



## National Parks Association of the ACT Inc.

*conservation education protection*

The Project Team,  
Kosciuszko National Park Wild Horse Heritage Management Plan,  
NSW National Parks and Wildlife Service  
Via npws.wildhorses@environment.nsw.gov.au

### **Submission on the (Draft) Kosciuszko National Park Wild Horse Heritage Management Plan**

Thank you for the opportunity to comment on the (Draft) Kosciuszko National Park Wild Horse Heritage Management Plan ('the Draft 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. We have been keen participants in the debates over the management of feral horses in the Australian Alps and are strong advocates for the feral horse management based on scientific evidence.

#### Key Points

The NPA ACT recognises that the Draft Plan has been developed in response to the requirements of the *Kosciuszko Wild Horse Heritage Act 2018* (KWhA). However, the NPA ACT also recognises that this piece of legislation undermines the primary conservation purpose for the existence of Kosciuszko National Park (KNP). It is also dismayed at the stated ability of the contents of the Draft Plan to prevail should these contents be inconsistent with anything in the KNP Plan of Management (the POM) (page 1 About this plan). The PoM has been developed to actively preserve the key environmental values of KNP and this has been reduced to secondary status by the requirement of the KWhA and the Draft Plan.

Wild horses are listed as a key threatening process for habitat loss under the *NSW Biodiversity Conservation Act 2016* and is identified as directly impacting 23 threatened flora and 11 threatened fauna species that occur in KNP through trampling and grazing vegetation and compaction of soil and disturbance of waterways.

Significant delays in implementing efficient and effective controls for management of feral horses in KNP has seen a significant increase in their population. The NPA ACT therefore welcomes the recognition of a target population (page 2 Executive Summary). However, the NPA ACT believes the proposed target of 3,000 represents a highly significant and continuing threat to KNP's natural values and the NPA ACT recommends the allocation of significant resources to ensure that the proposed target is reached as quickly as possible. This has a number of benefits, being:

- the total number of horses needing to be removed to reach the target will be lower as a shorter time period reduces the impacts of horse reproduction;
- reductions in costs due to having to remove fewer horses; and
- reaching the target quickly, allows a longer period of time to analyse the impact on KNP's natural values resulting from the maintaining of this still large number of horses and will therefore help guide the reassessment of the Draft Plan in 2027

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The Draft Plan should also recognise that maintaining the horse population at 3,000, given the current near 20% reproduction rate, will require removal of around 500 horses per annum and this will result in continuing costs. These ongoing costs must be considered as part of any review of the target population number.

The NPA ACT notes that the Draft Plan is proposing that nearly a third of KNP or approximately 220,000 hectares will be kept as wild horse protection areas (page 2 Executive summary). This area includes highly significant natural assets and represents a direct threat to their conservation undercutting the primary rationale for the establishment and maintenance of a national park.

The NPA ACT strongly supports the maintenance of zero horse areas but the size of these need to be significantly increased to protect the key conservation values of KNP and to provide horse free buffers between KNP and its neighbouring reserves both in NSW and in the ACT and Victoria.

### Detailed Comments

*Page 4 The heritage value of sustainable wild horse populations* - It is important to note that much of the heritage value is derived from “legends, stories and myths” including literature like “The Man From Snowy River” and the “Silver Brumby”. However, Paterson had not originally planned to locate his poem in the Snowy region and Elyne Mitchell in the years after the Silver Brumby series expressed concern that the alpine regions were able to be degraded through hard hooved animals and that KNP needed to be protected from all such animals.

Many of the heritage features listed on page 4 can be preserved without the need for a physical presence of horses and their resulting impact on the natural environment. The need for a long-term population of horses in KNP is questionable and should be evaluated against the potential to maintain populations on private lands outside of KNP.

*Page 8 Protecting wild horse heritage values while maintaining other environmental values* – In addition to the impacts listed in this section it should also be noted the recording of the extensive damage able to be caused by a small mob of 13 horses in area of 40 square kilometres as detailed on page 25 of *Assessing the Impacts of Feral Horses on the Bogong High Plains Victoria* January 2018, by Dr Arn Tolsma & Dr James Shannon.

*Page 12 Wild Horse Retention Areas* - The Draft Plan should reduce the wild horse retention areas to provide:

- a buffer zone along the Snowy Mountains Highway to reduce the risk to public safety of a collision between a vehicle and a horse
- buffer zones between KNP and all neighbouring reserves. This is particularly relevant to complement the strong horse management plans in the ACT and Victoria.
- protection for the sources and headwaters of the Murray and Murrumbidgee rivers
- protection for the full length of the Goodradigbee River in KNP
- priority protection to threatened species located in the current wild horse retention area

*Page 15 Wild Horse Removal Areas* - The NPA ACT strongly supports the creation of wild horse removal areas but would recommend an expansion of the areas in line with its comments above. It also recommends that the removal occurs before 30 June 2027 to:

- reduce the total number of horses needing to be removed to reach the target will be lower as a shorter time period reduces the impacts of horse reproduction;

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- achieve reductions in costs due to having to remove fewer horses;
- to provide a greater period of recovery time for these areas following the horse removal.

*Page 16 – Wild Horse Prevention Areas* – The NPA ACT strongly supports all actions to prevent the introduction of feral horses into these areas and recommends the introduction of buffer zones in the retention areas where these abut a prevention area to lower the risk of incursions.

*Page 18 – Control Methods* – The NPA ACT 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. However, in the first sentence of this section the NPA ACT recommends the inclusion of control efficiency in this sentence as one of the key matters in determining which controls are to be used in specific reduction operations/scenarios.

*Page 18 – Animal Welfare* – The NPA ACT agrees that animal welfare is a key factor in the selection of control measures and believes that the selection of control measures must be the most humane and efficient for the specific reduction operation/scenario.

*Page 20 – Capture Methods* – Both the methods referred to in this section are labour intensive and inefficient compared to other control methods. While they do have a role to play in certain circumstances, they have been shown over many years now to have little impact on overall horse numbers. Under no circumstances should horses captured by these methods be released back into KNP.

*Page 20 - Control Methods* – The NPA ACT notes that trapping and rehoming will only occur where there are pre-identified 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 that can still result in animal welfare concerns.

The NPA ACT strongly supports the use of ground shooting as a method that is both efficient and humane but it should only be undertaken by highly skilled professional shooters or suitably trained rangers to maximise animal welfare. The general public should not be licenced to undertake ground shooting and should be kept well away from all operations.

The NPA ACT supports the Draft Plan's rejection of roping or "brumby running" as this approach is deemed to be a particularly inhumane control method. Given its inhumanity, it is also concerning that historic brumby running is cited by stakeholders as a matter for conferring heritage values on the feral horse population (page 4).

*Page 20 Aerial Shooting* - The NPA ACT agrees with the statement that aerial shooting can have the lowest negative animal welfare impacts of all lethal control methods and is RSPCA approved. It therefore notes with regret the constraints currently on this control method and recommends that the National Parks and Wildlife Service introduces a program to improve community understanding of the benefits of this method, in order to facilitate its future use.

The NPA ACT also notes contradictions with the Draft Plan's statement about a lack of social licence for aerial shooting given the successful use of aerial shooting of horses in the Northern Territory and the National Parks and Wildlife Service's own use of aerial shooting for other animals, for example, deer in Royal National Park as per the 8 December 2020 NSW Department of Planning, Industry and Environment media release "Ongoing operations to remove feral deer in Royal National Park a success".

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The NPA ACT recalls that, during the process for the preparation of the 2016 Wild Horse Management Plan, surveys were conducted that showed that, once presented with all the facts, members of the general public recognised aerial shooting as an appropriate method of control. This further supports the appropriateness of raising community awareness of the benefits of aerial shooting.

*Page 21 – Reproductive Control* – The NPA ACT agrees that effective and efficient reproductive control methods are still to be developed. It also notes that reproductive controls have a long-term effect on populations but do not by themselves reduce the short to medium term impacts of current horse populations.

*Page 21 Exclusion Fencing* – The NPA ACT notes that exclusion fencing can be a useful process for the protection of specific sites. However, in deciding whether to use exclusion fencing land managers must consider the potential impact exclusion fencing can have on non-target populations. The type and duration of exclusion fencing should be considered on a site by site basis to ensure the most appropriate form is used in the specific circumstances.

Page 21 – Review of the Plan – The NPA ACT strongly supports the need of a review of the progress of the actions in the Draft Plan. It recommends sufficient resourcing to ensure rigorous independent scientific review is used to determine the progress of the Draft Plan's targets and the outcomes of the actions of the Draft Plan in respect to the conservation values of KNP.

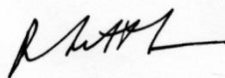
The NPA ACT also notes that the Draft Plan does not identify how remediation work is to be funded and implemented to address the damage already done.

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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