

Evaluation of the implementation of the Kosciuszko National Park Wild Horse Heritage Management Plan (2021)

29 November 2022

Goals

The goals of this part of the evaluation were to determine:

1. Whether control operations are occurring in accordance with the Plan
2. Whether animal welfare considerations are being adequately managed and addressed
3. Any recommendations

Focussing on

- i) How the Standard Operating Procedures were compiled, including consultation with scientific and other stakeholders
- ii) Ongoing monitoring of implementation of The Plan, including control operations
- iii) Documentation/Records that are relevant
- iv) NPWS engagement with stakeholders to improve animal welfare outcomes
- v) NPWS actions in updating policies and procedures for wild horse control in the Park

Evaluation process

The evaluation was undertaken in November 2022, and included detailed evaluation of over 100 documents, a site visit to Kosciuszko National Park, including observation of passive trapping and removal to holding yards, and interviews with NPWS employees involved in horse management.

Summary

My evaluation concluded that control operations are occurring in accordance with the plan, and that animal welfare considerations are being adequately managed and addressed. I identify several key aspects of the success which should be continued, and identify some risks to continued success. Based on this evaluation, I make recommendations to enhance welfare outcomes, and the public perception of welfare outcomes.

Detailed Evaluation

1. Are control operations occurring in accordance with the Plan?

The Kosciuszko National Park Wild Horses Heritage Management Plan (2021; The Plan) is explicit that control methods should be selected based on maximising animal welfare outcomes, the effectiveness of the method, and area-specific management variables (such as terrain, accessibility, weather). This evaluation therefore assesses whether animal welfare outcomes are maximised, while consider if the techniques are effective and appropriate to the areas in which they are conducted.

Consistency with legislation

Ensuring optimal animal welfare outcomes firstly requires consistency with relevant Commonwealth and State animal welfare legislation, regulations, codes of practice and standard operating procedures. After reviewing the relevant legislation (as outlined in The Plan) and the documents provided on control operations, it is clear that the control operations conducted to date have been consistent with all legislation.

Development of Standard Operating Procedures

An Animal Welfare Assessment (AWA) was undertaken by the Kosciusko Wild Horse Independent Technical Reference Group (2015) for all control methods that had an existing Australian or State Standard Operating Procedure (SOP), standard or guideline, which provides a basis for assessment of the implementation. For some control methods, there was no SOP at the time that The Plan was formulated, and these techniques therefore require the development of a SOP, and an animal welfare assessment of the method before it can be implemented.

The Plan stipulates that for each control method, a Standard Operating Procedure be developed that is specific to the Park, using already developed standard procedures as a baseline. The Plan requires that these Park-specific Standard Operating Procedures involve consultation with the Royal Society for the Prevention of Cruelty to Animals (RSPCA) relevant specialists, and require approval from the Deputy Secretary of the National Parks and Wildlife Service (NPWS).

I reviewed the development of Park-Specific Standard Operating Procedures for the following finalised Standard Operating Procedures:

NPWS H001: Ground shooting

NPWS H002: Passive trapping

NPWS H003: Removal for domestication (rehoming)

NPWS H004: Removal for knacker or abattoir

In addition, I examined the development of the following preliminary program standard operating procedures:

Killing in yards – preliminary program

The development of these SOPs followed closely the process outlined in the Plan. Existing SOPs were used to develop and formed the basis of the Park-specific procedures where available. Feedback on the draft SOPs was sought from both technical experts and the RSPCA. Feedback was incorporated into the draft SOPs, which frequently underwent multiple rounds of consultation. The resulting SOPs adhere to a high standard of rigour in terms of animal welfare outcomes, generally to a higher standard than the existing SOPs (Sharp & Saunders 2014: Model Code of Practice for the Humane Control of Horses, with associated SOPs). I was satisfied that the procedure for development was rigorous, and the SOPs prioritize the maximising of animal welfare outcomes.

Two forms of control are still being assessed and developed for future implementation, and so these forms of control were not assessed as no implementation has occurred. These were aerial and/or ground mustering into yards, and reproductive control. The planned development of these forms of control follows the same rigorous process of SOP development.

The SOPs are required to be reviewed yearly, and plans for the yearly review are underway. The SOPs can be modified with further consultations should new information arise, or following any unexpected events, providing reassurance that the SOPs are functioning as a rigorous minimum standard from which to conduct operations but also build new knowledge and experience for better welfare outcomes.

In conclusion, the development of SOPs is rigorous and complies with The Plan. Consultation is appropriate and feedback has been incorporated, sometimes resulting in considerable modification and review of drafts. The Park-specific SOPs adhere to the standards in already developed SOPs, with equivalent or higher ethical standards. Modifications take into account the site-specific nature of control operations and incorporate new information as it becomes available.

Excluded methods

I am unable to comment on the following methods, as they are not currently being considered. The Plan is clear that both a) brumby running and roping, and b) translocation to other parts of the park or other parks should not occur. In line with The Plan, there is no evidence that either of these is occurring. From both a welfare and an effectiveness perspective, these control methods should continue to be excluded from any consideration of management or control of horses in the park.

Aerial shooting can have low negative welfare outcomes (ie good welfare outcomes) when conducted in accordance with best practice. The risk identified in The Plan (loss of social licence to control horses) still holds and should continue to be considered. However, given the potential for welfare outcomes to be improved with the method, the feasibility and public acceptability should continue to be assessed, particularly in reviews of the plan. It is important to consider that welfare outcomes and perception of welfare outcomes can differ, which should be considered, as The Plan recognises the importance of engaging with stakeholders with a diversity of views. An effective and constructive advisory body consisting of both community representatives and scientific experts could help to bridge the gap between actual and perceived welfare outcomes.

Implementation of Standard Operating Procedures

The welfare implications of the implementation of the SOPs was assessed based on detailed documentation, interviews with key personnel, and a site visit including observation of passive trapping and transportation.

The SOPs are rigorously followed by personnel, and all are familiar with the details of the SOPs, and all personnel had welfare as a priority.

Passive Trapping and Transportation

Several key factors contributed to the success of the observed passive trapping and removal.

1. Employees were used rather than contractors, with contractors often paid per horse. This removes the motivation to catch more horses to be paid more. Furthermore, this means that NPWS is directly in control of these operations.
2. No number targets are set for field crews, again reducing any motivation to remove all capture horses, rather than following the specifications in the SOP regarding horse health, age and pregnancy.
3. Skills of the field crew. The field crew were highly skilled, and took time to ensure the horses were calm as they worked with them, and became habituated to people as the operation progressed, resulting in enhanced welfare outcomes. This took time as well as skill, but resulted in excellent welfare outcomes.

These factors combined to result in welfare outcomes that were better than predicted by the Animal Welfare Assessment as the procedures were not cumulative, but rather the horses became habituated to the procedures, which was confirmed by my observations, and by independent veterinary observations.

Given the highly experienced and very skilled field team, a risk for capture and removal is loss of personnel in this space.

Following transportation to holding yards, horses are treated in a similar way by the same personnel, resulting in high welfare outcomes during their time in the holding yards, until transportation for rehoming or to the knackery/abattoir. The welfare outcomes at the knackery were assessed by an independent veterinarian, and were assessed as high, and higher than expected based on the AWA due to the skill of the staff at the knackery.

When horses are rehomed, transportation is undertaken by the rehomingers. The diligence undertaken by NPWS to ensure continued welfare of the horses is as prescribed by the SOP, and at a higher standard than legally required, which is appropriate. However, once rehoming begins, the horses are under the care of the rehomingers, which could be a risk if adverse welfare outcomes were to result.

Ground shooting

The SOP has been followed in detail, and the implementation has resulted in better than expected welfare outcomes (<1% of horses not killed immediately), which has been verified by a highly skilled independent observer. The welfare outcomes are better than predicted based on best practice by the AWA. The skill of the operators was again key to this success. There was no evidence of non-kill shots having been taken, nor of foaling mares being shot. Following death from head or heart/lung

shots, further holes that can resemble bullet holes are made by scavengers, as observed on other carcasses. After several days of decomposition, a foetus can be expelled due to build of gas pressure in the hindgut, giving the appearance of foaling, but this occurs post-mortem. This is seen in both hindgut fermenters like horses and in ruminants, but doesn't indicate any adverse welfare outcomes.

These concerns do indicate that there are risks associated with ground shooting in terms of the social license to conduct operations, similar to aerial shooting. Ground shooting operations to date have followed the prescription of the SOP, but the perception has been that some of these operations did not follow the SOP. Given that The Plan also prioritizes community and stakeholder involvement, it is important that the operations both follow the SOP and are accepted by stakeholders as following the SOP. It is recommended that publicly accessible areas and iconic horses are avoided in these operations to balance welfare outcomes with public acceptability.

The practice of keeping trapping operators separate from shooting operators is a good one, and results in teams with specialised skills, which enhances welfare outcomes.

Record keeping is appropriate and rigorous.

Success of Operations

The Plan aims to manage The Park in zones, with a reduction in numbers in the wild horse retention areas (32% of the Park), remove horses in the removal areas (21%) and prevent horses entering the remaining area (47%). To reach these goals, sufficient horses need to be removed. This is important for animal welfare considerations, as sufficient horses need to be removed to have a positive effect on the landscape, so that the impacts on the horses is balanced against the positive effects on the landscape. Therefore, a key question is whether the control methods are sufficient to result in a positive effect on land values. The current rate of removal is sufficient to have an impact on current population size, and seems scalable to the higher numbers required to reduce population size. The numbers removed need to be balanced against the goals for the park, which should be considered during the reviews of the SOPs, as well as revision of The Plan.

2. Are welfare considerations being adequately managed and addressed?

Throughout every stage of implementation, animal welfare was prioritised. Therefore, my conclusion is that welfare considerations are being adequately managed and addressed.

Nonetheless, there are several risks to keep in mind:

1. Welfare outcomes are dependent on staff skills, so loss of skilled operators could result in reduced welfare outcomes
2. After removal for rehoming, horses become the responsibility of the re-homers, but poor welfare outcomes could result for the horses, representing both an animal welfare risk, and a reputational risk
3. Shooting operations may lose the social licence to operate if perceptions of welfare outcomes as well as the actual welfare outcomes are not managed appropriately

4. The removal of horses, and therefore the welfare outcomes, are only justified if sufficient numbers are removed to have a positive effect on remaining species. Alternative techniques with good welfare outcomes (such as aerial shooting) may need to be considered if sufficient numbers are not removed with current techniques, although these also present risks in terms of social licence to operate

The current engagement with stakeholders to improve animal welfare outcomes is appropriate and includes highly skilled experts in animal welfare. The Wild Horse advisory body comprising community representatives and scientific experts is yet to be instigated, but this wider consultation is key to continued success and any improvement in the understanding of welfare outcomes. This is a matter of priority.

The NPWS actions in updating policies and procedures for wild horse control in The Park is appropriate. Of particular note are the yearly reviews. It was also noted in discussions that any adverse events would result in broader consideration of practices, and revision of the SOP as required, following the same process of consultation as is followed in the development of the SOPs. This is appropriate and should continue.

3. Recommendations

It is imperative that several of the currently implemented practices continue as outlined below:

1. Operations conducted by staff of NPWS, rather than contractors so that operations adhere strictly to the SOPs rather than being motivated by numbers removed
2. That the SOPs continue to be prioritized in terms of welfare over numbers removed (ie mare and foal dyads, and pregnant mares continued to be released from traps)
3. The expert skillset of the staff continues to be developed and prioritized
4. The current practice of constantly reviewing operations and revising with increased experience continued
5. Regular independent review of operations continue both to ensure good welfare outcomes and to provide updated advice for future operations (including in other areas)
6. Standard invitation to the RSPCA Chief Inspector to visit ground shooting and other operations continue
7. Yearly review of the SOPs

It is further recommended that:

1. The Wild Horse Advisory body consisting of both community experts and scientific experts is started as soon as possible, and considers welfare issues as a priority, since public perception of welfare remains a risk
2. There is continued monitoring if the removals are sufficient to impact the ecology of the area, and that alternative control methods be considered if sufficient numbers are not being removed
3. The risk of adverse welfare outcomes after re-homing be considered,
4. That shooting operations consider the public perception, since public perception of operations is paramount to success. For example, iconic horses should be avoided, and shooting should generally take place in the least accessible areas first.

GLOSSARY OF ABBREVIATIONS

AWA: Animal Welfare Assessment undertaken by the Kosciuszko Wild Horse Independent Technical Reference Group (2015), and reviewed by the Kosciuszko Wild Horse Scientific Advisory Panel

NPWS: National Parks and Wildlife Service

RSPCA: Royal Society for the Prevention of Cruelty to Animals

SOP: Standard Operating Procedure

The Park: Kosciuszko National Park

The Plan: Kosciuszko National Park Wild Horses Heritage Management Plan (2021)

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