



Ms Stacey Taylor  
Conservation Strategy Officer  
Environment, Planning and Sustainable Development Directorate

Dear Stacey

### **Commentary on the Draft Namadgi National Park Feral Horse Management Plan**

The National Parks Association of the ACT (NPA ACT) welcomes the opportunity to provide initial commentary on the draft Namadgi National Park Feral Horse Management Plan (the Management Plan).

The NPA ACT has had an ongoing interest in the mitigation of feral horse impacts in the ACT and New South Wales and welcomes this update of the ACT's existing management plan for feral horses. The NPA ACT supports the efforts by the ACT PCS to educate the public of ACT as to the threats posed by horses, and values to work by ACT PCS over the last few decades to rid the park of the few horses that have occurred.

### **General Comments on the Management Plan**

Overall, the NPA ACT welcomes the continuation of the Act's strong policy on the management of feral horses in Namadgi National Park. The ACT's approach to feral horses is in stark contrast to the failed management practices adopted by New South Wales, which have seen ever increasing feral horse numbers in Kosciuszko National Park. However, the NPA ACT is concerned that its members are seeing an increasing level of horse damage in parts of Namadgi.

The general outline of the Management Plan suitably addresses the problem of potential incursions of feral horses into the ACT.

The Introduction and sections on horse social organisation, biology and ecology environmental impacts of horses, and historical distribution and control activities provide a good background to the issue in the ACT.

The sections on feral horses in a regional context explains the basis for the problem in the ACT as part of the Australian Alps and the widespread feral horse problem. In respect to commentary on page 10, it is the NPA ACT's understanding that around 100 horses were trapped and removed from the Blue Water Holes area in late 2019.

Section 3.4 The Threat to Namadgi NP is a summary of the ecological and cultural values of Namadgi, and the threatened species there. The NPA ACT notes with concern the

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population of semi-wild horses on the Clear Range. This has been an on-going problem for quite a number of years now and NPA ACT members are able to provide empirical evidence that this population has contributed to a degradation of the Clear Range ridge line. The ACT PCS should utilise the legal controls in its power to remove this population.

The section also has a few minor problems in presentation, such as:

- Figure 3 uses three colours, all of poor contrast. This figure would be improved by using bold primary colours to illustrate the preferred habitats and potential habitats that could be used by horses
- Box 2. Although it is fairly obvious from the text, there is no label on image (a) on the left.

Section 3.5 Methods for control of feral horses – The methods for horse control have been well described and assessed for their suitability and effectiveness. The inclusion of many references that cover analysis of effectiveness of methods shows that the full range of methods has been considered.

4. Namadgi NP horse management strategy - The goals and objectives for horse in control Namadgi NP appear sound.

The strategies are generally sound, but the NPA ACT would argue that aerial culling is more efficient and humane than live trapping and euthanasia on site. In fact, the Management Plan itself asserts on page 20 that aerial culling is “the most cost-effective landscape-scale method of feral horse control for the Australian Alps”.

The use of aerial culling as a control method is an obvious choice when “aerial surveillance (at least biannually) “ is a strategy of prevention (Page 20). It would be much more efficient if every aerial surveillance flight by helicopter is primed for aerial culling as soon as horses are sighted. It seems very inefficient that a surveillance flight is followed at some future time by setting up trap yards, baiting horses, regular checking, and euthanasia and removal of any trapped horses, when aerial culling would give an immediate result. In addition, the NSW experience has shown that live trapping is resource intensive and has failed to stop the increase of horses in that state.

Naturally, the NPA ACT supports the use of all suitable codes of practice for aerial culling to ensure that all such culling is humane. It is notable that the Interim Technical Reference Group for the development of the Draft wild horse management plan for Kosciuszko NP, 2016 assessed aerial culling as the most humane option for horse culling, as long as skilled shooters and pilots were used and all COPs followed.

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While surveillance flights would be much more costly than on-ground inspections, they are likely to be more efficient in having adequate coverage of large areas on the same date. When combined with aerial culling, one flight or a series of flights can generate an index of the population, as well as a measure of 'catch per unit effort' which can be converted to a cost (\$) for every horse killed.

It appears that the Management Plan reflects a concern about negative public reaction to aerial culling, that appears not justified when "aerial shooting is generally accepted as an appropriate option in specific circumstances (Straight Talk 2015)." (page 21).

During the last year, when the Minister for Environment publicly expressed the determination to remove every horse that enters the ACT, the people of the ACT have expressed little negative reaction to the idea of lethal culling, even by aerial culling.

The NPA ACT also notes that the Management Plan fails to refer to the successful and cost effective eradication of feral horses at the Singleton military base.

However, the NPA ACT also notes that while aerial culling is its preferred control method specific circumstances may dictate that, for those circumstances, an alternative control method will be more effective. Feral animal control requires land managers to be flexible in the techniques used and the Management Plan provides the ACT PCS with a range of control options.

5. Monitoring and assessment of feral horse management in Namadgi NP - The NPA ACT notes that a key part of monitoring and assessment is to track changes in abundance, density and distribution of feral horses. A key method to achieve that result would be as described above: surveillance flights combined with aerial culling, where records can be collected of the number of horses seen, number culled, and the location of the shot horses (using GPS). Those activities would provide all the necessary data on abundance, density and distribution at 6 monthly intervals.

#### Additional minor points

- Page 17 end of para 4 remove word - is to **the** conserve the natural environment in a manner ensuring that disturbance to that environment is minimal.
- Page 19 next to last line – extra )
- Page 20 Para 2 -has not **been** employed commonly
- Page 25, 4.6 National Parks Association **of the ACT**

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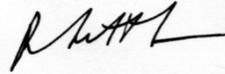
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Should you require any further information regarding the NPA ACT's input, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, Convener, NPA ACT Environment Sub-committee.

Yours sincerely



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Rod Griffiths  
Convener, Environment Sub-committee  
National Parks Association of the ACT

8 May 2020