

Bushwalking NSW

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DRAFT WILD HORSE HERITAGE MANAGEMENT - KOSCIUSZKO NATIONAL PARK

Introduction

Bushwalking NSW Incorporated is the peak body for bushwalkers in NSW and the ACT. It represents the interests of over 11,000 bushwalkers from nearly 70 bushwalking clubs throughout the state, and provides a united voice to local, state and federal government agencies and other bodies on issues affecting bushwalkers.

In preparing this submission, Bushwalking NSW has reviewed the Draft Kosciuszko National Park Wild Horse Heritage Management Plan. Bushwalking NSW has also been informed by comments and suggestions by representatives of our member organisations and other affiliates. Our affiliated clubs and their members have been enjoying Kosciuszko National Park for generations and it is widely considered one of the premier bushwalking destinations in the country. We have been supportive of the work that NPWS performs in relation to the management of the National Park. However, we have become increasingly alarmed at the increasing number of wild (feral) horses in the National Park and the impacts we are witnessing on the park environment.

While our submission has a focus on bushwalking, we recognise that our member organisations undertake other recreational activities such as cross-country skiing. As outdoor recreationists, we also have a strong connection to environment and have made comment on environmental issues where we feel this is warranted.

The comments below reflect the structure of the Draft Plan.

Executive Summary

It is stated that preparation of the plan has been **informed** (our emphasis) by advice from the Kosciuszko Wild Horse Community Advisory Panel established under the Kosciuszko Wild Horse Heritage Act. It is also stated that advice from the Kosciuszko Wild Horse Scientific Advisory Panel has been **considered** (our emphasis), as has information from Aboriginal stakeholders and a range of relevant sources.

The tone in this paragraph suggests that the advice from the Community Advisory Panel has been given greater weight than advice from the Scientific Advisory Panel or Aboriginal stakeholders. The reader is left unclear on this. However, given that areas nominated for horse retention are also known to be environmentally and culturally significant such as the Snowy River corridor, this suggests that the views of scientists and Aboriginal stakeholders were afforded lesser weight in deliberations about which areas are for horse retention, removal or prevention.

Section 1 Purpose of the plan

It is acknowledged that Section 5 of the Kosciuszko Wild Horse Heritage Act 2018 (Kosciuszko Wild Horse Heritage Act) requires the preparation of a draft plan for the park.

However, it is our view that this legislation is inconsistent with the objectives of the National Parks and Wildlife Act 1974 and the Kosciuszko National Park Plan of Management 2006.

Therefore, the Kosciuszko Wild Horse Heritage Act 2018 should be repealed.

Section 3 The heritage value of sustainable wild horse populations

The 2015 Context report concluded that horses are a cultural attribute of the National Park. However, this refers to 'the role of horses in pioneering history and pastoralism', specifically 'the role of horses' not 'the role of wild horses'. Wild horses are a subset of horses, and claims of the heritage value of wild horses often incorrectly refer to horses that were saddled, ridden, trained horses.

The plan also says 'some specific types of horses may have heritage values'. This is a rather weak statement and should be clarified by cultural heritage specialists.

Section 4 Other environmental values of the park

The draft Plan outlines a considerable range of environmental values. Yet it is hard to gauge how these values were assessed against the heritage value of the wild horse population. This is particularly relevant when the reader is presented with maps of horse retention, removal and exclusion zones in Section 5.

We note in passing that members of our affiliated clubs have reported incidents with horses being aggressive and approaching campsites or small groups of walkers.

We would argue that other environmental values have not been adequately considered in defining these zones.

Section 5 Protecting wild horse heritage values while maintaining other environmental values

The intention to reduce the wild horse herd to 3,000 is supported. However, we would advocate that this number is still too high and leaving the herd at 3,000 would result in unacceptable environmental impact.

For example, we note that horse retention zones contain habitat for the Broad-toothed rat (*Mastacomys fuscus*) – vulnerable fauna species under the Environmental Protection and Biodiversity Conservation Act 1999. We also note that the Byadbo Wilderness is an area containing many Aboriginal heritage sites and places. Byadbo is also listed for horse retention.

We are also puzzled as to why the recommendations in the Aboriginal Cultural Values Report (Donaldson and Feary 2020) appear to have been ignored, particularly in relation to horse removal and prevention zones.

We note that Cowombat Flat in the Pilot Wilderness will continue to contain wild horses even though horse damage to watercourses including the source of the Murray River is evident.

How will these values be protected?

Another problem with the horse retention zones is that there appears to be no means to prevent horses entering areas of high conservation value. For example, the map showing horse retention zones includes an area to the north of Lake Jindabyne that is not far from the eastern boundary of the Jagungal Wilderness. Jagungal is currently largely horse free.

However, there would be little impediment to horses from a retention zone entering the Jagungal Wilderness.

This problem of encroachment will also occur at the Cooleman karst area which is proposed to be entirely surround by horse retention. How will horses be kept out of the karst area?

Similarly, the horse retention zones in the Byadbo and Pilot Wilderness Areas can be expected to continue to contribute to the environmental damage evident in these areas. Parks Victoria will also have the challenge of managing horses from NSW crossing the border into Victoria. This will undermine the cooperation that NPWS is seeking with landholders and managers including those across the border.

The decision to include Old Currango in a horse retention zone is also disappointing as this culturally and environmentally significant area is exhibiting evidence of severe horse damage. There has also been a recent report of people camping who had to abandon their tent that had been flattened by milling horses. Similar incidents involving horses and campers have also occurred at nearby Blue Waterholes

Why 3,000 horses?

NPWS estimated 3,000 horses in the National Park in 2002 (Kosciuszko National Park Horse Management Plan 2008, p 13). The 2003 plan (Horse Management Plan for the alpine area of Kosciuszko National Park p 5) has a long list of environmental damage by that approximately 3,000 population. The draft 2016 Draft Wild Horse Management Plan proposed reducing the herd to less than 3,000 over 5-10 years and then reducing the herd to 600 within 20 years.

It is unclear why 3,000 was selected as the target number given that previous plans acknowledged the environmental impacts from a 3,000 strong herd. Given that even small numbers of horses can impact environmentally sensitive places such as sphagnum bogs and water courses, the retention of 3,000 appears to be a decision to consign much of Kosciuszko National Park to permanent environmental degradation.

Our position is that the herd should be reduced in size to no more than 600 horses as proposed in the 2016 draft Plan. These horses should be confined to areas where environmental damage can be minimised. Horses should be excluded from all wilderness areas or areas contiguous to wilderness areas.

Amendments to Horse Retention, Removal and Prevention Zones

As well as reducing the herd to no more than 600 horses, we request a number of amendments to the nominated zones:

- Retention zones should be reduced in size to protect habitat of threatened and endangered species of plants and animals and areas with high concentration of known Aboriginal heritage and cultural sites and places.
- Converting the small central retention zone north of Lake Jindabyne into a removal zone to protect the nearby Jagungal Wilderness.
- Expanding the Cooleman karst removal zone south and eastwards to include Old Currango.
- Conversion of the Byadbo and Pilot Wilderness Areas from a retention zone to a removal zone.

Section 6 Control methods

We support the animal welfare methods proposed. Strict adherence to nominated standards and practices will be vital to ensuring that public support for a culling program can continue.

We also support all of the control measures proposed. However, we believe that aerial shooting should be retained as an option, if other control measures prove ineffective. In particular, we support the approach proposed by Parks Victoria in the draft Feral Horse Action Plan 2021 for the Alpine National Park. This proposes the use of aerial shooting in exceptional circumstances or if other methods cannot meet objectives.

We consider that NPWS should adopt a similar approach.

All control methods should be routinely assessed to confirm their effectiveness in meeting management objectives.

If there is concern about the loss of social licence if aerial shooting is implemented, then it should be within the capacity of government to communicate effectively with the general public about why aerial shooting is desirable.

We note that aerial shooting of pigs, deer and goats already occurs in national parks without any apparent backlash from the general public.

We agree that carcass management should be on a case-by-case basis. Obviously, carcasses should be removed from places that will be used or visited by the public such as roads, fire trails, walking tracks and campgrounds.

Section 7 Review of the plan

It is essential that the Plan is reviewed well before 2027 and, ideally, should be reviewed at least every two years. Six years is too long to wait to assess if the Plan is effective.

Collection of monitoring and research data should be an ongoing task and should feed into regular reviews of the Plan. It is also critical that the horse population is surveyed on a regular basis so that the agencies and the general public can assess whether the Plan is meeting its objectives.

Although not directly mentioned in the Plan, it is essential that horse reduction is adequately funded over the six-year life of the Plan. Backsliding on adequate funding after the first year or two will just undermine public confidence in the management program. Ideally, this funding should have bipartisan support in the NSW Parliament.

Section 8 Community and stakeholder involvement

While ongoing liaison with a variety of stakeholders is desirable, we would be wary of supporting yet another wild horse advisory body. It should not become a platform for frustrating effective implementation of measures to reduce horse numbers.

We also support cooperative management across the high-country national parks and other public lands. However, we can only speculate as to the reaction of Victorian and ACT land managers to the continuation of substantial horse numbers in Kosciuszko National Park.

Submission summary

In short, Bushwalking NSW Inc considers that:

- The Kosciuszko Wild Horse Heritage Act 2018 should be repealed as it is inconsistent with the objectives of the Kosciuszko National Plan of Management.
- A residue herd of 3000 is way too high. While achieving 3000 within six years would be commendable, the program should continue past 2027 to reduce the herd to no more than 600 horses by 2040.
- Preserving 32% of the National Park for horse retention is way too high. It should be no more than 5% of the Park and should exclude all Wilderness Areas and areas of cultural and environmental significance.
- Aerial shooting should be included as a control measure if other measures are ineffective.
- Monitoring of the Plan should be ongoing and reported and implementation of the Plan should be adequately funded over the life of the Plan.



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