

Colong Foundation for Wilderness: Submission to Draft Wild Horse Management Plan for the Alpine area of Kosciuszko National Park

Terminology

Although there may be reasons for calling some pest species “feral” and others “wild”, this is confusing to a community already poorly informed about the issues. The term “wild” is somewhat more emotive than “feral” and somewhat less so than “brumby”. English (2001), having recognised that people have different perceptions about horses than other pest animals, uses the term “feral horse” in all three of his reports. The Kosciuszko Plan of Management clearly states “wild horses are feral” (NPWS 1988, p.119).

Colong position statement

- The Plan should refer to the horses as “feral”, so that they are clearly differentiated from native “wildlife” and not laden with emotional terminology. This would be consistent with the terminology used in the independent reports on feral horses in Guy Fawkes River National Park (English 2000, 2001).

The horse is a feral animal and the NPWS has clear statutory requirements to remove feral animals from its estate

The NPWS is treating horses differently to other feral species. The National Parks and Wildlife Act does not allow for this arbitrary differentiation.

In the case of Dorrigo District Pest Management Plan, taking a different approach to horses than to other species of feral animals would “require a change in policy and possibly even a change in legislation” (English 2001, p. 4). English states “The challenge in developing an approach that will be adopted in GFRNP (Guy Fawkes River National Park) starts with decisions about the way in which the horse will be considered in the future – feral pest animal or cultural icon”. He sees the former as “the reality”. The challenge therefore becomes “to separate the myth from the reality in a way that can be accepted by the community” (English 2001, p.4, 5). This expert advice is equally applicable to Kosciuszko National Park.

Colong position statements

- The NPWS should abide by its statutory requirements to control feral horse populations as a pest species.
- Horses need to be treated in the same manner as any other animal pest species.

Composition of the wild horse management steering committee

Colong is concerned that members of the steering committee have influenced the outcomes of the draft Management Plan before the committee complies with its obligations to incorporate community views via the submission process. The statement “shooting would be used only to euthanase injured or very ill animals as recommended by veterinary advice” defies due process and the policies and recommendations of both government departments and independent professional bodies.

Colong position statement

- The committee should be representative of the interests that Kosciusko National Park has been established to protect. These interests do not include those of supporters of feral horses. Members should not have virtual veto powers to determine how feral horses are managed.

NSW Government position

It is obvious that the NSW Government’s current position on aerial shooting has dictated the draft Management Plan’s position on aerial shooting. This should have been made absolutely clear in the draft Plan. There can be no doubt that aerial culling is considered the most humane method of removing large numbers of horses. Further, in relation to the last recorded aerial cull of horses in NSW (October 2000, GFRNP), which precipitated the ban, the NPWS have had charges of cruelty dismissed by a July 3 court hearing in Sydney. Therefore, any continued ban on aerial culling needs to be substantiated within the legal parameters outlined in the legislative framework outlined on page 6 of the Draft Plan.

Colong position statement

- A detailed and fully referenced discussion of the control method of aerial culling needs to be included in the Plan of Management within the context of the legislative framework outlined on page 6 of the draft Management Plan.

Management options/ adaptive management

English (2000) concluded that, in the case of Guy Fawkes River National Park, the NPWS had used a number of management options since 1992 in attempting to reduce the number of feral horses including: roping; mustering; trapping and darting and that only 156 horse were removed with significant risk to both humans and the horses themselves (p. 23). 156 horses had been removed from Guy Fawkes during 15 musters between 1992 and 1999. English questioned the cost effectiveness of these activities. There were also significant animal welfare concerns.

The proposed control methods of trapping, roping and mustering will not be able to reduce a population of 3,000 feral horses in Kosciuszko National Park. The population is very large, with a potential natural increase of 20% per year. Apparently, 13 horses

have been trapped in the 2001/2002 season (to the end of May) (SMH, 1/6/02). Such meagre figures substantiate the ineffectiveness of the management options being proposed for the Kosciuszko horses in the draft Management Plan.

Colong position statement

- Colong does not support the use of control methods that have already proven ineffective in Kosciuszko and Guy Fawkes River National Parks.
- The NPWS should adapt its management and undertake management options that will provide the most effective methods of reducing the number of feral horses in Kosciuszko National Park in the shortest possible time period.

The fate of captured horses is uncertain

Roping and mustering by contracted horseriders, followed by transportation, may cause extreme stress to the horses. Further, since the captured horses become the property of the contractor involved, despite obligations under the Prevention of Cruelty to Animals Act 1997, the final fate of these horses lies with individuals isolated from the public accountability of a government agency. Finally, since the fate of the horses is ultimately related to their age or ability to be tamed, this escalates the possibility of inhumane treatment.

Colong position statement

- Colong questions whether the proposed management options are the most humane methods of removing horses from the Park.
- Colong is concerned that the proposed methods will be isolated from processes of public accountability

Aerial shooting

The Australian Veterinary Association's Policy No 5.17 states that "strictly controlled helicopter shooting represents the most humane technique for large scale culling programmes, provided that such programmes are conducted only by skilled and trained shooters under careful, controlled and planned government operation" (English 2000, p. 7). English also cited the SCA Report 1991 which concluded that the only practical method for quick and humane culling of large animals in inaccessible locations was helicopter shooting (English 2000, p. 9). This is because shooters can get close to the target animal and wounded animals can be followed up quickly and killed.

In his report on the cull of feral horses in Guy Fawkes River National Park in October 2000, English concluded that that aerial shooting be retained as a method of control and that the community be made aware of the need for effective control of feral animals in that they threaten our native fauna (English 2000, p. 24). It is important to note that the terms of reference for Professor English in his *Management Plan for Feral Horses in Guy Fawkes River National Park* (English 2001) did not include the option of aerial culling. This politicised the outcome of the report.

Aerial shooting has been seen as an acceptable method of culling other feral species such as pigs and goats.

Colong position statement

- A period of 14 years has elapsed since the release of the Kosciusko Plan of Management 1988, and the NPWS now seems to expect the community to accept another two years of trial control measures that are known to be ineffective, when the most effective and humane method of reducing large numbers of horses is widely recognised. A minimum on-park population, which must approach zero, should be achieved in a humane way, in the shortest possible period of time. The method should recognise the positions of other agencies and independent scientific bodies. This method is aerial shooting.

Distribution of feral horses

The draft Management Plan states that there are approximately 3,000 wild horses in Kosciuszko, with the main population of 1,400 in the southern part of the park (including the alpine area). The draft plan does not explain why the proposed management is aimed at reducing the horse population only in the alpine area, particularly since all ecosystems within Kosciuszko have evolved without the presence of large hard hooved animals. While the alpine area might be considered the most sensitive to impacts on flora, fauna and water quality, other areas of the Park also need to be managed for this pest species. (Refer impacts listed on p. 5 of the draft Plan, which are not specific to an alpine environment). Horses move through the park. Sub-alpine areas have already been cited as areas of concern by the public (p.5).

Colong position statements

- The entire Park should be managed for the eradication of feral horses
- If this is not the NPWS position, the Management Plan should clearly state why this is the case
- If it is a case of management priority due to lack of resources this needs to be stated
- The plan needs to incorporate the arguments for the need to maintain viable populations of endemic species rather than sacrifice these for the benefit of the retention of a population of large pest species.

Population ecology

In general, mares produce, on average, one foal every two years and under good conditions the population can increase by 20% per year (English 2000, p. 6). The preliminary projections for Kosciuszko, cited on page 12 of the draft Management Plan, need to be graphed and referenced. It is difficult to make informed decisions when the data do not detail the population trend assumptions. Even if the figures are accepted, an

8 to 30 year time frame to reduce the population to between 800 to 850 horses is unacceptable, given the indisputable impacts the horses are having on the Park's fragile environment. Further, as detailed in the results of the genetic analysis of the feral horses in GFRNP (Nicholas *et al.* 2002), that population is constantly being replenished from either natural or human assisted immigration from other areas. It is reasonable to assume that this method of population increase may be extrapolated to Kosciuszko. The population projection needs to clearly include this parameter in its analysis.

Population targets for introduced animals

Page 12 of the draft Management Plan says, "targets for the reduction of horses have yet to be set", yet the NPWS policy on Introduced Animals clearly states that they "shall not be allowed to remain on Service estate" (cited by English 2000, p.5). This has been confirmed by the NSW Minister for the Environment, Bob Debus, on July 3 (Minister for the Environment 2002). While it is recognised that reduction to, and maintenance of, feral horses at low densities is probably the best level of population control achievable (Department of Conservation 2002, English 2001), the Service does not give a target population for Kosciuszko NP, rather a target of zero for the Alpine area.

English (2001) states "there is general agreement that the feral horse population in GFRNP must not be allowed to grow again in an uncontrolled manner" (p. 13).

Colong position statement

- The target population should be zero and a minimum population should be achieved in the shortest possible time period

Kosciuszko Plan of Management Second Edition (prepared in accordance with section 75 of the *National Parks and Wildlife Act 1974*)

Past management

It is difficult to reconcile a 20-year gap in any form of management for horses as a pest species with the documented impacts that horses have on natural ecosystems. The Kosciuszko Plan of Management (NPWS 1988) clearly states that it "recognises that wild horses are feral and that quantitative data on their effect on the Park environment are thought to be negligible. The current licensing system, which authorises particular persons to catch wild horses, will be reviewed for its effectiveness as a control measure. The Service will undertake a study of the environmental impact of wild horses and methods for their control" (NPWS 1988, p.118).

Appropriate Use

The "encouragement and regulation of appropriate use" involves a provision of a range of opportunities for visitors to interact with the natural and cultural features of a park, wherever this is compatible with the goal of conserving natural features and processes. The management of a national park should not, therefore, create artificial features or

promote the use of any specific features in a way that destroys natural and/or cultural values of the park. A major objective of this plan is to provide visitors with a range of opportunities to use and appreciate Kosciusko National Park, while protecting its important features and processes” ‘ (NPWS 1988, p.4). The plan does not list feral horses as a value that needs to be protected.

Resolution of conflicting expectations

The management objectives emphasise that “when it is necessary to resolve conflicting expectations precedence will be given to the primary objective of protecting the outstanding scenery and features of Kosciusko” (NPWS 1988, p. 5)

Specific area Provisions (Kosciusko)

“...careful consideration will be given to this species when formulating management decisions for this Unit. The known *B. parvus* habitats will be protected from any environmental degradation” (NPWS 1988, p. 14).

Control of introduced plants and animals

The section “ Programme proposal” (p.117) states that the proposal should detail “the species involved and assessed extent of impact; the resources and best practical methods required for control; ...the expenditure required, including budget for follow-up work; the expected environmental impact of the programme from the appropriate environmental assessment, including potential secondary effects” (NPWS 1988, p. 117). Shooting is listed as a specific control method (NPWS 1988, p.118).

Colong position statements

- The NPWS must redress its huge gap in past management of the horse as a major pest species.
- The Management Plan needs clearly state that the horses are feral and that any alternative view would constitute “inappropriate use” of the Park.
- In the case of conflicting expectations with respect to the management of feral horses in Kosciuszko, precedence must be given to the primary objective of protecting the outstanding features and scenery of Kosciuszko.
- The protection of the habitat of native species such as *B. parvus* should override any protection strategies for feral horses.
- The Management Plan should include, at the very least, the control parameters outlined in the Kosciusko Plan of Management (NPWS 1988, pp. 117 – 118)

Impacts

While the general impacts of horses on ecological systems are indisputable, there seems to be very little quantitative data available. There has been less research on

horses than other feral species (English 2000, 2001). Given that the “effects on mountain environments by horses have been voiced for over a century” (draft Management Plan, p. 8), the lack of specific quantitative data on these impacts in Kosciuszko is of concern. This Park has been part of the NPWS estate for nearly 30 years.

The draft Plan recognises that impacts of feral horses are becoming more apparent (p.5). English recognises that impacts are density dependent (English 2000, p.22). The rate of change in the ecosystems is difficult to estimate as the relationship between horse densities and the degree of modification is not well described (Department of Conservation 2002).

Colong position statements

- The Management Plan needs to document a much more detailed analysis of the impacts that feral horses have had on the Park.
- The Plan needs to include a theoretical analysis of the cumulative impacts of the feral horses. This needs to include both temporal and spatial contexts.
- The Plan needs to include estimates of how each control method (including aerial culling) will reduce both the immediate and cumulative impacts of feral horses in the Park.

Monitoring

It may take several years after control methods are instigated for environmental qualities to show improvement due to the slow growth rate of vegetation and energy cycling within high altitude ecosystems (Department of Conservation 2002 cites Rogers 1994).

Colong position statement

- The Management Plan needs to detail monitoring methods for each of the control methods citing specific environmental indicators.

NPWS annual reports

The section on pest management in the last three NPWS Annual reports (NPWS 2000, 2001, 2002) mention foxes; cats; rabbits; wild dogs; feral pigs; rodents; feral goats and cane toads. Although there is mention of the horses in “Conservation partnerships” in the 2000-2001 Annual report, the NPWS has not fulfilled its obligations to report on a major pest problem in NSW National Parks.

Colong position statement

- The NPWS needs to fulfill its obligation to discuss the feral horse problem in its annual reports. Such discussion should refer to management programmes and include population targets and the methods and results of monitoring.

Cost/ benefit analyses

The draft Plan does not include a quantitative analysis of costs for each method of control. Further, it does not attempt to incorporate the environmental cost of continued damage to the Park by feral horses.

While the draft Plan mentions the “large amount of resources” (p.4) spent on restoring and protecting the alpine area, it does not transfer this concept to the costs of retaining horses in the park.

Some quantitative measure of the benefits of removal might be found in the results of the current monitoring of the beneficial results to Guy Fawkes River National Park of the removal of 606 horses in October 2000, leaving approximately 60 to 100.

Colong position statements

- The Management Plan needs to present a quantitative analysis of the financial costs of each control method (including aerial culling), assuming: a target population of zero; and a minimum time frame to reach this target.
- The Plan needs to estimate the environmental costs of each control method (including aerial culling), assuming: a target population of zero; and a minimum time frame to reach this target.
- The Plan needs to detail its proposed monitoring programme, including the ecological features it will use as indicators.

Overseas comparisons

Although the draft Plan looks at populations of feral horses in NZ and the U.S., English emphasises that Australian conditions are unique and that control options must take this into account (English 2001, p.4)

Any comparison between the control of horses in the US and within our own national park system must be viewed with caution, primarily because many US native species evolved with ungulates.

The horse must be viewed as a feral species. It is not endemic to Australia. It does not require any particular component of Australian ecosystems for its survival. It is surviving and flourishing in a variety of Australian ecosystems. Conversely, many of Australia's native species require very specific features of their environment to survive and reproduce. They are being forced to compete for resources with a large ungulate with which they have not evolved.

The New Zealand experience

The Kaimanawa herd is located primarily on army land, although described as an upland wilderness in a sub-alpine area with forest remnants, shrublands, wetlands, tussock grasses, gravel/pumice fields, pools and rocky places. The environment is highly susceptible to damage even by a low number of horse. Swift action was required, as since investigations began, some plants had already become extinct.

In the case of the Kaimanawa wild horse, genetic researchers have advised that the herd is not genetically significant and, because the herd is not a distinct breed, a minimum population of 300 horses will maintain the genetic variability of the herd. The herd was reduced to 500 in 1997. 100 per year have been captured and as of May 29, 2002 there are approximately 729 to 793 horses in the area (two counts).

It has been concluded that the current Schedule IV listing of the protected area for the horses known as the Kaimanawa wild horses is no longer serving the intended purpose of S7 (II) of the Wildlife Act 1953. "This population is not in need of protection, it is need of management. Other mechanisms can be used to ensure a viable population of Kaimanawa horses is preserved" (Department of Conservation 2002).

Position of Environment Australia

It is the position of Environment Australia that feral horses cause serious environmental damage. Under favorable conditions, feral horse populations can increase by 20% per year. Helicopter shooting is considered the most humane way to reduce feral horse numbers over large areas. It is quick and the animals are not subject to the stresses of mustering, yarding and transportation. (Environment Australia 2002)

On-going public participation

Colong position statement

- The Management Pan needs to detail methods of on-going public participation in the issue. This needs to include specific methods for this to occur.

References

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