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## VICTORIAN BRUMBY ASSOCIATION NATURAL RESOURCES COMMISSION

### KOSCIUSZKO NATIONAL PARK BRUMBY MANAGEMENT SUBMISSION

#### BACKGROUND

One of the world's great national parks, and the largest in New South Wales, Kosciuszko National Park covers 690,000 hectares. The park contains the highest mountain on mainland Australia, the famous Snowy River and all NSW ski fields. Its many and varied attractions include walks through alpine herb fields; spectacular caves and limestone gorges; scenic drives; and historic huts and homesteads.

KNP also contains the Alpine Brumbies that are intrinsically linked with our heritage; the Brumbies made immortal by Banjo Patterson and Eleyne Mitchell. These Brumbies have roamed many regions of KNP for up to 200 years and by their very links with our nationhood, are a contentious management issue.

The National Parks Act has two over arching principles; to protect the native flora and fauna contained within the park and also to protect the social and heritage values contained within the park. Brumbies are clearly linked to and part of our post settlement history. They're entwined with our culture and our national sense of identity. As such, the National Parks Act requires that they be protected.

The 2016 Draft Plan of Management for the Kosciuszko Brumbies has just been released and is currently undergoing a community consultation period.

#### ISSUES

The Draft Management Plan (DMP) plan states that it is planned **to lower the population of Brumbies in KNP to 400- 800** over the coming ten to twenty years. In 2003, a single bushfire event in KNP wiped out 2500 Brumbies. If the population had been this low, the Brumbies of KNP would have been eradicated.

Page 23 of the Draft Plan states that should the remaining populations (once 400 – 800 is reached) be threatened or wiped out by natural events, they will be neither supported nor replaced.

Such a low target population places the Kosciuszko Brumby at risk of extinction within the next twenty years.

The DMP contains many disturbing inconsistencies and 'facts' that are simply wrong.

Commencing with just a few such as:

- **p 11 '...Mares can foal from 1-2 years of age..'**. Mares don't begin to cycle until 12-14 months, therefore allowing for an 11 month gestation, it can be easily seen that this is incorrect and we have verified with the references quotes that they have never stated this.
- **rehoming statistics are incorrect**, stating in just one example, rehoming rates in 2010 of only 8 Brumbies or 3% of those caught. The VBA alone in 2010 rescued and rehomed 23 Brumbies directly from NPWS which, if added to the 8 shown would actually total 31 Brumbies rehomed, or 11% of those caught – a significant difference!
- **Ground shooting:**

- The Draft plan states that ground shooting would be undertaken in accordance with the relevant Code Of Practice (COP) however the COP states that ground shooting should only be undertaken where the terrain is NOT hilly, treed or rugged – which almost all of KNP is!
- The COP also states that entire mobs should be shot together and Brumbies should be stationary when shot.
- It goes on to state that if the stallion is shot, the rest of the mob will mill around and be easily shot. The last fact is correct for Camels, but not Brumbies, where the lead MARE will lead the mob to safety – at speed!
- The Humanness assessment rates the level of distress as only ‘moderate’ for ground shooting, taking into account ‘the high risk of being wounded’ and ‘suffer a painful and protracted death’. This given that truck transport is comparatively rated at ‘severe’ in the same domain makes absolutely no sense.
- Therefore shooting an entire mob of stationary Brumbies simply isn’t possible.
- **Mustering for Euthanasia:**
  - The Draft plan states that this would be undertaken in accordance with the Mustering COP. It also states on both pages 29 and 30 that carcasses would simply be left ‘in situ’ to rot due to the high cost of disposing of carcasses.
  - The COP for mustering states that all carcasses must be disposed of appropriately by either burning or burial.
- **Fertility Control:**
  - The Draft plan states that fertility control requires Brumbies to be mustered and trapped and is therefore stressful and expensive. This is incorrect.
  - The Humanness assessment states that fertility control can be applied to either trapped Brumbies or via dart gun from a helicopter. This is incorrect.
  - Darts cannot be fired from helicopters due to the air disturbance making aiming a dart impossible. We have personally spent time with two different fertility control programs in the USA where fertility control is administered to free roaming wild horses – in one instance, the entire mob being treated by a woman in her 70s! Both programs are government endorsed and have published, scientifically proven results. This method has been used in the USA for thirty two years and has a huge amount of published, peer reviewed science behind it!
- **Prevention of Cruelty to Animals Act:**
  - Throughout the Draft plan, there is mention of complying with various Codes of Practice, however many of these are incorrect and outdated.
  - At no time is the Prevention of Cruelty to Animals Act, the overriding legislative imperative, mentioned. This is a grave concern.
  - Even in the summary of the Draft Plan (page 3), cost effectiveness is mentioned prior to humaneness.
- **Risk to Motorists:**
  - The risk to motorists has been highly overstated in the Draft plan, on page 20, where it is stated as being ‘moderate to high’.
  - Between 2008 and 2015, the VBA worked on an advisory group with NPWS and RSPCA regarding the Brumbies of KNP. IN this time, the risk to motorists was identified by NPWS as an issue. In an attempt to ameliorate this risk, we (VBA) wrote to the NSW Roads and Maritime Service in 2013 to request that speed limits be lowered. This request was refused and we were advised that the risk to motorists was ‘negligible’ in comparison to other wildlife.

## **MANAGING THE BRUMBIES OF KOSCIUSZKO NATIONAL PARK FOR THE FUTURE**

The question should be asked, is there a humane, effective and cost effective way of managing the Brumbies of Kosciuszko National Park at a sustainable level into the future?

## **RESEARCH**

One of the main flaws of the 2008 Wild Horse Management Plan is of that the various research goals indicated at the end of the plan, most were not undertaken, leading to a lack of science based evidence of impacts. There is a clear need to quantify both the positive and the negative impacts that Brumbies can have on the variety of ecosystems they exist within. Programs such as the one undertaken in KNP to slash grasses for the Sun Moth to breed could be merged with the broader management of Brumbies in the National Park, using the Brumbies grazing habits as a benefit to the ecosystem. Conservation grazing is used widely in Europe and other parts of the world for just this purpose. Indeed NPWS itself uses conservation grazing to lower grasses for nesting birds already (although not in KNP).

The recently released report 'An assessment of feral horse impacts on treeless drainage lines in the Australian Alps' indicated that in areas where Brumbies were present, during bushfires, those areas either did not burn or burned cooler. Snowgums are known to not re-establish after particularly hot burns, therefore the presence of Brumbies in these environments is clearly of benefit and worthy of further study.

## **TARGET POPULATION**

An agreed target population should be one that would survive naturally occurring events such as bushfires, extreme winter (snowfall) events etc. The bushfires that burned through the KNP region in 2003 wiped out more than 2500 Brumbies, so clearly a population as low as 400 is not sustainable.

Given the huge area of land that KNP occupies, the VBA feels that a population of 4000 is sustainable with minimal negative impact and a great deal of positive impact. Once the Central region of the NP has no Brumbies, we estimate that an appropriate split would be to retain around 1000 Brumbies in the southern region and 3000 Brumbies in the northern region.

## **MANAGEMENT PROGRAM**

The following methods and figures show that it is quite possible to humanely, effectively and cost effectively remove high numbers of around 700 Brumbies per year for around five years prior to assessing the remaining population via a count of numbers and also an assessment of impacts (which would be more important than the numbers). We estimate that removing this figure of Brumbies for five years would leave around 4000 Brumbies across KNP.

### **Fertility control:**

- Bago, Maragle and other region (to be identified – potentially in the Southern region)
- Run by community groups using citizen scientists as per attached plan
- 2 trails in areas with populations of around 250
  - o 50 mares treated in each population (around 50% of mares)
    - 100 foals not born each year
- Cost less than \$200/ Brumby not born

### **Passive Trapping:**

- Long Plain, Kiandra, Tantangara dam etc
- Snowy Plains
- Conducted in house by NPWS rangers
- Remove 300/ year
  - o Important to provide further support for rehoming groups
- Cost around \$1074 (NPWS provided figure, although DMP states \$1094?)/ Brumby trapped

### **Muster for rehoming:**

- Region to be identified
- Run by local organisation as per NZ Kaimanawa model
- Remove 200 / year

- Important to provide support for rehoming
- Cost around \$800/ Brumby mustered

**Muster for Euthanasia – limited application only:**

- Inaccessible regions such as lower Pilot wilderness area
- Only considered where road access is absent, fertility control is not viable (due to access issues) and Brumby numbers must be managed based on measured impacts on both the environment and the Brumbies themselves.
- Conducted in house by NPWS qualified staff, supported by Brumby Advisory Committee
- Brumbies euthanased on site in portable knock box/ screened from other Brumbies.
- Cost estimate similar to that of Trap for rehome - \$1074

**Ground shooting of uncontained Brumbies – extremely limited:**

- This method should only be used for euthanasia of injured, single Brumbies due to the flee nature of horses and the inability to follow up on injured Brumbies.
- Conducted in house by NPWS qualified staff, supported/ advised by Brumby Advisory Committee

**ONGOING HUMANE MANAGEMENT OUTCOMES**

Once achieved, maintaining the population at the level of around 4000 Brumbies would require the removal (or fertility control of) only 400 – 450 Brumbies per year. The 1000 Brumbies in the southern region, where there is less road access for trapping and removal could be controlled using fertility control. In the Northern region, there could be some fertility control (potentially around the Bago/ Maragle region) with the remaining Northern population, which has good road access, being trapped or mustered for rehoming purposes. Currently, up to 180 Brumbies per year have been rehomed and with further support for rehoming groups, a higher number is achievable.

**SUPPORT FOR REHOMING**

It is imperative that NPWS support the rehoming of Brumbies. This is currently done by charitable groups who fundraise and use personal funds to rescue, train and rehome Brumbies caught by NPWS. Lifting the capacity of those key groups to rehome more Brumbies would assist in further developing a humane program where Brumbies who must be removed from KNP are given a chance for a future.

**TRANSPORT FOR SLAUGHTER**

The current situation where almost all of the Brumbies removed from KNPW are transported extremely long distances for slaughter is reprehensible and incredibly inhumane. Bound for Peterborough in South Australia, these Brumbies face a journey of around 1300 kilometres which may span several weeks as they are 'pooled' at various depots whilst full loads are put together to make transport viable. The cumulative stress of such a voyage is totally unacceptable and must be stopped.

**FURTHER DISCUSSION**

The Victorian Brumby Association is committed to being a part of the solution for the Brumbies of Kosciuszko National Park and would be happy to further discuss any of the information included in this brief report more fully.



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## **VICTORIAN BRUMBY ASSOCIATION**

### **KOSCIUSZKO NATIONAL PARK BRUMBY FERTILITY CONTROL PROGRAM SUBMISSION**

#### **Background.**

One of the world's great national parks, and the largest in New South Wales, Kosciuszko National Park covers 690,000 hectares. The park contains the highest mountain on mainland Australia, the famous Snowy River and all NSW ski fields. Its many and varied attractions include walks through alpine herb fields; spectacular caves and limestone gorges; scenic drives; and historic huts and homesteads.

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#### **The current situation.**

- Passive trapping program run by expert rangers at a cost of \$1074 per Brumby removed (figures obtained from NPWS)
- Population varies across the KNP from low to medium density.
- KNP demonstrates many areas where the environment is extremely healthy and Brumbies are clearly shown to be present.
- There is no current region specific published studies on effective, humane, cost effective Brumby population control methods.
- Without management, peer review research worldwide shows that wild horse populations can increase at 10% when wild horse yearling survival rates are taken into account.

#### **Aim.....**

- To manage the population of Brumbies in two regions of the KNP to retain the high environmental value of the area whilst also preserving the rich cultural history of the settlement of the region.
- To maintain genetically viable, healthy mob of Brumbies for current and future generations to observe and experience for the benefits of:
  - o Learning about our cultural heritage
  - o Observing and learning about wild horse behaviour to benefit the management of domestically kept equines.
  - o Trial fertility control in a best practice method to better understand its application to the Australian environment

- To maintain a 'status quo' on a healthy, stable environment by maintaining all current residents of that environment. 'Do no harm' (see Issue box 1, Greater Alpine National Parks Draft Management Plan June 2014) is the first ecological principle.

#### **Method.....**

- Study and map Brumby mobs within area
- Strengthen partnership with Sporting Shooters Association NSW (SSANSW) re delivery method
- Strengthen partnerships with Universities regarding ongoing scientific studies.
- Build community support group to call on for monitoring and recording training to assist with program.
- Deliver 'citizen scientist' program to community observers to assist with recording foaling/ deaths/ other relevant events.
- Work with National Parks and Wildlife Services Rangers to record observations they make as part of their regular duties re foaling/ deaths etc
- Target delivery program – ideally late Spring/ early Summer so can record births etc at the same time as delivery.
- Work with NPWS and SSANSW to develop plan to maintain park user safety whilst delivery program is occurring (estimated to be 10 days in each of years two, three and four of the program).
- Delivery team: 1 shooter, 1 observer/ recorder for delivery and recording of important data
- Report in draft form annually in February on progress, trends noted, statistics
- Program to run for five years:
  - o Year 1 – Study and mapping of existing mobs, observation of foaling rates etc. Develop with NPWS, concepts for studies of ecology to be undertaken in conjunction with fertility control trial.
  - o Year 2 – Active delivery of PZP to 50 of breeding age mares in each region chosen for trial. Also recording of last 'non control' fertility year. Report to NPWS on final planning stages of delivery program.
  - o Year 3 – Recording of results of first 'control' year. Active delivery of PZP to 50 breeding age mares in each region chosen for trial. Draft report to NPWS on progress of program.
  - o Year 4 - Recording of results of second 'control' year. Active delivery of PZP to 50 breeding age mares in each region chosen for trial. Draft report to NPWS on progress of program.
  - o Year 5 - Recording of results of third 'control' year. Final report to NPWS on progress of program. Publish results of program. Consider/ Develop plan for ongoing management of KNP using fertility control.

#### **Potential supporting studies....**

- Population demographics/ increase estimation, using yearling survival rates.
- Grazing habits – seasonal and general, weed control (ie grazing of introduced grasses etc)
- Genetic studies using field collected hair samples. This will allow us to measure and compare level of inbreeding, contributing breeds, genetic health considerations etc.

## **Benefits.**

- This is a first of its kind program – it will attract considerable attention and has opportunity for further development and roll out to other areas.
- The management of Brumbies in Australia is a hot and contentious topic. NPWS have the opportunity to be seen as trailblazers in the area of humane population management whilst maintaining an already healthy environment.
- Significant cost saving over current program costs of \$1074 for passive trapping vs less than \$200 for fertility control (with no impact of unborn Brumbies nor their removal).
- Avoidance of horse and ranger injury due to risks associated with current program and timing.
- KNP is a healthy, dynamic, stable environment. Altering any part of that will have inevitable flow on effects. This is an opportunity to retain this environment for future study.
- Retaining the rich cultural history of the region and our country; horses were an integral part of the exploration and settlement of this region and Brumbies have run in this area for all of post settlement history.
- Tourism currently draws on the local Brumbies. Many local tour operators offer the opportunity to see Brumbies in the wild as a drawcard. As a reasonably accessible location, there is the opportunity to build on Brumby tourism to bring further economic benefit to the area.