



Protection of the Alpine National Park – Feral Horse Strategic Action Plan 2018-2020 (Draft)

**Submission from the Australian Veterinary
Association**



The AVA

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9,500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife. Government veterinarians work with animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We also have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association. The AVA has a range of special interest groups (SIGs), allowing members with shared interests or expertise to develop their practice and skills in a specific area. For the purposes of reviewing the *Protection of the Alpine National Park – Feral Horse Strategic Action Plan 2018-2020 Draft* (Draft Plan), three of AVA's special interest groups – *Equine, Conservation and Biology* and *Animal Welfare and Ethics* – have been consulted for their expertise and knowledge to produce this submission.

Summary

The AVA accepts that the number of horses currently residing in the Alpine area is threatening the habitat critical to plants and other animals and impacting catchment and water qualities - amongst other negative environmental outcomes that are outlined in the *Draft Plan*. To be able to achieve fauna and flora conservation goals as well as reducing competition for finite food and water resources, it is apparent by evidence outlined in the *Draft Plan* that a reduction of feral horses in Victoria's national parks may be necessary – provided the management is humane and justified. It is pleasing that the *Draft Plan* will observe national codes of practice and standard operating procedures for the management of feral horses and that annual reviews of operations will be undertaken to determine progress in the delivery of the management actions outlined in the *Draft Plan*.

Many Australians are concerned about the humaneness of feral horse control methods. Management efforts across Australia varies significantly due to the varying abundance of feral horses, the different pest status among states and territories, available resources, differing environments or topography, and existence of regional (cross-jurisdictional) management plans. It is suggested in the *Draft Plan* that a target removal of 1200 horses over a three-year period will contain population growth (400 per annum) and the removal of 200 horses per year would keep current levels stable, allowing for births and natural deaths.



Fauna and habitat dependency

The *Draft Plan* justifies in part, the removal of horses on the basis of their impact on small mammals like the Smoky Mouse (*Pseudomys fumeus*) and Broad-toothed Rat (*Mastocomys fuscus*). It states that “*The opening up of these grasslands makes the broad-tooth rat and other native species more vulnerable to predation by introduced predators such as feral cats and the European red fox.*”

On reviewing the scientific literature of The Action Plan for Australian Mammals 2012, it suggests that the threats with a ‘severe’ consequence rating for these species are predation by red foxes, inappropriate fire regimes, global climate change, habitat loss and fragmentation. The direct effect of feral herbivores on habitat change and resource depletion is rated as ‘moderate’.

Therefore, removal or the reduction of the number of feral horses is unlikely to save these species and an integrated approach that targets foxes and cats effectively is required.

Proposed control methods

The concerns of the AVA are for the welfare of the feral horse population being managed, and for protection of the natural or agricultural values important to the particular area. Available control methods include trapping and mustering, capture and removal, fencing, and aerial and ground shooting.

The *Draft Plan* indicates the following regarding proposed control methods:

- **Trapping will be used as the preferred control method**
- **Mustering will be trialled as a secondary control method**
- **Roping will be suspended as a capture method while scientifically evaluated**
- **Fencing will be researched and will be considered in at least two restoration areas that will be established**
- **Fertility control will not be used**
- **Shooting will not be used to control free ranging feral horses**

The *Draft Plan* does not give a welfare explanation of these choices. The AVA believes this should be included. Current best practice for maximising the welfare outcomes for the horses is published on the website of the Australian Government Department of Agriculture, Fisheries and Forestry – *A Model of Assessing the Relative Humaneness of Pest Animal Control*



Measures (Second edition June 2011). This recommends using a *Humaneness Matrix* to assess the best welfare outcome for the horse. It compares the welfare impacts prior to death (trapping, transporting, mustering) and the method of death.

Trapping

This method must be administered in accordance with *Standard Operating Procedure HOR004: Trapping of feral horses*. The following must be adhered to:

- Trap yards must be constructed around water sources
- Trapping must be administered during dry periods in cooler months when horses drink regularly and are congregating around water holes
- Traps must be monitored regularly – minimum once daily
- Feed and water must be available for all trapped horses to access
- Trap gates must be large enough to allow large stallions to enter
- Trap gates and fencing must not have loose wire or sharp edges
- Trap yards must be large enough for each horse to have space to avoid social stress
- Trap yards must provide appropriate shade and shelter

As capture and handling increases stress on feral horses that are not accustomed to confinement or close contact with humans, there are many conditions that may arise such as capture myopathy, heat stress and dehydration, physical injuries, fighting between horses, stress induced infections, feeding disruption (resulting in ill-thrift or colic) and abortion in pregnant females. There is also a risk of other animals such as macropods entering traps. These possible outcomes must be considered when resourcing this operation and **at least one experienced equine veterinarian must be present at each site where this occurs, to assist in the management of this process and to assess, treat or administer euthanasia to animals**. This is essential to maximise the welfare outcomes for the horses.

Mustering

This method must be administered in accordance with *Standard Operating Procedure HOR004: Trapping of feral horses*. If mustering is used as a secondary control method as planned, the following must be adhered to:

- Operators must have a good knowledge of horse behaviour and moving patterns and be familiar with the terrain to avoid dangerous areas
- Mustering must be administered during cooler months to avoid heat stress
- Mustering must not take place if horses are in poor body condition



- Distances that the horses are to be mustered should be kept to a minimum by using portable yards
- Feral horses should be handled quietly without force, to avoid trampling
- Avoid mustering when females are foaling or have young at foot (avoid spring and summer months)
- Dogs or electric prods must not be used
- There must be sufficient holding yards to avoid mixing unfamiliar groups or individuals.

The mustering control method may result in the same conditions for the horses as does the trapping method and therefore it is vital that **at least one experienced equine veterinarian must be present at each site where this occurs, to assist in the management of this process and to treat or administer euthanasia to animals** during these operations.

Roping

This method is not supported by the AVA. This method causes considerable stress to feral horses and there is no evidence that suggests this is an effective method.

Fencing

Fencing to protect high asset areas is supported by the AVA provided that the fencing is designed in such a way that horses will not become entangled or injured and that the fencing does not hinder horses accessing sources such as waterways.

Fertility control

This is currently not considered a practicable option by the AVA and considered 'not currently effective' in the *Model code of practice for the humane control feral horses*. This is because hormones to control fertility are difficult to administer and annual treatment would be required. To impact large populations, fertility control alone will be ineffective due to the long life of horses.

Shooting

Although this method has been ruled out of this *Draft plan*, the AVA strongly recommends that this be reconsidered. Ground and aerial shooting (only if carried out by experienced and skilled shooters and pilots) is a humane method of destroying feral horses – especially where horse density is high. Shooting is considered more humane than capture and removal as the animals are not subject to the stresses of mustering, yarding, and long-distance transport.



If the method of shooting was reconsidered and became part of the *Draft Plan*, it must be administered in accordance with *Standard Operating Procedure HOR001: Ground shooting of feral horses* and *HOR002: Aerial shooting of feral horses*.

It is understood that there is a negative public perception around shooting feral horses, however, it is extremely disappointing that public perception guides policy with resultant poor welfare outcomes. A public education campaign, designed in conjunction with animal welfare and veterinary expert opinions, may assist in demonstrating positive welfare outcomes using this method compared to others. Minimising the suffering should be the priority therefore the most humane methods should be used. In other states, the humaneness of aerial shooting has been extensively monitored by the RSPCA and the government animal welfare veterinarians. Similar monitoring could be used in Victoria.

Experience from the NSW Kosciuszko National Park

The recent review of the Kosciuszko National Park Horse Management Plan has suggested that trapping, mustering and rehoming are not able to remove a sufficient number of horses. These methods alone were found to be ineffective – showing only a marginal benefit in slowing population growth. While ruling out aerial shooting of horses, New South Wales has retained the ground shooting as a humane option. It is also noted that on a cost-effectiveness basis, trapping and mustering are expensive options.

Captured horse management

The AVA is pleased that there is an intention to maximise the chances for captured horses to be rehomed and that minimising poor welfare outcomes will be a consideration in the delivery of the control programs. *The Australian Animal Welfare Standards and Guidelines Land Transport of Livestock* must be adhered to throughout this management program. We are, however, concerned that there has been a lack of consultation regarding the welfare assessment process and believe that **a much larger veterinary input and involvement must be implemented into the *Draft Plan*.**

Transport should be coordinated so as there is a minimum amount of loading and reloading of horses. We support the following priorities of the *Draft Plan*:

- Minimisation of transport and holding times for captured horses prior to transport
- Horses assessed as potentially suitable for rehoming will be assessed by skilled brumby rehoming groups
- Horses that are in poor health, if transport conditions are likely to result in poor welfare outcomes for the horse or the horse is otherwise unsuitable for rehoming (or unable to be rehomed) may be culled at the capture site.



We would also recommend the following:

- Health assessments of horses be performed by a veterinarian
- Horses identified for slaughter MUST be humanely euthanised by a veterinarian at the holding site before transport
- Horses that are scheduled for rehoming be microchipped and audits performed annually throughout their lifetime
- Rehoming organisations should be carefully assessed before horses handed over.

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References

[AVA Policy – Control of feral horses and other equidae](#)

[Standard Operating Procedure HOR004: Trapping of feral horses \(Trudy Sharp, Invasive Animals CRC\)](#)

[Standard Operating Procedure HOR003: Mustering of feral horses \(Trudy Sharp, Invasive Animals CRC\)](#)

[Standard Operating Procedure HOR001: Ground shooting of feral horses \(Trudy Sharp, Invasive Animals CRC\)](#)

[Standard Operating Procedure HOR002: Aerial shooting of feral horses \(Trudy Sharp, Invasive Animals CRC\)](#)

[Model code of practice for the humane control feral horses \(Trudy Sharp, Glen Saunders\)](#)

[A Model of Assessing the Relative Humaneness of Pest Animal Control Measures \(Second edition June 2011\) \(Trudy Sharp, Glen Saunders\)](#)

[Kosciuszko National Park Horse Management Plan](#)

[Ecological and human dimensions of management of feral horses in Australia: a review \(Dale Graeme Nimmo; Kelly K. Miller\)](#)

[The Australian Animal Welfare Standards and Guidelines Land Transport of Livestock](#)

[The Action Plan for Australian Mammals 2012](#)

[Ecological and human dimensions of management of feral horses in Australia: a review \(Dale Graeme Nimmo; Kelly K. Miller\)](#)

http://www.agriculture.gov.au/Style%20Library/Images/DAFF/_data/assets/pdf/0008/929888/humaneness-pest-animals.pdf