

# Impacts and management of feral horses in the Australian Alps

## AJP Submission Guide

### Introduction

Brumbies are introduced free-roaming horses that have existed in Australia since European invasion. Brumbies are sentient animals that are worthy of protection, yet they have also attracted controversy due to competition with native animals and environmental damage, particularly in sensitive alpine areas.

**The Animal Justice Party (AJP) opposes the use of cruel, lethal control methods against brumbies including aerial and ground shooting. Where intervention is proven necessary, humane non-lethal options should be used.**

This Parliamentary Inquiry presents an opportunity to discuss the future of brumbies in our alpine areas and to make recommendations. **The Inquiry is broad, looking at all aspects of management, so this is not just about ‘kill or don’t kill’**, it will consider the relevant state laws, the ecological and cultural management of the environment where brumbies live and also allows you to tell your story or describe your experience with brumbies.

However, population numbers of introduced horses are an important aspect of the enquiry. Current management plans focus on reducing numbers by shooting horses and whilst non-lethal measures are touched upon, this mainly consists of rehoming, despite an admission that there are insufficient resources to facilitate this in any great numbers.

**Lethal control (killing/culling) is currently favoured by Government agencies** such as Agriculture Victoria, Parks Victoria and the Department of Energy, Environment and Climate Action, who are responsible for the ‘management’ of introduced species’. **The greatest issue is**

**that non-lethal approaches are not even being considered.** The current arguments against them are ‘too expensive’, ‘too difficult’, ‘not enough evidence’, yet if no resources are diverted to further research, then we’ll never know if these measures could work practically.

**This is your opportunity to advocate for funding and consideration of more humane methods of controlling brumby populations.** Given that existing strategies have only had short term and localised impacts while being the default solutions over many years, the impact of non-lethal strategies is likely to take more time to become effective. Consequently, it is important that we adopt a longer-term view toward population control of introduced species.

## Consultation Details

For details on the terms of reference for the enquiry, go to [Impacts and management of feral horses in the Australian Alps](#) on the Parliamentary enquiry website.

Consultation closes on Friday, 28th April 2023 with feedback to be provided via the [Parliament's Online Submission Portal](#).

## How to make a Submission

If you have not used the Parliamentary portal before, you will be required to create a login. Otherwise, please use your pre-existing login.

You will be required to complete a few steps, before you can upload your submission;

1. Ensure you select the correct consultation from the drop down menu (Impacts and management of feral horses in the Australian Alps)
2. You will be asked to enter your contact details again. This is important, if they cannot verify your existence, your submission will be ignored.
3. You will be asked to specify whether you are happy for your submission to be published and if so, can it include your name?
4. Lastly, make sure your submission is in one of the following formats: PDF, DOC, DOCX, TXT, then upload and submit!

## Ideas on How to Respond

There are 5 areas that the consultation asks you to comment on. You may choose to discuss as many of them as you would like (although #2 and #3 may require more specialised knowledge), OR you may focus on a particular topic or area that you are more passionate or knowledgeable about.

1. Discuss the impacts of brumbies on biodiversity, ecology, Indigenous cultural heritage and the Murray, Murrumbidgee, Snowy and Cotter River's headwaters. Identify the best practice methods to decrease the population of brumbies (in order to minimise these impacts in future).
2. What are the Commonwealth's responsibilities and what powers do they have to act on brumbies? This includes considering their rights and responsibilities under the EPBC Act 1999, as well as International treaties.
3. How do State and Territory laws interact with Commonwealth law, and how adequate are they at managing brumby populations?
4. How can we repair and restore the environmental impact of brumbies in the Australian Alps? Especially with regards to impacts on known threatened species.
5. An opportunity to add any other points you would like them to consider. (This is your opportunity to include a personal experience or anything you believe is relevant to this inquiry that's not covered in the areas above).

## Below are some points you may like to focus on in your submission:

### 1a. The Impacts of brumbies

- It is generally agreed that there are significant environmental issues with brumbies existing in Alpine region national parks, and that numbers are left unchecked, the damage will continue.
- The types of damage most often cited are soil compaction and erosion, trampling native vegetation, destroying sphagnum bogs and polluting waterways. They can also help to spread invasive weeds. As they have no predators and they breed relatively quickly, wild horses can put undue pressure on the landscape in a relatively short period of time.

- It's not a good idea to downplay the ecological arguments that relate directly to Alpine ecosystems (unless, of course, you have very strong scientific evidence). This will give the impression you are not aware of the problems. As animal advocates, we consider the needs of all animals. In this case, our arguments should strike a balance between good welfare and the right of ecosystems, and animals living within the ecosystems, to thrive.
- Generalised arguments about the environmental damage that humans do or that climate change does to threatened species overall only deflect from the issue, and are outside of the scope of the submission.
- Some organisations, like the Australian Brumby Alliance, argue that there can sustainable populations of brumbies within the Alpine National Parks, however, evidence to support this is hard to find.
- Wild horses can have positive effects on the environment by sequestering carbon, reducing bushfire loads, and converting drier grasses into fresher, greener grasses, but these positive impacts are more apparent in over-grazed farmland than in Alpine regions.

## 1b. Population Control methods

### Immunocontraception

- This method involves administering contraception via a dart gun. It is designed to be a long- term solution to the problem of over population.
- There have been trials in the USA, which have been successful, many of which have been based on preserving the species, but some of which have been used to control 'pest' species.
- It is often said that this method won't work to control populations in Australia, however no trial has actually been carried out here, and we invite the various government agencies to carry out a trial.
- It is considered to be a humane method and does not have an affect on the animal's ability to carry out their natural behaviours.

### Aerial Shooting

- Aerial shooting is the method that appears to be favoured by various government agencies, such as Parks Victoria and National Parks Association of NSW, despite disastrous attempts to use it in the past.
- It's useful to talk about past examples where aerial shooting has produced disastrous results, and invoked public outrage. A well documented example is the shooting that took place in the Guy Fawkes River National Park, where over 600 brumbies were shot from helicopters in a cull contracted by the NSW National Parks and Wildlife Service. The resultant public outcry and eyewitness evidence of inhumane practices resulted in a lawsuit by the RSPCA against the NSW NPWS as well as the Environment Minister.<sup>1</sup>
- A good point to make is that wild horses are bad targets for aerial shooting, due to their flighty natures. As they are prey animals, alert to any danger and quickly panicked, their natural response to the helicopter is to run; this makes it more difficult to accurately shoot them.
- Paradoxically, shooting can also lead to increased numbers if animals are fertile as there is more feed available and mares will be in condition to produce more offspring.

### Removing Brumbies from National Parks

- Australian brumbies have an important place in the Australian psyche, and among certain sections of the population, are a much-loved animal. As such, they could be a popular tourist attraction that could draw visitors to the regions. It is better to suggest that they become incorporated into regional eco-tourism outside of the parks, rather than have them stay there.
- There are currently organisations that run brumby sanctuaries. With some investment, this could be encouraged.
- There are some agencies that help people to adopt brumbies. This has been on a small scale until now, but with some investment, this could also be encouraged.
- Due to their potentially positive effect on the environment, and their ability to regenerate over-grazed land, wild horses can be deployed to farmland to maintain grasses and help to re-wild over-grazed areas.

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<sup>1</sup> <https://australianbrumbyalliance.org.au/reviewing-the-october-2000-aerial-shooting-of-guy-fawkes-brumbies/>

- If you have an idea that you're not sure will work, there's nothing wrong with including it anyway, as an example of something the Government can look into. One of the biggest problems with animal management in Australia is the reluctance to research different methods of solving the problem. Remember, we're not expected to have all of the answers, but we can challenge the Government to research new methods or to invest in different solutions.

## 2. Commonwealth rights and responsibilities

- The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) is the key Commonwealth Legislation to protect the Australian environment and endangered and threatened native wildlife within the Commonwealth of Australia. This Legislation offers no protection for introduced animals including wild living horses or Brumbies.
- Under Australian legislation the Brumby is classed as 'feral' and is treated as such. There is no provision for their protection, preservation and continuation of the genetics into the future.

## 3. Commonwealth Vs State/Territory Laws

- In Victoria, there is no Legislation to protect wild living Brumbies within the 2 key areas, namely Barmah National Park and the Eastern Alps of the Alpine National Park Victoria.
- The United Animals Nation has strongly requested all countries of the world to conserve its wild horse breeds as with continued inbreeding of our domestic horses we will soon be looking to our wild horse populations to put back the strength and endurance we are rapidly losing in domestic horses. This alone, is a valid and real reason for the Government to introduce sustainable, long term management programs.
- In Victoria, feral horses have been formally recognised as a 'threatening process' under Victoria's Flora and Fauna Guarantee Act 1988. Parks Victoria therefore has an obligation to reduce their numbers.

## 4. Environmental Restoration

- Restoration of riparian environments such as wetlands, streambanks and drainage lines can be achieved through rewilding and conservation efforts. One key way to restore

riparian environments is through planting native vegetation that increases stability of the soil while also having other biodiversity benefits.

- In order for re-wilding to be effective, the number of animals must also increase.
- Removing the horses would remove a significant amount of biomass from the parks, which if not replaced in an effective way, decreases the ecosystems' chance of restoration. This requires experts in the field of re-wilding to oversee.

## 5. Additional info - Tourism

- The potential to attract people into the high country simply to see brumbies in the wild would be enormous. Walking tours could include looking for wildlife and visiting the historic huts in the region, combined with using existing accommodation options. Supporting ethical ecotourism options creates local jobs and supports regional communities for the future.

## Conclusion

Humans are responsible for the impact of introduced species, through poor decision-making.

We must not vilify 'pest' species.

Please use this consultation to send a strong message that we need to consider all possible alternatives in managing the populations of brumbies – and that non-lethal measures can be effective, and should be considered as part of this and any future management plans.

Please reach out to Nat Kopas if you have any questions or would like to discuss further:

[advocacy@ajpvic.org.au](mailto:advocacy@ajpvic.org.au)

Thank you for being a voice for animals.