



The Australian Brumby Alliance

ABN : 90784718191

**Submission
to the
Natural Resource Commission: Part-2
Pest Animal Management Review (NSW)
12th May 2016**

Thank you for the opportunity to provide feedback on NSW's Pest Animal Management draft plan released April 2016.

The Australian Brumby Alliance (ABA) Inc. was formed in April 2008. Its mission is to act as a National Body for the Recognition, Management, Preservation and Welfare of Australian Wild Horses (Brumbies). Member groups have developed a solid understanding of the skills and complexities required to collect Brumbies trapped by park removal programs, then gentle and rehome them. Rehomed brumbies are suited to a range of general equestrian activities including endurance riding, horse shows, children's ponies, carriage work and/or simply a family favourite.

ABA members have worked with park staff in New South Wales, Queensland, and Victoria to implement the most humane method of brumby population control, if respective park management plans require Brumby numbers to be lowered.

The ABA applauds the plan's comprehensive pest strategy and for acknowledging that Brumbies are seen by many as a cultural icon with strong cultural and historical importance.

ABA responses to the NCR draft report recommendations are below.

What are your reasons for support of the recommendations?

- We support a 'whole Pest Management' approach, because progress cannot be made by removing one pest species in isolation.
- We support ongoing management for sustainable Brumby Populations, because we strongly believe in the heritage values that Brumbies represent. Also, until Brumbies have heritage recognition, the pressure to remove them totally will remain. Australia without its horse heritage would deny future generations the ability to see a living part of our early settlement history and impact the many Aboriginals who also value the role Brumbies have played in their recent social history.

- We support euthanasia on site for passively trapped Brumbies, **IF** no people skilled in wild horse rehoming are able to collect them, because trucking un-handled Wild Horses, to abattoirs to be killed, increases the stress on the Brumbies unnecessarily.
- We support reintroducing Dingo populations as natural predator cascades, because this is nature's way to weed out the less robust Brumbies, and is far preferable to humans deciding who should live or die.
- We support the need to structure management on peer reviewed information, because current information used to manage Brumby populations is outdated and based on false, emotive assumptions.
- We support the urgent need for Brumbies to have heritage status, because without such a status, there is significant pressure placed on removing entire Brumby populations under current national park management plans which would deny future generations their living heritage.
- We support the need to conduct effective evaluation and reporting of outcomes, because without effective evaluation processes, how do we progress our *real* knowledge base, so that realistic solutions can be continually improved.
- We support the need for management to be adaptable to new knowledge and skills (such as conservation grazing), because it builds on the positive impacts *sustainable* Brumby numbers have provided to Australia's environment for the past 200 years.
- We support the urgent need to conduct robust research on, e.g. population dynamics, what causes these impacts, how to identify sustainable horse population levels that also support robust environments, etc.; because without well researched facts, we cannot provide an effective, transparent, holistic, management plan.

If any, what are your reasons for non-support of the recommendations?

- *Aerial culling and ground shooting free roaming Wild Horses*

We do not support aerial culling and/or ground shooting free roaming Wild Horses because:

- it fails to meet the RSPCA definition of humane killing i.e. “when an animal is either killed instantly or instantaneously rendered insensible to pain until death supervenes”;
- it is not possible to guarantee a kill, first shot, every time, when shooting horses, from helicopters, as they are a moving target, there are shifting downdraughts, and often vegetation to contend with;
- rough, steep, canopied terrain markedly increases injury risk & foal separation;
- it is impossible to ensure ground back-up can promptly kill each wounded horse; and
- more humane removal methods are available; e.g. passive trapping & fertility control.

Further the any proposal to cull, either by aerial or ground shoot 90% of our Snowy brumbies will enrage the public as was the case at Guy Fawkes National Park in 2000. There are many Australian citizens who are incredible proud of the heritage Snowy Brumby, whose ancestors fought for us in several wars and enabled settlers to survive in Australia, and who gain immense pleasure seeing a free Snowy Brumby spirit living untamed and unfettered

- *Reduce red tape surrounding recreational hunting on private land. (R-23)*

The ABA reject any move to ease licence requirements, because it is vital all hunters are required to be licensed, and to demonstrate they have the skill to humanely kill the animals they are licenced to hunt.

- *Enforcement to bait dogs etc. (Page 42)*

We reject the use of bait for dogs, because bait results in an uncontrolled and painful death, and impacts non-target species i.e. it is not a humane option.

- *Risks of feral herbivores (deer, donkeys, horses, buffalo, goats, camels and cattle) spreading disease is of concern. They are difficult to survey and contain, and are potentially a highly mobile, widespread and long-term host of infection (Hampton et al. 2004). (Page 47)*

In this regard for these species to become infected, the infection has to enter the environment, therefore the focus should be to prevent any infections being introduced. Furthermore, the ABA is not aware of any potential, highly mobile, widespread, long term infections having been identified in the species listed, to date.

- *7.4 Recreational hunting as a management tool. (Page 94)*

We strongly reject this, because it is impossible to ensure compliance, and control will not be effective while the sports hunter needs their target game species to always be available to hunt.

What are your suggestions for improvement in pest animal management?

- Any method chosen for any species must put humaneness as the *first* priority, and the degree of cost effectiveness must never be placed above the most humane option.
- It is vital that people with skills to manage, gentle and rehome Wild Horses are involved in any consultation and Pest advisory bodies (where Brumbies are involved).

NRC Recommendations:

Reduce the impact of feral horses - The NSW Government should:

- i. Finalise the work of the technical reference group and respond to its findings*

We have provided initial feedback on the ITRG released only recently on 1-May-2016 in Part-3 of the ABA submission.

- ii. *Remove feral horses in ecologically sensitive areas using best practice management techniques after consideration of the recommendations of the independent technical panel.*

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- iii. *Recognise the heritage value of feral horses within its management program and maintain an acceptable population level across the landscape.*

We support this view, provided the population levels ensure genetic viability and allow for major catastrophes such as the 2003 severe wild fire that reduced the Brumby population by 64%.

We are extremely concerned that the draft NPWS management plan states that 90% of the Wild Horse populations in Kosciuszko national park will be culled, leaving a small population of 600 Brumbies.

Up to now, and as reflected in the ITRG (March 2016) report, NPWS dialogue has inferred “some” management, or to reduce numbers to an acceptable level through slowly reducing numbers and regular, science based, environmental assessments.

However the shock decision by NPWS to “*management*” to the excessively low level of 600 [400-800] Wild Horses in Kosciuszko National Park will result in *management to extinction*, not *management of sustainable, viable levels*.

The ABA strongly advocates for an acceptable population level of around 5,000 as suggested by Michelle Dawson on page 28 of the Parks Victoria “Greater Alpine National Parks” draft management plan, to ensure that the *Heritage Snowy Brumby* will continue to survive and show all future Australians a unique, *living* part of their early settlement history.

Survival depends on the ability of a Wild Horse population of around 5,000 [as recommend by Michelle Dawson [page 28 of the Parks Victoria “Greater Alpine National Parks” draft management plan], to roam free over at least 70% of the area they currently live in, which for KNP is still only 45% of the overall park, in order to;

- A. maximise the essential genetic mix,
- B. maintain their social family groups, and
- C. allow for a 64% (or higher) death rate such as occurred in the 2003 severe wild fire.

It is vital to grasp that - the first severe wild fire to overtake a small population of 600 Brumbies will eliminate virtually all the remaining 600. Any remaining Wild Horses will not have adequate genetic robustness to overcome in-breeding, and so result in our Snowy Mountain Brumby heritage being *lost for ever*.

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