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National Parks Association of the ACT Inc.

conservation education protection

Email to Conservation@parks.vic.gov.au

Submission on the (Draft) Feral Horse Action Plan 2021

Thank you for the opportunity to comment on the (Draft) Feral Horse Action Plan 2021 ('the Action Plan').

The National Parks Association of the ACT ("NPA ACT") is a community-based conservation organisation with more than 60 years of experience in helping to protect our natural environment. We have an active interest in the management of Australia's high country and are strong advocates for the feral horse management based on scientific evidence. We appreciate that feral horse management has the potential to generate emotional responses but believe that the adoption of well thought out, practical and efficient management approaches has benefits for the environment and animal welfare.

The NPA ACT would like to compliment the Action Plan on:

- Recognising the impact that the rapidly increasing populations of feral horses are having on the Alpine National Park's ecosystems;
- On prioritising the most humane, safe and effective horse control techniques;
- its commitment to ongoing monitoring within Alpine National Parks of the feral horse population and their environmental impacts
- recognising that this forms an important part of an overall commitment to feral animal control in the Alpine National Park.

The NPA ACT strongly supports the five points that make up the Action Plan's strategy (section 1.2 of the Action Plan).

The Action Plan would be strengthened by:

- clearly identifying reduction targets;
- increasing the initial potential reduction of 500 hundred horses in the eastern alps (Section 5.1 page 27). Given the identified 15% annual increase in horse numbers in the Alpine National Park between the 2014 and 2019 surveys, a reduction in 500 horses would be unlikely to even offset natural increase. Therefore, managers will have to contend with not only the already significant population but a greater impact of population growth. Feral horse programs can be costly exercises and delays in reducing the feral horse population will add to Vic Parks' costs, affecting the resources across that reserve estate as a whole. It would be more efficient to focus resources at the start of the program to achieve a rapid decrease in horse numbers as this would reduce the ultimate number of horses that need to be removed:
- continuing to reduce reliance on the inefficient rehoming approach to feral horses;
 and

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discussion on carcass disposal options.

Control methods

The NPA ACT strongly supports the availability of a wide range of control methods. It is well acknowledged that land managers need to be flexible in the methods used in controlling feral populations.

The section on control methods is a considered analysis of available techniques.

In regards to ground and aerial shooting, the NPA ACT commends the emphasis on the use of professional shooters and the monitoring of their skills. The NPA ACT believes that shooting, in most instances, is the most humane and efficient method of population reduction. However, it should only be undertaken by high skilled professional shooters to maximise animal welfare.

The NPA ACT notes that trapping and rehoming will only occur where there are preidentified homing participants and the NPA ACT supports this approach if trapping is to be used. However, trapping overall is a resource intensive and relatively inefficient process and as identified in the Action Plan can still result in animal welfare concerns.

The NPA ACT supports the Action Plans rejection of roping or "brumby running" (Page 21) as this approach is deemed to be a particularly inhumane control method.

The ACT government has a strong feral horse strategy and its approach of immediate removal of feral horses entering from Kosciuszko National Park has been highly successful in reducing damage to the ACT's wilderness area.

Should you require any further information on our comments or our organisation, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, convener, NPA ACT Environment Sub-committee.

Yours sincerely

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