Protection of the Alpine National Park

Draft Feral Horse Action Plan March 2021

Submission by the
Invasive Species Council

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About the Invasive Species Council

The Invasive Species Council was formed in 2002 to advocate for stronger laws, policies and programs to keep Australian biodiversity safe from weeds, feral animals, exotic pathogens and other invaders. It is a not-for-profit charitable organisation with over 5000 supporters, funded predominantly by donations from supporters and philanthropic organisations.

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Overview

This submission is a response to the invitation by Parks Victoria to provide feedback on the Protection of the Alpine National Park: Draft Feral Horse Action Plan April 2021.

The (Draft) Feral Horse Action Plan 2021 follows the Protection of the Alpine National Park – Feral Horse Strategic Action Plan 2018-21, and focuses on how feral horses will be managed in the Alpine National Park and adjacent State forests over the next ten years, from 2021. Since the original Action Plan was released in June 2018, significant changes to the context of the managing feral horses in the Victorian Alps have occurred, requiring reconsideration of the methods for their management.

The Invasive Species Council (ISC) has been concerned about the lack of action in regard to removing feral horses over the last three years due to legal challenges, the offensive and belligerent actions of some in the community, logistical challenges and the reliance on ineffective methods such as trapping and rehoming in the existing Feral Horse Strategic Action Plan 2018-2021. In the meantime, the feral horse population has been increasing at around 15% per year or more while the alpine environment struggles to recover from the impact of drought and landscape-scale bushfires.

The action plan presents the threats from feral horses to ecosystems, catchments and cultural heritage but fails to address the potential risk to biosecurity from spread of disease such as equine influenza, strangles and anthrax, which can be serious threats to domestic horses and contamination of drinking water from *Cryptosporidium*.

ISC welcomes a fresh approach to control methods that will now introduce ground and aerial shooting as control options. These have been clearly demonstrated as the most cost efficient and effective control methods and where carried out professionally have the best animal welfare outcomes. The emotive arguments put forward against these methods have no foundation in evidence and have led to unacceptable impacts of feral horses continuing in the Alps for far too long.

Nevertheless, ISC is concerned that the plan lacks goals, commitment and ambition in delivering on the objectives. Actions such as “to remove sufficient horses to reduce ecological impacts” are imprecise and statements such as “in the eastern Alps, feral horses are considered beyond eradication” indicates a poorly argued willingness to allow feral horses to remain in the Alpine National Park.

With aerial and ground shooting as control methods it is entirely feasible to remove 5000 feral horses over the 10-year life of the plan, indeed less. Recently Parks Victoria utilised ground and aerial shooting, to cull over 4300 feral deer across more than 200,000 hectares to support the recovery of threatened species and habitats. There is no reason why a similar approach cannot be applied to feral horses with the same result.

While ISC welcomes the re-enforcement of the long-held strategy to eliminate the feral horse population in the Bogong-Cobungra area, the plan doesn't address why feral horses should remain in the Eastern Alps, albeit in lower numbers. The plan acknowledges that while feral horses are present, ecological asset protection will be required. The biosecurity approach to invasive species management clearly shows the high-cost implications of allowing a population of feral horses to remain in the containment and asset protection phases.

The goal of the plan must be to eradicate feral horses from the Alpine National Park over the ten-year period of the plan (or sooner) with a strategy that outlines the pathway to get there.

The action plan states that "In the first year up to 500 feral horses may be removed (10% of the population). Following this, annual removal targets will be developed…" This suggests that removing 10% of the population as an annual target is somehow sufficient. With population growth rates well in excess of 10% a year, this target is not only unambitious and ineffective, but is costly as this will require sustained and increased investment in control to contain numbers.

A 10 % annual target for reduction of the feral horse population will lead to a 40% increase in the population by year 10 and an increase in investment required each year. In contrast, a sustained cull of 45% of the population annually will effectively eliminate the population of feral horses over 10 years, with costs reducing each year.

In accordance with the National Parks Act (1975) Parks Victoria is required to "exterminate or control exotic fauna in the park". The action plan states that "the scale and intensity of removal is ultimately determined based on whether horse impacts to peatlands and streambanks have been reduced to a level that can allow for recovery". This indicates clearly that Parks Victoria is content with feral horses being present as long as they are under some subjective threshold of impact.

The Act does not provide for the deliberate presence of exotic species should removal be feasible, so this strategy clearly lacks any ambition to manage the park in accordance with the National Parks Act (1975). Should Parks Victoria believe that feral horses be allowed to remain in the Alpine National Park, this should be made explicit in the plan rather than suggesting eradication is not technically feasible. This is clearly not the case if aerial and ground shooting in employed.

Goals and Priorities for the Feral Horse Action Plan: Ambition

The action plan describes in detail the risks from feral horses to ecosystems, species, catchments and cultural values but fails to present an effective strategy that is likely to address those risks. The plan currently lacks a clear goal and an ambitious strategy to remove the risk.

The Alpine National Park is becoming seriously degraded while minority "save the brumby" groups have managed to stymie effective action. **Bold and ambitious leadership based on good science is needed.**

While some in the community will never accept removing feral horses from the Alps, particularly through aerial and/or ground shooting, it is shown the middle ground of general community concerns or anxiety around the issue can be moderated if people are properly informed of the facts and evidence and involved in decision processes (OEH 2015a). ISC suggests that investing in an education program that informs the community of the rationale for feral horse removal through aerial and ground shooting is preferred to trying to reach a compromise through vague objectives that will fail to fulfil the Victorian government's legal obligation to manage the national park.

The goal of the plan must be to eradicate feral horses from the Alpine National Park over the ten-year period of the plan (or sooner) with a strategy that outlines the pathway to get there.

Objectives around "reducing impacts" can only be an intermediate measure toward elimination of the population.

This eradication goal is clearly not feasible under the current Alpine National Park – Feral Horse Strategic Action Plan 2018-21, as the prescribed control methods are demonstrably ineffective. The introduction of aerial and ground shooting as control methods now makes it is entirely feasible to remove 5000 feral horses over the 10-year life of the plan, indeed less. Recently Parks Victoria utilised integrated ground and aerial shooting, to cull over 4300 feral deer across more than 200,000 hectares to support the recovery of threatened species and habitats. There is no reason why this approach cannot be applied to feral horses with the same result and be more cost effective than ongoing programs with no end point.

The Biosecurity Approach: Being Effective

The framework for a biosecurity approach to invasive species identifies four key management approaches: prevention, eradication, containment and asset management. These outline the cost effectiveness of actions relative to area occupied by the invasive species and time. The purpose of taking this approach is not just to invest where it is most cost effective, but where possible to reduce the area occupied and thus focus instead on eradication and prevention. The outcome has high cost effectiveness as well as eliminating impacts. Lower returns on investment and sustained impacts are associated with managing widely established feral horse populations.

Eliminating the Bogong-Cobungra feral horse population is welcomed and we applaud the plan for aligning with the biosecurity approach in this instance.

In contrast, in the Eastern Alps where the feral horse population is greatest, the plan's objective of simply "reducing impact" appears to show content with the population being in a holding pattern in the exponential spread zone of the invasive species curve. This will need high numbers to be removed and sustained each year because the population will be at the peak of recruitment levels. The perverse outcome of this unambitious strategy is that a program of regularly removing high numbers of feral horses will have to be sustained throughout the plan period and beyond, with the need for costly asset protection continuing. This scenario can be avoided if the area occupied is reduced to the left-hand side of the curve.

Previous studies in the Alps (Dawson 2009) have put forward that a 21% reduction in feral horse numbers is required to simply sustain a horse population. Removing 500 feral horses in year 1 as presented in the action plan is only 10% of the population. As an ongoing target this will clearly not address population stability let alone reduction. A simple analysis of a sustained 15% fecundity rate against a range of population reductions over 10 years indicates that a sustained 45% reduction in the population each year will still leave 50 horses in year 10.

To effectively eliminate the population of feral horses over 10 years, a sustained cull of 45% of the population is required annually. This amounts to a starting point of 1637 feral horses being removed in year 1 reducing to 42 feral horses being removed in year 10 with a total of 6968 horses being removed. This leaves a residual population of about 50 feral horses. Investment required in control and asset protection will have steadily declined over the 10 years. Ideally the population reduction should aim to occur over a shorter period to account for unexpected setbacks and to limit the overall cost and number of horses requiring removal.

Contrast this to a 10% reduction per annum as suggested by year 1 in the action plan. After 10 years, the population will have grown to 7052 feral horses despite 6745 (almost as many as the 45% scenario) being removed. In year 10 there would still need to be 784 feral horses removed as the population steadily rises, as opposed to 42 under a 45% reduction scenario. Investment has steadily grown over the 10 years, with no benefit as the number needed to be removed each year to meet the 10% target has increased. This approach fails from multiple perspectives.

The Protection of the Alpine National Park: Draft Feral Horse Action Plan needs to map the biosecurity zones now so they are tactically evident at the start of implementation then indicate how these will diminish over the 10 years to be left with only low cost and low impact prevention and elimination strategies.

Disease

The plan presents the threats from feral horses to ecosystems, catchments and cultural heritage but fails to address the potential risk to biosecurity from spread of disease. Feral horses can carry equine influenza, strangles and anthrax (potentially spread to humans). These can be a serious threat to domestic horses and the Australian horse industry. Horses are known to carry the parasite *Cryptosporidium parvum*, which can cause serious gastroenteritis in humans if it contaminates drinking water. Disease should be added to the potential threats of feral horse in the Alpine National Park.

Methods

Aerial and Ground Shooting

Modelling of feral horse management in the Australian Alps shows unequivocally that utilisation of aerial culling is a necessary strategy to effectively control horses. This result stands in addition to its other potential benefits of lower cost, animal stress and landscape disturbance (Beeton and Johnson 2019). ISC therefore welcomes the addition of aerial shooting to the range of control options available. Integrated aerial and ground shooting has shown to be effective in many states for feral horse control as well as for feral deer control in Victoria. If it is included in the plan, Victoria will finally be able to draw on the most effective methods. It must be implemented carefully but without undue delay.

ISC does not agree that aerial shooting be only used in response to "exceptional circumstances or if other methods cannot meet objectives". Due to the nature of the terrain, particularly in the eastern Alps, ground shooting will not be feasible across much of the landscape. Aerial shooting must be an equally preferred method to ground shooting from the start for inaccessible landscapes, as is the case with Parks Victoria's current integrated ground and aerial shooting control program for feral deer. Otherwise, the numbers required to quickly draw down the population (over 1000 to be removed per year for the first three years of a 45% population reduction scenario) will not be achievable.

Summary of Recommendations

ISC puts forward the following feedback and recommendations:

Eradication of Feral Horses

1. The goal of the Feral Horse Action Plan must be to eradicate the population of feral horses in the Alpine National Park over no more than a 10-year period and prevent re-introduction. This is entirely feasible through an integrated ground and aerial shooting program. To not do so in a national park when there is the opportunity, is indefensible.
2. The feral horse population in the Bogong-Cobungra area must be eliminated as a first step to eradication of feral horses from the park in 10 years.

Methods

3. The introduction of aerial and ground shooting to cull feral horses in the Alpine National Park is fully supported as this is proven to be the only effective methods available.
4. Shooting must only be conducted by professional shooters and pest controllers. The program cannot be compromised by the actions of non-professionals.
5. Community benefits through capture and rehoming of feral horses on a limited basis as described in the plan is supported. This program must be implemented cautiously and not divert attention from rapidly applying more effective measures. Trapping and rehoming is merely a social response to the problem and is not effective in reducing the impact of feral horses.
6. Aerial shooting must not be used in a limited way in response to *"exceptional circumstances or if other methods cannot meet objectives"*. Due to the nature of the terrain, particularly in the eastern Alps, ground shooting will not be feasible across much of the landscape and will not meet the number reduction required. Aerial shooting must be an equally preferred method to ground shooting from the start for inaccessible landscapes, as is the case with Parks Victoria's current integrated shooting control program for feral deer.
7. Parks Victoria must develop an intensive education program with the community to present the rationale for why feral horses must be removed from the Alpine National Park, the ineffectiveness and inhumane issues associated with "passive methods" and the humane nature of ground and aerial shooting.

Strategy

8. The annual population reduction rate of feral horses must be at least 45% of the extant population per annum to come close to elimination by year 10.
9. The plan should map the biosecurity zones and provide a schedule based on population estimates, locations and potential fecundity to determine the number of horses that need to be removed annually over a ten-year period to eliminate the population.

Disease

9.The plan should address the risks of disease spread from feral horses.

References

Beeton, J. & Johnson, C. (2019) Modelling horse management in the Australian Alps. Ecological Restoration and Management. Vol 20, Issue 1. Special Issue: Feral Horses in the Australian Alps.

OEH (2019) Community Engagement Report. Wild Horse Management Plan Review. Straight Talk. Office of Environment and Heritage NSW.

Dawson, M. (2009) Aerial Survey of Feral Horses in the Australian alps. A report to the Australian Alps National Parks Liaison Committee.