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gloriosa*

# **Australian Native Plants Society Canberra Region Inc**

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Ms Gladys Berejiklian -NSW Premier  
280 Willoughby Road,  
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Mr John Barilaro – Deputy Premier  
GPO Box 5341  
SYDNEY NSW 2001

Gabrielle Upton – Minister for Environment  
GPO Box 5341  
SYDNEY NSW 2001  
Dear Premier/Ministers

## **RE: NSW Government policy(s) on feral horses.**

### **1) The Australian Native Plants Society – Canberra Region Inc**

The ANPS was established in 1962. ANPS is a non-profit, voluntary community organisation dedicated to the growing, conservation, preservation, promotion and appreciation of Australian native plants. ANPS has over 270 members, including many working in a professional capacity in many spheres related to native plants (e.g. ecology, botany, horticulture and entomology) as well as closely related scientific disciplines.

The ANPS constitution prominently advocates activity in conservation through the promotion of the conservation of Australian plants and their habitats and observing and support for laws related to the preservation of Australian native plants.

ANPS members regularly undertake field and camping trips into NSW to floristically rich areas. Ecosystems are not confined by State borders and ANPS members believe the nation's natural assets are owned by (and should be accessible to) all Australians. Our members have contributed to the knowledge of many natural areas by making publicly available lists of flora (and sometimes fauna) species that were observed during these trips. Our members have located new species and new records for plant species in some areas. Our records are also made available by entry onto the Atlas of Living Australia and Canberra Nature Map.

The Kosciusko region is a regular area of visitation by our members involved with organised field trips and on an individual basis. ANPS was very surprised and saddened by the government's decision to protect feral horses in NSW where they occur on protected lands. Members of ANPS are well aware of the detrimental impacts that the growing population of feral horses is having on alpine and sub-alpine grasslands, peatlands, swamps and bogs within the KNP (and other national parks) through selective over-grazing, soil compaction and general disturbance in wetter areas which is leading to erosion, as well as the implications for already listed threatened species and vegetation communities.

### **2) Documents reviewed since the government's feral horse protection decision was made**

ANPS made a submission to the 2016 *Kosciuszko National Park Draft Wild Horse Management Plan*. Since your decision of May 2018 to conserve and heritage protect the feral horse populations in Kosciuszko National Park, we have reviewed the extensive amount of news items and press releases from many sources on the reasons for your decision.

### 3) ANPS concerns

We have very considerable concern about the decision itself (which was made without due and diligent consideration of all the science that has been done and scientific advice you have received from your own scientific advisory groups and many others over decades), and with some very dubious anecdotal information appearing to play a significant part in the decision.

#### Scientific advice

The first important step is to recognise “brumbies” for what they are. The name “brumby” being given to them as though they are some sort of exceptional breed of horse is disingenuous. “Brumbies” are nothing more or less than a feral horse, and they are contributing to the overall environmental damage in KNP as are feral pigs, deer, rabbits, foxes, cats and dogs. After cattle grazing was removed from KNP, the public purse was used to restore and rehabilitate extensive areas of herbfield from the erosion caused by the private interests involved in the cattle grazing. It has taken many decades and considerable finance to repair, and there is still evidence in some areas of the damage the cattle caused. Feral horses will now, because of your uninformed decision, continue to affect many areas in similar ways.

ANPS notes that one of your proposals covers research and monitoring to accurately count feral horse numbers to scientifically inform future wild horse managements plans. First, much of this research and monitoring has already been done – hence the scientific advice that your government received. Second, it really does not matter whether it is 4,000 or 8,000 horses that are present. The damage they cause through erosion is more than evident. Much less evident is the damage they are doing to the habitat(s) of threatened flora and fauna. The NSW government has been constantly provided with well researched and accurate scientific advice over many successive feral horse management plans, so there is no wriggle room to say the advice was/is not available or was inaccurate. You have simply decided to ignore the evidence based, it would seem, on inaccurate anecdotal information from what is a minority with vested interests.

The NSW Scientific Committee’s *Preliminary Determination Habitat Degradation and loss by Feral Horses, Equus caballus. Linnaeus 1758*, as a Key Threatening Process in May 2018 quite clearly provides the extent of the problem created by feral horses in NSW, including KNP. That information was fully available to you, and yet the government is totally ignoring that information in the decision it made, which led to the resignation of one of the NSW Scientific Committees significant contributing scientists.

ANPS notes that a Heritage Management Plan for feral horses is to be prepared by the Minister for Environment. Is this HMP for feral horses in NSW as a whole, or just in KNP? ANPS presumes the draft management plan will consider the available science and be made available for peer and public review?

It is absolutely essential that governments always diligently consider the science involved in their decisions. To not do this, and then rely on myths and inaccurate anecdotal information threatens not only the protected natural areas concerned, but the broader community’s faith in government. The very fact that you totally ignored the draft 2016 feral horse management plan and all the public consultation that went into its preparation is appalling. This is especially so when the 2016 plan said it would keep 600 horses, despite the majority of calls to get brumbies out of the KNP. Your decision on heritage protection for feral horses has contributed to a loss of faith in your ability as a government to protect natural areas.

Importantly, KNP is nationally heritage listed as well as for the protection of nature, and the NSW government is supposed to abide by national legislation. It is the view of ANPS that the proposal to protect feral horses in this way in KNP may be in breach of the national EPBC Act.

#### Anecdotal and inaccurate information

John Barilaro has made a number of statements in support of this damaging Bill which, at best, are questionable or exaggerated.

*KNP exists to protect natural values which includes brumbies..... that have a rich history in region (nearly 200 years) and are a quintessential part of life on the Monaro.*

Horses have contributed internationally in opening up new lands. They were one of the few means of transport available to early European settlers everywhere. So, horses definitely had a place in national development and were a quintessential part of life across the world. It is important to note however, that the feral horses present internationally today are a result of domestic horses escaping or being released. It is beyond comprehension that the NSW government has accepted John Barilaro’s uninformed comment that the natural values of KNP also includes feral horses. How can the heritage and cultural significance of feral horses after less than 200 years be held as equally significant as the Australian habitats and species that have evolved over millennia in our alpine landscapes?

### *World War 1 horses.*

While the feral horse population of the Monaro may have contributed in a small way to the 136,000 horses sent from Australia, the bulk of them was a form of stock horse known as a Waler, a breed which was only officially recognised in 1986. While some already domesticated horses may have been involved, it is disingenuous to attribute unbroken feral horse populations of the Monaro as contributing in a significant way.

### *Horses moved if in sensitive areas*

This cannot be regarded as a management action as the feral horses will simply return to favoured locations. Beside this, one of the major complications of any previous management actions has been the complexity and wildness of the terrain, making accessing the animals very difficult. ANPS believes this to be a “feelgood” statement that will prove to be impossible to manage.

### *Areas will be identified that will not suffer significant harm.*

It has already been shown that the areas the horses favour and will inhabit are the very vegetation communities that have already been shown to be the most susceptible to feral horse damage. You can try and identify less sensitive areas but how are you going to keep ever-expanding feral populations in the areas you identify? ANPS also presumes that all the good science already gathered will be part of the process of making a selection, and that scientific views will be sought? Even the biggest proponent of retaining feral horses in KNP has admitted “*Sure they can make a bit of a mess but it is short-lived.*”

### *Relocation and rehoming.*

ANPS would be in complete favour of these solutions if only it could be shown they have worked. The problems confronted are:

1. the lack of groups/persons interested in rehoming what will be thousands of horses;
2. an unpreparedness and silence from professed interested groups/individuals to house the feral populations outside the KNP;
3. accessing the horses to round them up, which causes a great deal of stress for the animals.

In reality, there have been very limited rehomings, and the greatest number of horses relocated were to an abattoir. Because of the above problems, they cannot be regarded as a management actions as they are simply disregarded or performed inefficiently.

### *Government made decision based on community views*

ANPS does not believe this to be correct. There was an appropriate and official public consultation process associated with the Draft 2016 Feral Horse Management Plan. The 2016 draft even compromised to retain some 600 feral horses, even though that number would still have created issues for park management. Despite this, the government and vested members of a very limited part of the community appear to have simply rejected the results of that consultation process, and now appear to be accepting mischievous and incorrect statements to retain the feral horses in KNP. A big concern to ANPS is related to the NSW Government moving away from science-related advice on many environmental issues in NSW.

### *Establishing a Wild Horse Community Advisory Panel*

ANPS presumes that this Panel will take in all the disciplines required to provide sound and accurate advice to government.

In conclusion, due to the various matters raised above, the ANPS does not support the current directions taken by the NSW Government for managing feral horses in any National Park. We will do all we can to raise awareness of the ludicrous proposals that you are to adopt, and the effects that this decision has on the National Park system and existing environmental laws.

Yours Sincerely



Geoff Butler  
Conservation Officer  
15 July 2018