

ANALYSIS OF PUBLIC SUBMISSIONS

Development of a Victorian Alps Wild Horse Management Plan

August 2013

Prepared by



Contents

1	Overview of submissions	2
2	Values and perceptions.....	4
2.1	Environmental impacts of wild horses in the Victorian Alps	4
2.2	Cultural heritage value of wild horses in the Victorian Alps.....	7
2.3	Wild horse impacts on tourism and visitors	8
3	Should wild horses be removed/controlled in the Alps?.....	9
3.1	Should wild horses be removed/controlled in the Alps?.....	9
4	Control methods	11
4.1	Views on methods for control of wild horses in the Victorian Alps	12
4.2	Destination of captured horses.....	16
4.3	Managing horse carcasses	17
5	Other recommendations.....	18
5.1	Priority areas for wild horse control	18
5.2	Public education and information.....	18
5.3	Provision of adequate resources	19
5.4	Cross-border cooperation with NSW	19
5.5	Rehoming and relocation of wild horses	19

1 Overview of submissions

This analysis provides information on the views expressed in public submissions received during the first round of public consultation for the Victorian Alps Wild Horse Management Plan. Parks Victoria, in partnership with the Department of Environment and Primary Industries, released a series of Information Sheets and Background Papers on wild horses and their management on public land in the Victorian Alps. At the same time the public were invited to prepare submissions on issues they believe should be considered in the development of the draft Victorian Alps Wild Horse Management Plan. Submissions closed on 22 July 2013.

Public submissions are a component of a broader community consultation process that was undertaken prior to the development of the draft plan. The consultation process also included the establishment and several meetings of a community Roundtable Group; a random telephone based public perceptions survey which investigated public views towards wild horses and their management in Victoria; a web based version of the same survey; and individual interviews with key interest groups. This report covers only the public submission component of the consultation process.

A total of 84 submissions were received consisting of:

- 64 submissions from individuals, including 5 from scientists with expertise in alpine ecology and 58 from other individuals with a range of interests including conservation, horses and recreational activities in the Victorian Alps
- 8 submissions from conservation/flora and fauna groups
- 4 submissions from brumby groups
- 2 submissions from horse riding groups
- 1 submission from a scientific research organisations specialising in alpine ecology
- 1 submission from a tour operator
- 1 submission from an animal welfare organisation
- 3 other submissions (from local Councils, a bushwalking group and a Catchment Management Authority).

Where several documents were received from an individual or organisation they have been counted as a single submission.

The place of residence of people who provided submissions was Melbourne or nearby (25 submissions), Gippsland (17), other parts of Victoria (12), New South Wales (5), the ACT (2) and the United States (2). The remaining submissions did not provide a place of residence.

The analysis is organised according to:

- values and perceptions (section 2)
- views on whether wild horses should be removed from/controlled in the Victorian Alps (section 3)
- views on wild horse control methods (section 4)
- other recommendations (section 5)

To maintain confidentiality, the names of the individuals providing submissions are not indicated. Each submission has been given a submission number which is provided in italics after specific views to enable cross-referencing with the original submissions and the submission summary table.

2 Values and perceptions

Perceptions of wild horse impacts, the cultural heritage value of wild horses and the weighting given to the conservation values of the Alps versus the cultural value of wild horses were important background factors in determining the views on wild horse management expressed in submissions. **The majority of submissions (67 of 84 submissions)** considered that wild horse damage in the Alps is significant and increasing and that it should be a major concern in wild horse management. **Ten submissions debated** the degree of wild horse damage described in the Parks Victoria Information Sheets and Background Papers.

Seven submissions described the cultural heritage values of wild horses, which they considered should be a major factor in management approaches. **A further 7 submissions questioned the place of brumbies** in Australian culture, suggesting it has been exaggerated.

The following subsections summarise the views expressed on the environmental impacts of wild horses in the Victorian Alps (2.1), the cultural heritage value of wild horses in the Victorian Alps (2.2) and wild horse impacts on tourism and visitors (2.3).

2.1 Environmental impacts of wild horses in the Victorian Alps

Viewpoint	No. of submissions	Who	Significant points
A. The major consideration is resolving significant and increasing horse damage to the environment of the Alps.	67 (total)	Individuals, conservation groups, tour operator, scientists	<i>(Subs 1, 2, 3, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, 34, 35, 36, 37, 38, 39, 40, 42, 43, 44, 45, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 64, 65, 66, 68, 69, 70, 71, 72, 77, 78, 79, 80, 82, 84.)</i>
Personal observations of increasing wild horse damage.	21	Individuals who visit the area regularly, conservation groups, tour operator.	Some submissions provide photos of observed increasing damage from wild horses <i>(Subs 7, 37)</i> .
There is a statutory obligation on government to protect the Alps environment from wild horse damage.	11	Individuals, conservation groups, scientists	Objectives of Victoria's National Parks Act 1975 which states that National Parks are for the protection and preservation of indigenous natural values. The requirements in the National Parks Act 1975 that exotic fauna in National Parks must be exterminated or controlled.

Viewpoint	No. of submissions	Who	Significant points
			<p>Various species listed as threatened under Victorian and Commonwealth legislation.</p> <p>Feral horses as a threatening process under Victoria's Flora and Fauna Guarantee Act.</p> <p>Wild horses threaten endangered Alpine Sphagnum Bogs and Associated Fens under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999.</p> <p><i>(Subs 13, 21, 27, 44, 49, 64, 65, 69, 77, 80, 82)</i></p>
Evidence provided of increasing environmental damage by horses is threatening the ecological integrity of the Alps, its catchment function and biodiversity.	6	Individuals, scientific researchers	<p>All introduced grazing species need to be controlled (including pigs, deer, rabbits), but horses cause a significant component of the damage.</p> <p>An uncontrolled horse population will increase the impacts of climate change as horse ranges will expand with reduced snow cover.</p> <p>Level of damage is less obvious to the untrained eye – people see vegetation cover but not the changes in structure and species that indicate ecosystem damage. <i>(Sub 69)</i></p> <p><i>(Subs 23, 25, 69, 79, 70, 84)</i></p>
Significant threats to specific threatened species and communities and other significant species from horse impacts	8	Scientific researchers, flora and fauna groups, conservation groups.	<p>Wild horses threaten several reptile and frogs species through habitat damage and the spread of Amphibian Chytrid Fungus <i>(Sub 49)</i>.</p> <p>Wild horse impact on ground dwelling bird species (Spotted Quail-thrush, Hooded Robin, Diamond Firetail and Brown Treecreeper) and those favouring undergrowth with loose soil and litter (Wonga Pigeon, Satin Bowerbird, Pilotbird, Eastern Whipbird and Olive Whistler) <i>(Sub 51)</i></p> <p>Wild horses threaten orchids – at least 4 rare species <i>(Subs 50, 59)</i></p> <p><i>(Subs 23, 25, 48, 49, 50, 51, 59, 79)</i></p>

Viewpoint	No. of submissions	Who	Significant points
B. Environmental damage by wild horses in the Alps is overstated.	10 (total)	Brumby groups, horse riding group, individuals.	<i>(Subs 4, 5, 42, 46, 60, 61, 62, 73, 75, 81)</i>
Environmental damage by wild horses is not as great as stated in the Information Sheets. Wild horse impacts should be seen in the context of other threats by introduced animals, human activities, native animals.	7	Brumby groups, horse riding group, individuals.	Photos of Native Dog Flat, Native Cat Flat and Limestone Creek Areas claiming to show minimal damage <i>(Sub 60)</i> . Exclusion plots do not demonstrate wild horse damage as horses are not the only grazing animals in the areas <i>(Sub 75)</i> . Wild horses can coexist with natural values at low densities as alpine environments have evolved with grazers <i>(Sub 62)</i> . <i>(Subs 4, 46, 60, 62, 73, 75, 81)</i>
Wild horses assist the environment by keeping the country open, preventing wildfires	5	Brumby groups, individuals.	Also references to cattle carrying out this role and environmental deterioration following removal of cattle. <i>(Subs 4, 42, 46, 73, 81)</i>
Number of wild horses quoted in information papers is questioned. Other introduced animals cause environmental damage.	3	horse riding group, Individuals.	Locals believe there were no more wild horses in the eastern Alps today than 30 or 40 years ago <i>(Sub 60)</i> . Population size estimation is affected by varying composition of horse groups. Many mares do not foal annually <i>(Sub 60)</i> . <i>(Subs 5, 60, 75)</i>

2.2 Cultural heritage value of wild horses in the Victorian Alps

Viewpoint	No. of submissions	Who	Significant points
A. Wild horses in the Alps are a significant part of Australia's heritage and their protection should be a predominant/significant concern.	7 (total)	Brumby groups, horse riding groups, individual.	(Subs 41, 46, 61, 62, 73, 75, 76)
Brumbies (wild horses) have significant cultural values.	7	Brumby groups, horse riding group, individual.	<p>Values attributed to brumbies include:</p> <ul style="list-style-type: none"> • a living heritage and part of Australians' national identity (Subs 61, 62, 76) • embodiment of society's previous dependence on the horse for developing Australia, in war (Subs 61, 62) • strong genetic strain agility, acute vision, endurance (Sub 61) • aesthetic value (Sub 61) • a right to remain in the Alps as they have been there for 150/200 years (Sub 61). <p>(Subs 41, 46, 61, 62, 73, 75, 76)</p>
Need for balance between heritage value of wild horses and protection of the environment	2	Brumby group, horse riding group, individual.	(Subs 41, 75)
B. Cultural heritage value of wild horses in the Alps is exaggerated/romanticised.	7	Individuals, conservation groups, scientists	(Subs 2, 27, 37, 44, 45, 52, 77)
The special valuing of brumbies has grown out of proportion for today's conditions. It should not exempt wild horses from being treated as any other pest animal.	7	Individuals, conservation groups, scientists	<p>Drovers previously shot wild horses for dog meat and to prevent interference with stock horses (Sub 37).</p> <p>The Man from Snowy River is a legend that has grown out of proportion (Subs 44, 45). There were only about 200 wild horses at the time of the Man from Snowy River legend (Sub 77).</p> <p>(Subs 2, 27, 37, 44, 45, 52, 77)</p>

2.3 Wild horse impacts on tourism and visitors

Viewpoint	No. of submissions	Who	Significant points
A. Wild horses are a tourism drawcard for the Alps.	2	Horse riding group, brumby group.	Mentions Corryong festival built around wild horses (<i>Sub 75</i>) and popularity of horse riding tours that advertise seeing brumbies (<i>Sub 73</i>).
Wild horse numbers and impacts negatively affect tourism	3	Individual, tour operator, conservation group	More reminiscent of a horse paddock than a Wilderness Area (<i>Sub 58</i>). Horse impacts reduce availability of unpolluted water in the backcountry in autumn (<i>Sub 7</i>). No evidence wild horses attract significant tourism to the Alps (<i>Sub 82</i>).
Wild horses can be dangerous to people/visitors	3	Individuals, conservation group	Reports of aggressive behaviour towards people (<i>Sub 49</i>). Increasing horse presence on roads (<i>Subs 49, 77</i>). Wild stallions can threaten domestic horses being ridden in the bush (<i>Sub 53</i>).
Wild horses are not a safety concern	1	Horse riding group	Wild horses tend to keep their distance from humans (<i>Sub 75</i>). Vehicle collisions with wild horses should be compared with collisions with deer, kangaroos and wombats (<i>Sub 75</i>).

3 Should wild horses be removed/controlled in the Alps?

The majority of submissions (61 out of 84 submissions) agree that some form of control of the wild horse populations in the Victorian Alps is required. Only two submissions specifically state that no control should occur. Some submissions did not specifically address this issue.

The majority of submissions advocate the aim of removing all wild horses from the Alps due to environmental damage. Eleven submissions advocate the retention of a wild horse population in the Alps with some control – of these, 7 submissions specify that the remaining wild horse population should be sustainable.

3.1 Should wild horses be removed/controlled in the Alps?

Viewpoint	No. of submissions	Who	Significant points
A. Remove or drastically reduce/control the wild horse population	50 (total)		<i>Subs 1, 3, 7, 8, 9, 10, 11, 12, 13, 15, 16, 17, 19, 20, 24, 25, 27, 29, 30, 31, 33, 34, 35, 36, 38, 39, 40, 44, 47, 48, 50, 51, 53, 54, 55, 56, 58, 59, 64, 65, 66, 69, 70, 71, 74, 77, 78, 80, 82, 84.)</i>
Wild horse populations in the Victorian Alps should be eradicated on the grounds of environmental damage.	42	Individuals, conservation groups, scientists, tour operator	Reasons for wild horse population eradication mentioned in these submissions include - the need to remove wild horse populations to prevent further environmental damage to the Alps; the responsibility of government to remove a feral animal under the National Parks Act and the Flora and Fauna Guarantee Act; specific areas of the Alps which have shown increased wild horse damage; threats from wild horses to threatened species due to damage of habitat and spread of disease (such as frogs, lizards, birds, small mammals, bog and wetland vegetation communities, orchids). <i>(Subs 1, 3, 7, 8, 9, 10, 11, 12, 13, 15, 16, 17, 20, 25, 27, 29, 30, 31, 33, 35, 36, 38, 39, 40, 44, 47, 48, 50, 51, 54, 55, 56, 58, 64, 65, 69, 70, 71, 77, 80, 82, 84.)</i>
Wild horses should be immediately removed from the Bogong High Plains.	15	Individuals, scientists, conservation groups, tour operator	15 of the above submissions advocate the immediate removal of the wild horse population in the Bogong High Plains <i>(Subs 13, 17, 27, 29, 33, 35, 40, 52, 54, 64, 70, 71, 77, 84).</i>
Wild horse numbers should be drastically reduced or controlled to	8	Individuals, conservation group, local councils	These submissions refer to the need for wild horse control/management, but do not refer to complete removal of the wild population or the maintenance

Viewpoint	No. of submissions	Who	Significant points
mitigate environmental impacts.			of a wild horse population in the Alps for cultural reasons (<i>Subs 19, 24, 34, 53, 59, 66, 74, 78</i>).
B. A wild horse population should remain in the Victorian Alps with some control.	11 (total)	Brumby groups, horse riding groups, individuals	(<i>Subs 5, 41, 42, 43, 46, 60, 61, 62, 73, 75, 76.</i>)
A sustainable Victorian Alps wild horse population should be maintained.	7	Brumby groups horse riding groups, individuals	Specifically mention a sustainable population of horses (<i>Subs 41, 43, 61, 62, 73, 75, 76</i>). 2 submissions indicate the population should be maintained in ‘non-environmentally sensitive areas’ (<i>Subs 41, 43</i>). Based on anecdotal evidence, 1 submission considers the Victorian Alps has carried between 5,000 and 7,000 wild horses without losing its environmental integrity (<i>Sub 61</i>). One maintains that horses can coexist in low densities with the natural values of the national park (<i>Sub 62</i>).
Some wild horses should remain in the Victorian Alps.	4	Individuals	(<i>Subs 5, 42, 46, 60</i>)
Wild horses should only be controlled if environmental damage by wild horses (as opposed to other threats) is proven.	4	Brumby groups, individual horse riding group	These submissions call for investigation and verification of wild horse damage in particular areas before beginning control – use of scientific research, accurate horse number counts, environmental impact statement is mentioned. This is linked to the concern that other animals and human activities are causing damage. (<i>Subs 46, 61, 62, 76</i>)
C. No control of wild horses in the Victorian Alps.	2 (total)	Individuals	These submissions consider there is inadequate evidence that wild horses are causing environmental damage in the Victorian Alps. They consider there is evidence that environmental damage is being caused by other factors, such as human recreation activities. One submission refers to wild horses as ‘a natural management tool’ that help prevent fires (<i>Sub 81</i>). The other submission considers that government departments mismanage the Alps and that the removal of cattle has depleted the area’s wildlife (<i>Sub 4</i>).

4 Control methods

There is widespread agreement in the submissions that the wild horse control methods used should be humane. **Thirty-three submissions (across the spectrum of views from conservation and brumby supporters) specify the use of a humane method.** Views on what constitutes a 'humane control method' or a method involving the least stress, pain and suffering to horses vary and lead to differing views on acceptable wild horse control methods.

A submission from an animal welfare organisation provides some guidance in **choice of a humane control method** (Sub 67). It supports control methods which 'involve the least pain, suffering or distress' for the animals and advocates use of the most humane and effective methods available in the circumstances, 'with cost, feasibility and public perception as considerations but not driving factors'.

Shooting was advocated by almost half of the submissions (40), but was opposed by 11 submissions. The next most preferred control method was **passive trapping** (supported by 16 submissions) and **mustering** (supported by 12 submissions).

No submissions considered that **chemical immobilisation** was a feasible large-scale wild horse control method, although an animal welfare organisation indicated that humane and well-regulated application by veterinarians might be used on small, accessible populations or for euthanizing captured horses.

Respondents did not necessarily favour only one control method. Several submissions advocated a **combination of methods** of wild horse control as suitable for different areas and situations.

Not all submissions specified which control methods were preferred.

The following subsections summarise views expressed in submissions on the various control methods (4.1), the destination of captured horses (4.2) and management of horse carcasses where lethal control methods are used (4.3).

4.1 Views on methods for control of wild horses in the Victorian Alps

In the following table, the broad headings ‘support’ and ‘oppose’ are used to summarise submissions that make reference to control methods. In some submissions support for specific control methods was conditional based on the use of certain techniques and/or practices. These conditions are summarised in the ‘significant points’ section.

Control method	Support/Oppose	No. of submissions	Who	Significant points
Roping/brumby running	Support	3	Individuals, horse riding group	<p>Considered to be part of a wider range of methods.</p> <p>Brumby is running considered to be an important heritage skill when undertaken responsibly and with animal welfare as a priority (<i>Sub 75</i>).</p> <p>Another submission (from scientific researchers considered the use of brumby running to control wild horse populations should be ‘acknowledged’ – but it unclear if they advocate this as an effective control method (<i>Sub 84</i>).</p>
	Oppose	11	Brumby groups, individuals, conservation groups, animal welfare organisation	<p>Roping/brumby running is considered inhumane due to the levels of prolonged stress to horses (<i>Subs 7, 19, 60, 61, 41, 46, 57, 62, 64, 67, 81</i>).</p>
Mustering	Support	13	Brumby groups, conservation groups, animal welfare organisation, individuals	<p>Conduct of mustering</p> <p>Mustering should be part of a combination of control techniques (<i>Subs 19, 62, 64</i>).</p> <p>It is important mustering be conducted by skilled operators and will regard to animal welfare (<i>Subs 37, 58, 60, 61, 62</i>).</p> <p>Recommended technique of ‘slow mustering’ at the pace of the slowest horse as causing least stress to horses and damage to the environment (<i>Sub 61, 62</i>). One submission considers this mustering should be done by helicopter (<i>Sub 61</i>).</p> <p>Another submission recommends contracting of helicopter mustering to a New Zealand team with 10 to 20 years’ experience of effective, humane mustering of wild horses in the mountainous Kaimanawa region (<i>Sub 37</i>).</p> <p>One submission proposes ground mustering would be most effective in the Nunningong area where there is good road access. Slow helicopter mustering (with a nearby</p>

Control method	Support/Oppose	No. of submissions	Who	Significant points
				<p>temporary abattoir) is proposed in the more remote Davies Plain (Sub 62).</p> <p>A submission from an animal welfare organisation (Sub 67) advocates the approach to mustering in Sharp and Saunders' Model Code of practice – use of coacher horses, conduct in cool or mild weather; quiet handline, pacing for the slowest horses; use of portable yards to minimise distances.</p> <p>Due to the cumulative stress on wild horses, the animal welfare organisation does not support mustering as a stage preceding lethal control unless humane euthanizing in situ is possible (Sub 67).</p> <p>Transport of live captured horses should only be for relocation or rehoming and should be conducted humanely to minimise stress and injury potential (Sub 67).</p>
	Oppose	3	Conservation group, bushwalking group, individual	<p>Mustering of wild horses is considered inhumane due to stress on the horses (Subs 77, 81); are unsuitable for Victorian Alps conditions (Sub 48).</p>
Trapping (passive)	Support	17	Brumby groups, conservation groups, scientists, individuals, animal welfare organisation	<p>Conduct of trapping</p> <p>Trapping will not capture large numbers/is less effective in remote areas – needs to operate in conjunction with other control methods (Subs 19, 26, 56, 62, 64, 84).</p> <p>Must be conducted by qualified personnel, according to animal welfare regulations/guidelines (Sub 41, 73). One submissions attached a letter from a vet called to attend horses in severe distress due to trapping and transport from the Alps in hot weather and the death of mares in late pregnancy/early lactation (Sub 62).</p> <p>Recommendations on ways to minimise stress on horses during trapping and subsequent transport are:</p> <ul style="list-style-type: none"> do not conduct trapping in late spring/early summer when mares are foaling (Sub 62) trap horses in cooler months (Sub 73) keep family groups together when trapping (Sub 73). <p>Trapping recommended for Cobberas area due to reasonable road access (Subs 26, 62).</p> <p>A submission from an animal welfare organisation (sub 67) advocates the approach to</p>

Control method	Support/Oppose	No. of submissions	Who	Significant points
				trapping in Sharp and Saunders' Model Code of practice – avoid foaling season, mitigate impacts on non-target species; daily trap inspections with increased frequency in extreme weather; provision of water at all times; provision of feed for periods over 24 hours; construction of traps to provide shade, shelter and sufficient space to avoid overcrowding. Transport of live captured horses should only be for relocation or rehoming and should be conducted humanely to minimise stress and injury potential. If wild horses cannot be humanely removed from the capture site they should be humanely euthanized at the capture site (<i>Sub 67</i>).
	Oppose	2	Conservation group, individual.	Trapping is considered inhumane due to stress on horses (<i>Subs 77, 81</i>).
Fertility control	Support	10	Brumby groups, individuals, conservation group	Except for 2 submissions (<i>Subs 22, 32</i>), supporters of this method considered fertility control to be a supplement to other control methods (when effective fertility control methods are developed) and not effective alone (<i>Subs 41, 55, 56, 60, 61, 62, 73, 77</i>). One brumby group proposes to conduct trials of the fertility drug PZP (as used by the US Bureau of Land Management on wild horses) at a brumby sanctuary (<i>Sub 41</i>). Another brumby group is working with the Invasive Animals CRC in Canberra to develop a fertility control process (<i>Sub 61</i>).
	Not feasible	5	Conservation groups, individuals, animal welfare organisation	These submissions specifically mentioned that fertility control would be ineffective in reducing sufficient numbers of wild horses or not feasible because of the costs involved (<i>Subs 19, 26, 64, 81</i>). A submission from an animal welfare organisation (<i>Sub 67</i>) considers the humane and well-regulated application of fertility control by veterinarians acceptable, but understands the method is not sufficiently developed to be a viable option.
	Trial the method	3	Brumby groups.	Conduct fertility control methods at brumby sanctuaries for eventual use in the Alps populations (<i>Subs 41, 73</i>) or the Bogong High Plains (<i>Sub 62</i>).

Control method	Support/Oppose	No. of submissions	Who	Significant points
Shooting	Support	40	Conservation groups, individuals, scientists, animal welfare organisation	<p>Shooting is advocated by about half the submissions, which are divided as follows:</p> <ul style="list-style-type: none"> • 23 submissions mention shooting only, without specifying aerial or ground methods (<i>Subs 1, 6, 8, 9, 12, 13, 19, 21, 26, 29, 31, 34, 38, 39, 50, 52, 53, 55, 56, 64, 71, 82, 84</i>) • 8 submissions mention aerial shooting (<i>Subs 3, 10, 27, 28, 35, 36, 44, 48</i>) • 7 submissions mention a combination of aerial and ground shooting (<i>Subs 7, 23, 37, 57, 58, 65, 67, 77</i>) • 2 submissions only mention ground shooting (<i>Subs, 60, 63</i>). One of these submissions (from a brumby supporter) supports ground shooting because of concerns for the stress suffered by horses in some other methods, but opposes aerial shooting (Sub 60). <p>Most of these submissions considered shooting the most effective and humane method to remove large numbers of horses and many rejected other control methods (such as roping, mustering and trapping) as being ineffective or insufficient by themselves.</p> <p>Many of these respondents note the unpopularity of shooting, but emphasise they believe it is the most effective and humane method for wild horse control. Some refer to the RSPCA position on shooting as a humane method.</p> <p>The desirability of conducting aerial or ground shooting by trained professional marksmen to ensure a humane approach is specified in many submissions (<i>Subs 9, 13, 23, 24, 28, 34, 58, 84</i>). One submission provides the example of an RSPCA supervised wild horse aerial shooting program in Carnarvon National Park in Queensland which uses a second helicopter to verify the death of shot horses (<i>Sub 77</i>).</p> <p>A submission from an animal welfare organisation (<i>Sub 67</i>) considers the biggest issue in wild horse control is stress to horses during control activities. In the absence of humane, effective, non-lethal alternatives, and in some circumstances it considers aerial and ground shooting, when performed under strict protocols by highly competent operators, is the least stressful method of control (especially in rugged country or where large scale control is required). They favour the approach to shooting in Sharp and Saunders' Model Code of Practice for ground and aerial shooting of wild horses.</p>

Control method	Support/Oppose	No. of submissions	Who	Significant points
	Oppose	11	Brumby groups, horse riding groups, individuals	These submissions oppose shooting as inhumane, some mentioning the potential for suffering by wounded animals (<i>Subs 5, 22, 41, 46, 61, 62, 73, 75, 76, 78, 81</i>). Some of these brumby groups are not opposed to humanely euthanizing wild horses caught by other methods and not destined for rehoming (<i>Subs 41, 61, 62</i>).
Other methods		1	Scientific researcher	One submission considered that allowing natural control of introduced grazers by dingos may supplement wild horse control in some areas of the Victorian Alps (<i>Sub 84</i>).

4.2 Destination of captured horses

Several submissions addressed the destination and humane treatment of wild horses after capture by trapping.

Five submissions (from brumby groups) considered **rehoming** to be the preferred destination for wild horses (*Subs 41, 60, 61, 62, 73*). An immediate decision on which horses should be rehomed was advocated. Two submissions considered that horses should be transported to their rehoming destination within 3 days of capture (*Subs 61, 62*).

Some of the submissions specified that **captured horses not destined for rehoming should be humanely destroyed**. Of these:

- 1 submission specified that the destruction of these horses should occur immediately on site (*Sub 60*) and another that slaughter should occur within 3 days of capture (*Sub 62*)
- 2 submissions recommended on site destruction of captured horses if transport to an abattoir could not occur within 3 days of capture (*Subs 61, 62*) or where more than 300 kms in road transport is involved (*Sub 62*)
- 1 submission suggested that a local knackery could be supported to handle the seasonal demand for wild horses and that wild animal meat markets might be promoted (*Sub 62*). This submission also suggested the use of a temporary slaughterhouse in regions with limited road access.

One other submission advocated humane destruction of horses at the capture site (*Sub 53*).

A submission from an animal welfare organisation indicates it only supports the transport of wild horses for relocation or rehoming (Sub 67). It does not support removal and transport of wild horses for lethal control with via saleyards or directly to an abattoir. The organisation considers that wild horses which are not to be relocated or rehomed should be humanely euthanized in situ or at the capture site.

4.3 Managing horse carcasses

Some submissions (from conservation groups, individuals, a brumby group and an animal welfare organisation) point out the potential of wild horse carcasses (whether from shooting or euthanizing at capture sites) to have environmental impacts such as attracting feral dogs, foxes and cats; water contamination; and disease transmission. The animal welfare organisation also refers to the stress to any remaining horses of large numbers of dead herd mates (Sub 67).

Most of these submissions recommend that carcasses should be either removed from the area (Subs 51, 67, 76, 80), buried (Subs 67, 51) or burnt (Sub 67).

One submission opposes removal of carcasses as too costly and considers that carcasses would decompose quickly (Sub 77). Another submission advocates shooting in late autumn so carcasses rot under the snow (Sub 57).

5 Other recommendations

This section outlines recommendations provided in the submissions to improve the effectiveness of the Victorian Alps Wild Horse Management Plan.

5.1 Priority areas for wild horse control

Staged control of wild horses **starting immediately with the smaller Bogong High Plains** wild horse population and then moving to the **larger populations in the east of the Alpine National Park** is advocated by 15 submissions – from conservation groups, individuals, scientific researchers and a tour operator. (*Subs 7, 13, 17, 27, 29, 33, 35, 40, 52, 54, 64, 70, 71, 77, 84*).

The timing and cost of control of large wild horse populations is seen as an issue in some submissions. One submission from a conservation group recommends that management of the eastern wild horse populations should commence with an initial reduction of the population at a ‘manageable cost’ with the aim of gradually removing all horses from the national park (*Sub 82*). One scientific observer emphasises that there needs to be an urgent reduction of the wild horse population to below self-replacement breeding levels to enable damaged areas to begin to recover (*Sub 23*).

One brumby group advocates different wild horse management methods for different areas based on degree of accessibility for humane removal of horses as follows:

- trial of fertility control on the small **Bogong High Plains** population (which the group considers is having minimal environmental impact)
- mustering in the **Nunniiong region** due to good road access for transport and rehoming of caught horses, and to reduce the movement of this population into the Alpine National Park. They wish to do this through an annual Mountain Cattlemen’s Muster to retain this tradition.
- passive trapping in the **Cobberas region**, which has reasonable road access for transport and rehoming
- low stress helicopter mustering in the more remote **Davies Plain** with a temporary abattoir for slaughter on the day of capture.

5.2 Public education and information

The desirability of a public education and information campaign to underpin the wild horse management plan is mentioned in several submissions (*Subs 3, 36, 58, 67, 68, 82, 84*). A submission from an animal welfare organisation considers public education on the relative humaneness of various control options is essential if management approaches are not be guided by ‘public perceptions’ and adverse impacts on horse welfare are to be avoided (*Sub 67*). One submission recommends that public education cover animal welfare, costs of control methods, effectiveness of methods and the nature and extent of environmental damage in the Victorian Alps (*Sub 68*).

5.3 Provision of adequate resources

Several submissions recommend that wild horse management needs to be adequately funded in the long term to ensure its effectiveness (*Subs 2, 55, 67, 68*). A submission from an animal welfare organisation indicates that a management strategy should provide for short and long term funding for effective ongoing management - including sufficient personnel, suitable access and vehicles, and appropriate removal of removed horses (whether alive or culled).

5.4 Cross-border cooperation with NSW

The need for a concurrent wild horse control program in the Victorian and NSW Alps to prevent wild horses reinvading areas of Victoria from which they had been removed is recommended by 6 submissions (*Subs 6, 7, 23, 37, 68, 82*).

5.5 Rehoming and relocation of wild horses

Three submissions from brumby groups provided advice on practices to ensure the welfare of wild horses during the **rehoming process** and once relocated (*s 41, 61, 62, 73*). Recommended measures included:

- initial placement of wild horses with experienced rehoming groups or brumby sanctuaries
- requirement for applicants wanting to rehome brumbies to provide references
- veterinary checks on horses after the first 6 and 12 months
- guidelines (developed with the RSPCA) for transport and receipt of wild horses removed from Guy Fawkes National Park in NSW (*Sub 41*).

One submission suggested that sale of removed horses could be a way of recovering the costs of removing wild horses from areas with low populations, such as the Bogong High Plains (*Sub 84*).

One brumby group advocates the establishment of **brumby sanctuaries** on or next to national and state parks which could be developed as tourist attractions enabling people to see and work with brumbies (*Sub 73*). The submission suggests that income from tourism and the sale of 'home ready' horses could be used for ongoing management of wild horses in parks.

Several submissions (from conservation supporters and a conservation group) suggest the establishment of some wild horses removed from the Victorian Alps as a **wild population in another location outside conservation reserves** as a way to continue the wild horse heritage tradition (*Subs 35, 53, 65, 82*). Two of these submissions suggest this be done by brumby supporters on private land. The third submission suggests that such a scheme might be funded by government, but should be separately funded from national park/conservation reserve budgets (*Sub 82*).

One brumby group **opposes the establishment of a wild horse population outside the Alps** as they believe this would result in the strain of alpine brumbies losing their 'core qualities' (*Sub 61*).