human contact, or as companion animals, for which there is already an excess number of animals for the homes available. This means other horses that ARE suitable riding or carriage horses are sent to the knackers because they could not be individually selected. This puts an unfair burden on those trying to rehome brumbies and simply shifts the problem to someone else.
- Brumbies are highly valued in the equestrian community, as they are genuinely excellent “all-rounders” – meaning they are suitable for a wide range of equestrian disciplines: eg: pony club mounts, trail horses, carriage horses, show horses, adult riding club and more. The only limitation on what a healthy, and well conformed brumby is suitable for is their size (many are too small to carry larger adult riders, or beginner riders), and their temperament (some are simply not curious enough or have been traumatised by the trapping process and/or transport). In addition to this, owning a brumby is an honour and a privilege, and their heritage alone adds value to the horse. This helps the horse find a home in the first instance, and increases its resale value, should it be rehomed. A high resale value keeps horses out of knackeries and abattoirs.
- The biggest barrier to individuals taking brumbies home is that most equestrians, even experienced riders, do not have the facilities, skills, or experience to train their own wild horse. Riding and training horses are different skill sets - not everyone can do both, and it is a rarity to be excellent at both. Experienced professionals using gentle training methods are needed to prepare these horses for their new home.
This is not currently accommodated in any way by NPWS, and many rehoming organizations have unrealistic expectations for the homes their horses go to, such as requiring adopters to own their own land (not rent), or to attend courses at the rehoming organization, even if they are experienced horse trainers. This reduces the number of available homes.
- To be successfully rehomed – in any capacity - brumbies need experienced handling from gentle horse people from trapping to training and rehoming.

Resolutions to problems preventing the current Kosciuszko National Park Wild Horse Heritage Management Plan from working would be more productive and appease community expectations than reintroducing aerial culling.

(i) any other related matters

Brumby Wonderland



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Animal Care Australia proposes a solution to brumby management that would appeal to brumby enthusiasts as well as appease environmentalists and the general public. We call it Brumby Wonderland, but it is much broader and all-encompassing than that.

Following a One Welfare model - recognising that animal welfare, biodiversity and environment are connected to human wellbeing [10] - Brumby Wonderland is a concept for a multi-function environmental centre and brumby sanctuary - open to the public.

This would have four departments that interlink, and overlap.

1. Rewilding with horses

- Rewilding is a term used in Europe where semi wild herds of horses are grazed in dedicated areas to be a link restoring former farmland into native landscape. Horses are uniquely suited to this purpose. There are several successful programs in the UK [11] [12] and the Netherlands. [13]
- The rewilding programs are environment based – to improve biodiversity, increase native vegetation, and trees, restoring past land clearing and “pasture improvement” aimed at cattle.
- The horses are semi-wild – meaning they are accustomed to humans and not afraid of them, but rarely handled. They are contained/fenced-in to certain areas, and not free ranging across the Park. Their access to rangeland grazing is carefully planned and monitored and directed by a dedicated management team to improve the land through recognised permaculture principles to restore native grasslands.
- Any breeding of horses is managed, with herd numbers reduced as required, through the Rehoming Centre or gelding of stallions and sterilisation of mares.

2. Brumby Rehoming

- The rehoming centre would have full-time horse trainers and staff to start initial handling and training of the horses. This allows the horses to be accurately assessed for temperament and physical wellbeing prior to travelling any further. Animals not suited to rehoming can be returned to the rewilding program – remaining onsite - to live out their lives.
- Rehoming organisations and individuals would then be able to transport horses from the Park without injury, and purchase animals at varying levels of education, based on the skills and experience of the homes waiting for them.
- Horses can be trained here for the tourism activities (below)

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- The centre could be multipurpose for retraining former racehorses for rehoming, for educating horse industry professionals, and run courses for brumby rehoming organisations and adopters.

3. Education and Veterinary Centre

- The vet centre would be a quarantine centre, equine vet clinic servicing the brumby program and local horses, as well as a larger purpose built wildlife hospital and wildlife sanctuary to rehabilitate injured wildlife found in the Park and neighbouring areas and provide a home for animals that cannot be released.
- The education centre would include conference rooms for wildlife education of veterinary staff and wildlife carers, emergency services training for Technical Large Animal Rescue, and private conferences for related industries.
- Education can also include animal care programs about responsible animal ownership, horse training and first aid for wildlife and pets.
- Equine Assisted Growth and Learning programs for ex-military, troubled youth, suicide prevention and ex-prison reintegration programs could engage with the rewilding herds and rehoming centre horses.

4. Tourism

- A Visitors Centre and Museum on the history of Kosciusko brumbies, their contribution to past Wars, and how the rewilding program works and is progressing. The local environment and landmarks would be included.
- Interactive, hands-on experiences with Brumbies (trained at the Rehoming centre): meet and greet, pony rides, Jackaroo tours, ridden and driven day tours and multiday ridden/driven camp outs to see the semi wild herds in the Park, and the National Trail, etc.
- Summer pony camps for kids and school excursions. Programs to educate children in juvenile detention, foster care, or respite carers.
- Historical re-enactment displays on special/local events – man from Snowy River, Light Horse Brigade, farming etc.
- Horse free activities such as 4wd tours, bushwalking, bird spotting, photography and artists retreats, and other outdoor adventure activities
- Accommodation, dining, and gift shop

This concept of a government owned facility with tendered operators within it (similar to the ski fields) holds the whole program accountable by keeping it transparent and visible to the public.

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Government needs to support the concept and provide necessary approvals etc. Animal Care Australia is not proposing the government fund it.

This project could and should be developed fully inclusive of environmentalists, horse lovers, wildlife lovers, outdoor adventurers, and would be an additional main attraction for tourism to the mountains all year round.

Being a multi-use centre for a broad range of industries, education and a venue for existing government supported programs will ensure that it will be self-sustaining and a significant attraction into the future.

Animal Care Australia has a broad plan for how Brumby Wonderland could be structured, operate, be self-funded and options for where the initial investment of funds could be sourced, so the burden is not all placed on government or charities. We look forward to an opportunity to discuss this in further detail with the Committee.

In conclusion:

The debate on what should happen to the brumbies is becoming more divided over time, with the extreme ends of environmentalists and brumby supporters becoming more antagonistic towards each other.

Animal Care Australia feels that this passion and enthusiasm – for native flora and fauna, as well as the horses – could be redirected into 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.

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 testimony at this Inquiry.

This submission can be publicly listed.

On behalf of the Animal Care Australia Committee,

Karri Nadazdy

Karri Nadazdy

Assistant to the President and ACA Horse & Livestock Representative.

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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] Budiansky, S (1997). The Nature of Horses. Their Evolution, Intelligence & Behaviour, Orion Books, USA, page 69
- [4] Mills, D. Nankervis, K (1999). Equine Behaviour: Principles and Practice. Blackwell Science, UK, page 131
- [5] Mason, E. (2023) Call for NPWS to stop brumby cull in face of 'flawed' population count. About Regional, published online: <https://aboutregional.com.au/call-for-npws-to-stop-brumby-cull-in-face-of-flawed-population-count/432232/>
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- [9] Harvey, A (2020). End of Life Option and the Problems with Horse Slaughter. Horses & People Magazine, January-February Issue 2020. <https://horsesandpeople.com.au/end-of-life-options-for-horses-and-the-problems-with-slaughter/?>
- [10] Garcia Pinillos, R et al (2016). One Welfare – a platform for improving human and animal welfare. Veterinary Record, October 2016, page 412-413
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[11] The Knepp Castle Rewilding Project, UK, established in 2002. <https://knepp.co.uk/rewilding/>

[12] 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>

[13] Schwartz, D.T. (2019). European Experiments in Rewilding: Oostvaardersplassen. Rewilding Earth, published online: <https://rewilding.org/european-experiments-in-rewilding-oostvaardersplassen> Oostvaardersplassen nature preserve, The Netherlands, established in 1970, ponies introduced in 1984.