



THE COLONG FOUNDATION FOR WILDERNESS LTD.

Monday 15th August, 2016

The Project Officer
Kosciuszko National Park Wild Horse Management Plan Review
National Parks and Wildlife Service
PO Box 2228
Jindabyne NSW 2627

Dear Sir/Madam,

Submission in support of the Draft Kosciuszko National Park Wild Horse Management Plan Review

The Colong Foundation for Wilderness thanks the Minister for the Environment, the Hon Mark Speakman, for his support of this draft plan and the efforts of the NPWS to save this park from the serious threat of an ever growing feral horse population. As Graeme Worboys and the Ian Pulsford (2013) observed, the direct impacts of a very large number of horses are considered to be comparable to the worst historic domestic grazing pressures that triggered the removal of stock from Kosciuszko State Park in the 1940s.

The Colong Foundation welcomes this draft plan to greatly reduce horse numbers. We do, however, request that all feral horses be humanely eliminated from this and all NSW national parks. There are 700,000 feral horses in Australia, more than in the United States of America and unlike Kosciuszko National Park, horses are not threatened. The Colong Foundation understands the politics of this issue but considers that the permanent degradation of the Kosciuszko wilderness in an attempt to placate the pro-horse lobby is too high a price.

The Foundation objects in the strongest terms to the retention of managed herds of feral horses in the Pilot and Goobarragandra Wilderness Areas. This concession will only lead to further calls for inappropriate horse recreation in these areas. Under this management proposal these wilderness areas will remain environmentally degraded while less remote areas are restored by the removal of these large exotic beasts. It makes no sense to allow feral horses to degrade core areas of wilderness while restoring park edge areas through the removal of horses. This twists conventional park management upside down.

Yet despite this appalling compromise of wilderness management principles, feral horse advocates by and large do not support this draft plan. These individuals seek to subvert the national park ethic of 'setting aside lands for nature', to create an ethic that 'permits the degradation of nature through the maintenance of large feral horse populations'. This inverts national park ethic is similar in logic to the recreational shooters wanting to define deer as a game animal, and not as a feral animal, so that feral deer populations will increase.

Communications regarding feral horse management

The Colong Foundation supports the draft plan as it will help to protect our unique Alpine heritage, and ensure visitors gain more enjoyment and a better appreciation of this park's many important heritage values.

The Foundation supports the NSW Government's opposition of the pursuit, muster and trapping feral horses from horseback because these operations are too slow to ensure effective population control (see page 25). The roping of individual horses is also an ineffective, resource intensive and a time-wasting practice (page 25). Adopting such inefficient control methods will see feral horse numbers increase in the park.

The desires of feral horse advocates to relive the pursuits of the Man from Snowy River are a fantasy, not an effective method of feral horse management. Such brumby' running or horse roping is not humane as the captured horse suffers high levels of stress. The method has a high risk of injury to the riders, as well as the horses, involved in the chase. For these reasons the website communications outlined in Action 2 on page 24 of the plan must not include favourable references to running of feral horses into yards. Expressing enthusiasm for brumbie running and roping will erode public support for NSW Government policy position opposing these ineffective practices (see page 25).

The community involvement objective in the plan of management must be rewritten to communicate national park values and promote appropriate and effective feral horse control management (see page 3, management objective 3). For example, 'To involve the community in the ongoing management of wild horses in Kosciuszko National Park through active participation in research, monitoring and control programs *so that nature conservation and wilderness outcomes are significantly enhanced.*'

The Colong Foundation strongly opposes action 10 – 'working with local communities to establish appropriate information and interpretive material on the heritage values associated with the wild horse population in the park' (see page 29). This will compromise the key public relations message that national parks are lands aside for nature.

The section on Cultural and Social Values of Wild Horses in Kosciuszko National Park (pages 11-13) must explain why elimination of feral horses is necessary and appropriate for a national park due to the damage that feral horse cause to park values.

Reinforcing land management history that is not grounded in national park values is a mistake. Park visitors should have natural values presented, not a history around feral horses and stock grazing. The current displays at the Jindabyne Visitors Centre are already too heavily biased towards celebration of non-park management of stock grazing.

Control methods

The Colong Foundation supports use of feral horse control methods that have been independently declared by experts to be both humane and effective (page 1 integrated regional pest management strategy is supported).

It is a mathematical certainty that Kosciuszko National Park will become further degraded unless the most effective and humane control methods are implemented so that at least 800 horses are eliminated each year. If this is not achieved, then the feral horse populations must increase beyond the 6,000 presently degrading the park. The plan will then not be able to prevent horses moving into other parts of the park.

Shorten control timeframe

The management plan's two decade timeframe for reduction and elimination of feral horses is too long. More effective eradication measures are required than are being considered (page 3 and 23, key strategies - dot points 6 and 7 are unrealistically slow to produce population reductions).

The Colong Foundation requests that alternative control methods be trialled, as it is likely that proposed methods will not be sufficient (these alternative methods should include aerial shooting under strict protocols e.g. FFAST protocols for aerial shooting). The plan's vision on page two should permit the management adaptation to viable methods that most effectively reduce the horse population, should there be a change in government policy.

The Colong Foundation urges that the NSW Government revisit its ban on aerial culling of feral horses as soon as possible under this plan (page 25). The NPWS has been advised by independent experts that aerial shooting is the most effective humane method of controlling feral horses. The Independent Technical Reference Group (2016) found that of the in situ lethal control methods assessed, aerial shooting under a best practice scenario had the lowest overall animal welfare impact. Where these conditions are not achievable, ground shooting, or passive trapping/mustering followed by on-site humane killing, were the next best options. Aerial shooting is humanely and effectively used as a control method for other mammals such as deer, pigs, and goats, so aerial shooting of wild horses can be undertaken humanely within Kosciuszko National Park.

Aerial mustering and trapping is supported by the Colong Foundation.

As you are aware, the current method under the 2008 horse management plan of passive trapping and trucking does not limit population growth. The NPWS staff and/or contractors undertaking this method are exposed to significant risk of injury from the horses during truck loading and this hazard needs to be properly considered in the integrated management strategy. The financial cost of this elimination method is greater than \$1,000 per horse, which is many times more than the horse is worth, but this cost is an underestimate as it does not include the environmental opportunity cost of not removing horses (page 25, control method dot point 1, passive trapping on its own is opposed as ineffective).

The trapping, mustering, removal and rehoming horses are very costly operations with a low chance that the captured horses can be successfully domesticated. These activities are undertaken because

the feral horse support groups successful lobbying. Less than one in five horses trucked out of the park are rehomed, and the rest suffer a stressful death (page 23, rehoming strategy is opposed as inhumane, page 28). Further, these practices divert resources from effective controls. In other words the pro-horse lobby is not really about humane horse treatment, but perceptions and emotions of individuals.

Fertility trials also should not be considered as a control option under the plan, as these costly practices drain limited financial and human resources. The Foundation agrees with the NPWS that fertility trials are not workable when large numbers of horses are involved (page 25, fertility controls opposed). The Colong Foundation also opposes use of fencing, particularly in wilderness areas because fences also obstruct wildlife (page 25, fencing controls opposed in wilderness). An exception could be made for the Namadgi National Park fence, as this park is free of horses and provides Canberra with fresh drinking water. The Colong Foundation, however, recommends instead that an exclusion zone is preferable. Such a zone should eliminate horses from Bimberi Nature Reserve and the Goodradigbee Wilderness area, as well as Namadgi National Park.

It is unfortunate that those who care about horse most cause more harm to horses, and rational argument does not seem to have any effect on the debate. There is a growing opinion in the community at large that having an opinion is equivalent to having an opinion based on science and evidence. Such views are very dangerous to democracy and can only be overcome by science education.

A managed herd of feral horses is opposed

The Colong Foundation opposes the concept of a managed herd of feral horses in Kosciuszko National Park. The NPWS would be aware that there are 700,000 feral horses in Australia. There is nothing unique about the feral horses in this national park. Feral horses have been eliminated from Namadgi National Park and this success can be and should be replicated in all NSW national parks where feral horses are present. The feral horse should be eliminated as part of this integrated pest management program proposed in the management plan (page 24, Strategy dot point 7 opposed).

National parks, by common understanding and definition, are not for the taxpayer-funded for the maintenance of herds of large exotic mammals that damage its natural environment. This is a perversion of national parks. National parks are areas set aside for nature, not horses.

The Colong Foundation requests that management action 2 be reworded. It should require the NPWS to state that the maintenance of feral horse populations not only impacts on other all heritage values in the park but compromises the common understanding of a national park as land set aside for nature (page 24, action 2).

Zones and Regions mostly supported, except for the use of wilderness as a feral horse refuge

The Colong Foundation rejects the proposal that the Pilot and Goobarragandra Wilderness Areas retain managed herds of feral horses. The containment zones within wilderness must be areas where feral horses are eliminated, not retained in managed herds.

The Colong Foundation recognises that some areas contain large numbers of feral horses and that their removal will require significant effort. It would be wrong to give these areas up to the horse lobby, and to concede environmental degradation of what were formerly the most intact parts of this national park. Wilderness then would be the very thing that some of its critics have complained about – a harbourage area managed for pest species.

The Colong Foundation completely rejects the zone objective ‘A reduced population of horses within this zone will be permitted in recognition of the cultural, community and social values of wild horses in the park.’ This objective denies and perverts the cultural, community and social values of declared wilderness. These areas must be subject to effective elimination of feral horses by the most humane method, aerial shooting, so that they do not become harbourage areas for feral horses.

The three management regions in the plan of management seem logical and are supported. It would be more appropriate for the Northern Region of the feral horse management plan to incorporate the Maragle, Bago and Green Hills State Forests. As the NPWS would know, these three state forests have a large horse population and contain important upland dells that are being heavily impacted and degraded by feral horses. These forests are horse harbourage areas of core habitat. Horses will migrate south-east from these forests into the national park, unless effectively suppressed by Forests NSW working in co-operation with the NPWS. In other words the logic of containment will not work if populations of feral horses continue to grow in these state forests.

The Colong Foundation believes that the public safety zone should not be a separate element in the plan but brought within the elimination zone. This would ensure better containment of horse populations. Containment seems to be the original intent of the management regions but without the public safety zones being areas of feral horse elimination, this intention cannot be achieved.

A similar argument can be presented for the Snowy River and Alpine National Parks, which I understand have their own feral horse management plan. The most logical thing would be to establish a southern exclusion corridor near and parallel to the Victorian border, perhaps along the Black Mountain Track to the south. The purpose of this exclusion corridor would be to break up the contiguous horse population between the two states. As the draft report observes, ‘allowing animals to cross into adjacent areas increases the environmental impacts in these lands and means the costs and resources associated with pest species programs in these areas are much higher’ (see page 29).

Rehoming of feral horses and program reference group are counterproductive

The Colong Foundation believes that the feral horse rehoming program creates environmental problems.

The Colong Foundation opposes the presence of a rehoming groups or feral horse advocacy groups on the Kosciuszko National Park Wild Horse Management Program Reference Group as this will be counterproductive to effective feral horse control (page 29, action 8).

The adverse influence of rehoming groups and their lobbying efforts on management is illustrated by the events of last year when 140 female horses and young foals were returned to the national park out of out of 180 horses captured. The feral horse and re-homing groups have defeated the current

pest control methods in the national park and in consequence are directly responsible for the parks' degradation (page 29, action 8 opposed). A reference group consisting of rehoming groups or groups that wish for feral horses to be retained in the national park must obstruct effective control techniques and guarantee failure of this management plan.

If horse numbers in Kosciuszko National Park are to be reduced, then each year hundreds more horses must be eliminated than currently achieved. The NPWS should not support rehoming of captured animals, any more than the NPWS should permit pigs or goats to be harvested by hunters. Both groups frustrate effective pest management efforts.

Over the last twenty years those who support the retention of feral horses in this national park have been responsible for severe environmental degradation of the Alps and increased horse suffering (page 29, action 8 reference group consisting of horse advocates will be counterproductive).

As a prerequisite of appointment, a program reference group member should be open to the possibility of more effective alternative control methods, including aerial shooting if feral horse populations are not reduced (page 28).

Feral horse grazing does not reduce wildlife severity

We agree with the NPWS that there is undeniable proof that horses cause significant damage and erosion in the Alps as confirmed in many scientific studies over the three decades. The claims that grazing by feral horses reduces wildfires are nonsense. The Independent Technical Reference Group found that the claimed positive environmental impacts of feral horse grazing are not supported by scientific evidence.

The NSW Government and the NPWS should not support the demands of those who wish a managed herd in the park. This proposal will confirm ineffective management outcomes and fail to prevent environmental damage.

Better management for the Pilot Wilderness

There is nowhere else in NSW where isolated islands subalpine environment can be managed for nature, except in the wilderness areas of Kosciuszko National Park. The Pilot Wilderness must not become a place where horse advocates attempt to relive the pursuits of the Man from Snowy River. Recreational horse riding in wilderness is not supported. Wilderness areas are the last places where the riding of domesticated horses or the maintenance of a herd of feral horses should be considered appropriate.

The Colong Foundation recommends, as an alternative, that the Key Environmental Asset Protection zone in the Pilot Wilderness be extended along the Ingeegoodbee River south to the Victorian border. This protection zone is achievable if the service road is used and warranted because of the damage large numbers of feral horses have caused to the river and its associated wetlands.

Thank you for the opportunity to comment.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Muir', with a stylized flourish at the end.

Keith Muir
Director
The Colong Foundation for Wilderness Ltd

Reference:

Worboys, G.L. and Pulsford, I. (2013) Observations of Pest Horse Impacts in the Australian Alps, Canberra, Available at: www.mountains-wcpa.org