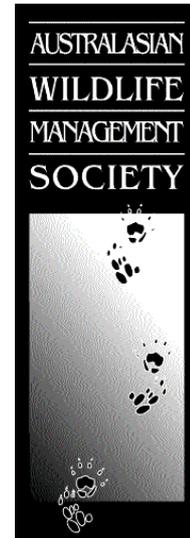


Tuesday 2nd November 2021

Draft Kosciuszko National Park wild horse heritage management plan

Submission by the Australasian Wildlife Management Society



The Australasian Wildlife Management Society (AWMS) is a professional society that promotes the study and application of scientific wildlife management in the Australasian region, with members from Australia, New Zealand, and around the world. Members come from all sectors of wildlife management and a wide range of institutions and private organisations, including wildlife research scientists, wildlife managers, wildlife practitioners, policy developers, educators and students. AWMS aims to influence policy and management decisions through the provision of clear, explicit and pragmatic advice on options for wildlife management and associated risks. AWMS welcomes the opportunity to comment on the Draft Kosciuszko National Park Wild Horse Heritage Management Plan (draft plan).

The Plan Itself

[Relevant section: 1. Purpose of the plan]

AWMS acknowledges the urgent need to control feral horses in Kosciuszko National Park (the Park). The detrimental impacts of feral horses on soil, vegetation and waterways are well established, and this in turn is threatening native species including the broad-toothed rat and corroboree frog. AWMS also acknowledges that feral horses are of heritage value to some people and that such values need to be explicitly acknowledged in management plans.

The draft plan itself sets out to retain feral horses in 32% of the Park, remove them from 21% of the Park, and prevent feral horse establishment in the remaining 47% of the Park. In doing so, the draft plan attempts to maintain the environmental values of the Park and protect the heritage value of feral horses by maintaining a population of around 3,000 individuals.

As a wildlife management organisation, AWMS is keenly aware that the implementation of an environmentally sub-optimal but socially acceptable management action is preferable to an environmentally optimal, but socially unacceptable management plan that is never implemented. However, while the draft plan represents a significant step in the right direction, AWMS is concerned that it will not sufficiently protect the environmental values

of the Park and that the methods to control and restrict the feral horse population may not achieve the desired outcome.

Our Concerns:

1) *3,000 feral horses is 3,000 too many*

[Relevant section: 5. Protecting wild horse heritage values while maintaining other environmental values]

The draft plan sets out a target to reduce the feral horse population to 3,000 by 30 June 2027. This is a long timeframe that will ultimately lead to another six years of overgrazing by feral horses. There is a need to reduce feral horse numbers more quickly in order for the Park to recover from drought, extensive bushfires and overgrazing. As a nation with no history of ungulates, even small numbers of horses will continue to degrade fragile wetland areas. If any feral horses are to remain in the Park their numbers therefore need to be reduced to well below 3,000.

2) *Restricting horses to designated areas will not protect threatened species and ultimately require fencing*

[Relevant section: 5.1 Wild horse retention areas]

The draft plan retains feral horses in 32% of the Park (221,258 ha). This is a very large area that will therefore continue to suffer from the impacts of feral horses, including areas supporting threatened species. In addition, feral horses will not respect the arbitrary boundary where they are protected or not, and they will continue to disperse into areas that are meant to be free of horses. This will require a long-term control/management program to keep feral horses within the retention areas. AWMS is concerned that this approach will fail, and ultimately require the need for fences (with a significant maintenance requirement) to restrict feral horse movements. Such fences come with their own detrimental impacts as they restrict the movement of native species and therefore fragment their populations. If feral horses are to be retained, suitable private properties outside the Park that can be fenced could be identified instead, so that all of the Park can be protected from the impacts of feral horses.

3) *Other control measures are needed, including aerial shooting*

[Relevant section: 6.2 Capture and control methods that are available for use in the park]

The draft plan proposes to use a combination of passive trapping, mustering, rehoming, ground shooting, tranquilising and reproductive control to capture or control feral horses. To effectively reduce feral horse numbers, all available methods that are effective and meet animal welfare standards should be used. Aerial culling should therefore not be ruled out as an option to control feral horses. The negative publicity surrounding aerial culling should be addressed directly using the scientific literature that indicates welfare outcomes from aerial culling are often better than other methods, such as trapping and rehoming. This conversation is difficult, but AWMS believes taking aerial culling off the table completely sets a poor precedent for effective wildlife management, and animal welfare science.

4) Heritage values can be maintained in other ways

[Relevant section: 5.1 Wild horse retention areas]

Feral horse retention areas are intended to protect the heritage value of the region. To do so, 3,000 feral horses will roam over 221,258 hectares of the Park. There are alternative ways that the heritage values can be protected through information at a visitor centre, preservation of huts/infrastructure and interpretive signs, or walking tracks along favoured travel routes of the feral horses. The plan does not fully explain how retaining 3,000 highly cryptic and secretive animals, in dense vegetation or remote areas where they are unlikely ever to be viewed by most visitors, will retain heritage values.

Summary

In summary, AWMS does not support the draft plan in its current form and recommends that a revised plan focus on:

- 1) Reducing feral horse numbers well below 3,000 and ideally removing them completely from the Park.
- 2) Identifying alternative feral horse retention sites outside of the Park if there is a need to preserve them.
- 3) Including aerial shooting as a control tool, subject to ongoing evaluations and improvements, such as “Thermally Assisted Aerial Shooting”.
- 4) Identifying alternative ways to educate the public about the history of feral horses in the Park in order to showcase their cultural values.

Ultimately, the above may require the NSW government to rescind the *Wild Horse Heritage Protection Act 2018* which is acting as a legal impediment to effectively conserving the environmental values of the Park.

Kind regards,

Dr Thomas Newsome,



Acting President

Australasian Wildlife Management Society