



Draft wild horse management plan: Kosciuszko National Park

Submission by the Invasive Species Council

August 2016

Introduction

The **Invasive Species Council** campaigns for better laws and policies to protect the Australian environment from weeds, feral animals and other invasive species. Email isc@invasives.org.au.

The Invasive Species Council appreciates the complex issues of feral horse management and welcomes the opportunity to make this submission. This submission is made in the interests of the conservation of the State's biodiversity, and to the protection and restoration of its natural habitats.

We find the Draft Wild Horse Management Plan to be a diplomatic, reasonably ambitious and well constructed document. It considers the concerns of all stakeholders – environmental, heritage and welfare concerns – and proposes a compromise in an attempt to meet all those concerns.

This is commendable in terms of public consultation, although it does raise questions about the degree of compromise made to the conservation of the park's values. For example, the twenty year time-frame for reducing horse numbers to 600 means that the impacts of large numbers of feral horses will continue over that time, albeit more closely managed. Also, the intention to maintain a population of feral horses in the park is at odds with the protection of the national park's conservation values and ignores the existence of alternative ways of conserving the cultural values of the horses.

So we welcome the intended reduction of the population, and of the impacts of feral horses on the park, and urge that the goal of the draft plan be implemented with determination, preferably sooner and more comprehensively than is outlined in the draft plan.

This submission is structured to broadly reflect the structure of the draft plan.

The Vision

A vision should be inspirational, aspirational and forward-looking, whereas the vision in the draft strategy reads as a risk-averse statement of knotty compliance issues. The vision also lacks the proper emphasis on nature conservation appropriate to national park management.

We understand that the reservation of the national park under the National Parks and Wildlife Act (the Act) requires attention to not only natural but also cultural values of the park. However, as a category II reserve under the IUCN protected area management categories, the Park's dominant management goals should be about nature conservation in line with the following IUCN statement:

Category II protected areas are large natural or near natural areas set aside to protect large-scale ecological processes, along with the complement of species and ecosystems characteristic of the area, which also provide a foundation for environmentally and culturally compatible, spiritual, scientific, educational, recreational, and visitor opportunities.

We note that the Act contains no definition of cultural or social values, thus presenting a difficulty to park managers in that anything whatsoever that is valued by people may be construed at times as having cultural or social value (even if the thing valued presents a direct threat to a park's natural values, as feral horses do).

For the Invasive Species Council the imperative of protecting the natural environment from invasive species outweighs any cultural value that may have been ascribed to an invasive species on *any tenure* of land or sea. So when it comes to invasive species management in an IUCN category II national park, the protection of nature is absolutely paramount.

Though some people may choose to value rabbits as pets, national park managers are not expected to maintain rabbit populations within IUCN II reserves. Authorities in NSW and interstate are not striving to maintain hawkweed populations in alpine areas out of deference to those who may choose to value hawkweeds as garden plants. So it should be with feral horses in Kosciuszko NP. They are damaging both cultural and natural values of the park and should be managed as an invasive exotic species like any other.

Those who place cultural value on horses may keep them on private land, may visit them at agricultural shows, may ride them at pony clubs or on racetracks and may use them for mustering stock on pastoral leases. But in a national park the protection of natural values must take precedence over an invasive exotic species no matter how much affection some may hold for that species.

The proposal to maintain a static herd of approximately 600 horses in the park appears to be based on the perception that this replicates historic feral horse numbers in similar areas at the time that Henry Lawson's Man from Snowy River and similar accounts were written. However we are not aware of any evidence that feral horse numbers were so high prior to the known high feral horse population of the last two decades.

Given all of the above, we propose a more appropriate Vision statement as follows:

The values for which Kosciuszko National Park is reserved suffer no impact from feral horses.

The Background

We are pleased that the natural values described include the alpine ecosystem as a whole and the whole diversity of vegetation types in the park. National parks are reserved to protect and conserve nature, and the draft plan recognises that fact. The tacit suggestion sometimes found in such plans that only listed threatened species need be protected, has been avoided. The whole park is reserved for the protection of nature, and so the management of feral horses throughout the park must be directed towards that end.

It is disappointing however that though half a page is devoted to describing the natural values of the park, two pages are given over to describing the cultural and social values of "wild horses" (feral horses). We expect that where an IUCN II reserve is concerned that such a document would give the greatest emphasis to describing the natural values of the park.

The lengthy description of the damage caused by feral horses, to both natural and cultural values in the park and also to vehicles, infrastructure and water catchments, is commendable and appropriate.

The Approach

We support the wild horse management zoning categories because they reflect the actions appropriate to the different stages in management of invasive species. We hold that the ultimate objective regarding eradicable feral species in national parks should be eradication, with prevention of re-invasion dominating management thenceforth.

Therefore, as the management program progresses, for example at the five-yearly review, the zoning should be adjusted to reflect a shift towards the "prevention" end of the invasion curve (assuming increasingly successful efforts to eliminate contain and control horses under the plan).

Objectives, Strategies and Actions

We support the targets for reduction of feral horse numbers in the park from 6000 to 3000 and thence to 600, although we would like to see numbers reduced more rapidly than is proposed (our preference is reduction to 600 over 5 years). Given the potential for the feral horse population to reproduce at the rate of 20% per annum, strong early population reduction targets are a necessary and commendable inclusion in the plan. We would also prefer to see the ultimate target being a horse population of zero- although we understand the very significant political barriers that exist around adopting such an ecologically proper target.

We particularly support eradication of feral horses from wilderness areas to conserve the values protected under the Wilderness Act 1987.

We note the plan lacks definitive detail on how feral horses will be excluded from sensitive areas and on how they will be prevented from invading new areas. A more detailed description of how these things might be achieved should be included in the final plan. This is a critical point as without a more rapid reduction in horse numbers than is described in the draft, and without an ultimate eradication of feral horses, the exclusion of those horses that remain from especially fragile areas will remain a difficult and costly on-going task in fulfilling the objectives of the park under the Act.

The challenge of managing or preventing the re-invasion of feral horses from Victoria has not been satisfactorily addressed in the plan. Efforts must be made to seek the cooperation of Parks Victoria in limiting horse numbers on the NSW border to limit their movement from Victoria into NSW.

Action 2 regarding website information gives equal weight to information about the heritage values of “wild horses” (feral horses) and to other park values. As the park's natural and other cultural heritage values far outweigh the heritage values of feral horses we urge that undue weight not be given to the latter on the NPWS website,

Action 4 is to “Continue and expand the program monitoring wild horse impacts on environmentally sensitive areas and areas with cultural heritage values”. This action fails to recognise that the entire park was reserved in recognition of high natural and cultural heritage values and of environmental sensitivity. Therefore the action should be reworded to remove the suggestion that only some parts of the park ought to be monitored for wild horse impacts.

Control Methods

We note the exclusion of aerial shooting from the control methods available, due to a recent government decision taken despite both the 2016 review of the earlier plan and the Independent Technical Reference Group having noted the effectiveness and humaneness of aerial shooting conducted in appropriate terrain and under appropriate guidelines. We are concerned that the objectives of the plan are unlikely to be met while one of the most effective and humane control methods is ruled out. Aerial shooting is particularly effective in the mix of methods available for remote and rugged terrain, and should be included in the methods available in the final plan, along with ground shooting, under strict animal welfare guidelines.

Unless the full range of available and appropriate methods is utilised through a modern integrated approach to pest management, the cost-effectiveness of feral horse management efforts will be compromised. Lethal, on-site techniques are a necessary part of an effective and humane management approach.

Other considerations

With regard to the Reference Group we urge that “wild horse” advocates not be over-represented on this group. As noted above, the park’s values are predominantly unrelated to feral horses and many of these values are placed at risk by horses. Therefore the composition of the reference group should reflect the breadth of park values, should place emphasis on the protection of natural heritage, and on the management of invasive species in protected areas, while also accommodating a sufficiency of people and organisations whose motivations and expertise centre around wild horses *per se*.

Acknowledging animal welfare concerns

The NSW Government should acknowledge growing public concerns about animal welfare by becoming more pro-active in its operations and the messaging it undertakes. Welfare is an issue that will only grow in importance. Research into the most humane methods of pest control should be funded. There is a need to explain that killing a smaller number of animals today can be far kinder than the alternatives: feral herbivores starving because they have run out of food; very large culls becoming necessary when populations become very damaging; animal welfare issues of trapping and then trucking feral horses long distances to an abattoir or knackery, or; serious impacts of habitat decline on native species. It should be explained that feral animals cause suffering and death when they prey on native animals, aggressively exclude native animals from their territory (horses do this) or consume pastures and other plants that native mammals would otherwise eat. Australia is fortunate in having the RSPCA playing a constructive role in this area by trying to balance welfare with the need to control some species.

Conclusion

We are grateful for the opportunity to make this submission, and we commend the intention to reduce feral horse numbers and so reduce the impact of feral horses on the park.

While we do not have the capacity to comment in details of the draft plan (for example the detailed proposed objectives and strategies for the proposed management regions and zones), we would welcome any invitation to participate in discussions towards improving the management of invasive species in the park.

We urge that the final plan describe a medium-term trajectory towards eradication of feral horses from Kosciuszko National Park, utilising all appropriate and necessary humane means of achieving that end.

Please contact Andrew Cox at andrewcox@invasives.org.au if you would like to discuss this submission.

References

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