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STATEMENT OF ISSUES AND ACTIONS FOR THE: DRAFT KOSCIUSZKO BRUMBY PLAN 2016.

BACKGROUND:

On Sunday the 1st of May, 2016, after a period of managed public consultation, the Draft Wild Horse Management Plan for Kosciuszko National Park was released to media. Stakeholder groups were advised after the release of this fact and have since been studying the plan and associated documents, totalling some 600 odd pages of documents.

The Draft Plan is now logged for a 60 day community consultation period. This has already commenced and will continue until the 19th of August, 2016.

ISSUES/ INACCURACIES AND LIES:

Based on the research we have undertaken, we have identified many, many issues, inaccuracies and information that could at best be described as incorrect, at worst, as an example of National Parks and Wildlife Service deliberately misleading the voting, taxpaying public. An example of just some of these include:

FACTS AND FIGURES:

- **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!
- **Reproductive ages for Brumbies.** The Draft Plan states on page 11 that Brumby mares are capable of having foals from 1-2 years of age. Given an 11 month gestation period, this indicates that fillies could become pregnant at only four weeks of age. This is physiologically impossible in a species where fillies typically don't become reproductively mature until around 14-18 months, meaning that the absolute earliest a filly could have a foal of her own would be 2 and a half years, more commonly three years of age.
- The Draft 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.

HUMANENESS:

- **Ground shooting:**
 - o 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!
 - o 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!
- Injury to fleeing Brumbies has been included as a possibility in the ITRG Humane assessment, but clearly not given enough weight – we feel ANY injured Brumby is not acceptable. If by comparison, they were yarded for shooting/ euthanasia, not one Brumby would escape injured
- The Humane 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.
- **Muster 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. This is in direct contravention of the COP (below)
 - 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 Humane assessment states that fertility control can be only 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 humane.

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.
- Over the past fourteen years, there has been only 28 incidents on the roads through Kosciuszko National Park involving horses. This is only 2 per year. Compared to other wildlife incidents, we agree that the risk is minimal.

ACTIONS – WHAT YOU CAN DO:

- **READ** the [Kosciuszko National Park Draft Wild Horse Management Plan 2016](#)
Then
 - **ASK QUESTIONS** and do research. Don’t believe everything in the plan, supporting documents or on facebook!
 - Planning process general inquiries email Kosciuszko.wildhorseplan@environment.nsw.gov.au
 - Media enquiries re: draft wild horse mgmt plan to OEH Public Affairs Team Ph. 02 9995 5347
 - Your local Brumby advocacy group – see www.australianbrumbyalliance.org.au
- Then

- **REPLY** on the Online form <http://www.environment.nsw.gov.au/protectsnowies/>
Or
- **EMAIL** your comments to: kosciuszko.wildhorseplan@environment.nsw.gov.au
Or
- **POST** your submission to:
The Project Officer , Kosciuszko National Park Wild Horse Management Plan Review
National Parks and Wildlife Service, PO Box 2228
Jindabyne NSW 2627.
And
- **WRITE** to anyone who will listen, such as:
 - o **The Hon Mike Baird**, NSW Premier
Contact form: <https://www.nsw.gov.au/your-government/contact-premier-new-south-wales>
Level 40, Governor Macquarie Tower, 1 Farrer Place, Sydney NSW 2000
 - o **Mark Speakman**, NSW Environment Minister - to NPWS
Contact form: <http://nsw.liberal.org.au/contact-2/>
Locked Bag 2, Kings Cross NSW 1340
 - o **Tom Bagnet**, Director metropolitan and Mountains NPWS
Email: info@environment.nsw.gov.au
14, 59-61 Goulburn St, Sydney NSW 2000
 - o **Penny Sharpe** Shadow Minister for the Environment and Heritage (Labour)
Email: penny.sharpe@parliament.nsw.gov.au Level 14, 59-61 Goulburn Street, Sydney NSW 2000
 - o **Animal advocacy groups**
 - o Your **local member** for Parliament
- **ATTEND** a rally to speak up for Brumbies at your local state parliament office!
 - o Melbourne: *TBC* June 23rd, 2016 – more information to come.....
 - o Sydney: *TBC* June 23rd, 2016 – more information to come.....*And*
- **CALL** your local **Brumby rescue or advocacy group** to see what you can do help the Brumby cause!
 - o www.victorianbrumbyassociation.org for up to date information on Victoria and New South Wales, merchandise and contacts.
 - o www.australianbrumbyalliance.org.au for Australia wide information and group contacts.

This is a critical time. Lets not be the generation who has to explain to our grandkids why there are no Aussie Brumbies in our Aussie High Country!

‘Unless some like you cares a whole lot, nothing is ever going to change...’ *Unknown*