



**CONSERVATION
COUNCIL** ACT REGION

Submission to the NSW Minister for Energy and Environment: Draft Kosciuszko National Park Wild Horse Heritage Management Plan

November 2021

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

For further information please contact:

Helen Oakey, Executive Director, director@conservationcouncil.org.au.

Introduction

The Conservation Council ACT Region welcomes the opportunity to provide feedback on the Draft Kosciuszko National Park Wild Horse Heritage Management Plan (2021)¹. *The Draft Plan's* main objective, to significantly and rapidly reduce horse populations across Kosciuszko National Park (KNP) (parts 5.2 and 5.3) is strongly supported. However, we have significant concerns about the proposed plan with regards to: the appropriateness and significance of horse heritage values at KNP, the environmental values that are listed, the context of the environmental values, and the implementation of the plan. We support *The Draft Plan* being significantly strengthened in order to protect the environmental and ecological values at KNP.

The Purpose of Kosciuszko National Park

KNP is not an appropriate place to protect the heritage values of wild horse populations. In NSW, national parks are “areas of land protected because of their unspoilt landscapes, outstanding or representative ecosystems, Australian native plants and animals and places of natural or cultural significance”.² KNP is reserved under the National Parks and Wildlife Act to “identify, protect and conserve areas containing outstanding or representative ecosystems, and natural or cultural features, landscapes or phenomena that provide opportunities for public appreciation, inspiration, sustainable visitor use and enjoyment”.³ The maintenance of any horse population undermines these objectives due to the accompanying environmental and cultural degradation.⁴ Habitat degradation and loss by feral horses is listed as a key threatening process under the *Biodiversity Conservation Act*.⁵ To allow any horse population to continue at KNP is not only outside of the Parks objectives but actively hinders them.

‘Heritage values’ as outlined in The Draft Plan and Kosciuszko Wild Horse Heritage Act,⁶ are not compatible with the objective of KNP. The degradation caused by maintaining wild horse heritage is at odds with these objectives; namely, ‘unspoilt landscape’ and ‘natural and cultural features’.⁷ *The Kosciuszko Wild Horse Heritage Act*,⁸ should not prevail over biodiversity and conservation values at KNP. It is recommended that *The Kosciuszko Wild Horse Heritage Act* be repealed,⁹ and that management of wild horse heritage values be pursued on pastoral land outside of KNP.

¹ “*The Draft Plan*”

² See ‘National Parks’ at: <https://www.nationalparks.nsw.gov.au/conservation-and-heritage/national-parks>.

³ (1974) (NSW) s30E.

⁴ Don Driscoll, Benjamin Scheele and Tein McDonald, ‘Feral Horses in the Australian Alps: An Introduction to the Special Issue’ (2019) 20(1) *Ecological Management & Restoration* 3 (‘Feral Horses in the Australian Alps’).

⁵ (2016) NSW schedule 4.

⁶ (2018) (NSW).

⁷ See ‘National Parks’ at: <https://www.nationalparks.nsw.gov.au/conservation-and-heritage/national-parks>.

⁸ (2018) (NSW).

⁹ Ibid.

Recommendations

- Repeal *The Kosciuszko Wild Horse Heritage Act (NSW) (2018)*.
- Pursue the protection of wild horse heritage values outside of KNP, for example, on pastoral land.

Environmental Values at Kosciuszko National Park

Unlisted Environmental Assets

The extensive discussion of environmental attributes at KNP in Part 4 of The Draft Plan is commended. We recommend that the following environmental assets are included in addition to those listed in the document due to their environmental and cultural significance:

- Corroboree Frog (*Pseudophryne corroboree*) habitat North and West of the Long Plain;
- Stocky galaxius (*Galaxias tantangara*) habitat near Tantangara Mountain;
- All the designated wilderness areas (the Byadbo, Pilot, Jagungal, Bogong Peaks, Goobarragandra and Bimberi wilderness areas)

Recommendations

- Revise *The Draft Plan* to include Corroboree Frog (*Pseudophryne corroboree*) habitat, Stocky Galaxius (*Galaxias tantangara*) habitat, and all the parks designated wilderness areas.

The Significance and Vulnerability of KNPs Environmental Values

The significance of the environmental values as discussed in Part 4 of The Draft Plan should be considered in context of issues such as climate change and the extinction crisis. Consideration of these issues will imply additional environmental pressures on KNP, making it even more difficult to justify a base-line population level of 3000 horses.

The Climate Crisis

The risks posed by the climate crisis increase the significance of conserving KNPs environmental values but are not considered in *The Draft Plan*. Specifically, alpine ecosystems, such as those that exist at KNP are particularly sensitive to climate change.¹⁰ Not only will KNP suffer through increased extreme weather events, lower rainfall, and more frequent and intense

¹⁰ Climate change impacts on Australia's alpine ecosystems, Rachel Slayter, 2010.

bushfires, but additional stressors will prevail at the park from invasion of other ecosystems. As the earth warms, the altitudinal range of vegetation will increase, as such vegetation from lower elevations will invade alpine ecosystems such as KNP, in a process known as vegetation ingression.¹¹ This phenomenon has the potential to drastically alter the environmental values of KNP and highlights the immense stress that the Parks' environment endures.

The Extinction Crisis

The environmental values at KNP are also increasingly significant due to the current global extinction crisis.¹² Australia is one of seventeen 'mega-diverse' nations in the world, making our biodiversity internationally significant.¹³ However, Australia has the unfortunate distinction of being the world leader in mammalian extinction and Eastern Australia is also globally recognised as a deforestation front.¹⁴ This highlights why adequate protection of National Parks is essential. All natural resources are becoming increasingly scarce, and thus increasingly significant.

Horses directly impact 23 threatened flora and 11 threatened fauna species that occur within KNP.¹⁵ They disrupt natural ecosystem functioning and damage habitats by: trampling, track creation, pugging (soil compaction), wallowing, erosion of streambanks, sphagnum bog and wetland destruction, overgrazing.¹⁶ There is no scientific evidence that suggests that the figure of 3000 won't continue to harm the KNPs vulnerable environment.

Instead of providing for the continuing degradation of environmental values, *the Draft Plan* should invest in ecosystem monitoring and restoration to amend the years of destruction caused by the invasive species, and protect this highly vulnerable and significant natural resource. Early and substantial resources and investment is needed for adequate protection and long-term benefits.

¹¹ Climate change impacts on Australia's alpine ecosystems, Rachel Slayter, 2010.

¹² See: Williams, K.J., Ford, A., Rosauer, D.F., Silva, N.D., Mittermeier, R., Bruce, C., Margules, C. 2011. Forests of East Australia: the 35th biodiversity hotspot. In: Keith, D.A. (ed). Biodiversity hotspots, pp 295-310. Springer, Berlin, Heidelberg.

¹³ Pacheco, P., Mo, K., Dudley, N., Shapiro, A., Aguilar-Amuchastegui, N., Ling, P.Y., Anderson, C. and Marx, A. 2021. Deforestation fronts: Drivers and responses in a changing world. WWF, Gland, Switzerland.

¹⁴ Ibid.

¹⁵ NSW Scientific Committee, 'Degradation and loss by Feral Horses (brumbies, wild horses), *Equus caballus*' (2018).

¹⁶ See Driscoll, D.A., Worboys, G.L., Allan, H., Banks, S.C., Beeton, N.J., Cherubin, R.C., Doherty, T.S., Finlayson, C.M., Green, K., Hartley, R., Hope, G., Johnson, C.N., Lintermans, M., Mackey, B., Paull, D.J., Pittock, J., Porfirio, L.L., Ritchie, E.G., Sato, C.F., Scheele, B.C., Slattery, D.A., Venn, S., Watson, D., Watson, M. and Williams, R.M. (2019), Impacts of feral horses in the Australian Alps and evidence-based solutions. *Ecol Manag Restor*, 20: 63-72. doi:10.1111/emr.12357.

Recommendations

- Review the impact of the proposed population of horses with consideration of all compounding influences on KNP's environmental values in *The Draft Plan*, specifically, climate change and the extinction crisis.
- Invest in ecosystem monitoring and restoration to amend the years of destruction caused by horses at KNP.

Implementation

In Part 5.1 of *The Draft Plan* a 6-year implementation time frame is proposed. Considering the aforementioned vulnerability and significance at KNP this implementation timeframe is unacceptable for the best environmental outcomes at the Park. It is recommended that the plan should be implemented immediately with significant additional funding allocated to the control program to ensure the horse population is reduced in a timely manner. If this is not a viable option then exclusion fencing may be required as an interim measure to protect locations of increased significance.

The use of ground shooting as outlined in Part 6.2 of *The Draft Plan* is supported. In addition, it is recommended that aerial culling should remain as a viable management option as it is humane and cost effective.¹⁷ It is noted that social license is referenced as a limiting factor to the utilisation of aerial shooting across KNP. While this may be an issue, taking an appropriate management option off the table because of a lack of community understanding is not an appropriate response.

The Draft Plan has not adequately considered its role as a good neighbour to the ACT and Victoria. Proposed horse retention zones are notably close to the ACT and Victorian borders. Maintaining horse populations in these areas will likely lead to cross border horse contaminations. This is particularly concerning with regard to the ACT as the horse retention zones would likely impact on the ACT Cotter Catchment, Namadgi National Park and the Ginini Ramsar Wetlands, all of which carry great environmental and cultural significance,¹⁸ and have been the subject to extensive protection measures by the ACT Government.¹⁹ Cooperation and neighbourliness is fundamental to the recently signed *Memorandum of Understanding for the Australian Alps*.²⁰

¹⁷ PetSmart, Aerial Shooting of feral horses: Standard Operating Procedure – HOR002.

¹⁸ For example see, Theden-Ringl, Fenja. "Common cores in the high country. The archaeology and environmental history of the Namadgi Ranges." (2018).

¹⁹ For example see, "Namadgi National Park Feral Horse Management Plan" (ACT) (2020).

²⁰ (2021).

Recommendations

- The plan should be implemented immediately with significant additional funding allocated to the control program. If this is not a viable option then exclusion fencing may be required.
- Horse retention zones should be removed from areas where cross contamination into the ACT and Victoria is likely.

Summary

The Conservation Council ACT Region supports the direction of the Draft Kosciuszko National Park Wild Horse Heritage Management Plan (2021) to significantly and rapidly reduce horse populations across KNP (sections 5.2 and 5.3), however has significant concerns with regards to the appropriateness of pursuing horse heritage values at KNP, protection of the environmental values, the wider context of the environmental management, and the implementation of the plan. We strongly support strengthening the Draft Plan to deliver better environmental outcomes via the following recommendations:

Summary of Recommendations

- Repeal *The Kosciuszko Wild Horse Heritage Act (NSW) (2018)*.
- Pursue the protection of wild horse heritage values outside of KNP, for example, on pastoral land.
- Revise *The Draft Plan* to include Corroboree Frog (*Pseudophryne corroboree*) habitat, Stocky Galaxius (*Galaxias tantangara*) habitat, and all the parks designated wilderness areas.
- Consider all compounding influences on KNP's environmental values in *The Draft Plan*, specifically, climate change and the extinction crisis.
- Invest in ecosystem monitoring and restoration to amend the years of destruction caused by horses at KNP.
- Reconsider the suitability of a "sustainable horse population" in light of all factors.
- Aerial culling should remain as a viable management option.
- Implement the Plan immediately with significant additional funding allocated to the control program. If this is not a viable option then exclusion fencing may be required.
- Remove horse retention zones from areas where cross contamination into the ACT and Victoria is likely.