



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

Suzanne Chate  
NSW Threatened Species Scientific Committee  
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**Submission: NSW Threatened Species Scientific Committee: Preliminary Determination on *Equus Caballus* (Feral Horses)**

Thank you for the opportunity to make a submission on the NSW Threatened Species Scientific Committee's ('the Committee's) *Preliminary Determination* regarding *Equus caballus* (feral horses). The National Parks Association of the ACT ("NPA ACT") is a community-based conservation organisation, which has worked for more than fifty-five 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 a strong interest in the management of feral horses in both the ACT and New South Wales. Our members are regular visitors to Kosciuszko National Park (KNP) and have observed the negative impact of the growing population of feral horses on this national park. The NPA ACT is also very aware that feral horses in KNP have the potential to threaten the environmental values of the ACT's Namadgi National Park. We have previously provided written submissions to the Independent Technical Reference Group (2015) and the National Parks and Wildlife Service (NSW) in 2016 on feral horse management planning in KNP.

The NPA ACT fully endorses the Committee's Preliminary Determination to support a proposal to list habitat degradation and loss by feral horses (*Equuus caballus* Linnaeus 1758) as a Key Threatening Process in Schedule 4 of the *Biodiversity Conservation Act 2016*, based on the sound scientific evidence presented. This reflects our own documented experience of feral horse damage in the Pilot wilderness and northern areas of KNP. We shared a photographic portfolio of some of this damage in our 2015 ITRG submission and can provide updated documentation collected in early 2018 on further damage since then, if desired.

We are very concerned about the almost unchecked expansion of feral horse populations in NSW and other states over the past decade. The Preliminary Determination notes that feral horses face few natural predators or diseases and includes the most recent estimate (2014) of the annual population increase between 2003 and 2009 in the Victorian East Alps (22 percent). With an annual reproductive

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rate such as this, and given the limited removal of only a few hundred feral horses each year from KNP, the number of feral horses would now be much higher than the last estimate in 2014. The control methods are costly and largely ineffective, and similar increases in numbers could be expected at other parks in NSW which have feral horse populations. The range of the horses also appears to be continually expanding.

The NPA ACT would further observe that the findings and recommendations of the Committee are consistent with those for other introduced domesticated animals in NSW that have previously been listed as Key Threatening Processes, such as deer, goats, and pigs.

We would welcome the advance of the Preliminary Determination to a Final Determination. We hope that a Final Determination will stimulate the finalisation and implementation of the draft KNP Wild Horse Management Plan. The long and ongoing delay in progressing this plan is another source of deep concern to NPA ACT.

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



Esther Gallant  
President  
National Parks Association of the ACT



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