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24 August 2016

The Hon Mike Baird,
Level 40,
Governor Macquarie Tower,
1 Farrer Place, Sydney NSW 2000

<https://www.nsw.gov.au/your-government/contact-premier-new-south-wales>

Dear Hon Mike Baird,

Professor Don Driscoll, recently sent you a letter urging support for the draft Kosciuszko National Park Brumby management plan to reduce Snowy Brumby numbers by 90%.

In 2014, Mr. Driscoll reported on the Snowy Brumby [Sydney Morning Herald\(External link\)](#).

National Parks and Wildlife (NPWS) then placed Mr Driscoll's report on their "Protect the Snowies" web page; although NPWS did not endorse or defend the report, they displayed it. The Australian Brumby Alliance (ABA) has serious reservations on Professor Driscoll's claim to be among the *greatest pool of knowledge about Alpine ecosystems in the country*.

In his 2014 report Prof Driscoll claimed that 20% of Kosciusko Brumbies alone will die of starvation, dehydration or poisoning each year. The author then calculated two options;

- Low count variation that 7000-11000 horses will die from starvation, dehydration or poisoning over ten years without aerial culling in the park, and
- High count of deaths up to 20,000 over the next 10 year period in the park.

The ABA refutes the claims made by Prof Driscoll as his figures are based on data recorded from Brumby populations all across Australia, most of which live in outback areas subject to drought. As a scientist, surely Prof Driscoll understands the Alps are different to the outback?

Prof Driscoll calculated 1,000 to 2,000 horse deaths annually from natural causes, so using the 2014 count of 6,000 horses in Kosciusko, wild horses would be extinct in a few years. Yet Prof Driscoll did not wonder why, at this death rate, Snowy Brumbies are not already extinct.

Considering Prof Driscoll's calculation of up to 2,000 Snowy Brumby deaths each year, we are also surprised that as a scientist, Prof Driscoll did not wonder why, over a two day ski trip, he failed to see further evidence of his predicted annual 1,000 to 2,000 carcasses.

Another example of low scientific rigour is Prof Driscoll's claim that for "the first time in the alpine evolutionary history", *horses dominate ecological process across the entire landscape*. Yet Mega Fauna herbivores weighing up to 1,000/2,000 kg (one had a hoof-like foot) roamed across the entire Australian landscape until going finally extinct by around 10,000 years ago.

The ABA has frequently expressed concern that NPWS base their Brumby management plans on outdated, biased rhetoric and non-peer reviewed studies. Having reviewed Prof Driscoll's paper, we are further convinced of NPWS's reliance on scientifically weak studies.

The inability of Prof Driscoll to recognise the significant differences between Alpine regions and outback regions is surely of great concern. We sincerely hope that Prof Driscoll and other scientists who support such flawed studies, are not among "*the greatest pool of knowledge about the Alpine ecosystems in the country*", even though they make such a claim.

The ABA supports the management of sustainable, Wild Horses living in sustainable wild environments, and; that excessive use of an areas by any species, (native and non-native), humans, weather etc. can result in excessive negative environmental impacts.

We differ from NPWS because we do not assume all negative impacts are solely due to Wild Horses just because they live in the same area. We also differ because we support the view observed by many, that **moderate** (Brumby) grazing can provide a range of **positive** impacts. Such different views would be resolved if peer reviewed studies were carried out to isolate both negative *and* positive (horse) impacts from all *other* impact variables.

In conclusion

The sensitive and complex issues to work through make it critical that the final plan is based on peer reviewed, published studies and importantly, studies that quantify the proportion of horse specific impact claims *in comparison* with impact from *other sources*, for example;

- pigs, goats, deer, rabbits, cats, dogs, native species (wombats etc.),
- humane activities such as hikers, 4WD, bikes etc., and impacts from
- Mining, the Hydro-electric Scheme and wildfires etc.

The Australian Brumby Alliance formally asks you as the Premier of NSW to consider the low level of scientific rigour Prof Driscoll demonstrated in his Snowy Brumby review, the apparently support of 41 co-signature academics and it seems of NPWS, and ensure that NPWS seriously consider the significant factual concerns we have raised in our submission.

We look forward to your earliest reply to our request; that you personally will ensure the final plan will be based on due scientific process before it is signed off by people your government have authorised to do so *as your Government's representatives*. In particular, that the people making the final decision will be held accountable to any future parliamentary scrutiny.

Yours sincerely,



President, Australian Brumby Alliance Inc.
24th August 2016

Cc:

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