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Australian Ecologists' Letter to the NSW Premier in support of feral horse control

The Hon Mike Baird, MP
Premier of New South Wales
GPO Box 5341
SYDNEY NSW 2001

Dear Premier Baird,

Humane and effective feral horse control is essential for Kosciuszko National Park to meet its obligations to biodiversity conservation under national and international agreements.

We are writing to you to express support for the Kosciuszko National Park draft Wild Horse Management Plan, 2016. The NSW Government must undertake humane and effective feral horse control to meet Australia's obligations to protect its unique Alpine natural heritage, and for NSW to meet the legal requirement of the Kosciuszko National Park Plan of Management.

As Kosciuszko National Park is an IUCN Category II Protected Area with a statutory plan of management, New South Wales is obliged to manage the park in a way that protects ecosystem processes, species and ecosystems that are characteristic of the area. This includes unique alpine wetland ecosystems and species such as the corroboree frog and alpine she-oak skink. These and other native alpine species are characteristic of the area because they have evolved in this region over millions of years. By contrast, horses are stock animals recently introduced and are not characteristic of this area, but threaten ecosystem processes, ecosystems and species that *are* characteristic. Horses are not compatible with the primary goal of nature conservation in a national park.

The estimated number of feral horses across Australia is approximately half a millionⁱ. Like the rest of our country, Australian alpine and subalpine ecosystems did not evolve in association with hooved animalsⁱⁱ and now are being degraded by high numbers of horsesⁱⁱⁱ. Since the late 1990s the environmental impacts from a growing feral horse population have become increasingly obvious^{iv}, and horses occupy 48% of the park^v. Impacts have been documented to streams, wetlands and catchments^{vi}. Feral horses damage waterways,

degrade soil, spread weeds and alter vegetation. These changes are likely to have negative impacts on native fauna^{vii,viii}.

Current methods of horse control under the 2008 wild horse management plan do not involve culling. On average only 450 horses have been removed each year over the last five years^{ix}. This effort has totally failed to control horse numbers and their environmental effects. Over this period, horse numbers increased from an estimated 4,200 horses in 2009^x to 6,000 today. Further, rehoming and domestication of captured horses under the 2008 Plan is not a solution for humane control as only 18% of 3183 horses removed since 2002 were rehomed. The remaining 82% of horses went to abattoirs after a long and stressful journey^{xi}. Such prolonged transport was ranked as the worst animal ethics outcome of all the control options considered (score 7) in the Independent Technical Reference Group report^{xii}. Fertility control also is not a practicable humane option for reducing horse numbers and we support its omission from the management plan^{xiii}.

On balance, fewer animals are predicted to suffer and die under a program of rapid population reduction than under the current management regime^{xiv}. A program of effective aerial culling implemented in the near future would be a far better animal ethics outcome than continuing the current strategy. Effective aerial culling will reduce the horse population quickly. This would minimise animal suffering by reducing the number of horses that die of starvation, poisoning or thirst. In addition, aerial shooting by trained and authorised National Parks and Wildlife Service staff^{xv} is the most humane method for removing horses, as identified in the Independent Technical Reference Group report^{xvi}. Aerial culling is therefore essential for reversing the animal ethics disaster that has unfolded in Kosciuszko National Park.

We support the goal of a significant reduction in feral horse numbers^{xvii}. However, the plan's twenty year time-frame to reduce horse numbers to 600 is too long. Given that horse populations increase at up to 20% every year^{xviii}, rapid reduction in an initial management phase is important. For example, at the current population size of 6000, potentially up to an extra 1200 horses must be managed next year. If the population was reduced to 100, an extra 20 horses would need to be managed in the following year. Rapidly reducing the population will therefore be more cost effective, result in fewer horses being killed over time, minimise horse suffering and prevent further degradation of Australia's unique alpine ecosystems.

We support the proposed control measures recommended by the Independent Technical Reference Group^{xix} including ground shooting. However, the most effective and humane control measures of aerial shooting should also be adopted to make rapid reduction of horse populations feasible. In addition, large numbers of horses are in areas inaccessible to vehicles, making aerial culling the only option for effective control.

Horse control should be a priority in wilderness to protect these core park areas from being further degraded. The management plan proposal to retain managed herds of wild horses in wilderness condemns these areas to on-going environmental degradation, with no appreciable heritage benefits given their remote location. Retaining horses in these wilderness areas would be contrary to the restoration management purpose of Section 9 of the Wilderness Act, 1987.

Protected areas cover less than 10% of the land area in NSW^{xx}. With such a small proportion, it is critical that all protected areas are dedicated to Australian native species, where feral species are excluded or controlled. We commend the new strategies to reduce horse numbers in the Kosciuszko National Park draft Wild Horse Management Plan, 2016. However, we urge you to reduce horse numbers more rapidly, to lower numbers, and using aerial culling which is the most effective and most humane approach.

Signatories to this letter include 41 ecologists from 16 universities in Queensland, New South Wales, Australian Capital Territory, Victoria and Tasmania. Collectively, we represent the greatest pool of knowledge about alpine ecosystems in Australia and most of us have direct research experience in the Australian alps or in practical land management decision-making, or both. It is this knowledge of ecology and management, alongside the accumulated evidence cited above, which allows us to draw our conclusions that rapid, humane horse control is essential for Kosciuszko National Park to perform its primary function of biodiversity conservation.

Yours sincerely,

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ⁱ Invasive animal CRC website horse fact sheet. <http://www.pestsmart.org.au/managing-vertebrate-pests-feral-horses-2/>, <http://invasives.org.au/project/feral-horses/>

ⁱⁱ Costin, A.B. et. al., 2000, *Kosciuszko Alpine Flora*, CSIRO/Collins Australia.

ⁱⁱⁱ NPWS, 2016, *Kosciuszko National park draft Horse Management Plan - questions and answers*, p.1.

^{iv} Dyring, J., 1990, The impact of feral horses (*Equus caballus*) on sub-alpine and montane environments in Australia M.Sc. Thesis, Division of Resource and Environmental Science, University of Canberra; and Landsberg, J. 1999, Horse Riding in Canberra Nature Park CSIRO Wildlife and Ecology.

^v NPWS, 2016, *draft Horse Management Plan for the Alpine Area of Kosciuszko National Park*, Office of Environment and Heritage, p.9.

^{vi} Environment ACT, 2007, *Namadgi National Park Feral Horse Management Plan*; and Worboys GL, Freudenberger D., Good R., Pulsford, I. & Banks, S., 2015, *Our Australian Alps Are Changing For the Worse*, theaustralionalps.wordpress.com

^{vii} <http://www.ecolsoc.org.au/hot-topics/feral-horses-australia>

^{viii} <http://aciucn.org.au/wp-content/uploads/2015/09/18-Worboys.pdf>

^{ix} NPWS, 2016, *draft Horse Management Plan for the Alpine Area of Kosciuszko National Park*, Office of Environment and Heritage, p.4.

^x OEH, 2014, Summary of Kosciuszko National Park results from Feral Horses in the Australian Alps National Parks: the Design and Analysis of Surveys Conducted in April-May, 2014

^{xi} NPWS, 2016, *draft Horse Management Plan for the Alpine Area of Kosciuszko National Park*, Office of Environment and Heritage, p.4.

^{xii} <http://www.environment.nsw.gov.au/resources/protectsnowies/knp-ssessing-humaneness-wild-horse-management-methods-2804.pdf>

^{xiii} Environment Australia, 2011, The feral horse – *Equus caballus* and feral donkey (*equus asinus*), www.environment.gov.au/system/files/resources/b32a088c-cd31-4b24-8a7c-70e1880508b5/files/feral-horse.pdf

^{xiv} Driscoll, D. and Banks, S., 2014, The grim story of the Snowy Mountains' cannibal horses, The Conversation, theconversation.com/the-grim-story-of-the-snowy-mountains-cannibal-horses-31691

^{xv} Environment Australia, 2011, The feral horse – *Equus caballus* and feral donkey (*equus asinus*), www.environment.gov.au/system/files/resources/b32a088c-cd31-4b24-8a7c-70e1880508b5/files/feral-horse.pdf

^{xvi} <http://www.environment.nsw.gov.au/resources/protectsnowies/knp-ssessing-humaneness-wild-horse-management-methods-2804.pdf>

^{xvii} NPWS, 2016, *draft Horse Management Plan for the Alpine Area of Kosciuszko National Park*, Office of Environment and Heritage, p.3.

^{xviii} Dawson 2009 Aerial survey of feral horses in the Australian Alps
<https://theaustralionalps.files.wordpress.com/2013/12/2009feralhorsealpssurvey.pdf>

^{xix} ITRG 2016, Final report of the Independent Technical Reference Group: Supplementary to the Kosciuszko National Park Wild Horse Management Plan, report by the Independent Technical Reference Group to the Office of Environment and Heritage NSW, Sydney.

^{xx} CAPAD 2014 <https://www.environment.gov.au/land/nrs/science/capad/2014>