protiviti®
Global Business Consulting

Department of Climate Change, Energy, the Environment and Water

Investigation report into the Kosciuszko National Park Wild Horses Rehoming Program

17 June 2024

Table of Contents

1. Executive Summary

1.1 Introduction

On 18 April 2024, Minister Penny Sharpe MLC (Minister Sharpe) received information from 2GB broadcaster Ray Hadley alleging that the NSW National Parks and Wildlife Service (**'NPWS'**) had failed to comply with its Domestication (rehoming) guidelines (**'Guidelines'**) when Rehoming over 250 wild horses to a person with links to an alleged illegal knackery in the Wagga Wagga area (person of interest or **'POI'**).

On 18 April 2024, Minister Sharpe requested that the NSW Department of Climate Change, Energy, the Environment and Water (**'DCCEEW'**) investigate the administration of the NPWS Wild Horse Re-Homing program (**'Program'**) as a whole.

Protiviti Pty Ltd have been appointed as an external investigator (**'Investigator'**) to focus on a set of predetermined list of questions related to the Program and the POI, together the **'Investigation Issues'**.

1.1 Background

The passive trapping and rehoming of horses from Kosciuszko National Park started in 2002, it was recognised through the 2008 Kosciuszko National Park Horse Management Plan and the Plan is required by law through the Kosciuszko Wild Horse Heritage Act 2018 (**'Act'**).

The Kosciuszko National Park Wild Horse Heritage Management Plan (**'Plan'**) was adopted in November 2021, and amended in October 2023 following the introduction of Standard Operating Procedures (including Rehoming) (**'SOP'**) and associated Domestication (rehoming) Guidelines (**'Guidelines'**) in February 2022. A revised SOP and Guidelines were approved in March 2024, but they have not yet been implemented as the Program is on hold.

The Plan provides the control methods, including the removal from the park for domestication (rehoming). The Plan confirms the implementation of the control methods will be consistent with the relevant Commonwealth and NSW legislation, including the Prevention of Cruelty to Animals Act 1979 (**'PCA Act'**), and codes of practice.

The intent of the current Plan and the Program, as articulated and confirmed by NPWS, is to:

- approve the Rehomers involvement in the Program;

- manage the welfare of the wild horses from trapping through to transfer to the Rehomers; and

- confirm the fate of the horses to support the improvement of the Program.

NPWS has confirmed the Program was never intended to maintain an ongoing responsibility for the welfare of the horses after transfer to the Rehomers or to monitor and oversight the Rehomers to confirm their ongoing suitability for inclusion in the Program.

(**'Program Intent'**)

1.2 Scope of the Investigation

The scope of the Investigation, as defined by DCCEEW, was to investigate the facts related to the Investigation Issues relative to the Program Intent (**'Scope'**). The primary objective is to prepare a factual report at the conclusion of the Investigation.

This Investigation will comply with all relevant requirements under Public Interest Disclosures Act 2022 ('**PID Act'**), referring any public interest disclosures back to DCCEEW's Ethics team accordingly.

Scope Assumptions:

Based on legal advice provided by DCCEEW the following assumptions support the Investigation.

- NPWS does not have the statutory authority to institute proceedings for offences against the PCA Act and do not have the authority or right to enter private property. Only the following agencies, organisations and persons can institute proceedings for offences against the Prevention of Cruelty to Animals Act 1979 (PCA Act):

  a) an approved charitable organisation (including the Royal Society for the Prevention of Cruelty to Animals (RSPCA)); or

  b) an inspector with the meaning of Division 2 of Part 2A, other than a police officer, or

  c) a police officer, or

  d) the Minister or the Secretary (of Regional NSW), or

  e) any other person or body prescribed by the relevant regulations.

- The Program Intent is administered in accordance with the Guidelines. On making any application to participate in the Rehoming Program, applicants are required to comply with the Guidelines. However, this requirement is not legislated or enforceable by NPWS. When an applicant takes charge of an animal, meaning the animal is loaded for transport, the Guidelines note that NPWS has no further responsibility for the animal. Clause 14 of the Guidelines states: "Transfer of the animals to the applicant is final on pick-up. On loading the applicant's transport the applicant becomes solely responsible for the animal's care, welfare and all associated costs and liability."

- The Guidelines are consistent with the PCA Act in that an Applicant takes charge of an animal then NPWS is no longer liable for the welfare of the animal. There is no ongoing statutory obligation on NPWS to maintain or be satisfied as to the animal's welfare following the transfer of an animal to the Applicant under the Program.

Scope Exclusions:

For avoidance of doubt, the Scope of the Investigation is subject to the following exclusions.

- The Investigation has not probed into or made findings regarding the conduct of specific employees involved in the program

- The investigation focused only on the Program and the supply of wild horses to the POI and did not consider the POI, the conduct and actions of the POI or their suitability to be a Rehomer.

- The Investigation has focused solely on NPWS and has not evaluated the role and responsibility of other Government Agencies relative to the Program and/ or legislation references in the Plan and the activities performed by those Government Agencies.

- The Investigation did not include physical site visits to Kosciuszko National Park (**'KNP'**), wild horses trapping or capture sites, or any of the Rehomer locations.

- The Investigation focused only on the Wild Horse Rehoming Program (as a single control method) and did not consider any possibility of rehoming outside of the Program, or other aspects of the broader Wild Horses program and associated control methods, including but not limited to ground shooting or aerial shooting.

- The Investigation referenced the current legislation, namely the Kosciuszko Wild Horse Heritage Bill 2018 Bill and Kosciuszko Wild Horse Heritage Act 2018 Act related to wild horse management, but did not consider the appropriateness of that legislation and / or the legal positions adopted by NPWS across the Program.

- The Investigation only confirmed the facts associated with the Scope to identify findings and recommendations relative to the Program Intent. The Investigation did not seek to design and implement any of the required changes to improve performance and/or compliance with the Guidelines.

The Terms of Reference supporting the Investigation is included in Appendix A.

1.3 Our Approach

The Investigation included:

- Desktop review of documentation, information and artefacts supporting the rehoming of wild horses;

- Interviews with key stakeholders involved in the management and operation of the Program;

- Walkthrough of the processes supporting the operation and administration of the Program;

- Review of supporting evidence, where appropriate, to confirm activities and outcomes associated with the Program and the provision of horses to the Rehomers; and

- Development of a draft and final report detailing the findings of the Investigation and associated recommendations.

The key stakeholder meetings and key documents reviewed as part of the Investigation are included in Appendix B and Appendix C.

1.4 Conclusion

Based on the Scope, and the associated Assumptions and Scope Exclusions, the results of the investigation and the responses to the General and Specific Questions we have concluded:

- NPWS has adopted a 'passive' and 'transactional' strategy and approach to the management of the Program which is consistent with the Program Intent. While consistent with the Program Intent the Guidelines are open to interpretation and may infer NPWS has a broader

responsibility. Those responsibilities may include the ongoing compliance with the requirements defined in the Guidelines, the monitoring of Rehomers (including the use of information from other Government Agencies) and the management of complaints, which it does not have the statutory authority to perform.

- NPWS has responsibility for the welfare of the horses while in the Park and transfer all responsibility for the horses and their care, welfare and all associated costs and liabilities at the transportation date (as confirmed in Requirement 14 of the Guidelines) and the collection of data on the fate of the horses is only used to support the improvement of the Program.

- NPWS has operational processes in place to manage their 'transactions' with the Rehomers (i.e. the receipt of their application and the provision of horses for rehoming). The operational processes supporting the 'transactions' are considered 'repeatable' (i.e. processes are established and repeatable, but documentation is limited or not in place and there is a reliance on specific individuals) and while there are gaps and they could be improved there is no evidence to suggest the 'transactions' were conducted outside of those established practices for Rehomers (including the POI) and that the transfer of ownership to the Rehomer was executed at the transportation date.

- NPWS could have made additional enquiries regarding the fitness of the POI to be a Rehomer based on the two applications, their ongoing interactions with the Rehomer and the non-receipt of fate returns. Other enquiries, resulting from the compliance, monitoring and complaints activities inferred in the Guidelines (which are not legislated or enforceable), may have been possible but that would have been inconsistent with the Program Intent and the statutory authority of NPWS.

- NPWS did not receive information or guidance from other Government Agencies regarding the POI that would have required NPWS to remove the POI from the Program prior to the POI requesting to be removed in July 2023. In addition, NPWS did not receive a communication or notification from the POI indicating any changes in their circumstances that may be deemed significant to NPWS and require the POI to reapply to the Program (as per Requirement 27).

Responses to the General and Specific Questions are detailed in Section 3.3 – General questions in relation to the Program and Section 4.2 – Specific questions – Specific questions in relation to the Person of Interest.

1.5 Findings and Recommendations

Based on the results of the Investigation of the Program and the supply of wild horses to the POI (and the 23 associated findings) four high level recommendations have been proposed to strengthen the Program. The recommendations are provided below and they have been grouped into themes for ease of delivery.

Recommendation 1: Reconfirm the Program Intent and adjust the SOP and Guidelines to reflect NPWS's statutory authority

The March 2024 SOP and Guidelines are partially inconsistent with the Program Intent and the Guidelines in their current form (which are not legislated or enforceable by NPWS) may infer that NPWS has a broader responsibility than is consistent with the statutory authority of NPWS. DCCEEW and NPWS should reconfirm and document the Program Intent (including whether NPWS should have a responsibility for compliance, monitoring and complaints) and adjust the SOP and Guidelines to reflect that position in a manner consistent with the role and responsibility of NPWS and its statutory authority.

Recommendation 2: Clarify the role of NPWS and their relationship with other Government Agencies

The role of NPWS should be clarified through the reconfirmation of the Program Intent, but they will remain reliant on other Government Agencies to inform them of any complaints, proceedings, prosecutions and/ or offences involving Rehomers. NPWS should formalise, where possible, their role and responsibility and their relationships with other Government Agencies to facilitate the communication and ongoing provision of information to allow NPWS to request Rehomers to reapply for the Program and/ or request their withdrawal from the Program.

Recommendation 3: Improve the application process

NPWS has a standard application form that provides coverage of the applicant's property, horse experience, transport, intended use of horses and animal cruelty. However, the application form, and the procedures supporting its review and approval, could be strengthened to provide NPWS with greater assurance over the information provided by the Applicant and greater confidence in the suitability of the Rehomer if approved to participate in the Program.

Recommendation 4: Formalise and improve the end-to-end processes supporting the Program

NPWS has established 'repeatable processes' to support the Program Intent, including the processing of Rehomer applications, the Rehomer requests and allocations, the transfer of horses to Rehomers and the processing of fate returns. Those processes should be formalised in an operational procedure, to compliment the knowledge and experience of the team, and improved in specific areas to provide an increased level of control. Improvements would include improvements to the application process, changes to the forms supporting the transfer of horses, ongoing performance of reconciliations, management of fate returns and the development of operational procedures for the Program.

1.6 Scope Limitations

This report has been prepared pursuant to the Statement of Work, dated 29 April 2024, which sets out the scope of our review and nothing within this report is intended to imply that we have carried out any work beyond that scope.

For the purposes of preparing this report, reliance has been placed on the representations, information and instructions provided to us by DCCEEW, NPWS and other Stakeholders. We have not sought to verify the accuracy or completeness of the information made available to us, nor have we conducted any procedures in the nature of an audit of the information or assumptions therein in any way, other than has been specifically stated in this report.

Our engagement did not constitute an audit in accordance with Australian Auditing Standards or a review in accordance with Australian Auditing Standards applicable to review engagements and accordingly no such assurance is provided in our report. The report has been prepared subject to the provisions and qualifications stated herein, for the sole use of DCCEEW.

2. Introduction and background

2.1 Introduction

Wild Horse Rehoming was introduced in 2002 as a control mechanism to support the reduction of wild horse numbers in Kosciuszko National Park. The current Program is supported by the Kosciuszko Wild Horse Heritage Act 2018 and the Kosciuszko National Park Wild Horse Heritage Management Plan (amended October 2023), the NPWS H003 Removal for domestication (rehoming) – Wild horse control standard operating procedure, associated standard operating procedures and supporting Appendices, including the domestication (rehoming) Guidelines. The diagram below provides an illustration of the key activities considered during the Investigation and acts as a reference point to describe the actual results. The processes highlighted in dark grey are included for completeness, but do not form part of the Program Intent.

End-to-End Wild Horses Rehoming Program					
Rehoming program owner	NSW National Parks & Wildlife Services (NPWS)				
Stakeholder Engagement	NSW State Government DCCEEW DPHI		Racing NSW RSPCA NSW Independent Vets		
Level 1	1. Program Design & Management		2. Rehoming Operations Management		
Level 2	1.1 Strategy & Objectives	1.2 Rehoming Program Design, Implementation & Maintenance	2.1 Rehoming Application Management	2.2 Wild Horse Management	2.3 Rehomer Management	2.4 Performance, Reporting and Oversight
Control Objective	"Definition and alignment of the program strategy and objectives"	"Establishment of the rehoming program and operating structure"	"Approval of eligible re-homers and ongoing management of horse requests"	"Humane trapping, horse welfare and provision of healthy horses requested by eligible re-homers"	"Ongoing management of re-homers to support their ongoing involvement in the program"	"Oversight of position and performance of program, and delivery of program strategy & objectives and management of risk"
Level 3	1.1.1 Reference legislative framework	1.2.1 Operating Model (Set-up, evaluate and enhance)	2.1.1 Rehoming Application Receipt	2.2.1 Passive Trapping of Horses	2.3.1 Fate returns	2.4.1 Program Performance/ Risk Management
	1.1.2 Develop strategy for Kosciuszko National Park	1.2.2 Program Documentation Lifecycle Management (Plans, Guidelines & SOPs)	2.1.2 Rehomer Application Review and Assessment	2.2.2 Horse Health Assessment	2.3.2 Rehomer monitoring	2.4.2 Program Reporting and Communication (internal & external)
	1.1.3 Develop strategy for Wild Horse Program (incl rehoming)	1.2.3 Third-Party Engagement and Document Consultation	2.1.3 Rehoming Application Approval	2.2.3 Temporary Holding of Horses	2.3.3 Compliance management	2.4.3 Program Monitoring and Oversight
		1.2.4 Program Marketing and Communication Management	2.1.4 Rehoming Requests (via phone/email)	2.2.4 Allocation or Horse Disposition Management	2.3.4 Complaints Handling	
			2.1.5 Rehomer exit/ removal (Offboarding)	2.2.5 Transfer of horse to re-homer	2.3.5 Rehomer reporting	
Data/ Information/ Systems	Manual records	Manual records	Manual Records Microsoft Excel Microsoft Outlook NSW Environment and Heritage	PowerBI Content Manager 10 Microsoft Excel Micosoft Outlook	Manual Records Microsoft Excel Microsoft Outlook	PowerBI Microsoft Excel
NPWS Roles & Responsibilities	Deputy Secretary Executive Director Park Operations Inland Director Park Operations Projects	Deputy Secretary Executive Director Park Operations Inland Director Park Operations Projects Senior Project Officer	Senior Project Officer/ Project Officer Field Officers (Teams: Blowering and Queabeyan)			Deputy Secretary Executive Director Park Operations Inland Director Park Operations Projects Senior Project Officer

2.2 Program

Background

The Program has operated in different forms since 2002. The current form of the Program was introduced in 2022 with the implementation of the NPWS H003 Removal for domestication (rehoming) wild horse control standard operating procedures **('SOP')** implemented on 20 February 2022. The SOP is deliberately focused on the management and welfare of the wild horses from trapping through to transfer to the Rehomers to reflect the Program Intent.

The SOP was updated on 15 March 2024. but has not yet been introduced given the Program has been on hold since April 2024. The SOP has five key attachments that support the operation and administration of the Program, including:

- Application to domesticate (rehome) wild horses;
- Domestication (rehoming) guidelines;
- Wild horse transport acknowledgement form;
- Proof of transfer form; and
- Daily Wild Horse Yarding Record.

The Program has supported the transfer of 1,831 horses to approved Rehomers since 2019. There are currently 21 Rehomers involved in the Program, including 19 active and 2 inactive (i.e. on hold and not receiving horses), that have taken approximately 435 – 445 horses in each of the last three years (2021 – 2023)

NPWS has a defined Rehoming Team of 5 members, including a Senior Project Officer, Project Officer, Senior Field Supervisor (Blowering), Senior Field Officer (Blowering) and Team Senior Field Officer (Queabeyan) that combine to deliver the Program with the support and oversight of Director Park Operations Projects, Executive Director Park Operations Inland and the Deputy Secretary NPWS. All individuals involved in the Program are experienced horse handlers and/or trained, as required by the SOP, and like the SOP they are focused on welfare of the horses.

In addition to the SOP, NPWS has established administrative procedures to support the Program, including the receipt and approval of applications, receipt of horse requests from Rehomers, allocation of horses to Rehomers, transfer of horses to Rehomers and requesting fate returns (i.e. confirmation of the fate of the horse after 4 months) from Rehomers consistent with the Program Intent.

Summary timeline of key events

The key events supporting the introduction and ongoing evolution of the Program are summarised below and support the findings of the Investigation shown in Section 3.

Date	Event
2002	Establishment of passive trapping and rehoming program
2008	Kosciuszko National Park Horse Management Plan introduced
6 June 2018	Kosciuszko Wild Horse Heritage Bill 2018
15 June 2018	Kosciuszko Wild Horse Heritage Act 2018
April 2020	Rehoming requirements for wild horses suspended in Kosciuszko National Park
24 November 2021	2021 Kosciuszko National Park Wild Horse Heritage Management Plan introduced
20 February 2022	Passive Trapping – Wild horse control standard operating procedure approved
20 February 2022	Removal for domestication (rehoming) – Wild horse control standard operating procedure approved
20 February 2022	Domestic (rehoming) Guidelines approved
20 November 2022	Evaluation of the implementation of the Kosciuszko National Park Wild Horse Heritage Plan
23 October 2023	Amended Kosciuszko National Park Wild Horse Heritage Management Plan approved
15 March 2024	Revised Domestic (rehoming) Guidelines approved
15 March 2024	Revised Passive Trapping – Wild horse control standard operating procedure approved

Please see Appendix D for a detailed timeline of events and associated evidence.

2.3 Person of interest

Background

The POI applied to be a Rehomer on 28 July 2020 and was approved to participate in the Program and receive horses on 19 November 2020.

With the introduction of the SOP and associated Guidelines, on 20 February 2022, the POI was required to reapply to the Program. The POI submitted a new application on 28 April 2022 and was reapproved to the Program on 29 April 2022.

While an approved Rehomer the POI received 301 horses during 2020 – 2023, including:

- 26 horses in 2020;

- 119 horses in 2021;

- 97 horses in 2022; and

- 59 horses in 2023.

During the three years the POI only provided two fate returns (i.e. confirmation of the fate of the horse he received 4 months after the transfer from NPWS) in March 2021 and June 2021 that confirmed the fate of 43 horses, including:

- 22 horses transferred on 13 December 2020;

- 11 horses transferred on 3 February 2021;

- 22 horses transferred on 6 March 2021.

NPWS followed up the fate returns on four occasions, but no further fate returns were submitted by the POI.

Based on the information provided by NPWS they were aware of three complaints raised against the POI during his time as a Rehomer. NPWS confirmed it does not investigate complaints and all matters were referred to the Royal Society for the Prevention of Cruelty to Animals (**'RSPCA NSW'**).

Summary timeline of key events

The key events associated with the POI and their involvement in the Program are summarised below and support the findings of the Investigation shown in Section 3.

Date	Event
19 November 2020	The POI was approved to be a Rehomer
17 March 2021	The POI responded to **first fate return** request
14 April 2021	**Complaint 1:** RSPCA NSW investigated a complaint associated with the behaviour of a horse in the POI's care
June 2021	The POI responded to the **second fate return** request
4 June 2021	**Complaint 2:** NPWS referred complaint to RSPCA NSW
29 April 2022	The POI reapproved to be a Rehomer
24 March 2023	Third fate return request sent by NPWS
19 June 2023	Fourth fate return request sent by NPWS
4 July 2023	**Complaint 3:** SMBSSMG advised NPWS that the POI had been added to Racing NSW exclusion list
5 July 2023	The POI requested to be removed from the Rehomer Program, and NPWS removed him from the Program

Please see Appendix D for a detailed timeline of events and associated evidence.

3. Findings from the Investigation into the Program

Detailed below are the results and findings of the Investigation of the Program associated with the program design, the program management and the general questions included in the Terms of Reference.

Any recommendations resulting from the Investigation are included in Section 5.

3.1 Program Design and Governing Documents

The *Kosciuszko Wild Horse Heritage Act 2018* (**'Act'**) recognises the heritage value of sustainable wild horse populations within parts of the Kosciuszko National Park. The *Kosciuszko National Park Wild Horse Heritage Management Plan* (as amended October 2023) (**'Plan'**) takes into account the objectives of the Act and sets out how that heritage value will be protected while ensuring other environmental values of the park (including values identified in the plan of management for the park) are also maintained.

The Rehoming of wild horses is one of the control methods, as defined in the Plan, to support the reduction of the wild horse population in Kosciuszko National Park to 3,000 by June 2027.

The Plan mentions that NPWS will approve the various standard operating procedures, continue to engage with community and stakeholder groups during implementation of the Plan, and work collaboratively with neighbouring landholders, including land management agencies, to minimise movement of wild horses across park boundaries.

NPWS has defined and approved a standard operating procedure for the rehoming of wild horses in the *NPWS H003 Removal for domestication (rehoming) – Wild Horses control standard operating procedure* (**'SOP'**), which was originally introduced in 2022 and reviewed and amended in March 2024. The latest version has yet to be implemented given the Rehoming Program has been on hold since April 2024. The SOP is complimented by other related standard operating procedures, including *NSWS H001 Group shooting*, *NPWS H002 Passive trading*, *NPWS H004 Removal for knackery or abattoir*, *NPWS H005 Killing in yards*, *NPWS H006 Mustering*, *NPWS H007 Euthanasia*, *NPWS H008 Problem wild horses* and *NPWS H009 Aerial Shooting*.

The SOP and the *NPWS H002 Passive trapping* – Wild Horses control standard operating procedure was developed by NPWS in consultation with, and recorded input from, the RSPCA NSW and an Independent Vet (contracted to provide independent advice on horse welfare).

NPWS has confirmed that the SOP deliberately focused on the management and welfare of the wild horses as per the Program Intent and confirmed by the SOP which states: *'Domestication (also referred to as rehoming or adoption) refers to the process by which a wild horse is removed from NPWS tenure is transferred to captivity under the ongoing care and ownership of an approved individual or organisation.'* The SOP was not intended or required to cover the governance, management and/or administration of the Program and as a result, the SOP is focused on the handling, temporary holding, loading/ unloading, transport of the wild horses, rehoming eligibility, and rehoming requirements, which is consistent with the Program Intent.

The SOP also includes supporting appendices, including:

- *Domestication (rehoming) guidelines*, including the minimum requirements for receiving wild horses from NPWS for domestication (rehoming);
- *Application form to domesticate (rehome) wild horses*, including the information and supporting evidence to be provided by the Rehomer when applying to join the Program;
- *Wild Horse Transport Acknowledgement Form*, including details of the date/ time a horse was transported;
- *Proof of Transfer Form,* including details of horse(s) that need confirmation they are from NPWS; and
- *Daily Wild Horse Yarding Record,* including details of temporary holding of wild horses.

The Guidelines confirm the minimum requirements for receiving wild horses from NPWS for rehoming, including requirements around transport, facilities, experience, husbandry, and responsibilities.

The Guidelines infer a broader responsibility for NPWS, when compared to the Program Intent, based on the following extracts from the Guidelines. In addition, the Guidelines are not legislated and NPWS does not have the statutory authority to enforce the requirements.

Applicants accept responsibility for the animal when transported.

- *Transfer of the animals to the applicant is final on pick-up. On loading to the applicant's transport, the applicant becomes solely responsible for the animals' care, welfare and all associated costs and liabilities* (Requirement 14).

Applicants accept specific restrictions associated with the animals received for rehoming.

- *The animals cannot be knowingly sold, traded, given away or transferred for rodeos or similar events and slaughter or processing for meat or by-products* (Requirement 15).

- *The animals cannot be knowingly sold, traded, given away or transferred via a public saleyard or auction within three months of receival* (Requirement 16).

- *The animals must not be returned to publicly managed lands. Penalties apply for releasing animal onto public land including NPWS land and offenders will be prosecuted* (Requirement 18).

Applicants accept NPWS may conduct inspections of their property and NPWS has the option to perform specific compliance checks as required (i.e. completion of site visits, checking of supporting evidence, provision of additional compliance checks, review of the fate of animals and accessing advice from relevant authorities or experts) to ensure the Applicant meets the Requirements and NPWS reserves the right to stop the provision of horses.

- *The applicant acknowledges that NPWS staff or its representatives may conduct compliance inspections of the locations where the animals are being kept* (Requirement 19).

- *NPWS reserves the right to refuse an application for rehoming if an applicant cannot adequately demonstrate they meet the criteria specific to NPWS* (Requirement 20).

- *An application for more than 25 animals may require additional verification by NPWS or its authorised representative relating to standard of care and compliance checks* (Requirement 23).

- *After four months of receipt of animals, applicants are to notify NPWS of the fate of the animals received (i.e. sold, transferred, died, euthanised, retained). Information will be recorded by NPWS for program improvement purposes* (Requirement 25).

- *Non-compliance of the approved applicant with the Guidelines will prevent applicant receiving any further horses from NPWS. NPWS reserves the right to withdraw an applicant's*

approval status at any time, based on advice from relevant authorities or experts. Evidence of animal cruelty will be referred to the RSPCA NSW (Requirement 26).

Applicants accept the responsibility to disclose on an ongoing basis any events, including animal cruelty offenses, that could impact their application.

- *Approved applications remain valid for a maximum of three (3) years. A new application must be submitted in the event of changes to the approved application's Property Identification Code (PIC) or facilities or any changes deemed significant to NPWS (including updates to these Guidelines). An approved applicant must disclose animal cruelty offenses committed during the approval application period to NPWS. The disclosure must occur before requesting any additional animals* (Requirement 27).

See Appendix E for full details of the Guidelines.

The Application to domesticate (rehome) wild horses ('Application') confirms the information to be provided by potential Applicants/ Rehomers, it provides coverage of questions that are considered relevant to the Program, and generally aligns to the Guidelines with questions covering the Applicants property, horse experience, transport, intended use of horses and animal cruelty. The application also includes acknowledgement that the information provided is complete and accurate, the Applicant is over 18 years or age, and the Applicant has read and understood the NPWS Rehoming Guidelines, and they agree to comply.

Information requested of the Applicant is limited to proof of ownership of the property (which is generally not provided) and photographs of the property where the animals will be held.

Note: NPWS confirmed "proof of ownership" is only requested at the time when an applicant mentions that the property does not belong to the applicant. If the applicant states that they own the property, NPWS does not follow-up or request applicants to provide proof of ownership.

Findings

F1 – **Program Intent**, as articulated and applied by NPWS, supports and facilitates the trapping, holding and transfer of horses to Rehomers, but it does not proactively oversee, and manage the Rehomers, as could be inferred from the Guidelines. As a result, the Guidelines may not fully reflect the Program Intent and the statutory authority of the NPWS.

F2 – **Policies and procedures** are limited to the SOP (which has been developed in line with the Program Intent) and Guidelines (which have not been developed in line with the Program's intent and NPWS's statutory authority) and there are no administrative or operational procedures to provide an end to end view of how the Program is managed.

F3 – **Roles and responsibilities** have not been defined clearly for NPWS, Applicants/ Rehomer, Government Agencies and other organisations or groups, in relation to the Program. The NPWS roles and responsibilities included in the Guidelines are inconsistent with Program Intent, the statutory authority of NPWS and are not supported by policies and procedures (and operational processes).

F4 – **Rehomer compliance** is reliant on the Applicants/ Rehomers providing timely, accurate and complete information at the time of application and on an ongoing basis and essentially 'self-regulating' their involvement in the Program. While that is considered consistent with the Program Intent it is inconsistent with the Guidelines that infer a greater level of responsibility on NPWS to check Program compliance.

F5 – **Rehomer application form** includes the property/ facilities, the experience of the individual and background of the individual, but the information and evidence provided by the Applicant is limited (e.g. No proof of identify, no proof of property ownership, no personal background verification or statutory declaration).

3.2 Program Management

NPWS has a defined Rehoming Team of 5 members, including a Senior Project Officer, Project Officer, Senior Field Supervisor (Blowering), Senior Field Officer (Blowering) and Team Senior Field Officer (Queabeyan), that combine to deliver the Program with the support and oversight of Director Park Operations Projects, Executive Director Park Operations Inland and the Deputy Secretary NPWS.

The results of the Investigation, and the associated findings, have been organised based on five activities considered relevant to the Program, as defined in the diagram shown in Section 2.1 and summarised below, to ensure complete coverage of the Program.

- **Rehoming application management** – the approval of eligible Rehomers and ongoing management of horse requests;

- **Wild horse management** – the humane trapping, horse welfare and provision of healthy horses requested by eligible Rehomers;

- **Rehomer management** – the ongoing management of Rehomers to support their involvement in the Program;

- **Performance, reporting and oversight** – the oversight of the position and performance of Program and the delivery of the Program strategy & objectives and management of risk; and

- **Data, information and systems** – the infrastructure supporting the management and administration of the Program.

3.2.1 Rehoming application management

NPWS has a standard application form which is required to be completed and submitted online, together with supporting information, and on completion the application is pushed to the *NPWS Wildhorses Mailbox* (npws.wildhorses@environment.nsw.gov.au). The information included in the application form provides coverage of questions that are considered relevant to the Program and generally aligns to the Program Intent with questions covering the applicant's property, horse experience, transport, intended use of horses and animal cruelty.

On receipt of the Rehomer application, NPWS checks the completeness of the application and the responses provided by the Applicant, including any supporting information. NPWS performs limited checks of the information provided in the application and will request clarification and/or additional information from the Applicant if required.

NPWS does not receive or check proof of property ownership if the Rehomer confirms they own the property (Question 5). However, NPWS will request supporting information, including a signed authority of use and contact details of the property owner, for property that is not owned by the Rehomer.

Based on the information provided by the Rehomer, NPWS will approve (or reject) the application and confirm the Applicant's status as an approved Rehomer. The rationale for approving the application is not documented and the approval is provided by the same person reviewing the application. An email confirming the approval is issued to the Applicant and the Applicant is added to the Kosciuszko Wild Horses Approved Rehomer List and included in the *approved Rehomer master spreadsheet* (Approved Rehomers 2022 – 2024, Approved

Rehomers 2020 and Approved Rehomers - 2019) used to manage the ongoing relationship with the Rehomers.

The Guidelines state *'An application for more than 25 animals may require additional verification by NPWS or its authorised representative relating to standard of care and compliance checks'* (Requirement 23). NPWS has confirmed the 25 animals refer to an individual application and/ or request and not the cumulative number of horses received by a Rehomer. The additional verification required is not defined outside of the information in the Application form.

Currently there are twenty one Rehomers approved to receive horses in the Approved Rehomer List. The current approved Rehomers all reapplied to the Program following updates to the SOP and the introduction of the Guidelines on 22 February 2022. In accordance with the Rehoming SOP and Guidelines all twenty one Rehomers will be required to reapply for the Rehoming program after 3 years or when there are changes in the Rehomer's circumstances reported by the Rehomer that are deemed significant by NPWS in accordance with Requirement 27. Note: The Stakeholder Update on the NSW Environment and Heritage website, last updated August 2023, currently states approved rehoming applications remain valid for 12 months, which is distinct from the Guidelines.

Rehomers request horses as part of their original application and via email or phone for any subsequent requests. The information is captured in the *approved Rehomers master spreadsheet*, which is used to confirm outstanding requests and support the allocation of horses trapped and deemed suitable for rehoming.

Rehomers will only exit, or be removed, from the Program if NPWS are advised by either the Rehomer directly or if advised of animal cruelty convictions from the RSPCA NSW or other Government Agency. NPWS does not actively check the status of Rehomers (see Section 3.2.3 – Rehomer Management) and their ongoing compliance with the Guidelines to determine their ongoing involvement as an approved Rehomer. Only one Rehomer has exited the Program, being the POI, who voluntarily withdrew from the Program on 5 July 2023.

The processes for reviewing/ approving applications and for the receipt of horse requests are manual, and supported by excel spreadsheets, which reflects the limited number of Rehomers and volume of horses being requested at any one time [Note: As of 31 May, there are pending requests from four Rehomers who have requested a total of 79 horses].

Two approved Rehomers are temporarily on hold and are not receiving horses from NPWS. The exact hold date for one of the Rehomers is not on record and the second Rehomer was put on hold from 11 November 2022. Both were a direct consequence of an ongoing Investigations by the RSPCA NSW and related concerns. The *approved Rehomers master spreadsheet* confirms that discussions with the RSPCA NSW and that no further horses are to be provided to those Rehomers until further confirmation on the animal welfare investigation.

Findings

F6 – **Application checks** are performed by NPWS to understand the status/ position of the Rehomer and confirm the information provided to support their application. NPWS has recently changed the application process to include informal social media checks, google/ google map checks and Racing NSW exclusion checks, but there remains a reliance on the Applicant to provide accurate and complete information.

F7 – **Approval of the Applications** is performed by the Senior Project Officer or Project Officer who also receives and reviews the application information provided by the Applicant.

F8 – **Reapplication to the Program** is inconsistent between the Guidelines (stating 3 years) and the NSW Government Environment and Heritage Rehome a Kosciuszko wild horse website (stating 12 months) and NPWS are reliant on the Rehomer to advise of any material changes that may require them to reapply to the Program outside of those periods (See Section 3.2.3 – Rehomer Management).

3.2.2 Wild horse management

The procedures supporting the passive trapping of wild horses are defined in *NPWS H002 Passive trading – Wild Horses control standard operating procedure* and confirms that NPWS rehomes the horses from the Park for domestication (rehoming) or transfers the horses to the knackery or abattoir for slaughter, alternatively they may be killed in the trap yards. The Field Officers complete Daily Passive Trapping Records to confirm and document the trapped number of horses on any day.

Protiviti received two audit reports performed by the Independent Vet which assessed the welfare of horses during passive trapping and in the temporary yards. The 2020 audit concluded with an overall result of 'mild' for negative welfare impacts on horses trapped with some positive impacts identified. The 2020 audit report included six recommendations, of which the Senior Project Officer advised that the first recommendation (formal training package) was completed by all the staff, and that there is a training register which shows the status of the staff members training results remains a work in progress. The Senior Project Officer also advised that the other five recommendations were considered during the review of SOP and Guidelines on 22 February 2022, but were not implemented.

The 2023 audit concluded with an overall result indicating the high welfare standards, as identified at the previous audit, have been maintained, despite changes in staff, demonstrating excellent staff training. This report did not include any recommendations and did not reference or monitor recommendations from any previous audit. The Senior Project Officer indicated that the same Independent Vet was part of the February 2022 and March 2024 review of Rehoming Program SOPs and Guidelines.

The volume of horses trapped, horse deaths, killed in trap/ holding yards, sent to knackery and rehomed were recently reconciled from 2018 – 2024, based on historical data captured (including data from the *Daily Wild Horse Passive Trapping Records, NPWS Wild Horse Transport Acknowledgement Form, NSW Transported Stock Statement Form (LLS),* loaded into a *wild horse consolidation spreadsheet*) and reported through a Power BI dashboard. The reconciliation, shown in Table 1, resulted in a discrepancy of one extra horse in 2022. The Senior Project Officer confirmed NPWS had trapped a total of 626 horses and recorded the fates of 627 horses.

Year	Trapped	Deaths in trap yards	Deaths in temporary holding yards	Rehoming	Knackery	Killed in Yards	Total of all fates
2019	99	3	0	68	28	0	99
2020	343	4	0	325	14	0	343
2021	444	1	0	443	0	0	444
2022	626	7	6	437	177	0	627
2023	1052	0	1	435	437	179	1052
2024*	196	1	0	123	58	0	182
Overall Total	**2,760**	**16**	**7**	**1,831**	**714**	**179**	**2,747**

*14 horses currently in NPWS holding yards

Table 1: Summary of disposition of horses trapped from January 2019 – April 2024

The procedures included in *NPWS H003 Removal for domestication (rehoming) – Wild Horses control standard operating procedure (SOP)* are performed by the NPWS Field Officers, considered to be experienced in horse handling and management. This includes assessing the general condition of the horses that have been trapped and identifying horses suitable for rehoming based on outstanding Rehomer requests and/or discussions with the Rehomers to confirm suitability of trapped horses and the number of horses to be transferred.

The results of the assessments to confirm the horses to be Rehomed (and also the other outcomes of all horses being either death, killed in trap/ holding yards or sent to knackery) are captured in a *wild horse consolidation spreadsheet* (based on manual records and/or information provided verbally by the Field Officers) which is automatically synchronised with Power BI dashboard maintained by the Senior Project Officer.

The horses identified for Rehomers are transferred to holding yards prior to collection by the Rehomers. At the time of transporting horses, the Field Officers complete the following:

- *Wild Horse Transport Acknowledgement Form* (including the date and time of pick up, address, driver name and transport company, vehicle registration, number of horses and signature of transporter). This form includes the Transporter that may be the Rehomer or Contractor hired by the Rehomer to transport the horses, but it does not name the Rehomer

and it does not confirm the Rehomer confirms/ acknowledges they are taking ownership of the horse(s) and they become solely responsible for the animal's care, welfare and all other associated costs and liability (As per Requirement 14); and

- *NSW Transported Stock Statement Form (LLS)* (including owner name, place of loading, destination, consigned to, information of horses, acknowledgment if the part A form was completed by owner or person in charge and if the part B form was completed by the driver or person in charge of the horse(s) while they are being transported and signature of the transporter) is completed by the transporter or NPWS Field Officer and signed by the transporter.

The process is reliant on Field Officer completing the information for all horses accurately and completely and the record keeping of the Senior Project Officer. See Section 3.2.5 Data, information and systems.

Note: The SOP includes a "Proof of Transfer" form. The form completed by the Receiver (i.e. a member of the public receiving the horse from the Rehomer) and submitted to NPWS for authentication of the horses they are receiving from the Rehomer. The form includes date of certification, name of the NPWS park, receivers name, receivers address, wild horse details and signature of the NPWS representative. The form includes a disclaimer stating "NPWS takes no responsibility for false or misleading information regarding the identification of horses." Senior Project Officer confirmed that this is an optional form completed only if the Receiver requires certification of the horses.

Findings

F9 – **The capture and reconciliation of information** associated with trapped horses and their fate (either rehomed, death, killed or sent to knackery) is manual, reliant on the completeness and accuracy of information captured by the Field Officers and subject to the quality of the record keeping, information management and reconciliations performed by the Senior Project Officer and the Project Officer.

- Data capture – Passive trapping data provided by the Field Officers, including information on the horses captured, health score and date of record, and transfer data included on the *Transport Acknowledgement Form* and the *NSW Transported Stock Statement Form (LLS)*.

- Data consolidation – Passive trapping data is manually keyed into the *wild horse consolidation spreadsheet* for daily synchronisation with Power BI. There is no verification performed on the accuracy of data provided by the Field Officers and the completeness of the data entered into the spreadsheet.

- Data reconciliation – Reconciliation performed to confirm the accuracy of passive trapping data provided verbally and in the *Daily Passive Trapping Record*, including the fates of horses arriving/ departing (e.g. death in trap yards, death in temporary holding yard, rehoming etc.) has only recently been completed and there is no regular reconciliation of data included in the *wild horse consolidation spreadsheet* and reported in Power BI.

- Data reporting – Passive trapping statistics keyed into the *wild horse consolidation spreadsheet* is synchronised and presented on Power BI on a daily basis. The information can be accessed by key personnel in NPWS, but not Field Officers.

F10 – **Transport requirements** for transferring horses are defined in the Guidelines and NPWS reserves the right to inspect trailers, crates and trucks prior to transport and refuse loading if NPWS staff believe the trailer does not ensure the safe transport of the horse. The two forms supporting the transfer, being the NSW Transported Stock Statement Form (LLS) form and the Wild horse transport acknowledgement form, are not currently mandatory, they are not signed by both NPWS and the Transporter/ Rehomer and do not include the name of the Rehomer. The NSW Transported Stock Statement Form (LLS) and the Wild horse transport acknowledgement form is only signed by the Transporter.

F11 – **Transfer of the animal** is considered final at pick-up (as per Requirement 14) and NPWS requires the transporter (which may be the Rehomer) to complete a wild horse transport acknowledgement form. The form requires the transporter to provide confirmation across six areas (associated with the horse's welfare, their experience and the transport), but it does not confirm or acknowledge the Rehomer is taking ownership of the horse.

F12 – **Proof of transfer forms** are completed by Members of Public that have received a horse from a Rehomer. In endorsing the form NPWS are confirming the horse, provided by the Rehomer, is a genuine wild horse. However, NPWS has limited information against which to make that endorsement.

3.2.3 Rehomer management

NPWS's interactions with Rehomers are limited to the original application and any subsequent reapplications (see Section 3.2.1 – Rehoming application management), the receipt of additional horse requests via phone or email (see Section 3.2.1 – Rehoming application management), the transfer of wild horses (see Section 3.2.2 – Wild horse management) and the provision of a fate return (i.e. confirmation of the fate of a horse) after 4 months as shown below, which is consistent with the Program Intent.

NPWS has an *approved Rehomer master spreadsheet* (Approved Rehomers 2022 – 2024, Approved Rehomers 2020 and Approved Rehomers – 2019) maintained by the Senior Project Officer to capture and maintain the Rehomer information in a semi structured format. The information is used to support the ongoing communications with the Rehomers and the rehoming transactions in which they participate.

The Guidelines require *'After four months of receipt of animals, applicants are to notify NPWS of the fate of the animals received (i.e. sold, transferred, died, euthanized, retained). Information will be recorded by NPWS for program improvement purposes'* (Requirement 25).

After four months NPWS can request, via email, the Rehomers to confirm the fate of the horses. The information, if received, is a free form email with limited content and is accepted without any independent checks being performed by NPWS. [Note: The brand and/or microchip numbers (if applicable) and the names and addresses of the new owner must be supplied if the animal has been sold or transferred]. If the information is not received, then the Senior Project Officer will issue periodic reminders.

NPWS confirmed the historical provision of fate returns by Rehomers has been variable and most Rehomers had not provided fate returns on a timely basis. Based on recent work performed by NPWS the fate return position has improved and 16 of the 21 Rehomers have provided all the required fate returns and are now compliant with that Guideline requirement. Going forward NPWS will track fate returns and prevent the transfer of horses if there are any fate returns outstanding.

As per the Requirement 26 in the Guidelines (*Non-compliance of the approved applicant with the guidelines will prevent applicant receiving any further horses from NPWS. NPWS reserves the right to withdraw an applicant's approval status at any time, based on advice from relevant*

authorities or experts. Evidence of animal cruelty will be referred to the RSPCA (NSW) NPWS are allowed to pause or stop the provision of horses for non-compliance. NPWS confirmed they have never stopped the transfer of horses to Rehomers who have not provided the fate returns on a timely basis.

Requirement 25 of the Guideline confirms that the fate return information will be recorded by NPWS for program improvement purposes (consistent with the article written by veterinarian Dr. Jordan Hampton) and does not affect the Rehomers' responsibility for the animal's care, welfare and all other associated costs and liability (As per Requirement 14)

Rehomers will only be removed from the program if NPWS receive confirmation of animal welfare concerns as advised by the RSPCA or other Government Agencies or requested by the Rehomer. On exit the NPWS send an exit acknowledgment email to the Rehomer and their name is taken off from the Approved Rehomer List on the NSW Government environment and heritage website. A Rehomer will be put on hold if the RSPCA NSW informally advise NPWS of any welfare issues or concerns that are being investigated and while on hold they will not be provided with any further horses.

Consistent with the Program Intent there are no policies, procedures, and operational processes in place to:

▪ ***Ensure ongoing compliance with the Guidelines.*** NPWS does not have mechanisms in place to monitor the ongoing compliance with Requirements defined in the Guidelines. As mentioned in Section 3.1 – Program design NPWS are reliant on information provided by the Rehomers who essentially 'self-regulate' their involvement in the Program;

▪ ***Monitor internal and external sources to access information that may trigger a review of, or discussion with, a Rehomer.*** NPWS perform only limited checks in the application process and have no processes to monitor defined information sources to trigger the review of a Rehomer, including established channels/ formal arrangements with other Government Agencies (including the RSPCA NSW, Racing NSW, and Local Government) to proactively share information on Rehomers given privacy limitations. Note: NPWS currently relies on informal relationships and discussions with the RSPCA NSW to obtain information on Rehomers; and

- ***Monitoring complaints received and associated with Rehomers.*** NPWS forwards any complaints to the RSCPA NSW and advises complainants to approach the RSPCA NSW directly. Any complaints received by NPWS are not monitored by NPWS and any communication with RSPCA NSW on complaints, including updates or outcomes, are considered informal due to the confidential nature of the complaints.

Findings

F13 – **Operating procedures** have not been established to proactively support Rehomer Management and ensure their ongoing compliance with the Requirements defined in the Guidelines and their suitability to be a Rehomer given the Program Intent. The absence of compliance management, Rehomer monitoring (including the use of information from other Government Agencies) and complaints management will limit NPWS's access to potential information that could trigger a review of a Rehomer and their potential removal from the Program.

F14 – **Record keeping** of Rehomer details, horse requests, allocations and horses transferred is a manual process, with information retained in the Approved Rehomers 2019 to 2024 excel files and other files stored in Content Manager 10. There is an increased reliance on the experience and knowledge of the Senior Project Officer given the information in a semi structured format.

F15 – **Fate returns** have not historically been enforced by NPWS and Rehomers have not consistently provided the 'fate returns' voluntarily as per the Guidelines. Going forward NPWS intends to prevent the transfer of horses if there are any fate returns outstanding.

3.2.4 Performance, reporting and oversight

NPWS has introduced a Power BI dashboard that provides Wild Horse Trapping statistics, with filtering by date. The dashboard accesses the *wild horse consolidation spreadsheet* and the information is available for review at any point in time by NPWS management to support their oversight of the Program.

NPWS also maintains an *Obligation Audit* (referred to as a Compliance register by NPWS) which includes the status of actions associated with specific requirements outlined in the:

- Kosciuszko National Park Wild Horse Heritage Management Plan

- Trapping SOP evaluation around the implementation of the wild horse management plan – animal welfare, trapping and rehoming SOPs.

- Evaluation of the implementation of the wild horse management plan – animal welfare

Each action has a reference number, task description, status of the action, key responsibility personnel and relevant comments. The progression of each action is monitored using a traffic light system (Red, Amber and Green) and relevant stakeholders across NPWS are engaged on a monthly basis to discuss and progress the tasks. The Obligation Audit covers specific actions resulting from the Rehomer Program, but it is not a register to ensure ongoing compliance with the Requirements defined in the SOP and the Guidelines.

The governance and oversight of the Program is performed through the NPWS management structure (including Senior Project Officer, Director Park Operations Projects, Executive Director Park Operations Inland and the Deputy Secretary). The status and performance of the program, including any events or issues, is provided by verbal updates, there is no regular reporting for the Program and any issues are escalated as required.

Findings

F16 – The Obligation audit/ Compliance register maintained by NPWS is an action tracking spreadsheet developed to support the progression of specific actions associated with the program. The information contained in the register reflects the Program Intent, but it does not provide a comprehensive view of Program compliance and/or all open actions based on the Requirements.

3.2.5 Data, information, and systems

The information supporting the Program is captured, transferred, and managed manually and the records supporting the Program are predominately maintained in free form excel spreadsheets. The data and records management for the Program is heavily reliant on the knowledge and experience of the Senior Project Officer.

As mentioned in Section 3.2.1 – Rehoming application management and Section 3.2.2 – Wild horse management the Program data (including Rehomer information and horse management information) is keyed into the *approved Rehomer master spreadsheet*, *wild horse consolidation spreadsheet* and other excel spreadsheets manually (with limited/ no checks) and synchronised

daily to Power BI to support dashboard reporting and reconciliations of the data are performed infrequently.

The Power BI dashboard was introduced in early April 2024. Prior to the introduction of Power BI, trapping numbers were keyed into an excel spreadsheet with no automated reporting mechanism. To support the migration to Power BI, the Senior Project Officer and Project Officer confirmed data in the Wild horse consolidation excel spreadsheet, and reconciled that data with individual *Transport Acknowledgement Forms*, *Transport Stock Statement Forms* and the *Daily Passive Trapping Records*. (See Table 1)

Hard copy documents, including but not limited to the *Daily Passive Trapping Records and the Transport Acknowledgement Forms* are stored physically in the NPWS office. The documents are scanned and uploaded onto Content Manager 10 when resources have capacity.

Findings

F17 – End user computing (i.e. excel, Power BI) is used to support the program given the bespoke nature of the program, the limited number of Rehomers and the limited number of transactions in any year. While a reasonable and cost-effective approach, the robustness of the excel files (and associated level of control over the data) could result in manual errors.

F18 – **Record keeping practices** supporting the Program are performed when possible and a combination of Content Manager 10 and manual files are being used as the primary source of information.

3.3 General Questions in relation to the Program

The following general questions, included in the Terms of Reference, have been answered based on the information obtained through the Investigation.

3.3.1 How are wild horses allocated by NPWS to applicants under the program?

NPWS has confirmed the horse requests, included in the original application and subsequent requests via email or phone, are logged in the respective *approved Rehomers master spreadsheet* and referenced when the horses are trapped. The horses are allocated based on their match to the Rehomer's requirements and phone or email exchanges between the Senior Project Officer and the Rehomer following the trapping of horses.

3.3.2 What are the current requirements in order to be approved as a Rehomer under the program, and are these appropriate?

The requirements to be an approved Rehomer are defined in the Guidelines (see Appendix E – Domestic (rehoming) guidelines), which are an appendix to the SOP. The Guidelines confirm the minimum requirements for receiving wild horses from NPWS and include coverage of transport, facilities, experience, husbandry, and responsibilities.

The requirements are referenced in the Application to domesticate (rehome) wild horses form and require the Applicant to certify:

- The information supplied is accurate, true and correct;
- They are over 18 years of age; and
- They have read and understood the NPWS Rehoming Guidelines and agree to comply.

As mentioned in Section 3.2.3 – Rehomer management NPWS has not been required to establish processes to monitor the ongoing compliance with the Requirements defined in the Guidelines given the Program Intent. As a result NPWS is reliant on information provided by the Rehomers who essentially 'self-regulate' their involvement in the Program.

The Requirements in the Guidelines impose responsibilities on NPWS that are not legally enforceable and inconsistent with the Program Intent.

3.3.3 Does the information sharing protocols or data sharing exist across the government agencies involved in Rehoming and animal welfare regulation, for example Racing NSW and local government?

There are no formal information sharing protocols that have been identified or confirmed by NPWS during the Investigation. NPWS does obtain information informally from RSPCA NSW and potentially other Government Agencies, but that information is limited or incomplete given legal and confidentiality/ privacy requirements and is generally provided after the compliant/ allegation has been investigated.

3.3.4 Under the current requirements, is NPWS required to make regular checks or enquiries regarding whether an approved Rehomer is still appropriate to be receiving horses?

As mentioned in Section 3.1. Program Design the Guidelines define the Requirements for receiving wild horses from NPWS for domestication (rehoming) and impose specific responsibilities on Applicants/ Rehomers and NPWS. While the Requirements do not require NPWS to make regular checks or enquiries to confirm a Rehomer is still appropriate to be receiving horses (consistent with the Program Intent) they do require Rehomers to remain compliant and submit a new application in the event of changes deemed significant to NPWS. In addition, a number of the requirements may infer NPWS are accepting responsibility to perform specific compliance checks as required (i.e. completion of site visits, checking of supporting evidence, provision of additional compliance checks, review of the fate of animals and accessing advice from relevant authorities or experts) to ensure the Applicant/ Rehomer continues to meet the Requirements.

3.3.5 In what circumstances, if any, should NPWS make further enquiries or checks with Rehomers after the delivery of horses?

In considering the circumstances in which NPWS would make further enquiries or checks with Rehomers after the delivery of horses it is important to confirm the Program Intent and NPWS's responsibility for the individual horses provided to the Rehomer and for monitoring the Rehomers.

The Guidelines confirm the *'transfer of the animals to the applicant is final on pick-up. On loading to the applicant's transport, the applicant becomes solely responsible for the animals care, welfare and all associated costs and liability' (*Requirement 14). This confirms NPWS only have responsibility for the horse's care and welfare up to the date of transfer.

The Guidelines also state that *'After four months of receipt of animals, applicants are to notify NPWS of the fate of the animals received (i.e. sold, transferred, died, euthanised and retained). Information will be recorded by NPWS for program improvement purposes* (Requirement 25).

This does not impact the transfer of responsibility for the horses (as per Requirement 14) and the fate returns are only used for Program improvement purposes.

For a Program management perspective, the SOP and Guidelines are silent on the overall role and responsibility of NPWS, but assuming NPWS are the owner and operator of the Program then the Guidelines may infer that NPWS has a responsibility for the Rehomers participating in the Program and a responsibility to monitor the Rehomers to ensure ongoing compliance with the Requirements defined in the Guidelines and their suitability to be a Rehomer. As mentioned in Section 3.2.3 – Rehomer management this would be inconsistent with the Program Intent.

3.3.6 What restrictions on wild horses and their use exist once received by Rehomers? For example, in what circumstances are recipients permitted to euthanise wild horses received under the program?

The Guidelines define the restrictions on the wild horses after their transfer to the Rehomers.

- *The animals cannot be knowingly sold, traded, given away or transferred for rodeos or similar events and slaughter or processing for meat or by-products* (Requirement 15).
- *The animals cannot be knowingly sold, traded, given away or transferred via a public saleyard or auction within three months of receival* (requirement 16).
- *The animals must not be returned to publicly managed lands. Penalties apply for releasing animal onto public land including NPWS land and offenders will be prosecuted* (Requirement 18).

The SOP and Guidelines are silent on the Rehomers euthanising the horses.

3.3.7 Identify any gaps that exist in the policies and procedures relating to the supply of wild horses generally.

There are no policies and procedures, other than the SOP and Guidelines, in place to support the Program and NPWS rely on established practices.

The *NPWS H003 Removal for domestication (rehoming) – Wild Horses control standard operating procedure* ('SOP') was developed by NPWS in consultation with, and input from, the RSPCA NSW and the Independent Vet.

NPWS has confirmed that the SOP was deliberately focused on the management and welfare of the wild horses as confirmed by the SOP scope which states *'Domestication (also referred to as rehoming or adoption) refers to the process by which a wild horse is removed from NPWS tenure is transferred to captivity under the ongoing care and ownership of an approved individual*

or organisation.' The SOP was not intended to cover the governance, management and administration of the Program and as a result, the SOP is only focused on the handling, temporary holding, loading/ unloading, transport of the wild horses, rehoming eligibility and rehoming requirements, which is consistent with the Program Intent.

The 'Guidelines' confirm the minimum requirements for receiving wild horses and provides coverage of transport, facilities, experience, husbandry and responsibilities and extend beyond the Program Intent.

Given the lack of formal documentation, i.e. operational procedures supporting the administration of the Program, there are potential gaps in the 'Rehoming application management', 'Wild horse management' and 'Performance, reporting and oversight' processes.

4. Findings from the Investigation on the supply of wild horses to the Person of Interest

Detailed below are the results of the Investigation of the supply of wild horses by NPWS to the POI and the specific questions included in the terms of reference.

Any recommendations resulting from the Investigation are included in Section 5.

4.1 Program's management of Person of Interest

4.1.1 Rehoming application management

The POI originally applied to be a Rehomer on 28 July 2020 and was accepted into the Program on 19 November 2020. They reapplied to the Program on 28 April 2022, due to the introduction of the new Guidelines, and were approved to continue in the program on 29 April 2022. The POI advised NPWS of their withdrawal from the Program on 5 July 2023.

Based on the information provided to support the 2020 and 2022 applications the following observations have been noted that indicate some level of inconsistency or incompleteness in the two applications that should have been confirmed by NPWS.

- The 2020 application did not include a detailed description of the property and facilities and was only supported by the photographs submitted with the application.

- The 2022 application included information for all questions. The responses in relation to his level of experience and intended use of the horses differed to the 2020 application.

- The property identification code (PIC) was not originally included in the 2020 application and was in error in 2022 application. NPWS requested the PIC in 2020 and confirmed the 2020 PIC in 2022.

- The property size increased from 400 acres to 460 acres for the same property address between the 2020 and 2022 applications.

- The facilities were not described in 2020, but were included in the application in 2022.

- The wild horse experience included in the 2020 application confirmed the POI had been breaking in horses for over 10 years and in the 2022 application confirmed the POI had grown up in a horse family and had 20 years of experience.

- The transportation details were not included in the 2020 application (in part due to covid and NPWS subsidising transport to Rehomers), but the details of suitable transport were included in 2022.

- The 2020 and 2022 applications were not supported by proof of ownership of the property and only referenced photographs of the property to support the applications. NPWS confirmed that they never requested or followed up with the POI to provide proof of ownership as part of his application.

- The 2020 and 2022 applications confirmed the POI would be applying for 10+ and 5+ horses. That is below the threshold of 25 animals, as per Requirement 23 of the Guidelines, that would have required additional verification checks.

- NPWS, or its representative, did not request or perform a physical inspection of the POI's property to support the approval of the 2020 and 2022 applications.

NPWS reviewed both applications, considered the information provided by the POI (as part of the application and based on requests by NPWS) to be sufficient. NPWS did not perform any additional independent checks or due diligence on the 2020 and 2022 applications prior to the applications being approved by the Senior Project Officer. NPWS confirmed with the POI that they were approved as a Rehomer and the POI was added to the Kosciuszko Wild Horses Approved Rehomer List.

NPWS did not request any additional information from the POI or confirm the POI's compliance with the requirements of the Guidelines outside of the 2020 and 2022 application process.

The POI made multiple requests for horses from 19 November 2020 until 19 June 2023 when they received their final allocation of horses and on 5 July 2023 they withdrew from the Program. 301 horses were allocated and transferred to the POI during that period.

The review and approval of the POI's applications and the requests for horses followed the established NPWS practices as described in Section 3.2.1 - Rehoming application management

4.1.2 Wild horse management

The transfer of horses to the POI from 19 November 2020 to 5 July 2023 followed the established NPWS practices as described in Section 3.2.2 – Wild horse management. The *Transport Acknowledgment Forms* provided were signed by the transporter or by the POI.

4.1.3 Rehomer management

The POI has provided fate returns for 43 horses out of a total of 301 horses that he received over the period 19 November 2020 to 19 June 2023. The fate return responses received from the POI were for horses transported in December 2020 and March 2021. NPWS did not follow-up on outstanding fate requests between June 2021 and March 2023. NPWS did however followed-up on fate requests in March, June, and October 2023. The POI did not provide any additional fate returns (for the remaining 258 horses) other than the two responses received in March and June 2021, but continued to receive horses.

Three complaints associated with the POI were confirmed by NPWS, as part of the Investigation, during the period 19 November 2020 to 5 July 2023. The complaints are summarised below.

- **Complaint 1:** On 14 April 2021, following a complaint about the transportation of wild horses from NPWS holding yards to the POI's property, an RSPCA NSW inspection occurred. The outcome of this inspection was not officially disclosed; however, on 14 April 2021, the RSPCA NSW confirmed to NPWS that there were no issues observed at the POI's property.

- **Complaint 2:** On 4 June 2021, NPWS received a complaint alleging the POI had sent horses under his care to knackeries along with other claims about the rehoming program. NPWS requested evidence to support the allegations against the POI from the complainant, but this was not provided. NPWS took no further action.

- **Complaint 3:** On 4 July 2023, NPWS was advised by the Secretary of the Snowy Mountain Brumby Sustainability and Management Group (SMBSMG) that the POI had been included on the Racing NSW Excluded List since 22 February 2023. NPWS were unaware of that information, and prior to any action being taken by NPWS the POI withdrew from the Rehomer program on 5 July 2023.

None of the complaints (and associated Investigations) required NPWS to reassess the POI's application and/or suitability to be a Rehomer and as a result NPWS continued to provide horses to the POI between 19 November 2020 to 19 June 2023 given the circumstances.

NPWS did not perform any additional activities to monitor the POI during the time they were a Rehomer. NPWS did not check the POI's ongoing compliance with the Guideline Requirements and NPWS did not receive any communication or notifications from the POI indicating any changes in his circumstances that could be deemed significant to NPWS and/or require the POI to reapply to the Program.

The request and receipt of the fate returns and the management of complaints followed the established NPWS practices as described in Section 3.2.3 - Rehomer management.

Findings

F19 – The supply of wild horses to the POI confirms the Program Intent as articulated and applied by NPWS, which is considered 'passive' and 'transactional' in nature and based on the 'best endeavors' of NPWS. That approach supports and facilitates the trapping, holding and transfer of horses to Rehomers, but it does not include the 'proactive' oversight and management of Rehomers. (see **Finding F1 – Program Intent**)

F20 – Applications submitted to NPWS were not completed in full, or consistently, and NPWS performed a limited review of the information prior to approving the POI's application. NPWS did not perform independent checks or due diligence on the POI and the information contained in his application. The situation is consistent with NPWS's approach to Rehomer applications (See Section 3.2.1 Rehoming application management) (see **Finding F5 – Rehomer application checks**)

F21 – Complaints associated with the POI and received by NPWS did not result in sufficient evidence for NPWS to temporarily or permanently stop or pause the supply of wild horses to POI or the POI's status as a Rehomer. However, NPWS has temporarily stopped providing horses to two other Rehomers as previously mentioned in Section 3.2.1 Rehoming application management. The situation is consistent with NPWS's approach to Complaints (See Section 3.2.3 Rehomer management) and the referral of all complaints to the RSPAC NSW (see **Finding F13 – Operating procedures**)

F22 – There were no direct/ formal communication lines between Racing NSW, RSPCA NSW or other Government Agency and NPWS which allowed NPWS to be informed about the POI's exclusion from the Racing NSW list, complaints, Investigations, or other matters that may impact the POI's status as a Rehomer. NPWS was informed by the Secretary from the Snowy Mountain Brumby Sustainability and Management Group of the POI's exclusion from Racing NSW and NPWS relies on informal discussions with RSPCA NSW to access information. The situation is consistent with NPWS's approach to monitoring internal and external sources (See Section 3.2.3 Rehomer management) (see **Finding F3 – Roles and responsibilities** and **Finding F13 – Operating procedures**).

F23 – Fate returns were only received for 43 out of a total of 301 wild horses provided to the POI. NPWS did not stop providing horses to the POI when fate returns were not provided as allowed under the Guidelines (Requirement 25). The situation is consistent with NPWS's approach to fate returns (See Section 3.2.3 Rehomer management) (see **Finding F15 – Fate Returns**)

4.2 Specific Questions in relation to the supply of wild horses to the Person of Interest

The following specific questions, included in the Terms of Reference, have been answered based on the information obtained as part of the Investigation.

4.2.1 What are the factual circumstances around the supply of wild horses to the POI accused of running the illegal knackery?

The POI received 301 horses from the Program between 19 November 2020 to 5 July 2023 as detailed in the table in Section 4.2.1 – Rehoming Application Management. The horses were requested by the POI and transferred by NPWS and followed the established NPWS processes detailed in Section 3.2.1 – Rehoming Application Management.

4.2.2 How were wild horses allocated to the POI during the period of time in question, and were all protocols followed?

The POI requested horses, including the number, sex and colour, via email/ phone and NPWS allocated trapped horses based on the requests received from Rehomers, including the POI as detailed in Section 4.2.1 – Rehoming Application Management and Section 4.2.2 – Wild Horse

Management. The requests and allocations followed the established NPWS processes detailed in Section 3.2.1 – Rehoming Application Management and Section 3.2.2 – Wild Horse Management.

4.2.3 Was there any follow-up or monitoring – formal or informal – regarding the POI?

NPWS performed specific follow-up activities associated with the POI's 2020 and 2022 applications as detailed in Section 4.2.1 – Rehoming Application Management and the receipt of fate returns as detailed in Section 4.2.3 – Rehomer Management. NPWS also engaged with the POI on an ongoing basis to obtain horse requests, allocate horses and transfer horses. Those activities did not include any monitoring of the POI's property, the horses previously provided to the POI or the POI's ongoing compliance with the Requirements included in the Guidelines, which is consistent with the Program Intent. The follow-up and monitoring of the POI is consistent with the established approach for other Rehomers as detailed in Section 3.2.3 – Rehomer Management.

4.2.4 Should NPWS have made enquiries regarding the fitness of the application to re-home wild horses given the large volume of horses requested by the applicant? Were any additional checks made or was additional information sought?

NPWS could have made additional enquiries of the POI to be a Rehomer based on the two applications, their ongoing interactions with the Rehomer and the non-receipt of fate returns.

Other enquiries, resulting from compliance, monitoring and complaints activities inferred in the Guidelines (which are not legislated or enforceable), may have been possible but that would have been inconsistent with the Program Intent and the statutory authority of NPWS. NPWS did not receive information or guidance from other Government Agencies regarding the POI that would have required NPWS to remove the POI from the Program prior to the POI requesting to be removed in July 2023. NPWS did not receive a communication or notification from the POI indicating any changes in their circumstances that may be deemed significant to NPWS and require the POI to reapply to the Program.

4.2.5 Was any information received by NPWS regarding the POI during the time that they were receiving rehomed horses?

NPWS confirmed that it did not receive any information associated with the POI in addition to the application and the complaints information as detailed in 4.1.1 Rehoming application management and 4.1.3 Rehomer management.

4.2.6 Review NPWS internal policies and procedures relating to the Program and identify matters and circumstances relating to the supply of wild horses to the POI that may fall outside those policies and procedures?

NPWS's policies and procedures are limited to the SOP and Guidelines and NPWS has not developed policies and procedures to document the governance, management and administration of the Program.

NPWS has established processes, that are not documented, to support some aspects of the management and administration of the Program, including applications, horse requests, horse allocations, horse transfers and fate returns. Those processes are manual, reliant on the completeness and accuracy of information captured by the Field Officers and subject to the quality of the record keeping, information management and reconciliations performed by the Senior Project Officer.

4.2.7 Are there any immediate lessons that can be learnt from the situation and can improvements be made to the settings in the future?

The Program Intent and role and responsibility of NPWS (aligned to their statutory authority) supports and facilitates the trapping, holding and transfer of horses to Rehomers (including the transfer of responsibility for the horses on pick-up), but it does not include the 'active' oversight and management of the Rehomers as inferred in the Guidelines. As a result, NPWS has limited opportunity and authority to confirm the ongoing suitability of the Rehomers and they are reliant on other Government Agencies to manage the welfare of animals that are no longer their responsibility and to inform, and advise on, the suitability of Rehomers.

The recommendations include in Section 5 reflects the findings and opportunities available to NPWS to reconfirm the Program Intent, adjust the SOP and Guidelines, clarify the role of NPWS

and their relationship with other Government Agencies, improve the application process and formalise and improve the management and administration of the Program.

Those changes would reduce the overall risk of the Program, allow NPWS to be advised of any complaints, proceedings, prosecutions and/ or offences involving Rehomers where possible. That would allow NPWS to restrict or limit the number of horses provided to an individual Rehomer. However, those changes may not prevent a Rehomer conducting illegal acts as that is outside of the responsibility of the Rehoming Program based on the Program Intent and the statutory authority of NPWS.

5. Recommendations

Based on the results of the Investigation of the Program and the POI (and the 23 associated findings) four high level recommendations have been proposed to strengthen the Program. The recommendations are provided below and they have been grouped into themes for ease of delivery.

Recommendation 1: Reconfirm the Program Intent and adjust the SOP and Guidelines to reflect NPWS's statutory authority

The March 2024 SOP and Guidelines are partially inconsistent with the Program Intent. The Guidelines in their current form (which are not legislated or enforceable by NPWS) may infer that NPWS has a broader responsibility that is inconsistent with the statutory authority of NPWS. DCCEEW and NPWS should reconfirm and document the Program Intent (including whether NPWS should have a responsibility for compliance, monitoring and complaints) and adjust the SOP and Guidelines to reflect that position in a manner consistent with the role and responsibility of NPWS and their statutory authority.

The reconfirmation of the Program Intent would allow NPWS to:

- Consider the completeness and legality of the Requirements contained in the Guidelines (see **Finding 1** and **Finding F13**);

- Consider the need for NPWS to perform compliance management, Rehomer monitoring and complaints management (see **Finding 13**);

- Consider the Requirements for the Rehomers and how they will ensure their ongoing compliance (see **Finding 4**); and

- Define the resources and infrastructure required to deliver the program and the role and responsibility of NPWS.

Recommendation 2: Clarify the role of NPWS and their relationship with other Government Agencies

The role of NPWS will be clarified through the reconfirmation of the Program Intent, but they will remain reliant on other Government Agencies to inform them of any complaints, proceedings, prosecutions and/ or offences involving Rehomers. NPWS should formalise,

where possible, their role and responsibility and their relationships with other Government Agencies. This will facilitate the communication and ongoing provision of information to allow NPWS to request Rehomers to reapply for the Program and/ or request their withdrawal from the Program. In clarifying the relationship with other Government Agencies NPWS will need to consider:

- the statutory authority of the NPWS and the other Government Agencies (see **Finding F3**)

- the legislation referenced in the Plan, including the PCA Act;

- the ability of other Government Agencies to share information given privacy/ confidentiality requirements;

- the timeliness of information to support the management of the Program (see **Finding F1**); and

- the alignment to policies and procedures (see **Finding F2** and **Finding F13**)

Recommendation 3: Improve the application process

NPWS has a standard application form that provides coverage of the applicant's property, horse experience, transport, intended use of horses and animal cruelty. However, the application form, and the procedures supporting its review and approval, could be strengthened to provide NPWS with greater assurance over the information provided by the Applicant and greater confidence in the suitability of the Rehomer if approved to participate in the Program.

The improvement of the application process should consider:

- the level of detail required to be included in the application form and the evidence required to support the application (**Finding F5**)

- the confirmation, checks and due diligence to be performed in consultation with the Applicant and independently (**Finding F6**);

- separating the approval of the application from the individual reviewing the application (**Finding F7**);

- the frequency Rehomers are required to reapply and/ or the frequency NPWS are required to confirm the application details are still valid (**Finding F8**); and

- the documentation of the application management process in the operating procedures (**Finding F2** and **Finding F13**)

- development of operational procedures to support operations and limit the reliance on the knowledge and experience of key individuals (**Finding F2** and **Finding F13**).

Recommendation 4: Formalise and improve the end-to-end processes supporting the Program

NPWS has established 'repeatable processes' to support the Program Intent, including the processing of Rehomer applications, the Rehomer requests and allocations, the transfer of horses to Rehomers and the processing of fate returns. Those processes should be formalised in an operational procedure, to complement the knowledge and experience of the team, and improved in specific areas to provide an increased level of control.

Improvements would include:

- change to the application process (as shown above)

- changes to the forms supporting the transfer of horses, including:

    - The wild horse transport acknowledgment form to ensure mandatory use, inclusion of signatures for both NPWS and transporter/ Rehomer and confirmation of the Rehomers name; and acknowledgement the transporter/ Rehomer are accepting responsibility for the horse(s) (**Finding F10** and **Finding 11**);

    - The proof of transfer form to ensure mandatory use at the transfer date to ensure direct association with the horses being transferred (**Finding F12**);

- continued improvement to the fate return process to confirm the specific information required from the Rehomers and to facilitate their timely completion for Program improvement purposes (**Finding F15**)

- ongoing performance of reconciliations to confirm volume of horses trapped, horse deaths, killed in trap/ holding yards, sent to knackery and rehomed (**Finding F9**);

- expansion of the obligation audit/ compliance register to include all requirements and actions to be managed and progressed by NPWS (**Finding F16**);

- uplift the operational spreadsheets to improve their structure, useability and control to facilitate the operational processes (**Finding F17**);

- accelerate the transfer of manual forms onto the Content10 system to support the operational processes and the reconciliations (**Finding F14** and **Finding F18**); and

Appendix A: Terms of Reference

Background

On 18 April 2024, Minister Penny Sharpe MLC (Minister Sharpe) received information from 2GB broadcaster Ray Hadley alleging that the NSW National Parks and Wildlife Service (NPWS) had failed to comply with its *Domestication (rehoming) guidelines* (Guidelines) when Rehoming over 250 wild horses to a person with links to an alleged illegal knackery in the Wagga Wagga area (person of interest or POI).

On 18 April 2024, Minister Sharpe requested that the DCCEEW investigate the administration of the NPWS wild horse Rehoming program (Program) as a whole. The proposed Investigation will focus on both general questions and questions specific to the Wagga Wagga case and POI, together the **'Investigation issues'** relative to the **'Program Intent'**.

General questions:

- How are wild horses allocated by NPWS to applicants under the Program?

- What are the current requirements in order to be approved as a rehomer under the program, and are these appropriate?

- Does information sharing protocols or data sharing exist across government agencies involved in Rehoming and animal welfare regulation, for example Racing NSW and local government?

- Under current requirements, is NPWS required to make regular checks or enquiries regarding whether an approved rehomer is still appropriate to be receiving horses?

- In what circumstances, if any, should NPWS make further enquiries or checks with rehomers after a delivery of horses?

- What restrictions on wild horses and their use exist once received by rehomers? For example, in what circumstances are recipients permitted to euthanise wild horses received under the Program?

- Identify any gaps that exist in the policies and procedures relating to the supply of wild horses generally.

With reference to the specific case:

- What are the factual circumstances around the supply of wild horses to the POI accused of running an illegal knackery?

- How were wild horses allocated to the POI during the period of time in question, and were all protocols followed?

- Was there any follow up or monitoring – formal or informal – regarding the POI?

- Should NPWS has made enquiries regarding the fitness of the applicant to re-home wild horses given the large number of wild horses requested by that applicant? Were any additional checks made or was additional information sought?

- Was any information received by NPWS regarding the POI during the time that they were receiving re-homed horses?

- Review NPWS internal policies and procedures relating to the Program and identify matters and circumstances relating to the supply of wild horses to the POI that may fall outside those policies and procedures.

- Are there any immediate lessons that can be learnt from this situation and can improvements be made to the settings for the future?

Investigation Scope

The following Scope has been defined by DCCEEW.

- The scope of the Investigation is to investigate the facts related to the Investigation Issues (**Scope**). At the conclusion of the Investigation, the Investigators will prepare a report on their findings of fact (**Investigation Report**).

- For the avoidance of doubt, the Investigation is not intended to investigate or make findings regarding the conduct of particular employees involved in the Program. Any allegations of misconduct against individual employees should be referred to the Ethics Team in DCCEEW.

- ██
██

- In addition, the Investigation will only identify the facts/ position associated with the Scope and identify findings and recommendations. The Investigation will not design and implement any required changes to improve performance and/or compliance.

DCCEEW requires a suitably qualified firm to complete an independent Investigation to perform the following activities:

- Reviewing the NPWS H002 Passive trapping: Wild horse standard operating procedure and NPWS H003 *Removal for domestication (rehoming) standard operating procedure* as at 20 February 2022 and 15 March 2024, the Guidelines, enabling legislation including the Kosciuszko Wild Horse Heritage Act 2018 relevant to the Scope and the 2021 Kosciuszko National Park Wild Horse Heritage Management Plan;

- Reviewing documents obtained during the course of the Investigation;

- Meeting with relevant NPWS officers responsible for the administration of the Program;

- Where appropriate, meetings with the parties who have raised concerns with DCCEEW about matters concerning the Investigation Issues;

- Considering, relevant to the Scope, other examples and procedures about the management of the Rehoming of wild animals from public land; and

- Reviewing and considering any other information and documents within the Scope of the Investigation held by DCCEEW.

The Investigation will be carried out on the assumption of complete cooperation and full disclosure from the parties involved, noting the Scope of the Investigation is not intended to extend liability to or incriminate any person/s.

Information may be shared with parties involved in the Investigation in order to afford the parties procedural fairness, as outlined below. Material provided to the Investigation may be made publicly available by DCCEEW unless it was specifically provided in confidence. Where a party has identified confidential parts in the material it provides, the Investigators will ensure that the information provided to the Investigators remains confidential.

The Investigation will be subject to all relevant requirements under the Public Interest Disclosures Act 2022 (PID Act). The Investigators will refer any public interest disclosures to the Ethics team in DCCEEW.

Appendix B: Key Stakeholder Meetings

The table below outlines the key meetings conducted with DCCEEW, NPWS and other Stakeholders.

No.	Topic	Attendees	Date of Workshop
1	NPWS Stakeholder Interview - ███████████	████████ - Deputy Secretary	Tuesday, 7th May 2024
2	NPWS Stakeholder Interview - ███████████	████████ - Director Park Operations Projects	Tuesday, 7th May 2024
3	NPWS Stakeholder Interview - ██████████	████████ - Executive Director Park Operations Inland	Friday, 10th May 2024
4	RSPCA Stakeholder Interview | Protiviti	██████ – RSPCA Chief Veterinarian ████████ - RSPCA Chief Inspector	Friday, 10th May 2024
5	NPWS Stakeholder Interview - ████████████ | ████	████████ – Senior Project Officer	Thursday, 16th May 2024
6	NPWS Stakeholder Interview - ████████████ | ████	████████ – Senior Project Officer	Friday, 17th May 2024
7	Playback Session ████████████ ██████	████████ - Deputy Secretary ████████ - Director Southern Ranges Branch (Acting Director on behalf of ████████) ████████ - Director Park Operations Projects	Tuesday, 28th May 2024
8	Independent Vet Stakeholder Interview - ██████████ ████	████████████ - Senior Lecturer in Veterinary Physiology (Independent Vet at Ecotone Extension)	Wednesday, 29th May 2024
9	NPWS Stakeholder Interview - ██████████ ████	████████ – Senior Project Officer	Wednesday, 29th May 2024
10	NPWS Stakeholder Interview - ██████████ ████	████████ – Senior Project Officer	Friday, 31st June 2024

Appendix C: Documentation Reviewed

A total of 191 documents have been received and reviewed as part of this Investigation. The following table lists out the key documents.

No.	Document name	No.	Document name
1	Kosciuszko Wild Horse Heritage Act 2018 No 24	16	Welfare Assessment and audit of wild horse passive trapping program in northern Kosciousko National Park_30.11.20.pdf
2	Organisational Chart Wild Horse Team Current May 24.docx	17	Welfare Assessment and audit of wild horse passive trapping program in northern Kosciousko National Park_3.5.23.docx
3	Kosciuszko-national-park-wild-horse-heritage-management-plan-230343.pdf	18	NPWS Summary of matters relating to the POI (updated 02.05.2024).pdf
4	Kosciuszko-national-park-wild-horse-heritage-plan-2021-evaluation-report.pdf	19	Approved Rehomers – 2019.xlsx
5	NPWS Program Summary (Updated 02.05.2024).pdf	20	Approved Rehomers – 2020.xlsx
6	NPWS H002 Passive trapping - Wild horse control standard operating procedure Reviewed Mar 24.pdf	21	Approved Rehomers 2022 – 2024.xlsx
7	Appendix A to NPWS SOP H002 - Daily Wild Horse Trapping Report Reviewed Mar 24.pdf	22	Rehomers awaiting fate returns.xlsx
8	NPWS H003 Removal for domestication (rehoming) - Wild horse control standard operating procedure Reviewed Mar 24.pdf	23	Approved Rehomers – 2019.xlsx
9	Appendix to Domestication SOP - Rehoming Guidelines Reviewed Mar 24.pdf	24	Approved Rehomers – 2020.xlsx
10	Appendix to Domestication SOP - Application to Rehome Reviewed Mar 24.pdf	25	Approved Rehomers 2022 – 2024.xlsx
11	Appendix to Domestication SOP - Proof of Transfer Form Reviewed Mar 24.pdf	26	NSW Transported Stock Statement Form (LLS) - Screenshots
12	Appendix to Domestication SOP - Temporary Yarding Daily Inspection Form Reviewed Mar 24.pdf	27	Rehoming Application of POI July 2020.pdf
13	Appendix to Domestication SOP - Transport Acknowledgement Form Reviewed Mar 24.pdf	28	POI Application to rehome wild horses – Approved Nov 2020.msg
14	NPWS H004 Removal for Removal for Knackery or Abattoir - Wild horse control standard operating procedure Reviewed Mar 24.pdf	29	POI rehoming application – 28 Apr 2022.msg
15	NPWS Excel Summary - Rehoming Wild Horses Nov 2021 - April 2024.xlsx	20	POI rehoming application – Approved - 29 Apr 2022.msg

Appendix D: Detailed Timeline of Events

Timeline of Rehoming Program (Documents/Legislation/Plans/Audits/Reviews)

Timeline Activity	Timeline	Supporting Evidence
2002		
Establishment of Passive Trapping & Rehoming Program (Kosciuszko National Park)	2002	Stakeholder Update October 2020	NSW Environment and Heritage
2006		
Kosciuszko National Park Plan of Management 2006 (Commenced)	14 June 2006	2006 Plan of Management - Kosciuszko National Park (nsw.gov.au)
2018		
Kosciuszko Wild Horse Heritage Bill 2018	06 June 2018	Kosciuszko Wild Horse Heritage Bill 2018 (nsw.gov.au)
Kosciuszko Wild Horse Heritage Act 2018	15 June 2018	Kosciuszko Wild Horse Heritage Act 2018 No 24 - NSW Legislation
2020		
Rehoming requirements for wild horses suspended from Kosciuszko National Park	April 2020	NPWS Rehoming requirements for wild horses removed from Kosciuszko National Park (2020) - superseded in 2022.pdf
2021		
Implementing the 2021 Kosciuszko National Park Wild Horse Heritage Management Plan	24 November 2021	Implementing the 2021 Kosciuszko National Park Wild Horse Heritage Management Plan	NSW Environment and Heritage
2022		
Domestication (rehoming) guidelines (Appendix B - NPWS H003 Removal for domestication (rehoming) - Wild horse control standard operating procedure) introduced	20 February 2022	NPWS domestication (rehoming) guidelines for wild horses removed from National Parks and Wildlife Services estate (2022).pdf
NPWS H002 Passive trapping - Wild horse control standard operating procedure introduced	20 February 2022	NPWS H002 Passive trapping - Wild horse control standard operating procedure.pdf
NPWS H003 Removal for domestication (rehoming) - Wild horse control standard operating procedure introduced	20 February 2022	NPWS H003 Removal for domestication (rehoming) - Wild horse control standard operating procedure.pdf
NPWS H004 Removal for knackery or abattoir - Wild horse control standard operating procedure introduced	20 February 2022	NPWS H004 Removal for knackery or abattoir - Wild horse control standard operating procedure.pdf
Minister for Environment and Heritage requested the Secretary of the Department of Planning and Environment to evaluate of the implementation of the Kosciuszko National Park wild horse heritage management plan	September 2022	As advised by NPWS
Evaluation of the implementation of the Kosciuszko National Park Wild Horse Heritage Management Plan (2021)	29 November 2022	NPWS kosciuszko-National-Park-Wild-Horse-Heritage-Management-Plan-2021-evaluation-report.pdf
2023		

Amended: Kosciuszko National Park Wild Horse Heritage Management Plan introduced	23 October 2023	NPWS Kosciuszko-National-Park-Wild-Horse-Heritage-Management-Plan-230343.pdf
2024		
Revised Domestication (rehoming) guidelines introduced	March 2024	NPWS Rehoming Guidelines Review RSPCA Mar 24.docx
Revised NPWS H002 Passive trapping - Wild horse control standard operating procedure introduced	15 March 2024	NPWS H002 Passive trapping - Wild horse control standard operating procedure.pdf
Revised NPWS H003 Removal for domestication (rehoming) - Wild horse control standard operating procedure (reviewed) introduced	15 March 2024	NPWS H003 Removal for domestication (rehoming) - Wild horse control standard operating procedure.pdf
Revised NPWS H004 Removal for knackery or abattoir - Wild horse control standard operating procedure (reviewed) introduced	15 March 2024	H004 Removal for knackery or abattoir - Wild horse control standard operating procedure.pdf

Timeline of supply of wild horses to the Person of Interest

Timeline Activity	Timeline	Supporting Evidence
2020		
The POI applied to be a Rehomer for the NPWS Rehoming Program	28 July 2020	NPWS Rehoming Application POI July 2020.pdf
NPWS followed up with the POI for additional information to support the application	19 November 2020	NPWS 2020 Application POI Information.msg
The POI was approved as a Rehomer for the NPWS Rehoming Program	19 November 2020	NPWS POI Application to rehome wild horses – Approved Nov 2020.msg
The POI received 15 horses from NPWS	27 November 2020	NPWS POI Rehoming Summary.xlsx
The POI received 11 horses from NPWS	13 December 2020	NPWS POI Rehoming Summary.xlsx
2021		
First Fate Return request sent by NPWS for the wild horses of the POI received and NPWS requested a response by 9 March 2021.	23 February 2021	NPWS Fate Return March 2021.msg
POI received 11 horses from NPWS	2 March 2021	NPWS POI Rehoming Summary.xlsx
POI received 10 horses from NPWS	6 March 2021	NPWS POI Rehoming Summary.xlsx
The POI responded to the first fate return request informing NPWS that 'all horses had found homes except 4 which he was confident would find homes'.	17 March 2021	NPWS Fate Return March 2021.msg
The POI received 3 horses from NPWS	1 April 2021	NPWS POI Rehoming Summary.xlsx
Complaint 1: NPWS Senior Project Officer emailed RSPCA NSW Chief Inspector regarding a complaint. The complaint was associated with the horse's behaviour while on the POI's truck according to the POI he had a long wait at road works and the horses did not settle, so his truck was rocking quite a bit. The POI informed NPWS of the inspection RSPCA conducted on his property associated with the complaint. RSPCA NSW Chief Inspector responded stating, the attending Inspector did not have any concerns regarding the horses at the property or the transport issue following enquiries with the POI.	14 April 2021	As advised by NPWS NPWS RSPCA Inspection Summary – POI 14 April 2021.msg
The POI received 7 horses from NPWS	29 April 2021	NPWS POI Rehoming Summary.xlsx
The POI received 10 horses from NPWS	14 May 2021	NPWS POI Rehoming Summary.xlsx
The POI received 10 horses from NPWS	20 May 2021	NPWS POI Rehoming Summary.xlsx
The POI received 5 horses from NPWS	21 May 2021	NPWS POI Rehoming Summary.xlsx
The POI received 11 horses from NPWS	29 May 2021	NPWS POI Rehoming Summary.xlsx
The POI received 10 horses from NPWS	30 May 2021	NPWS POI Rehoming Summary.xlsx

Second Fate Return request sent by NPWS for the wild horses the POI received on 2nd and 6th March 2021 and NPWS requested response by 25 June 2021.	June 2021	NPWS Fate Return June 2021.msg
Complaint 2: NPWS received a complaint from an approved NPWS Rehomer about the POI allegedly sending horses in his care to knackeries. The complaint was referred to the RSPCA NSW.	4 June 2021	As advised by NPWS NPWS Complaint – 4 June 2021.msg
The POI responded to the second fate return request informing NPWS "all the horses I have received have found homes with some people taking 2/3 at a time and also some rehoming sanctuary also working in with me help find homes for horses".	22 June 2021	NPWS Fate Return June 2021.msg
The POI received 16 horses from NPWS	9 July 2021	NPWS POI t Rehoming Summary.xlsx
The POI received 12 horses from NPWS	14 July 2021	NPWS POI Rehoming Summary.xlsx
The POI received 7 horses from NPWS	15 July 2021	NPWS POI Rehoming Summary.xlsx
The POI received 7 horses from NPWS	29 September 2021	NPWS POI Rehoming Summary.xlsx
2022		
The POI submitted new application to be a Rehomer of NPWS Rehoming Program	28 April 2022	NPWSPOI rehoming application – 28 Apr 2022.msg
Additional information was requested by the POI to progress application	28 April 2022	NPWS POI rehoming application – further information provided – 28 Apr 2022.msg
The POI's Application was approved via email	29 April 2022	NPWS POI rehoming application – APPROVED - 29 Apr 2022.msg
The POI received 9 horses from NPWS	5 May 2022	NPWS POI Rehoming Summary.xlsx
The POI received 3 horses from NPWS	8 July 2022	NPWS POI Rehoming Summary.xlsx
The POI received 5 horses from NPWS	11 July 2022	NPWS POI Rehoming Summary.xlsx
The POI received 8 horses from NPWS	24 July 2022	NPWS POI Rehoming Summary.xlsx
The POI received 16 horses from NPWS	28 August 2022	NPWS POI Rehoming Summary.xlsx
Racing NSW received reports that thoroughbred horses were allegedly being slaughtered for dog meat on the property.	September 2022	As advised by NPWS
The POI received 10 horses from NPWS	5 September 2022	NPWS POI Rehoming Summary.xlsx

The POI received 6 horses from NPWS	29 September 2022	NPWS POI Rehoming Summary.xlsx
The POI received 8 horses from NPWS	31 October 2022	NPWS POI Rehoming Summary.xlsx
The POI received 10 horses from NPWS	18 November 2022	NPWS POI Rehoming Summary.xlsx
The POI received 10 horses from NPWS	2 December 2022	NPWS POI Rehoming Summary.xlsx
The POI received 12 horses from NPWS	16 December 2022	NPWS POI Rehoming Summary.xlsx
2023		
The POI is listed on the Racing NSW Excluded List	22 February 2023	NPWS Complaint against POI July 2023.msg
The POI received 10 horses from NPWS	25 February 2023	NPWS POI Rehoming Summary.xlsx
The POI received 10 horses from NPWS	10 March 2023	NPWS POI Rehoming Summary.xlsx
Third Fate Return request sent by NPWS for the wild horses to the POI received on the following dates; 10 horses received on 5th September 2022, 6 horses received on 29th September 2022 8 horses received on 31st October 2022, 10 horses received on 2nd December 2022	24 March 2023	NPWS Fate Return Reminder March 2023.msg
The POI received 5 horses from NPWS	25 April 2023	NPWS POI Rehoming Summary.xlsx
The POI received 13 horses from NPWS	16 June 2023	NPWS POI Rehoming Summary.xlsx
The POI received 13 horses from NPWS	19 June 2023	NPWS POI Rehoming Summary.xlsx
Fourth Fate Return request sent by NPWS for the wild horses to the POI received on the following dates; 10 horses received on the 25 February 2023	19 June 2023	NPWS Fate Return Reminder June 2023.msg
Complaint 3: Secretary of Snowy Mountain Brumby Sustainability and Management Group Inc. (SMBSMG) sent an email to NPWS informing about the POI being included in the Racing NSW exclusion list.	4 July 2023	NPWS Complaint against POI July 2023.msg
The POI contacted NPWS advising he would cease rehoming horses from the park and requested to be removed as an approved NPWS Rehomer.	5 July 2023	NPWS Program Summary (Updated 02.05.2024).pdf - Page 14

NPWS responded to Secretary of Snowy Mountain Brumby Sustainability and Management Group Inc. (SMBSMG) about the POI's exclusion stating "Thank you for your email to the Acting Coordinator General of the Environment and Heritage Group about wild horse management in Kosciuszko National Park. Your email was referred to the National Parks and Wildlife Service (NPWS) for a response.	18 July 2023	NPWS Response to complaint against POI July 2023.msg
2024		
Program temporarily suspended from April 2024.	April 2024	NSW Environment and Heritage public website - Rehome a Kosciuszko wild horse

Note: The timelines do not include all visits conducted by RSPCA NSW in 2021, 2023 and 2024 given the limited information provided by RSPCA NSW.

Appendix E: Domestic (Rehoming) guidelines for wild horses removed from National Parks and Wildlife Service estate

The guidelines, as at March 2024, are shown below for reference purposes only.

Domestication (rehoming) guidelines

For wild horses removed from National Parks and Wildlife Service estate

The following criteria represents the minimum requirements for receiving wild horses from National Parks and Wildlife Service (NPWS) for domestication (rehoming).

Transport

1. The applicant is responsible for providing adequate transport of the animals from the location specified by National Parks and Wildlife Service (NPWS) to their new home. NPWS reserves the right to inspect trailers, crates and trucks prior to transport and refuse loading if NPWS staff believe the trailer does not ensure the safe transport of the animals. Transport vehicles must meet the requirements of the Australasian Animal Welfare Standards and Guidelines – Land Transport of Livestock (Australian Health Australia 2012).

2. All trailers and trucks must have a sliding rear gate.

3. Maximum transport durations without unloading for a spell, food, and water for most classes of horses is 12 hours from the location of pick up from NPWS (Animal Health Australia 2012). a. Maximum transport duration is reduced to 8 hours when ambient temperature along the transport route exceeds 30 degrees Celsius (Friend 2001; Weeks et al 2012; Padalino 2015). b. Additional transport duration restrictions apply for other classes of horses, e.g. foals and heavily pregnant mares, in accordance with the Australasian Animal Welfare Standards and Guidelines – Land Transport of Livestock (Australian Health Australia 2012).

4. Horses must be transported to the applicant's approved property.

Facilities

5. The applicant must provide proper and sufficient food, water, shelter, care, and a safe, appropriate facility for containing the animals. Minimum facility requirements are:

Yarding (required on arrival) • 1.8 meter-high fences for an animal two years of age or older. • 1.5 meter-high fences for a yearling. • Fences constructed from metal or wood posts and rails. • Minimum space of 12 m2 per adult horse, and 9 m2 per yearling or foal (NSW Agriculture 1996). • Well-drained surface. • Ability to have physical contact with other horses. • Freedom from harassment or injury caused by other horses. • Shade and/or shelter.

Paddocking (all horses are expected to be paddocked as soon as possible after initial yarding) • Housed with at least one other horse (domestic horses may help with the transition) • Standard stock fencing consisting of post and rail, conventional stock barrier, electric, or a combination. Fencing can be 1.2–1.5 m in height of Barbed wire-only fencing is not permitted. • No more than 1–4 horses per 2 hectares (depending on pasture quality and availability) (NSW Department of Primary Industries 2007) are permitted.

6. Heavily pregnant mares must have access to an appropriate area to foal.

7. Stallions may need to be initially yarded longer than other classes of horses (i.e. more than two weeks), and hence require yards larger than the minimum requirements. A crush or race must be available for safe gelding to occur. 8. If horses are being transported via a truck without a full ramp, a suitable, accessible and well-maintained ramp must be available for the unloading of horses on arrival. Experience 9. Applicants must have the skills and experience necessary to train and handle unbroken (unstarted) horses using the principles of equitation science.

Husbandry

10. The applicant acknowledges that the horses are wild and unhandled and as such have received no training, farriery, dental treatment, first aid or preventative health care, such as vaccinations and deworming. The horses may have undiagnosed or unidentified illnesses or injuries.

11. Horses must be inspected at least once daily.

Responsibilities

12. Where possible, animals will be selected to meet the applicant's specified preferences. Where this is not possible, animals will be selected for the applicant, with the preference to retain horses in family groups wherever possible. An applicant is to take possession and ownership of all animals designated for them.

13. The applicant agrees to maintain regular contact with NPWS during operations and provide transport for animals from the location specified by NPWS to their new home within 48 hours of being notified. Animals can be collected by prior appointment only.

14. Transfer of the animals to the applicant is final on pick-up. On loading to the applicant's transport, the applicant becomes solely responsible for the animal's care, welfare and all associated costs and liability.

15. The animals cannot be knowingly sold, traded, given away or transferred for: • Rodeos or similar events. • Slaughter or processing for meat or by-products.

16. The animals cannot be knowingly sold, traded, given away or transferred via a public saleyard or auction within three months of receival.

17. Before applying to rehome stallions, applicants are to ensure they have identified a local veterinarian that is willing to geld mature stallions that have received minimal handling and in a field situation.

18. The animals must not be returned to publicly managed lands. Penalties apply for releasing animals onto any public land including NPWS land and offenders will be prosecuted.

19. The applicant acknowledges that NPWS staff or its representatives may conduct compliance inspections of the location where the animals are being kept.

20. NPWS reserves the right to refuse an application for rehoming if an applicant cannot adequately demonstrate they meet the criteria specified by NPWS.

21. A Property Identification Code (PIC) must be supplied for the location where the animals are to be kept.

22. An application must be made for a minimum of 5 animals. Applications for 4 animals or less should be made directly to wild horse rehoming groups and individuals.

23. An application for more than 25 animals may require additional verification by NPWS or its authorised representatives relating to standard of care and compliance checks.

24. Applicants must be at least 18 years old, have no convictions related to cruelty to animals or be listed on the Racing NSW Excluded List.

25. After four months of receipt of animals, applicants are to notify NPWS of the fate of the animals received (i.e. sold, transferred, died, euthanised, retained). Brand and/or microchip numbers (if applicable) and the names and addresses of the new owner must be supplied if the animal has been sold or transferred. Information will be recorded by NPWS for program improvement purposes (Hampton et al 2016).

26. Non-compliance of an approved applicant with the guidelines will prevent the applicant receiving any further horses from NPWS. NPWS reserves the right to withdraw an applicant's approval status at any time, based on advice from relevant authorities or experts. Evidence of animal cruelty will be referred to RSPCA NSW.

27. Approved applications remain valid for a maximum of three (3) years. A new application must be submitted in the event of changes to an approved applicant's PIC or facilities, or any other change deemed significant by NPWS (including update of these guidelines). An approved applicant must disclose animal cruelty offences committed during the approved application period to NPWS. This disclosure must occur before requesting any additional animals.

To apply

Applicants must complete and sign an Application to Rehome Wild Horses form. Once approved, the applicant is eligible to rehome wild horses from NPWS.

References

Animal Health Australia (AHA) 2012. Australian animal welfare standards and guidelines — land transport of livestock. Animal Health Australia, Canberra, Australia. www.animalwelfarestandards.net.au/files/2021/06/Land-transport-of-livestock-Standards-and-Guidelines-Version-1.-1-21-September-2012.pdf

Friend, T. H. 2001. A review of recent research on the transportation of horses. Journal of Animal Science. 79, E32–E40.

Hampton, J. O., Hyndman, T. H., Laurence, M., Perry, A. L., Adams, P. and Collins, T. 2016. Animal welfare and use of procedural documents: limitations and refinement. Wildlife Research. 43, 599–603. NSW Agriculture. 1996. NSW animal welfare code of practice no 3 - horses in riding centres and boarding stables.

NSW Agriculture, Sydney, Australia. www.dpi.nsw.gov.au/animals-and-livestock/animal-welfare/animal-care-and-welfare/other/companion-animal-files/nsw-animalwelfare-code-of-practice-no-3-horses-in-riding-centres-and-boarding-stables

NSW Department of Primary Industries. 2007. Pastures for horses. Primefacts. 525. NSW Department of Primary Industries, Orange, Australia.https://www.dpi.nsw.gov.au/animals-andlivestock/horses/horse-feeding-and-nutrition/pastures-horses

Padalino, B. 2015. Effects of the different transport phases on equine health status, behaviour, and welfare: a review. Journal of Veterinary Behaviour. 10, 272–282.

Weeks, C. A., McGreevy, P., and Waran, N. K. 2012. Welfare issues related to transport and handling of both trained and unhandled horses and ponies. Equine Veterinary Education. 24, 423–430.