



National Parks Association of the ACT Inc.
1960-2010
50 years of conservation, nature protection and education

Ms Robyn Parker
Minister for the Environment
Office of Environment and Heritage NSW
PO Box A290
Sydney South NSW 1232

Dear Ms Parker

Re. Draft strategic directions for horse riding in NSW national parks and reserves (the Draft)

Thank you for the opportunity to make a submission on the *Draft strategic directions* for horse riding in NSW national parks and reserves.

The primary purpose of national parks and nature reserves

It has been accepted generally that the primary purpose of national parks and nature reserves is for the conservation of the natural environment to preserve biodiversity and complex ecosystems which are under increasing pressure in Australia. Our parks and nature reserves are also significant for cultural heritage and for recreation within certain parameters so that activities do not degrade or impact negatively on the natural environment.

The National Parks Association of the ACT (NPA ACT): its interests and concerns

The National Parks Association of the ACT (NPA ACT) is a 52 year old conservation organisation with approximately 350 members many of whom regularly visit and walk in the national parks and reserves of NSW to enjoy their plants, wildlife, and scenery. The NPA ACT was instrumental in establishing Namadgi National Park in the ACT and maintains a keen interest in nature conservation in the ACT, NSW and across Australia.

Kosciuszko National Park (KNP) and Bimberi Wilderness adjoin Namadgi. The NPA ACT has a direct interest in cross border management of neighbouring national parks which affect Namadgi National Park. An example is the growing number of feral horses in KNP some of which are entering Namadgi. Another example is the increasing pressure from recreational horse riders who want access from KNP to Namadgi with the associated risk to fragile subalpine areas in the park from horse riding impacts which are documented in the KNP PoM (2006, p.121).

The NPA ACT is very concerned that the NSW Office of Environment and Heritage's *Draft strategic directions for horse riding in NSW national parks and reserves* conflicts with the NPA ACT's policy on Horse Riding.

Regarding Namadgi National Park, where restricted horse riding already occurs, the NPA ACT's policy on Horse Riding states:

- the activity “should be restricted to designated management tracks” east of the main section of the park and “outside the proposed wilderness area centred on Booth Range. In other conservation areas, existing access for horse riding should not be expanded. NPA ACT would prefer no horse access to national parks...”
- “Horse riding should require a permit system to manage numbers and key access, and observance of the Australian Alps Horse Riding Code should be mandatory...”
- “NPA ACT accepts the operation of existing facilities for recreational riding camps on the Bicentennial Trail though we would prefer the Bicentennial Trail was rerouted outside the park. Any other such facilities should be closed”.

Comments on *The Draft strategic directions for horse riding in NSW national parks and reserves*

The NPA ACT cannot accept the *Draft strategic directions* as it stands because:

Definition of recreational horse riding

- “**Recreational horse riding** means the riding or other use of horses for recreation or leisure activities (including horse drawn carriages or drays). It includes activities such as trail riding, endurance riding and horse trekking. These meanings apply regardless of whether a person is physically on the horse or not; and regardless of whether the activity is competitive or not. Recreational horse riding does not include the use of horses for search and rescue operations, scientific research and other park management purposes” (Dept of Environment and Conservation (NSW), Recreational Horse Riding Policy 2006). Assuming that the terms “horse riding” and “recreational horse riding” are synonymous, the definition above is comprehensive and gives extensive leeway and dominance to horse riders to the detriment of the natural environment and of other national park and reserve users. Increased access for horse riding is inequitable and unsustainable;

Sufficient access already

- horse riders already have access to over 100 national parks and reserves in NSW: "Horse riding is currently permitted on thousands of kilometres of trails across more than 110 reserves." (*Draft*, p.4). If this already extensive access is increased as proposed under the *Draft*, biodiversity and conservation of the natural environment in our NSW national parks and nature reserves, which should be the primary objective, will be very seriously threatened. Damage to subalpine and alpine areas in Kosziusko National Park (KNP) has already occurred in the northern section of the park where recreational horse riding is prevalent and there are many horse camps. The situation will worsen and be impossible to rectify;

Environmental damage

- the mechanical forces exerted by a horse and rider have been calculated to “show that the static pressure exerted by a shod horse and rider is more than 20 times the pressure exerted by a man wearing boots and more than twice the pressure exerted by

a trail bike or four-wheel-drive vehicle” (Landsberg, Jill, March 1999, p 20, *Horse Riding in Canberra Nature Park, A Report to Environment ACT*. CSIRO Wildlife and Ecology);

- horse riding is heavy impact recreation, causing trampling of vegetation, stream bank erosion, pollution of waterways, and the spreading of weeds via horse feed and manure; a 1997 NPWS survey indicated the extent to which horse riding causes damage: over 70% of parks where horse riding occurred, suffered damage to vehicle tracks and native vegetation, to walking tracks, camp sites, and stream banks (Conroy, Bob & Harden, Bob 1997, *Horses for Courses? Recreational Horse Riding in New South Wales National Parks, Australia*. NSW National Parks and Wildlife Service, Hurstville NSW);
- Landsberg’s study investigates studies in the “Differences among users and vegetation types” for three different overseas environments, Rocky Mountain forest, Rocky Mountain grassland, Welsh sand dune pastures: “In three different environments, tolerance to trampling (indicated by a high-use threshold) was consistently highest for walkers, followed by motorcycles, horses and a light van” (Landsberg, Jill, p 21);
- extrapolating from an Australian study, Landsberg quotes from Whinam *et al.* (1994) that in the Central Plateau of Tasmania, “20-30 horse passes were sufficient to cause changes in shrubland, herbfield and bolster heath, but had little effect on dry grassland”. The complexity of the natural environment and different patterns of riding activity, including overnight camping, indicate that the precautionary principle should be adopted and that horse riding should be restricted, not increased;
- under “Social and economic impacts” (p 26), Landsberg writes: “The financial costs associated with managing horse riding can be substantial. Gibbs (1993) reported that the North Metropolitan District of the NSW NPWS allocated \$80,000 from its annual budget to maintain a network of bridle tracks in Ku-ring-gai Chase and other north metropolitan parks. Harden (1996) cites an unpublished report by Davidson *et al* (1994) that estimated it would cost \$325,000 to repair and upgrade 33 km of horse tracks in Ku-ring-gai Chase (excluding supervision costs), and a further \$34,000 per annum for maintenance. Thus the estimated cost of repairing and upgrading tracks in this dry eucalypt forest environment was approximately \$10,000 per km initially, plus an extra annual expenditure of \$1,000 per km for maintenance. Similar costs were estimated for track works in subalpine environments in Tasmania (Whinam and Comfort 1996). Taking inflation into account, cost estimates for 2012 would be higher;
- horses spread weeds mainly through their faeces, seeds being dispersed for 10 to 14 days after ingestion and passing through the digestive system at high levels for the first four days (St John Sweeting, RS & Morris, KA, August 1990, ‘Seed Transmission through the Digestive Tract of the Horse’, *Plant Invasions: the Incidence of Environmental Weeds in Australia*, eds. SE Humphries, RH Groves & D.S. Mitchell, pp. 170-2, Australia National Parks and Wildlife Service, Canberra)
- the weed spread risks of horses differ from those of other weed vectors in several ways. Because of their size, horses can transport much larger numbers of seeds than most other vectors and add larger amounts of nutrients (nitrogen, phosphorous, heavy

metals) to the environment through faeces and urine and cause greater levels of disturbance than humans bushwalking. An adult horse produces 17-26 kg of dung and 5-7 l of urine a day (Matsui et al. 2003, cited in Pickering et al. 2010);

- further evidence of the spread of weeds via horses is published in the Eleventh Australian Weeds Conference Proceedings, University of Melbourne, 1996: “It is clear that horses are a potentially significant vector in the dispersal of a range of weed species, and that the concerns of managers regarding dispersal of weeds by horses are legitimate ... Of the 36 species recorded present in either manure or established along track verges (Table 2), only two have not been definitely recorded as being dispersed by a vector other than horses. Thus the role of animal species and management vehicles as weed seed vectors should not be ignored (Weaver, Vicki and Adams, Robyn: ‘Horses as Vectors in the Dispersal of Weeds into Native Vegetation’, School of Aquatic Science and Natural Resources Management, Deakin University (Rusden), 662 Blackburn Road, Clayton, Victoria 3168, Australia). Horse floats and support vehicles for horse riding groups are weed seed vectors; management vehicles are more likely to follow disinfecting protocols;
- if Endurance riding is permitted under OEH's "demand-based approach to the provision of new horse riding opportunities ..." (*Draft*, p.2), the damage to the natural environment will increase substantially;
- horse camping sites at Cooinbil, Rocky Plain, Wares Yards in northern KNP, and Pinch River in the Lower Snowy River catchment, smell strongly of horse dung; horse riders' activities should not impinge on the experiences of walkers and other passive recreationists;
- damage from horses in the vicinity of horse riding camps in KNP indicate non-compliance with the Horse Riding Code; the numbers of horse riders in the fragile subalpine areas should be reduced, not increased;
- without exception, every horse camp in the northern part of KNP shows evidence of horseriders failing to abide by the Australian Alps Horse riding code wherein it is recommended that water be taken to the horses by bucket. Each nearby stream has banks and vegetation broken down.
- the language of the draft gives every indication that during the immediate, medium-term, and long-term planning intervals outlined in the *Draft*, horse riders' demands, including Endurance riding and Horse trekking (*Draft*, p.7) will be acceded to: “Where proposals will require a change to the PoM, the relevant Regional Manager will determine whether to progress PoM amendments immediately or whether the new opportunity would more appropriately be considered during the next planned PoM review” (*Draft*, p.8):
This statement reflects a conflict of interest with conservation and appropriate management of the natural environment in our national parks and reserves in NSW;

Horse Riding Code

- the Horse Riding Code is itself questionable: it sets a limit of 40 people in a single group in a park (HRC, p. 7). This number is excessive for high impact recreation;

Inadequate staffing and resources

- national parks and nature reserves in NSW do not have enough staff and resources to monitor horse riding impacts, to ensure that riders comply with the Horse Riding Code, and to restore areas that have been damaged. One very rarely sees a ranger in the backcountry areas of national parks in NSW or the ACT. Staff will be placed under even greater pressure when required to work with regional working groups including relevant local horse riding stakeholders in the three "horse riding landscapes": Far South Coast and Ranges, Hunter and Northern Tablelands, Blue Mountains and Northern Sydney (*Draft*, p.8);

Climate change: an additional stressor

- climate change is placing considerable stress on the natural environment, including in Australia's national parks and nature reserves, with KNP's alpine and subalpine ecosystems at greatest risk. The *Draft* does not consider the impact of increased horse riding pressures on national parks and reserves in the context of climate change;

Horse riding in wilderness areas contravenes definition of wilderness and the Wilderness Act 1987

- in proposing a three year trial of horse riding in wilderness areas in Kosciuszko, Oxley Wild Rivers, Barrington Tops, Deua and Wadbilliga national parks, the *Draft* (p.10) contravenes the very nature of wilderness as defined under the Wilderness Act 1987 on the NSW Government Environment & Heritage website, particularly points (a) and (c), emphasised in bold:

6 Identification of wilderness

(1) 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 *Draft strategic directions* also contravenes the management principles for wilderness areas, particularly points (c) and (d), emphasised in bold:

9 Management principles for wilderness areas

A wilderness area shall be managed so as:

(a) to restore (if applicable) and to protect the unmodified state of the area and its plant and animal communities,

(b) to preserve the capacity of the area to evolve in the absence of significant human interference, and

(c) to permit opportunities for solitude and appropriate self-reliant recreation (whether of a commercial nature or not)".

Horses are not native to Australia and their use in wilderness will not enable preservation of the natural systems and biological diversity of our wilderness areas;

horse riding impacts are substantially modifying the environment and removing “opportunities for solitude and appropriate self-reliant recreation”.

- the trial would contribute to the destruction of wilderness values because there are no guarantees that riders would remain on fire trails or roads that may traverse the wilderness. Horse riding camps in wilderness would be inappropriate because of their impacts, including weed distribution;

The Australian Alps National Parks and Reserves

- the implications of the *Draft* have to be considered in the context of the Australian Alps National Parks and Reserves, consisting of eleven national parks and nature reserves, which were included on the National Heritage List on 7 November 2008. Granting increased horse riding areas to the fragile areas of the Australian Alps will conflict with their conservation and protection;

Memorandum of Understanding 2006: conflict of interest

- the *Draft* states that "In 2006, the Liberal National Coalition signed a Memorandum of Understanding (MoU) with peak horse riding stakeholders which seeks to provide more horse riding opportunities in the national parks system, including in wilderness areas ... The Government is committed to providing improved horse riding opportunities in national parks and reserves within the statutory bounds of existing legislation" (p.3). The statement is a conflict of interest where conservation in national parks and reserves of NSW for the common good is being negated to meet horse riding interests. The horse riding impacts of a powerful minority of park users will impact negatively on the majority of park users who are passive recreationists. Also, the statement : “Where proposals will require a change to the PoM, the relevant Regional Manager will determine whether to progress PoM amendments immediately or whether the new opportunity would more appropriately be considered during the next planned PoM review” (*Draft*, p.8): contradicts the *Draft* statement, p.3: “The Government is committed to providing improved horse riding opportunities in national parks and reserves within the statutory bounds of existing legislation”.
- the Liberal National Coalition did not attempt to sign a Memorandum of Understanding with other sections of the community that may hold views and aspirations counter to the interests of the ‘peak horse riding stakeholders’. The MOU is thus not representative of the broader NSW community and the undertakings are not a fair reflection of democratic process. The MOU was also undertaken while the Liberal National Coalition was not in government. The MOU is thus meaningless, and should not commit the NSW Government to implementing the understandings in the MOU.
- it is very unfortunate that the natural environment is being sacrificed for political expediency in the same way that hunters are being granted access to national parks and nature reserves in NSW;

Cultural reasons but changed conditions

- to cite cultural reasons for increasing the numbers of horse riders in national parks and nature reserves is misguided. Australia's population has increased dramatically since colonial days and conditions have changed.
- the demand-based approach to the provision of new horse-riding opportunities must meet the strictest environmental and heritage protection standards and be acceptable to the broad community, not only interested stakeholders.
- The KNP PoM (2006, p.122) partly explains the problems of horse management: "Whereas once horse riding in the mountains was largely undertaken only by local people, the park is increasingly attracting recreational horse riders from distant places within New South Wales and interstate. Such impacts are especially pronounced at confined locations where horse riding activities are concentrated such as in the Pinch River area, and at designated vehicle-accessible horse camping areas." Such impacts are unsustainable.

Combined impact of feral horses and recreational horse riding

- the number of feral horses in KNP has increased dramatically.: "The estimated size of the population from the 2009 survey is 7679 horses (coefficient of variation 25.4%). This represents an annual increase of 21.65% per annum since the previous estimate in 2003, which is close to the maximum intrinsic rate of increase for horses. If the population continues to grow at this rate it will reach over 13 800 horses by 2012, with a likelihood of increased environmental implications. The feral horse population has also increased its distribution since 2003" (*Aerial survey of feral horses in the Australian Alps*. Prepared for the Australian Alps Liaison Committee, Michelle Dawson 2009);
- the alpine and subalpine environment is being severely affected by the combined impact of recreational and feral horses;
- the management of neighbouring KNP in NSW is impacting on the management of Namadgi National Park: feral horses from KNP and horse riders from KNP wanting greater access to the ACT, are placing increasing pressure on the limited staff and resources in the ACT's Parks Conservation and Lands.

Recommendations

For recreational horse riding, the NPA ACT strongly recommends that:

- access to wilderness areas in NSW not be granted;
- access to national parks and nature reserves in NSW be confined to present areas and to private properties where horse riding interests are welcome;
- a permit system be instituted to manage numbers and access;
- the Horse Riding Code be modified to set a maximum of 10 people in a single horse riding group, not 40 as presently stipulated;
- strong emphasis be given to public education programs about the impact of horses in national parks and reserves and for the need for compliance with an updated and amended Horse Riding Code;

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- representatives from commercial horse riding businesses and from horse riding alliances be trained and inducted in reducing the impacts of horse riding;
- recreational horse riders and commercial companies meet the costs of restoring and revegetating damaged natural areas and roads in national parks and nature reserves;
- commercial horse riding businesses already operating in national parks and reserves be regulated and only allowed to continue operating under special licences contingent on meeting stringent environmental protection criteria. New operators should not be permitted

No particular recreation group should regard it as their right or entitlement to be able to demand greater access to areas in national parks or nature reserves, especially when they are heavy impact.

If you would like to discuss any of the matters raised in this submission I can be contacted through the NPA ACT office or on my mobile 0410 875 731

Yours faithfully

A handwritten signature in black ink, appearing to read 'Rod Griffiths', is centered on a light-colored rectangular background.

Rod Griffiths
President, NPA ACT

28 June 2012