



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

Manager
Planning Evaluation and Assessment
National Parks and Wildlife Service
PO Box 95
Parramatta 2124

Submission on Proposed Horse Riding in Wilderness Amendments (2018) to Plans of Management

Thank you for the opportunity to make a submission on the Proposed Horse-Riding in Wilderness Amendments (2018) to Plans of Management document (the Proposal). The National Parks Association of the ACT ("NPA ACT") is a community-based conservation organisation, which has worked for fifty-eight years 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, support to scientific research on some key environmental issues, and engagement with government policies and programs.

The NPA ACT has significant concerns about the Proposal. It believes that:

- Wilderness values are being threatened
- The results of the survey upon which the Proposal is based (the Survey) shows that horses are a potentially significant transportation vector for weeds in wilderness areas
- The Survey is not able to predict the impact of horse-riding on wilderness areas should horse-riding numbers increase in these areas.

These concerns are addressed in greater detail in Attachment A.

Based on the above the NPA ACT believes that continued horse riding in wilderness areas poses a significant threat to the concept of wilderness and the environmental values in those areas.

The Survey resulted in a range of recommendations to address a scenario where horse-riding continues in the trial area or is introduced in new wilderness areas. These recommendations will need to be funded from an ever decreasing environmental budget in NSW. Therefore, even from an economic perspective, continuing horse-riding in the trial areas is detrimental to the environment as there will be a reduced bucket of funding for all other management activities in the reserve estate.

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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. Alternatively, Mr Griffiths can be contacted directly on 0410875731.

Yours sincerely



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President
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Rod Griffiths
Convener, Environment Sub-Committee National
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Attachment A

Weed Events

The Survey clearly fails to identify horse-riding as a vector of weed transportation. The only trial site not to experience weed events during the trial period was the one site in which no horse-riding occurred. The following are the numbers of horse-riders identified during the trial period and the number of weed events:

Site	H o r s e - r i d e r Numbers	Average Horse- riders Per Week	W e e d E v e n t s Identified
Mummel Gulf	0	0	0
Deua	44	0.42	3
KNP	62	1.02	28
Tarlinton	35	0.33	8

This table shows the low level of horse-riding over the trial period but despite this the survey still identified weed events in all locations except Mummel Gulf. The occurrence of weed events will necessitate greater monitoring of the areas opened up to horse-riding with a commensurate reduction in available resources in the NSW Parks Service. Without the increased monitoring there is a risk of wider weed infestation which would require a proportionately higher use of resources to manage.

Ability to predict future impacts

The Survey states that the “trial was not able to predict the potential impact prolonged use of tracks and trails by horse riders or an increase in horse rider numbers might have on wilderness values.” This would be partly to do with the small numbers of horse riders frequenting the trial sites over the trial period.

In a review conducted by the ACT Parks and Conservation Service on the impact of runners on a specific site in the ACT, during an orienteering carnival, there was clear evidence of greater environmental damage as the number of runners increased. Naturally, being bigger and harder footed an individual horse will have a greater impact than a human runner. It would therefore be reasonable to expect that as horse-riding numbers increase in the trial areas their impact will be greater than the low numbers experienced during the trial. And horse riding numbers will increase as publicity raises awareness of the areas. This will increase the need for maintenance by the NSW Parks Service and the potential for the degradation of the environmental values of the areas.

Due to the very low numbers of horse-riders during the trial period, any conclusion that future increased visitation will not have a detrimental effect on environmental values is not justifiable. As it is unlikely that the NSW Parks Service will seek to limit numbers to those experienced in the trial, the survey is correct in stating its inability to predict future impacts. The NPA ACT would therefore contend that allowing horse-riding in the proposed areas is

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not supported by the survey and risks endangering the environmental values of the areas and will lead to increased maintenance costs for the NSW Parks Service.

Wilderness Values

Section 6 of the *NSW Wilderness ACT 1987* states:

“An area of land shall not be identified as wilderness by the Director-General unless the Director-General is of the opinion that:

- (a) the area is, together with its plant and animal communities, in a state that has not been substantially modified by humans and their works or is capable of being restored to such a state,
- (b) the area is of a sufficient size to make its maintenance in such a state feasible, and
- (c) the area is capable of providing opportunities for solitude and appropriate self-reliant recreation.”

The trial areas are part of declared wilderness in NSW. Already throughout the NSW reserve estate and in NSW in general there are vast areas open to horse-riding. Allowing horse-riding in the trial area increases the area available for horse-riding only by a small percentage. However, such an introduction has the potential to change the wilderness nature of the areas affected. Within the northern section of the Kosciuszko National Park (KNP) there are numerous horse camps and trails. NPA ACT members walking in the northern section of KNP often find horse related equipment, dung and damaged watercourses. Such impacts are not compatible with the NSW’s own concept of wilderness as set out in its legislation and are a further argument against the introduction of horse-riding in wilderness areas. It is vital to put the environmental values of our wilderness areas above the claims for access of special interest groups.

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Compacted and denuded earth around tree used for tying up horses (KNP).



Damage to stream banks near horse camp (KNP).

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