



Environment and Science Division

Parks Victoria

Via engage.vic.gov.au/alpine-national-park-feral-horse-strategic-action-plan

Submission: Protection of the Alpine National Park: Feral Horse Strategic Action Plan 2018-2020 (draft)

Thank you for the opportunity to make a submission on the draft *Alpine National Park (ANP) Feral Horse Strategic Action Plan 2018-2020* (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 removal of feral horses from ACT, NSW and Victorian national parks. NPA ACT members are regular visitors to Victoria’s Alpine National Park (ANP) 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 the natural and cultural values of the ACT’s Namadgi National Park, which is a part of the same alpine ecosystem as the ANP. These inter-relationships are recognised in the Plan, and we applaud the stated intention of the Victorian government to integrate its feral horse management with cross-border park agencies.

The management of feral horses in Australia’s alpine areas is a very emotive issue for some sectors of the community, and the NPA ACT also would like to thank Parks Victoria for its efforts in developing a succinct Plan that both accurately identifies these animals as feral, rather than ‘wild,’ and clearly describes their adverse impacts on these rare and fragile alpine landscapes.

Summary

The NPA ACT welcomes the general thrust of the Plan, being the active and humane reduction of the numbers of feral horses in the ANP, utilising a strategic and evidence-based approach. The NPA ACT 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 the ANP.

The NPA ACT supports:

- The expanded horse control program, which focuses on increased feral horse removal and prevention of the establishment of new populations within the ANP;
- The five key core conservation objectives of the Plan (subject to points raised in Attachment A);
- The Plan’s recognition of, and emphasis on, protecting Aboriginal cultural heritage and working with Traditional Owners;
- The removal of all horses from the highly ecologically sensitive Bogong High Plains-Cobungra area; and
- The introduction of a systematic and realistic monitoring and evaluation system, featuring annual reviews of the efficiency and effectiveness of the feral horse control operations; and
- Plans to undertake practical, applied research on key feral horse control issues.

The NPA ACT does not support:

- Severely limiting the number of feral horses to be removed from the Eastern Alps over the next three years, given the level and extent of damage that they are causing to this area;

- The exclusion of ground and aerial shooting as a control method during the first three years of Plan implementation, solely on the basis of public expectations, when there is evidence that it is the most inexpensive and humane way of managing feral animals when properly done; and
- The lack of recognition of the importance of prioritising the removal of all feral horses from the Murray River catchment area, due to its significant economic and ecological values – despite identifying the source of the river as being “in very poor condition” and “not showing resilience to the impacts of horses” (p 3).

The critical subject of budgetary needs and sources to implement the Plan also needs to be addressed in the content of the Plan.

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, convener, NPA ACT Environment Sub-committee.

Yours sincerely

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President
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28 January 2018

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ATTACHMENT A: DETAILED COMMENTS

1 Executive summary (page 3)

Refer to overall comments in summary and detailed comments below

2 Purpose of the plan (page 4)

Refer to overall comments in summary and detailed comments below

3 Background (pages 6-7)

The recognition of the need to complement feral horse control in alpine areas with other programs to address the impacts of additional pressures on Victoria's natural environment, including a range of invasive plants and animals, is a strength of the Plan.

While it is stated that the Plan aims to strike a balance between environmental protection needs and legal obligations, humane treatment of feral horses, and social expectations regarding the management of heritage connections, the control actions described in later sections of the Plan do not adequately meet environmental protection or humane animal treatment needs. Refer to our comments in the following relevant sections.

4 Environmental values (pages 8-10)

The NPA ACT concurs with the threats to alpine environmental values identified in the Plan. We would note, however, the need for more peer-reviewed evidence of the impact of feral horses on native alpine fauna. This could potentially be included in the research objectives of the Plan.

5 Heritage Values (Page 11)

Another positive feature of the Plan is the attention given to the risks to Aboriginal cultural heritage values posed by feral horses and accompanying measures to address these risks. The Plan also appropriately acknowledges post-European settlement folklore values associated with feral horses among some community members and divergent views on the relative importance of folklore versus environmental values. As stated previously, the NPA ACT is concerned that environmental values have not been given sufficient priority in the Plan's actions, despite the provision of clear information about the negative impacts of feral horses and the legislative requirements of the Victorian government to manage these impacts.

6 Known and potential impacts of feral horses (pages 12-15)

NPA ACT members have been concerned about the impact of the rapidly increasing population of feral horses on the Australian Alps for a long time. The NPA ACT has a long association with the ANP, and its members have been involved in many bushwalks and field trips throughout the national park. NPA ACT 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. In particular, an NPA ACT-led party of bushwalkers visited the Cowombat Flat area (Vic/NSW), Tin Mine (NSW) and McFarlanes Flat (Vic); they created a portfolio of photos that illustrated the extent of damage occurring from the impacts of feral horses, which can be found at <http://www.flickr.com/photos/91914657@N08/sets/>.

As the Plan intends to include cross-border cooperation initiatives, we would suggest the inclusion of an additional reference to the environmental pressures created by the movement of feral horses between the ANP, Kosciuszko National Park (KNP), Brindabella National Park and Namadgi National Park and other adjoining reserves in the Australian Alps region. Graeme Worboys et al describes some of these impacts in *Our Australian Alps are Changing for the Worse* (Feb 2015), such as the entry of feral horses from KNP into the ACT water catchment area in increasing numbers.

The NPA ACT believes that the Plan should be more explicit in the threats of feral horses to humans. Feral horses near roads pose a potential threat to vehicles and their occupants. NPA

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ACT members have empirical evidence of feral horse movements through their campsites and threatening human feral horse confrontations.

7 Conservation objectives and outcomes (page 16)

The NPA ACT strongly supports the long-term conservation objectives and short-, medium- and long-term outcomes of the Plan, with three notable exceptions.

Firstly, we feel that the short-term and medium-term targets for the reduction of the feral horse population in the Eastern Alps are too low. The report refers to modelling which has found that the “aspirational goal” of removing 400 horses each year over three years will be sufficient to reduce or stabilise horse numbers. However, the basis of this modelling has not been published, and current official horse numbers (2,350) indicate that even doubling the current trapping and removal rate may not be sufficient to deal with estimated population growth rates of 10-20 per cent. Observations of herds by NPA ACT bushwalkers suggest the reproduction rate could be even higher. The Plan indicates that horse control methods have not kept pace with horse population growth rates over the past 10 years (p 19); more needs to be done to prevent further damage to the ANP over the next three years. In keeping with the Plan’s stated commitment to transparency (p 25), modelling assumptions should be made public, as these form a key element of setting baseline removal figures against which progress will be measured.

Secondly, the NPA ACT would also contend that the Plan’s medium-term outcome of containment of the Eastern Alps feral horse population significantly reduces the Plan’s environmental effectiveness. 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 a large remnant population will simply add to the ongoing costs for the Victorian government, 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.

Moreover, the ongoing feral horse program has already been a costly exercise and delays in reducing the feral horse population means additional costs that affect the resources across Parks Victoria 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.

Lastly, our view is that the medium-term outcome of “increased community support for rehoming captured horses and horse management” is unrealistic, based on experience from KNP where rehoming activities have not been successful. The Plan does not state how such community support can be built nor does it refer to the ‘lessons learned’ from NSW.

8 Management approach (pages 17-25)

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

We are disappointed to learn that the Plan will “principally be delivered using the control method of passive trapping” (p 18), despite considerable evidence from across the alpine national parks that these methods are costly and ineffective. The rationale provided for taking this approach is that the perception and preference of most stakeholders and community interest groups are that this is the most humane control method. The Plan should also provide explicit information on the stresses and trauma to “passively trapped” and transported feral horses as well the risks to humans involved in the handling of large dangerous animals. We note that the Plan has allowed for further public consultation on shooting (and other methods) following an evaluation in year 3.

The NPA ACT supports 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

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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>). We think that public education which provides accurate information on the advantages of this feral horse culling method should be included from year 1 of the Plan, rather than delaying this critical discussion for three more years.

The planned trial of aerial and ground mustering is a good initiative. However, NPA ACT questions the value of the roping ('brumby running') trial, due to concerns about a conflict of interests between commercial and environmental/humane control interests, even if an independent review is undertaken.

Neither environmental nor bushwalking groups are explicitly identified as key stakeholders and partners in managing or monitoring feral horses. As an environmental and bushwalking organisation the NPA ACT feels that these groups should be considered as stakeholders. They can play a valuable role in feral horse control and monitoring and this should be acknowledged in the Plan.

Regarding communications (p 25, sub-section 8.2.3), the intention to pro-actively inform the community and stakeholders of action and progress is commendable. It would be useful to outline the methods by which this will be done and how effective two-way ('open and responsive') communication will be achieved.

Monitoring, evaluation and research (pages 26-29)

The NPA ACT considers the monitoring, evaluation and research plan to be generally effective, with the addition of peer reviewed research regarding feral horse impacts on alpine fauna where such information is lacking or inadequate. We note that there is already a large body of scientific information on this point in *Caring for our Australian Alps*

Catchments. Citation: Worboys, G.L. and Good, R.B. (2011) *Caring For Our Australian Alps Catchments: Summary Report For Policy Makers*, Department of Climate Change and Energy Efficiency, Canberra

However, under sub-section 9.4.3 (animal welfare), we would note the need to add the word *independent* to the description of the monitoring program for roping (should this proceed) and to the overall technical review of animal welfare outcomes, in line with statements made to this effect in section 8.

Reporting and review (page 30)

It is unclear why the existing (independent?) Technical Reference Group may not be asked to continue its review and guidance role beyond the first year of implementation of the Plan. Ongoing objective and independent technical advice and monitoring will be essential to the credibility of implementation of the Plan.