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SUBMISSION

Draft Kosciuszko Wild Horse Management Plan 2016

1) The Australian Native Plants Society – Canberra Region (ANPS)

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 is 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 through selective over-grazing, soil compaction and general disturbance in wetter areas which is leading to erosion.

2) Documents reviewed

The main documents used by ANPS in relation to this submission were the 2003 *Horse Management Plan for the Alpine Area of Kosciuszko National Park* (Ref 2), the 2008 *Kosciuszko National Park Horse Management Plan* (Ref 3) and the 2016 *Kosciuszko National Park Draft Wild Horse Management Plan* (Ref 4). We also reviewed the Questions and Answers information sheet (Ref 1) available on the OEHS website. ANPS also relied on visual observations of horse damage in areas of the KNP that have been visited by our members.

The Purpose of National Parks

Since the advent of the European invasion of Australia, serious and irretrievable damage has been caused within all natural ecosystems in the nation. In retrospect, and now knowing what damage can be done to fragile ecosystems over such a short period of time, it goes without saying that if this continent was being developed with the knowledge we have today, things would in most respects be very different. We are now desperately trying to fix many of the environmental problems we have created.

In NSW, there is only about 10% of the State which remains in “pristine” condition, or in a condition close to pristine. Fortunately, in acknowledgement of the damage we have done, some forward thinking individuals and governments (guided by community pressure), realised the need to protect representative examples of these very precious natural assets. Since the declaration of the first National park many others have been created, and some only because they were the remnants left that were generally unsuited to agriculture in its various forms.

While there have been considerable past disturbances in the area now designated as Kosciuszko National Park, it is the largest national park in New South Wales and one of the largest conservation reserves in Australia. It is a UNESCO Biosphere Reserve and is an integral component of the Australian Alps National Parks and Reserves, which were included on the National Heritage List in 2008 (Ref 4).

Within the KNP is Australia’s highest mountain, indigenous sites, European heritage sites and various unique and rare ecological communities only associated with the high country. It is crucial to take every possible action to conserve those parts of the park that remain in their natural state. As was clearly stated:

“NPWS has a legal duty to protect the range of natural and cultural values within the park. While NPWS acknowledges the community and heritage values associated with the wild horse population, it has a responsibility to minimise the impacts of introduced species, including wild horses.” (Ref 1).

ANPS is fully aware that wild horse management within KNP is contentious and emotive, but our view is that the wild horse population needs to be eliminated from the KNP over time using the most humane means possible.

The issues related to wild horses

ANPS is well aware of the detrimental impacts that the growing and highly mobile population of feral horses is having on alpine and sub-alpine grasslands, peatlands, swamps and bogs within the KNP through selective over-grazing, soil compaction and general disturbance in wetter areas which is leading to erosion. Already two orchid species have been listed as vulnerable due to grazing impacts upon them. The environmental argument for protection of the park is quite clear.

We are also aware of the cultural/heritage argument for retaining the wild horses, and do have some sympathy for this view (i.e. keeping the brumby extant). The horses were originally introduced in the 1830's, but were generally in much smaller numbers. The very high-country people who we laud in our folklore managed the wild horse population. If it grew too large, shooting and other forms of trapping were employed to keep the numbers under control. There was also a more regular "take" from the population, as horses were crucial as pack and transport animals and for farming purposes and as recreational animals. In fact they were also used for meat and skins (Ref 4). The overall population was therefore better and effectively managed.

While some visitors may regard the sighting of wild horses as an experience they want in the park, this should not override the far greater environmental values the park protects and is renowned for, especially as we now have the ultimate detrimental pressures of climate change on the ecosystems of the park.

Vision for the Wild Horse Population in the KNP

The vision of the management plan states:

"To conserve the outstanding values of Kosciuszko National Park with the support of the community through active, adaptive and humane management of wild horses to minimise their adverse impacts on natural, cultural and visitor values, while acknowledging the cultural and social values of the Kosciuszko National Park wild horse population"

The issue with the vision statement is the premise that the horses have a high cultural/heritage value. ANPS acknowledges the wild horses have heritage value, but these values, especially keeping the breed extant, can be as easily maintained on land outside the park as within it. It also takes the pressure off NPWS financial and human resources, thus permitting these resources to be better focussed on other more important management issues within the KNP.

Objectives of the Draft Wild Horse Management Plan 2016

The three objectives of the plan are:

1) To reduce the impacts of wild horses on the natural and cultural heritage values of Kosciuszko National Park by reducing the overall population of wild horses using a range of cost-effective and humane control measures.

ANPS supports this objective, but is very concerned about how it is to be achieved. The 2008 plan did not achieve the proposed outcomes. In fact, the numbers of wild horses have grown from about 3,000 in 2002 to 6,000 in 2016. There is no reference to why the last plan was unsuccessful.

We have no confidence that the new plan will achieve reduced horse numbers unless it contains clear means of control and the resources and budget with which to carry out the plan.

2) To reduce and mitigate the risk of adverse wild horse interactions and incidents with park visitors and the public more generally.

Obviously ANPS supports public safety issues while in the KNP.

3) To involve the community in the ongoing management of wild horses in Kosciuszko National Park through active participation in research, monitoring and control programs where possible.

NPWS partly does this by requesting responses to submissions. It would be useful to know what the majority of submissions actually support, and whether it is based on science and facts or

emotion. There is ample scientific ecological evidence of the damage the horses do, and significant amounts of money have been spent to control erosion in various areas of the park.

As a wild horse population(s) could be maintained in high country free-range freehold lands, this would seem to be an obvious solution that would assist in maintaining the environmental values of the KNP.

Strategies of the Draft Wild Horse Management Plan 2016

The strategies within the plan are:

1) Inform and better educate the broader community and stakeholder groups about the humaneness of different wild horse control methods, including the costs, constraints and operational challenges involved in each method.

Supported by ANPS.

2) Implement a range of wild horse control measures as detailed in Section 3.3 where effective, appropriate and sustainable, given financial and other constraints.

Supported by ANPS.

3) Employ a range of control methods, including lethal control methods, to reduce the overall wild horse population in the park to minimise impacts and mitigate associated risks. A lack of demand for domesticating wild horses should not hinder implementation of the plan.

Supported by ANPS. but pressure to stop control actions until others have the time or inclination to “re-home” horses should in no way affect management programs.

4) Effect elimination (e.g. of the Snowy Plains population) and prevent incursions of wild horses into the Central Region (e.g. onto Main Range) to achieve and keep the Central Region of the park free from wild horse impacts.

Supported by ANPS.

5) Minimise impacts in the Northern and Southern regions by reducing the horse population in these areas, including in the Yarrangobilly and Cooleman Plain karst management units and other key environmental asset protection zones.

ANPS would prefer an ultimate target of no horses within the KNP.

6) Reduce the overall impact of the wild horse population by reducing it from 6000 to less than 3000 horses in five to 10 years.

ANPS supports a quicker target time for the gradual reduction of the wild horse populations, with an ultimate target of no wild horses in KNP.

7) Reduce the overall population of wild horses to approximately 600 (400–800) horses within 20 years. This population will be permitted in acknowledgment of the cultural, economic and social values of wild horses in the park. This may be achieved more rapidly, and it is desirable from an ongoing animal welfare and resource requirement perspective that it be achieved as quickly as possible.

ANPS supports a quicker target time for the gradual reduction of the wild horse populations, with an ultimate target of no wild horses in KNP.

8) Once the overall population has been sufficiently reduced, adopt an approach of minimal management intervention incorporating fertility control and small-scale, non-lethal harvesting (trapping, mustering, removal and rehoming). This approach will limit population growth and also reduce or negate the need to apply lethal control methods.

ANPS would prefer an ultimate target of no horses within the KNP.

9) Reduce the two-way movement and spread of wild horses between the park and neighbouring private properties and public lands.

ANPS has heard rumours that horses removed from the KNP have been re-introduced at various times. While this is hearsay until proven, the potential for this re-introduction should be monitored.

It may be useful that horses taken for re-homing or abattoirs should be tagged or marked in some way which can then be retraced to the persons/organisations undertaking the original removal.

10) Implement animal welfare responses for wild horses at both the population and individual animal level guided by policies and approaches applied to other introduced or pest animal species. For example, the wild horse population will be subject to natural processes such as drought, fire and snow events. Populations lost through natural processes will not be re-established in the park. Supplementary feeding or watering, or removal for veterinary treatment and return to the park will not be undertaken. Sick, injured, diseased or distressed animals will be humanely euthanased.

Supported by ANPS.

11) Remove horses from high speed road corridors, while providing opportunities elsewhere for park visitors to view wild horses safely.

ANPS would prefer an ultimate target of no horses within the KNP.

12) Encourage and facilitate continued research and development of wild horse population management techniques.

Supported by ANPS.

13) Establish a scientific panel to design a wild horse survey methodology that quantifies the environmental damage caused by wild horses, in addition to estimating total wild horse numbers. This methodology will underpin future wild horse surveys, which are to be carried out every five years, the results from which will inform future reviews of the Kosciuszko National Park Draft Wild Horse Management Plan, with such reviews to be conducted every five years

Supported by ANPS.

Control Methods of the Draft Wild Horse Management Plan 2016

The control methods as listed are generally supported by ANPS. However, we would like to see a more organised and regular approach to implementation, and a more definite proposal for the resources required to undertake the management program.

Kosciuszko National Park Wild Horse Management Program Reference Group.

ANPS cautions that there needs to be great care in the representation of organisations on any reference group. Conservation groups in the ACT have had numerous experiences with some of the animal welfare and protection groups. Some of these groups have resorted to very intimidatory and threatening actions against any parties with different views to them. The damage that wild horses create is well known and documented, and is very well covered in the draft management plan. This research is what should drive the management plan and any actions undertaken, not emotive issues. It is therefore also important that the reference group is appropriately balanced. Proper leadership is required by the authorities to ensure that bullying tactics do not win the day.

Conclusion

Overall, ANPS supports the plan, but based on the lack of actions undertaken under past plans we do not have much confidence that this plan, without commitment, will improve the removal of wild horses from KNP. At the very least, the plan should contain more definite program activities and an indication or, better still, a guarantee for provision of the resources that will be needed to achieve the objectives and strategies. ANPS would rather see a plan that aims to completely remove wild horses from the KNP.

ANPS recognises that the wild horses have some heritage value(s). However, we feel that the heritage of millennia of ecosystem evolution has much higher value, especially as such unique ecosystems are under threat from a multitude of factors. It would be relatively easy to establish arguments for the heritage values of other feral species (e.g. pigs, goats, deer, foxes, cats and

rabbits). It is only because the horse has been more interwoven with human beings in a closer way, and therefore their feral existence is viewed with more empathy. There appears to be no reason why the heritage value of the form of wild horse (brumbies) cannot be maintained on larger holdings outside the KNP.

References

Ref 1): *Draft Wild Horse Management Plan questions and answers information sheet* <http://www.environment.nsw.gov.au/resources/protectsnowies/knp-wild-horse-plan-flyer.pdf> Office of Environment & Heritage website Aug 2016

Ref 2): *Horse Management Plan for the Alpine Area of Kosciuszko National Park* (NPWS 2003)

Ref 3): *Kosciuszko National Park Horse Management Plan* (DECC 2008)

Ref 4): *Kosciuszko National Park Draft Wild Horse Management Plan* (OEH 2016)