



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

The Project Officer
Kosciuszko National Park Wild Horse Management Plan Review
National Parks and Wildlife Service
PO Box 2228
Jindabyne NSW 2627

Dear Project Officer

Submission to the Kosciuszko National Park Wild Horse Draft Management Plan Review

Thank you for the opportunity to make a submission on the Kosciuszko National Park (KNP) Wild Horse Draft Management Plan Review (the Plan). The National Parks Association of the ACT (“NPA ACT”) is a community-based conservation organisation with more than fifty years of working to protect our natural environment through an active outings and work party program; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs.

The NPA ACT has a particular interest in the management of feral horses in both the ACT and KNP. NPA ACT members are regular visitors to KNP and have become increasingly concerned about the impact of feral horses on this national park. They are also very aware that feral horses have the potential to threaten to the environmental values of the ACT’s Namadgi National Park, which adjoins KNP.

The management of feral horses in KNP is, for some sectors of the community, a very emotive issue and the NPA ACT would like to thank the National Parks and Wildlife Service (NPWS) for its efforts in developing this Plan under some extremely difficult circumstances.

Summary

The NPA ACT welcomes the general thrust of the Plan, being the active and humane reduction of the numbers of feral horses in KNP. The NPA would question whether the long timescale involved in reducing the feral horse population and the size of the proposed remnant population leads to efficient, effective and economic management of the feral horse population in KNP.

The NPA ACT supports:

- The expansion of control activities available to the NPWS
- The Plan’s objectives numbers 1 and 2; and
- The exclusion of “brumby running” as a control activity.

NPA ACT Submission to Kosciuszko National Park Wild Horse Draft Management Plan Review

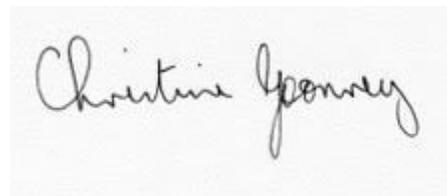
The NPA ACT does not support:

- The Vision;
- The Plan's objective number 3;
- The time taken to fully enact the control program; and
- The size of the feral horse population to be maintained.

Further detailed comments have been included as Attachment A to this submission.

Should you require any further information please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, convenor, NPA ACT Environment Sub-committee.

Yours sincerely

A handwritten signature in black ink that reads "Christine Goonrey". The signature is written in a cursive, flowing style.

Christine Goonrey

Vice President

National Parks Association of the ACT

14 August 2016

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ATTACHMENT A

Detailed Comments

Impact of Feral Horses - Since 2010, feral horses have spread their range to now occupy almost the entire shared border with Namadgi National Park in the ACT as illustrated in Graeme Worboys et al, *Our Australian Alps are Changing for the Worse*, Feb 2015. These feral horses are entering the ACT water catchment area in increasing numbers, creating an environmental and financial burden for the ACT jurisdiction.

The movement of feral horses between KNP, Brindabella National Park, the Alpine National Park, as well as, Namadgi National Park and other adjoining reserves in the Australian Alps region places significant environmental pressure on these key ecosystems.

The NPA ACT has regularly reported on feral horse issues in its newsletter over the past 18 months. In particular, it has described the feral horse effects noted by an NPA ACT-led party of bushwalkers on a walk to the Cowombat Flat area which included the source of the Murray River, Tin Mine (NSW) and McFarlanes Flat (Vic). Several members of that party created a portfolio of photos that illustrated the extent of damage occurring from the impacts of feral horses. This portfolio of photos can be found at <http://www.flickr.com/photos/91914657@N08/sets/>.

Further evidence of horse damage in KNP is contained in the Graeme Worboys and Ian Pulsford report entitled *Observations of Pest Horse Impacts in the Australian Alps, March 2013*, which is available at www.mountains-wcpa.org.

These impacts are confirmed in the Plan – refer to page 13 et al.

Vision (Page 2)

The NPA ACT believes that the vision should be amended to read:

“To conserve the outstanding values of Kosciuszko National Park through active, adaptive and humane management of wild horses to minimise their adverse impacts on natural, cultural and visitor values.”

The NPWS is not required under legislation to require the support of the community to achieve its conservation objectives. The NPA ACT would be concerned that if the words “with the support of the community” were included this would open opportunities for pressure groups claiming to represent the community to undermine the feral horse management program.

The inclusion of the words “while acknowledging the cultural and social values of the Kosciuszko National Park wild horse population” could be seen as legitimizing the maintenance of a feral horse population in KNP on the basis of their cultural significance. The NPA ACT would contest any suggestion that horses represent a unique cultural value in KNP. If claims for this were accepted it is difficult to see where distinction between other domestic animals could be drawn. Would the NPWS be suggesting that population of feral dogs, cats, cows, pigs, etc should also be maintained based on their past association with settlers in the Snowy Region?

Much of the assertion that horses have a unique cultural significance comes from the existence of 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.

Summary (Page 3)

The NPA ACT supports the Plan objectives numbers 1 and 2. It believes that while community involvement is useful in general across KNP it has limited application for feral horse management. Therefore, objective number three should be removed or clearly identified as being subordinate to objectives 1 and 2.

The NPA ACT would support community involvement in feral horse rehoming but only where this does not impact on the efficiency and effectiveness of the overall horse management process.

The NPA ACT has specific concerns about the expressed key strategy to achieve the objectives (page3). These are the excessive time proposed to reach the Plan’s goal and a sizeable population of feral horses will still exist after 20 years.

There are a number of issues associated with the length of time taken to reach the Plan’s stated goal. The Plan concedes that the previous process under the 2008 Plan was “costly, time consuming and did not effectively reduce the wild horse population” yet the Plan’s timeframes have the potential lead to similar outcomes.

By having a long timeframe for the reduction in the feral horse population, managers must contend with not only with the already the significant population but a greater impact of population growth. The feral horse program has already been a costly exercise and delays in reducing the feral horse population means additional NPWS costs that affect the resources across that Service 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.

There would also be an animal welfare benefit in this approach as fewer horses would be affected by the control methods.

The NPA ACT would also contend that the Plan’s goal of maintaining a population of 600 feral horses significantly reduces the Plan’s environmental outcomes. While it is appreciated that it is extremely difficult to fully eradicate any feral pest the eradication of the feral horse population should still be the aspirational goal of the Plan. Controlling such a large remnant population will simply add to the ongoing costs for the NPWS, for no apparent gain. It is important to note that wild horse and burro management in the USA has turned out to be a very costly exercise.

Attribute (Page 5)

The NPA ACT has concerns about the following statement “(t)he acknowledgement of the Kosciuszko National Park wild horse population as an ‘attribute’ associated with nationally significant cultural and social values is unique to the Kosciuszko National Park and cannot be applied to other wild horse populations in the NSW park system.” As previously reasoned, the NPA ACT disagrees strongly with any proposal that the feral horse population in KNP is of “national”

significance. The attributes put forward to support such “significance” could easily be used to argue for similar maintenance of feral horse populations across NSW and Australia despite the NPWS’ disclaimer. It is important to consider that the maintenance of such an “attribute” is detrimental to truly nationally significant natural values held by the Australian Alps.

On Page 13 it is stated that “(t)he presence of wild horses in the park has tourism, economic and marketing value to the Snowy Mountains region because some people visit the park with the expectation of seeing wild horses in the landscape.” While the sight of horses to some is attractive, the presence of such views would indicate a failure in the communication of the underlying values for which KNP was established and the wide-ranging negative impacts that (page 13 et al) arise from a feral horse population.

Impacts (Page 13)

The NPA ACT has long association with KNP and its members have been involved in many bushwalks, field trips and work parties throughout that national park. NPA ACT members have been concerned about the impact of horses and their increasing population for a long time. NPA members have documented impacts and have been subject to safety concerns from feral horses over this time. They are able to corroborate, empirically, many of the impacts listed in the Plan.

The NPA ACT is also very concerned about the potential for traffic incidents involving feral horses throughout KNP. There are a number of high speed roads through the park which are not far from known feral horse concentrations. The photos on page 20 give a clear indication of the damage able to result from an accident involving a feral horse. While the Plan proposes to maintain horse free corridors around major roads, this will be difficult to achieve and the best solution would be to significantly reduce the horse population, as quickly as possible.

Strategies (Page 23)

The NPA ACT strongly supports dot points 2 and 3 and recommends that dot point one be moved to after these dot points. While education about the control methods to be used is important it should not hinder their speedy implementation.

The management of dot point 8 relating to actions after the goal population will be hindered by the size of the remnant population. The use of non-lethal techniques will be more effective with a smaller, or even eliminated, population. The NPWS should not constrain itself to non-lethal methods of control once the target population is met as efficiency in control should also be a key driver.

Dot point 11 should not contain the words “providing opportunities elsewhere for park visitors to view wild horses”, Formalising such opportunities will only add to the pressures on achieving efficient and effective control of feral horses and further legitimizes their inappropriate status in the park.

Control Methods (Page 24)

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 NPA ACT supports the banning of “brumby running” (Page 24) as this approach is deemed to be a particularly inhumane control method. The NPA ACT would still support the use of aerial culling as recent veterinary studies in the Northern Territory have shown it to be a humane and effective control method (Hampton, J.O. (2013) *Assessment of the Humaneness of Feral Horse Helicopter Shooting Operations in the Northern Territory: Tempe Downs*. NT Parks and Wildlife Commission). In addition, the NPA ACT would emphasise the findings of the English report of 2000 which concluded that aerial shooting was a suitable and humane method for removing horses from Guy Fawkes National Park (<http://www.environment.nsw.gov.au/resources/pestsweeds/englishReport.pdf>).

Involving the Community (Page 28)

The NPA ACT is dubious about the usefulness of a Kosciuszko National Park Wild Horse Management Program Reference Group that will involve representatives of widely opposing views. It is felt that such a Group may hinder or distract from the key management objectives of the plan. It would be more useful for the NPWS to convene a grouping of appropriately qualified experts to assist it in implementing the Plan quickly, efficiently and effectively.