



# *The Australian Brumby Alliance*

ABN : 90784718191

## **Submission to Kosciuszko National Park Draft Wild Horse Management Plan August 2016 Att.3 - *Straight Talk Consultation***

### **Common ground for future work to build on - noted by the ABA such as,**

- “Many people in the community and within stakeholder groups can agree that management of the wild horse population is required. The issues of how, and to what level, are where dis-agreement and conflict begins”. [2008 Management plan highlights P1]
- Most participants value the Snowy Mountains as a national park, but for different reasons, with many valuing wild horses as part of the heritage or iconic attraction of the Snowy Mountains [Community Engagement report P15]
- Participants ranked Wild Horses second last (at 3%) as a major threat to the park for question “What do you think are the major threats to the park?” [Initial on-line survey P13]
  - **Human activity including tourism 63%**
  - Introduced Flora and fauna 35%
  - Pollution/environmental damage 31%
  - Over development/commercialisation 25%
  - Climate Change 20%
  - Bush fires 20%
  - Lack of Government sup/maintenance 8%
  - Nothing/not sure 8%
  - Skiing 4%
  - 4WD 3%
  - **Wild Horses 3%**
  - Hunting 1% [Other 10%]

### **Public consultation highlights supported by the ABA, such as:**

- “We feel that brumbies are now a part of the Australian landscape. People expect to see brumbies whilst in the park and many visit with the hope of seeing some of these beautiful wild horses”. [Kitchen Table P14]
- “A significant proportion of respondents saw the cultural and heritage significance of wild horses in Kosciuszko National Park as important”. [Kitchen table P15]
- Only one in three respondents correctly identified horses as feral animal or pests. [Initial on-line survey P20]

**Most participants saw horses (Brumbies) as native to Australia**

[Second Straight Talk survey P15]

**The ABA supports the consultation result that: The majority of the public did not support aerial or ground shooting, such as;**

1. **Non-lethal** methods were supported by more respondent groups than lethal methods, [Community Engagement report **P14**]
2. Aerial shooting and mustering from the air were the least acceptable method. [Community Engagement report **P10**]
3. The least supported method is aerial shooting (but still acceptable to 34.1% of respondents), although ground shooting was more acceptable than both baiting and poisoning, and fencing. [Community Engagement report **P16**]
4. The clear majority of responses (two-thirds) indicated that ground shooting is **not** considered an acceptable management method with 21 responses scoring between 1 and 4.
5. (Aerial shooting) very similar result to ground shooting showing very clear preference by participants for non-lethal methods of population control. [Kitchen Table **P11**]

**The ABA is concerned about the ambiguity in consultation questions asked that should have been broken down further, such as;**

- We had to rank “Trapping & removal then rehoming or transport to abattoir” [Kitchen Table **P5**] A statistically unsound question and should have been separated into;
  - a. Trapping and removal then rehoming.
  - b. Trapping and removal then transport to abattoir.

ABA note: We tried to have the question separated on the grounds that the question includes diametrically opposed, ambiguous and statistically flawed. The reply by NPWS “this is the only method NPWS is currently utilising to control the wild horse population in Kosciuszko National Park” was *in-comprehensibly bureaucratic* to us.

- We had to choose horse’s *vs* environment [second survey **P19**] which ignored the reality that many of us value an environment with Brumbies living in reasonable numbers.

**The ABA was highly concerned about the: Inaccurate education provided to consultation forums, such as;**

1. The audience was told “Although some fertility controls can be administered by dart rifle, the range of these rifles means that horses must be trapped or mustered & yarded for the dose to be delivered effectively [Town Hall meeting **P19** and kitchen table **P14**].

ABA note: After intense lobbying by people who had seen fertility control being delivered by dart gun to USA Mustangs and Dartmoor ponies [GB; NPWS, gave a short correction, but did not update other printed papers. By NPWS telling the audience it costs \$1074 to trap each Brumby, and trapping was essential to apply fertility control, the approx. \$36 per shot would have been inflated to \$1,100 per shot - a significantly, and biased, **deviation from the truth**.

2. The On-line Engagement forum P9 and Straight Talk consultation period, participants were informed that ‘*It costs NPWS on average \$,1074 to passively remove a wild horse.*’ <https://engage.environment.nsw.gov.au/protectsnowies?page=2>

ABA query: Why are Straight Talk reports that bring together the 2 year consultation period now referring to an *average cost to passively trap and remove a wild horse of \$1,094?*

3. Information provided for; Assateague Island (USA) and Kaimanawa (NZ) wild horse populations ..... “have set objectives to significantly reduce wild horse populations to minimum viable population levels of **100s** rather than 1000s of wild horses”. [2008 Plan highlights P27]

ABA note: Figures referred to in the 100’s is based on older studies. Genetic studies on USA Mustangs now report the need to raise levels up **to the 1,000’s** not 100’s to avoid inbreeding. [Ref Chapter-5 [Genetic Diversity in Free-Ranging Horse and Burro Populations](#)]

### ABA response to: Perceived bias against Wild Horses, such as;

- Straight Talk reports often stress that, “when given credible and *accurate information* about population control methods and the need to control the wild horse population, and the time to **reflect** on that information, community members will **reassess** their initial thoughts about the use of lethal control methods”. [Engagement Conclusions P4]

**ABA response** - This report seems to suggest NPWS should provide more education to the public on negative impacts of wild Horses. We are concerned that while NPWS rely on **non-peer reviewed** studies and **ignore overseas** peer reviewed studies, such as populations need to be 1,000’s not 100’s, informed decisions cannot be made.

- Straight Talk state “although feral horses are not the only introduced hoofed mammals to have such effects, their effects are distinguishable from, additional to and distinct from any threats posed by other herbivores; [2008 Management plan highlights P20]

**ABA response** - This sentence is poorly constructed and infers that the ‘effects’ from horses outweigh **all** threats posed by other herbivores. By suggesting other herbivores are of minimal consequence, NPWS risk being seen to show an extreme example of bias towards any Wild Horse presence. If, however, the sentence means that horses, with their large feet, leave clearly visible ground prints, that obliterate any signs of other herbivores, **we would agree**, and say this reinforces our view that NPWS studies just rely on the latest obvious hoof print as evidence, rather than identify prints from other herbivore and their impacts.

- Straight talk state that “the claim that NPWS are unfairly ‘targeting’ wild horses when there are other feral animal issues in the park that are being ignored..... is a tactic to obfuscate the issue and avoid genuinely engaging on it. [Engagement Conclusions P4-]

**ABA response** – Straight Talk’s description of horse effects as being *distinguishable from, additional to and distinct from any threats posed by other herbivores* suggests that NPWS do, in fact, unfairly target horses above other herbivores.

Furthermore, **Comparing** NPWS statistics we see that in the past 5 years an annual average of; **369 Pigs, 186 Deer, 169 Goats, 51 Cats, 407 Foxes and 275 wild dogs** were culled. So the aim to remove 600 Brumbies annually for the next 5 yrs. is **significantly** above other specie figures, and **supports our view** that “NPWS are unfairly ‘targeting’ wild horses”.

**The ABA was concerned to see consultant trends to encourage to NPWS with potential to: Further polarise sensitive management views, such as;**

- Several times Straight Talk reports warn NPWS to “prepare for possible ‘**breakouts**’ of **opposition** to the final plan – including **staged images** and incorrect information”  
*[Engagement Conclusions P6]*

**ABA response** - Such words sadly just add to already inflamed tensions.

- Straight Talk also warn NPWS of the need to reinforce “government decision makers in their **support for the plan**”, and urge NPWS with “do **not rest or lapse** into just focusing on implementation as the opposition will continue in some quarters”.  
*[Community Engagement Conclusions P7]*

**ABA response** – Inflammatory warnings only serve to heighten already emotive and sensitive public views, and suggests Straight talk have by now, lost their objectivity.

- Straight talk states “A key feature of the engagement with horse advocates during this process has also been their **lack of acceptance** of the evidence of damage being done to the park by wild horses and of wild horse population numbers ..... until evidence that meets their satisfaction is provided. *[Engagement Conclusions P3/4]*

**ABA response** – It is hard to accept NPWS **impact** claims while they base decisions on non-reviewed, un-published studies that seem to us to be lacking scientific **rigour, objectivity** and biased for reasons above.

Furthermore, the ITRG report “There is often a **paucity** of published **peer-reviewed** literature on the application of control methods for wildlife and pest animal management” *[ITRG 2016]*.

- “all participants agreed *[Town hall P2]* that the humaneness of any management method was important”.

**ABA response** – Not all at the town hall meeting ignoring a table group that put humaneness as the lowest priority. Agreed that the humaneness of any management method was important”, one table put humaneness at the bottom of options offered to that question.

It has long been the wont of Australian Ecologists to attribute most environmental problems in rural lands to the evils of grazing. The list includes soil compaction, soil erosion, loss of biodiversity, loss of vegetation ‘structure’, and chronic eucalypt decline.

*Firestick Ecology by Vic Jurskis [Ref-12]*

On a lighter note – The ABA notes the following on-line engagement quotes below:

**On-line engagement quotes provided by Straight Talk**

“Once the numbers are known, try and decide on a number that does no more harm than skiers and bush fires”. [*On-line Engagement P39*]

And

“...Ecosystems adapt and find a new equilibrium and it may well prove that if all brumbies were removed from the Park that the area would be adversely affected in ways that we cannot foresee.” [*On-line Engagement P45*]

And

"How can we condemn one species for being destructive to the environment in order to survive, when all we as humans have done is play a destructive role in our ecosystem and environment? “ [*On-line Engagement P53*]

This ABA Att-3 *Straight Talk Reporting* forms part of our total submission to the Kosciuszko National Park – Wild Horse Management draft Plan. Please also refer to the Main ABA submission, Att-1 Managing Viable Brumby Populations and Att-2 Impact Perspectives.

Please feel free to contact the ABA with any queries about our submission to the draft plan by contacting Jill Pickering via (03) 9428-4709 or emailing [pickjill@hotmail.com](mailto:pickjill@hotmail.com)

Yours sincerely



Australian Brumby Alliance Inc.  
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*References are listed at the end of the main ABA submission.*

**ABA Main Submission**

- Att.1 Managing Viable Brumby Populations
- Att.2 Impacts in perspective
- **Att.3 Straight Talk Consultation**