



Friends of Grasslands

supporting native grassy ecosystems

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Independent Inquiry on the Impacts and management of feral horses in the Australian Alps.

Friends of Grasslands (FOG) is a community group dedicated to the conservation of natural temperate grassy ecosystems in south-eastern Australia. FOG advocates, educates and advises on matters to do with the conservation of native grassy ecosystems, and carries out surveys and other on-ground work. FOG is based in Canberra and its members include professional scientists, landowners, land managers and interested members of the public.

FOG welcomes the opportunity the Inquiry provides to consider recommendations to reconsider the decision made by the NSW Government to not adequately manage feral horse populations in the Australian Alps.

In 2021 FOG provided a submission to the NSW Government (attached) expressing considerable concern regarding the impacts of feral horses on the unique habitats in the Alps, particularly on threatened species and critically endangered ecological communities. We urged for actions to be taken to limit numbers, including total elimination of horses out of the high conservation areas.

We are very concerned that the NSW Government has not given any consideration of the biodiversity impacts by allowing the feral horse population to continue to increase within the Kosciuszko National Park. These impacts are not just on the National Park, since they inevitably to spread into neighbouring country, putting pressure on those neighbours (including the ACT and Victorian governments) to have to carry out additional control of the feral horses.

We urge the Inquiry consider these matters and take into account the significant impacts of the horses on some of the most iconic country in Australia.

Yours sincerely

Professor Jamie Pittock
President
28 April 2023

Attachment

The Project Team
Kosciuszko National Park Wild Horse Heritage Management Plan
National Parks and Wildlife Service
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Dear Sir/Madam

Kosciuszko wild horse management plan

We call on the NSW Government to:

1. Repeal the *Kosciuszko Wild Horse Heritage Act 2018* and manage feral horses under the *National Parks and Wildlife Act 1974*;
2. Eliminate feral horse populations from high conservation value areas, including: a) habitats of threatened ecological communities and species; b) all designated wilderness areas, and c) areas of cultural significance for the Traditional Owners;
3. Reduce the population in the plan period to less than 600 feral horses;
4. Adopt a more humane approach to feral horse control by reducing the population more quickly than the six years proposed and by using aerial shooting

We ask you to significantly revise this draft plan to conserve the Park from feral horses and retain its environmental values.

Background

Friends of Grasslands (FOG) is a community group dedicated to the conservation of natural temperate grassy ecosystems in south-eastern Australia. FOG advocates, educates and advises on matters to do with the conservation of grassy ecosystems, and carries out surveys and other on-ground work. FOG is based in Canberra and has many members in nearby New South Wales. Its members include professional scientists, landowners, land managers and interested members of the public.

FOG has a strong interest in alpine and sub-alpine grasslands and associated fens, peatlands, swamps and bogs and has visited the Kosciuszko National Park in the past. We have been concerned for a long time about the presence of wild horses in Kosciuszko National Park and their impact on the Park's biodiversity values. We are particularly concerned about impacts on the fragile alpine grassy ecological communities and lowland grassland communities that are present in the Park. These include the NSW listed communities Snowpatch Feldmark and Snowpatch Herbfield (both critically endangered), and the nationally listed communities Alpine Sphagnum Bogs and Associated Fens (endangered), Natural Temperate Grasslands of the South Eastern Highlands (critically endangered) and White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland (critically endangered).

In July 2016 we provided comment on the *Kosciuszko National Park Draft Wild Horse Management Plan*. We have also written to the Threatened Species Commissioner about our concerns and made representations to government about the impacts of grazing and other disturbance on fragile alpine plant communities in the past (concerning Victorian alpine areas in 2005 and Bago Plateau in 2007).

I had the opportunity to accompany a helicopter inspection of the habitat of threatened wildlife in northern areas of Kosciuszko National Park in January 2020 as the fires were coming under control. At that time the destruction of native habitat was extensive but a large population of feral horses survived and were trampling the peat and heathy wetlands, eating the first regrowth and mowing down the surviving vegetation in places like Nungar Plain that is (was) core habitat for threatened wildlife. FOG's view at that time was, and still is, that if we don't immediately reduce feral horse numbers the

consequences for Kosciuszko National Park and its unique Australian flora and fauna will be horrendous – an emergency cull of the feral horses in Kosciuszko National Park is urgently needed in the habitats of threatened species and to allow the burnt vegetation to recover.

Legislative framework

FOG is completely opposed to the NSW Government's choice to maintain populations of a feral animal in a national park through specific and restrictive legislation, the *Kosciuszko Wild Horse Heritage Act 2018*. We strongly urge that this law is repealed and that feral horses are managed under the *National Parks and Wildlife Act 1974*.

Emphasis of the draft plan

The wording of the draft plan headings is perplexing and, in our view, completely misleading and conveying an inappropriate emphasis. Titling section 4 as "Other environmental values of the park." implies that feral horses have environmental values and that these are, in fact, more important than the actual environmental values. In fact, their "heritage" values are completely at odds with environmental values. The attributes in section 4 are the core environmental values of the park and the values for which it was created – the values that are being degraded by retention of feral horse populations. We ask you to amend the wording of section 4 to "Environmental values of the park" and make similar changes where needed throughout the text.

Horse retention areas

FOG strongly supports the concept of priority horse free areas. However, it is alarmed that horses would be retained in 32% of the Park, including in areas with very high conservation values. The rationale for this is the "wild horse heritage values" of these areas. It is not clear why such a large area is needed to conserve these values, particularly when there are numerous unique and endangered native species and ecological communities that are expected to survive in a much reduced natural extent. Instead we believe that the NSW Government should apply conservation principles and, in this initial program, remove feral horses from habitats of threatened species and communities, ensuring that representative areas of each ecosystem are conserved free from horse damage. For example, it is inexcusable that none of the dry mountain ecosystems and gorges of the Snowy River valley are proposed as horse removal areas.

We ask that the Plan is redrafted to greatly increase the area of the feral horse removal areas so that the following values are protected:

1. Habitats of threatened ecological communities and species. The nationally endangered ecological community alpine sphagnum bogs and associated fens occurs throughout the area north of Kiandra between the two northern priority horse free areas. Given its endangered status and the inevitable long term impacts of climate change, any additional threat (such as feral horses) will result in a reduction of this ecological community. These bogs are also habitat of the endangered Northern Corroboree Frog. While noting that the plan states that "The decision may be made to reduce horse numbers in other areas of the park if they are judged to be causing unacceptable impacts to the environment ... ", our view is that once such damage has occurred it is too late. Restoration of the lost biodiversity is unlikely and the result will be a reduction in this important ecological community and a greater chance of its eventual extinction.
2. All designated wilderness areas. Feral horses are incompatible with the values for which wilderness areas have been designated in the Park. Removing horses from wilderness areas would greatly increase conservation of areas of habitat of threatened biota and representative areas of each ecosystem.
3. Areas of cultural significance for the Traditional Owners. Feral horses should be eliminated from areas containing sites of particular cultural significance identified by Aboriginal custodians,

including the Snowy River corridor, Kalkite mountain and the headwaters of the Murrumbidgee and Goobarragandra rivers.

Feral horse numbers

FOG notes that, unlike the 2016 version, the current draft Management Plan does not contain a suggested maximum for the wild horse population in the Park. The accompanying *Community Advisory Panel Report* proposes a rate of reduction in horse numbers over a time period rather than focusing on a fixed end-state population, and suggests a transitional target population size of approximately 3,000-4,000 horses whilst impacts are assessed across the whole KNP heritage zones. As well, the *Draft Kosciuszko National Park Wild Horse Heritage Management Plan Consultation fact sheet* states “The draft plan requires 3,000 wild horses to be retained in 32% of the park”, and that the population will be reduced to this level by 2027. The *Final Report of the Kosciuszko Wild Horse Scientific Advisory Panel* (SAP) states that “The SAP advises that the wild horse management plan has clear and achievable outcome-based objectives, i.e. adaptive management (Allan & Stankey 2009), as outlined in the below sections of this report ... The end goal is to reach an environmentally sustainable population of wild horses in KNP.” However, we could find no mention of a target population.

From this, it isn't clear what in fact the Plan is aiming to achieve in terms of population control. Assuming the figure of 3,000, in FOG's view this is too high for several reasons:

1. The horses are concentrated in grassland and heath areas, which the reports acknowledge will eventually alter the ecology of these areas. It is essential that we protect not just the ecological communities that are listed as threatened, but also other unique communities that are at present more common. As well, the alpine and sub-alpine grasslands are the habitat of threatened species, such as the alpine sheoak skink and broad toothed rat, that are particularly impacted by feral horse grazing;
2. Kosciuszko National Park is meant to protect our native biodiversity, not support a large population of a feral animal that should be considered a threatening process. While acknowledging the cultural significance of horses for some people, surely this can be immortalized in a way that doesn't impact on our unique and irreplaceable natural heritage;
3. The figure of 3,000 horses is considerably in excess of the numbers that appear to have caused environmental damage in the past;
4. Given the rate of increase quoted of 23% per year, this would expand to over 8,000 horses within the five years of the initial management period mentioned in the fact sheet (although not anywhere else) if unchecked, an unrealistic number if environmental damage is to be avoided.

If, instead, the aim is to keep the population at a level that leads to no environmental damage, it isn't clear from the draft Plan itself how this will be achieved. For example, in section 10 (Policies and Actions), for the areas outside the exclusion zones there is an action “Monitor environmentally sensitive areas and areas with cultural heritage values for horse damage”. However, there is no information about how this will occur. In particular:

- How many of such areas will be monitored?
- For the areas that are monitored, what ecological communities they will cover, where they might be, and at what frequency they will be monitored?
- What are the indicators of damage that would trigger additional control measures?
- Where will community input occur (as suggested on p4 of the SAP) in this process?

FOG's view is that the feral horse population should be kept at a much smaller level than the 3,000 proposed in the documents. We would support control to a maximum feral horse population of 600 (by 2027 as a first step in horse control) as proposed in the 2016 draft plan.

Humane control of feral horses

We do not like the idea of killing animals, but where this must be done it should be implemented in the most humane manner. We welcome the NSW Government's proposal to allow ground shooting in the wild as a step forward. We disagree that the Government does not have a social licence to use aerial shooting, as practiced for control of feral animals in most other jurisdictions in Australia. The NSW Government has never clearly communicated with the public as to the benefits of this rapid and humane control method compared to the alternatives. We urge the NSW Government to use aerial shooting.

The proposal to reduce feral horse numbers over six years from around 14,000 to around 3,000 means that, with a population growth rate of up to 23%, thousands more feral horses may die than would need to if the cull was conducted far more quickly. Even with a population of 3,000 feral horses, around 600 would need to be removed each year simply to stabilize the population. A faster cull to a smaller population is a more humane approach.

In conclusion

The wild horse population has already done significant damage to the grasslands, fens and bogs, and waterways of the Park. Unless the population is significantly reduced, our fragile alpine ecosystems will be at increasing risk, with the inevitable result of loss of species and vegetation communities. Grassy ecosystems will clearly be amongst those most threatened.

We ask you to significantly revise this draft plan to conserve the Park from feral horses by:

- a) expanding the area from which horse populations will be removed so that a full range of biodiversity and cultural values are conserved;
- b) reducing horse numbers further to a maximum population of 600 in the plan period; and
- c) using aerial shooting to more quickly and humanely reduce feral horse numbers.

FOG also believes that the *Kosciuszko Wild Horse Heritage Act 2018* should be repealed and feral horses managed under the *National Parks and Wildlife Act 1974*.

Yours sincerely

Prof. Jamie Pittock
President

27 October 2021