

Submission by Reclaim Kosci to:
**The draft Kosciuszko National Park wild
horse heritage management plan**

Document Details

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About Reclaim Kosci

Reclaim Kosci was founded in 2018 by the Invasive Species Council, National Parks Association of the ACT, National Parks Association of NSW, Colong Foundation for Wilderness and the Nature Conservation Council of NSW. Reclaim Kosci is a broad consortium of community voices calling for decisive action to protect Kosciuszko's unique ecosystems and wildlife from damage by feral horses. Reclaim Kosci represents 24 organisations and societies, and over 10,000 individual supporters.

Reclaim Kosci is hosted and led by the Invasive Species Council. Invasive Species Council was formed 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 and background

This submission is a response to the invitation from the NSW Department of Planning, Industry and Environment (DPIE) to provide feedback on the draft Kosciuszko National Park wild horse heritage management plan.

The draft Kosciuszko National Park wild horse heritage management plan focuses on how the feral horse population will be managed to 2027 and beyond.

The plan has been prepared in accordance with the *Kosciuszko Wild Horse Heritage Act 2018* which has led to a disturbing change of approach to managing the serious impact and threats of feral horses to the outstanding national heritage values of Kosciuszko National Park (KNP).

The Invasive Species Council, National Parks Association of NSW, National Parks Association of the ACT, Nature Conservation Council of NSW and Colong Foundation for Wilderness initiated the Reclaim Kosci campaign in 2018 due to concerns about the lack of progress in reducing the feral horse population and impacts in Kosciuszko National Park over the last two decades as the population exploded due to ineffective policy and action as outlined below.

- In 2003 when the first horse management plan was released there were an estimated 2300 feral horses in the park which halved after the 2003 bushfires down to around 1000.
- In 2008 a new Kosciuszko National Park Horse Management Plan was released with the feral horse population in KNP being about 4000 in 2009.
- In 2016 the KNP feral horse population had grown to about 6000. The 2016 Draft Wild Horse Management Plan was developed and prescribed an ambitious reduction of the feral horse population to 600 in reaction to the alarming population growth, but this was not adopted.
- The *Kosciuszko Wild Horse Heritage Act 2018* was subsequently enacted to provide for a sustainable population of wild horses in Kosciuszko National Park and led to a pause in feral horse removal while its consequences were being deliberated.
- In 2020 the feral horse population in KNP was estimated at over 14,000 horses and continuing to grow and expand.
- With an 18% per year increase, the population is likely to be thousands more in 2022 when the plan is finally implemented.

This increase in the population has occurred over the life of two failed plans and one ambitious but unadopted plan. Over the period 2002-2020 only 3620 feral horses were removed from the park over an 18 year period (KNP SAP 2020). In the meantime, the feral horse population has been increasing at an average of around 18% per year or more (Fletcher 2021 and Dawson 2009) while the alpine and sub alpine environment struggles to recover from the impact of landscape scale bushfires.

This situation of failed and ineffective policy and action is clearly unacceptable and we look forward to significant improvement in the management of feral horses in Kosciuszko National Park, albeit within the constraints and influence of the *Kosciuszko Wild Horse Heritage Act 2018*.

Reclaim Kosciuszko supports the significant reduction of Kosciuszko's feral horse population to 3000 in the interim, and provide recommendations to strengthen the draft plan, before finalisation.

Key principles

The overriding principles that Reclaim Kosci puts forward in relation to management of feral horses in Kosciuszko National Park are:

The goal must be to eliminate feral horse damage in Kosciuszko National Park through a significant reduction in numbers, prevention of their re-introduction and restoration of horse-damaged areas with a strategy that outlines a pathway to conserve Kosciuszko horse heritage off-park.

Introduced animals should not be retained in Kosciuszko National Park

There is no scientific justification to retain a large horse population in Kosciuszko National Park. Reclaim Kosci advocates that notwithstanding the social and heritage value that some in the community place on horses, feral horses do not belong in protected areas reserved for conservation, such as Kosciuszko National Park. There is ample evidence that feral horses disrupt natural ecosystem functioning and damage habitats by trampling, track creation, pugging, soil compaction, wallowing, erosion of streambanks, sphagnum bog and wetland destruction and overgrazing which is unacceptable in protected areas (Driscoll et al. 2019).

Should there be a demonstrated need to retain wild horses from Kosciuszko National Park associated with European history of the area this should be carried out only on off-park sanctuaries. This practice has occurred successfully now for some years through the rehoming program. The association of horses with early European settlement occurs throughout the Monaro Plains and adjacent areas and there is ample opportunity to protect horses in that landscape, but away from areas of protected public land with high conservation value.

The Kosciuszko Wild Horse Heritage Act 2018 must be repealed

The objective of the *Kosciuszko Wild Horse Heritage Act 2018* is to recognise the heritage value of sustainable wild horse populations within parts of Kosciuszko National Park and to protect that heritage. Maintaining sustainable populations of feral horses is clearly incompatible with managing areas of high conservation value and severely compromises the ability to effectively prioritise, protect and manage the outstanding biodiversity and wilderness values of Kosciuszko National Park. This is evident in the draft plan under '1. Purpose of the plan' which is to protect horse heritage and does not articulate environmental goals.

Habitat degradation and loss by feral horses (brumbies, wild horses), is listed as a key threatening process under the *NSW Biodiversity Conservation Act 2016*. The NSW National Parks and Wildlife Service should not be constrained by the *Kosciuszko Wild Horse Heritage Act 2018* in managing that threat. While this Act is in place there will continue to be conflict over the impact of feral horses on natural and cultural values in KNP. This Act must be repealed.

Feral horses in-situ are not an Australian Alps National Heritage-listed value

The draft Kosciuszko National Park wild horse heritage management plan cites extracts from Australian Alps National Parks and Reserves National Heritage Listing in relation to European settlement and pastoralism and

historical associations with horses suggesting feral horses are a listed value. There is nothing in the National Heritage listing that identifies what are now feral horses as being an in situ national heritage listed value. This position was upheld in Victorian Courts in 2020 (Federal Court of Australia. 2020). Indeed, feral horses clearly impact negatively on identified and listed national heritage values such as *EPBC Act* listed threatened species. Feral horses directly impact on 23 threatened flora and 11 threatened fauna species that occur within Kosciuszko National Park. Reference to the National Heritage value is misleading as its currently presented and should be clarified in the final plan.

Specific recommendations related to strategies in the plan

Notwithstanding the positions of principle above, Reclaim Kosci makes the following other comments in relation to the draft Kosciuszko National Park wild horse heritage management plan.

The draft Kosciuszko National Park wild horse heritage management plan provides some ambitious targets for the next five years, albeit constrained by meeting the objectives of the *Kosciuszko Wild Horse Heritage Act 2018*. Reclaim Kosci supports the principles and adoption of a biosecurity approach by identifying areas of prevention, elimination and containment/control and asset protection. However, there are clearly issues with extent of the areas where feral horses will be retained, the numbers that are considered “sustainable” and the methods that are required to substantially reduce the population, given previous lessons learnt first-hand by the managing agency, the NSW National Parks and Wildlife Service.

Horse retention areas

Feral horses currently occur across 53% of Kosciuszko National Park and the draft plan proposes to retain horses in 60% of their existing range. The horse retention area proposed covers about 220,000 hectares or 32 % of the park. This is a massive area to continue to allow feral horses to remain and to effectively manage the population. The objectives of the horse retention area are incompatible with the following outstanding values and statutes.

Impact on biodiversity, threatened species and assets of intergenerational significance

Keeping thousands of horses in Kosciuszko runs contrary to international standards for park management and will threaten the survival of sensitive alpine ecosystems and native Australian wildlife, such as the critically endangered stocky galaxias.

It is estimated that at least 33 threatened species live within the proposed horse retention zone. About half of these are either already known to be impacted by feral horses because they’re vulnerable to trampling, grazing or habitat damage (Driscoll 2021). The horse retention zone includes extensive areas of the Alpine Sphagnum Bogs and Associated Fens ecological community (a national heritage listed value) including Tantangara creek which is the habitat of the critically endangered stocky galaxias.

The stocky galaxias is a unique Australian fish that occurs nowhere else on Earth except for a small patch of Kosciuszko. The entire occurrence of this species exists within the northern horse retention zone. If implemented as written, the draft plan would permanently lock-in a key threat to this critically endangered species.

The federal government has placed the stocky galaxias on its list of 100 priority threatened species for recovery, yet the plan will effectively guarantee the destruction of its habitat.

The horse retention zones also include extensive areas of assets of intergenerational significance that were declared in September 2021 for their exceptional natural values. In relation to assets of intergenerational significance, The National Parks and Wildlife Amendment (Assets of Intergenerational Significance) Regulation 2021 under the *National Parks and Wildlife Act 1974* section 78B states the following actions may be taken for the management of declared land:

- (a) The management of known or foreseeable risks to the land, including the protection of the land from bush fire risks.

Retention of horses in these areas pose a clear risk to such lands. For example, AIS-E0-160, an area of 10,727 hectares in northern Kosciuszko, falls within a horse retention zone. It is habitat for known horse-threatened species, the broad-toothed mouse (*Mastacomys fuscus*) and the alpine she-oak skink (*Cyclodomorphus praealtus*).

This proposed retention approach in the plan is inconsistent with NSW commitment to zero extinctions within its national parks estate.

Impact on Wilderness

The horse retention area also includes parts or the whole of wilderness areas gazetted under the *Wilderness Act 1987*. These include Byadbo, Pilot, Jagungal, Bramina, Goobarragandra, Bogong Peaks and Bimberi Wilderness Areas.

The objects of the *Wilderness Act 1987* are to provide for the permanent protection of wilderness areas and to provide for the proper management of wilderness areas.

In relation to permanent protection, Section 6 of the Act (Identification of Wilderness) states:

- (1) the area is, together with its plant and animal communities, in a state that has not been substantially modified by humans and their works or is capable of being restored to such a state.

In relation to proper management Section 9 of the Act (Management Principles) states:

A wilderness area shall be managed so as:

- (a) to restore (if applicable) and to protect the unmodified state of the area and its plant and animal communities; and
- (b) to preserve the capacity of the area to evolve in the absence of significant human interference.

The retention and active management of an introduced species (i.e. feral horses) is clearly an action of significant human interference in protecting the unmodified state of the wilderness area and is incompatible with the purpose and proper management of wilderness areas as stated in the Act.

Impact on Aboriginal heritage values

The 'Aboriginal cultural values report: Investigating Aboriginal people's associations with wild horses in Kosciuszko National Park', identified "the protection of significant ancient Aboriginal heritage sites and cultural landscapes, inclusive of tangible and intangible values, as a key concern to the Aboriginal

participants". It states "the damage to Aboriginal heritage sites and cultural landscapes caused by wild horses in Kosciuszko National Park requires urgent and active management to halt and remedy" (Donaldson & Feary 2021).

The report recommends the headwaters of the Murrumbidgee and Goobarragandra Rivers and the Lower Snowy River should be included in the wild horse eradication area to protect important archaeological sites.

Impact on Australian Alps national parks cross border and co-operative management programs

The vision for the Memorandum of Understanding (MOU) in relation to the Co-operative Management of the Australian Alps national parks is "of Agencies working in partnership to achieve excellence in conservation management of its natural and cultural values and sustainable use through an active program of cross border co-operation" (AALC 2021).

Parks Victoria is proposing a significant reduction of feral horse numbers and impacts in the Alpine National Park (Eastern Alps section) bordering Kosciuszko National Park. This includes the use of aerial and ground shooting. The ACT Parks and Conservation Service has a policy of not allowing feral horses to remain in Namadgi National Park and also employs aerial shooting.

The proposal for feral horse retention areas to include the Pilot and Byadbo Wilderness areas contiguous with the Alpine National Park on the NSW/Victorian border will severely compromise the Victorian feral horse control program. This is clearly at odds with the MOU requirements for cross border co-operation to achieve excellence in conservation management of its natural and cultural values.

Recommendations for wild horse retention areas

The primary position of Reclaim Kosci is that horses should be eradicated from the majority of their existing range in the park. Reclaim Kosci does not support the proposal to retain wild horses across 32% of the park (60% of their existing range) and we will continue to advocate for the elimination of feral horse damage in Kosciuszko National Park.

We make the following recommendations to the retention areas in the spirit of improving the plan. Reclaim Kosci believes these are crucial to reduce the impact of the proposal to retain feral horses in Kosciuszko National Park.

- (1) Classify all wilderness areas in Kosciuszko National Park as wild horse prevention or wild horse removal areas. This will have multiple positive outcomes:
 - The plan will be compatible with the objectives and provisions of the *NSW Wilderness Act 1987*;
 - The plan will protect areas identified by the Aboriginal community as important Indigenous cultural heritage areas that are at risk from feral horses, being the headwaters of the Murrumbidgee and Goobarragandra Rivers and the Lower Snowy River;
 - The plan will be more compatible with protecting and conserving National Heritage listed values by providing additional protection and conservation of 33 threatened species and the Alpine Sphagnum Bogs and Associated Fens ecological community; and
 - The plan will align with the intent of the Australian Alps National Parks MOU in regard to cross border management with Victoria and the ACT.

- (2) Incorporate reference to the *Wilderness Act 1974* and the *Biodiversity Conservation Act 2016* in section '2, Matters considered' of the plan in describing the plan's legal framework. This should include a description of how the plan meets the relevant requirements of the respective Acts.
- (3) Include all assets of intergenerational significance in wild horse prevention or removal areas.
- (4) Put in place asset protection measures in remaining wild horse retention areas to protect specific values at risk of damage from feral horses such as areas containing the Alpine Sphagnum Bogs and Associated Fens ecological community, Currango Plain and the habitat of critically endangered species such as the stocky galaxias.
- (5) Remove the Kalkite Mountain wild horse retention area and reclassified as a wild horse removal area as retaining this isolated population will continue to be high maintenance and a risk to the Jagungal Wilderness Area.
- (6) Create a larger horse removal buffer area around the Cooleman Karst removal area.

Population reduction

The feral horse population in Kosciuszko National Park has grown largely uncontrolled from around 1000 following the 2003 bushfires to 14,380 in 2020. The numbers are expected to be thousands of animals higher by the time the Kosciuszko National Park Wild Horse Heritage Management Plan is implemented.

Given the failure to control the feral horse population over the last 20 years, Reclaim Kosci supports the significant and relatively rapid reduction of the number of feral horses in Kosciuszko National Park. The final target of 3000 is too high and a backward step on the draft plan from 2016. Noting this, effort must be directed to rapidly reducing the feral horse population in the park

The notion that the figure of 3000 feral horses represents an ongoing sustainable population after 2027 has no basis in science. Any retention of feral horses after 2027 must be based on a science-based evaluation of impacts on biodiversity and Aboriginal cultural values and thresholds of acceptable impact in the wild horse retention area.

Previous studies in the Alps (Dawson 2009) have put forward that a 21% reduction in feral horse numbers is required to simply sustain a feral horse population. To maintain a feral horse population at 3000 will require 500-600 feral horses to be removed annually and on an ongoing basis; forever. This will be a challenge for recurrent funding, resources and social licence and is unsustainable.

Recommendations for feral horse population reduction

- (1) Include annual removal targets in the plan. The planned reduction of the feral horse population in Kosciuszko National Park of more than an estimated 9000 feral horses by June 2027 is supported but the plan should include annual targets are needed to monitor progress and ensure this is on track to be achieved.
- (2) Include in the population reduction the removal of feral horses from all wilderness areas, all assets of intergenerational significance, the Currango Plain and the Kalkite population by 2027 (see horse retention areas above).

- (3) Note that, the primary position of Reclaim Kosci is that feral horse damage should be eliminated from Kosciuszko National Park over the longer term. We do not support the target of 3000 by 2027 and believe this target should be lower. Continued ratcheting down of feral horse populations should occur followed by continued sustained removal until feral horse damage is non-existent.
- (4) Note that, any retention of feral horses in Kosciuszko National Park after 2027 must be based on a science based evaluation of impacts on biodiversity and Indigenous cultural values and thresholds of acceptable impact.

Capture and control methods

There has been a failure in controlling the feral horse population in Kosciuszko National Park that has seen the population explode with associated impacts on the park. This has been largely due to removal methods being constrained to passive trapping and removal of horses from the park to new homes or a knackery. This high cost and poor horse welfare approach has resulted in only 3620 feral horses removed from the park over the last 18 years.

To reduce the population at the scale proposed in the draft plan there will need to be a sustained removal rate of around 38% of the population each year. This will mean in the first year of the program over 5000 feral horses will need to be removed declining to around 3000 annually by year 4 (figures subject to population monitoring).

Given this annual removal is higher than the total achieved over the last 18 years, the plan must equip park managers with new much more effective strategies to effectively control the feral horse population and to achieve the plan's targets. Reclaim Kosci welcomes the addition of aerial and/or ground mustering into yards and lethal control methods including shooting and tranquilising in yards and ground shooting.

Aerial shooting

Reclaim Kosci is concerned that the plan rejects aerial shooting outright as a control method.

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).

Without access to aerial shooting it will be unlikely that the high annual removal numbers needed to reduce the population to 3000 by 2027 will be able to be achieved. This will be particularly the case for large inaccessible and rough terrain areas like the Pilot and Byadbo Wilderness Areas.

The plan states that advice of the Kosciuszko Wild Horse Scientific Advisory Panel is that, if undertaken in accordance with best practice, aerial shooting can have the lowest negative animal welfare impacts of all lethal control methods. However, there is a concern that the implementation of an aerial shooting program will result in a loss of the social licence to remove wild horses from the national park.

While some in the community will never accept removing feral horses from the Alps, particularly through aerial and/or ground shooting, the community engagement report for the KNP Wild Horse Management Plan in 2016 found that the middle ground of general community concerns or anxiety around horse control

methods can be moderated if people are properly informed of the facts and evidence and involved in decision processes (OEH 2015).

Furthermore, the recent application of aerial shooting to horses in Namadgi National Park by the Australian Capital Territory Parks and Conservation Service proves that aerial control programs can be undertaken successfully (Gentleman 2021).

On 1 November 2021 Victoria finalised its feral horse management plan for the Alpine National Park, which included the option of aerial shooting. By ruling out aerial shooting, NSW will be an outlier in management agencies across the Australian alps.

Reclaim Kosci suggests that investing in an education program that informs the wider community of the rationale for feral horse removal through aerial shooting will have positive outcomes for social licence.

Recommendations for feral horse capture and control methods

- (1) Note that Reclaim Kosci supports the addition of aerial and/or ground mustering into yards and lethal control methods including shooting and tranquilising in yards and ground shooting, performed in accordance to standard operating procedures and animal welfare protocols.
- (2) Note that shooting must only be conducted by professional shooters and pest controllers. The program cannot be compromised by the actions of non-professionals.
- (3) Note that capture and rehoming of feral horses is supported provided it can remove required volumes of feral horses in the park required rapidly drive down the population. This program must be implemented cautiously and not divert attention from rapidly applying other measures that are more effective at rapidly driving down numbers.
- (4) Note that the trapping of feral horses for delivery to a knackery has significant animal welfare issues. Thus, Reclaim Kosci supports that trapped horses should be put down humanely killed in-situ if not being pre-arranged for rehoming.
- (5) Incorporate into the plan the allowance to use aerial shooting when circumstances require. When death is the end-point, in-situ aerial shooting can have the lowest animal welfare impacts and should be added to the methods available and be an equally preferred method to ground shooting for inaccessible landscapes. This may include trials of aerial culling with independent animal welfare assessments.
- (6) Implement an intensive education program with the community to gain social licence for aerial shooting by presenting the rationale for why feral horses must be removed from Kosciuszko National Park, the applicability and effectiveness of lethal and non-lethal control methods in different circumstances, and the relative humaneness of the range of control methods when used in specific circumstances. Education on lethal measures should contextualise the use of aerial shooting as standard practice for integrated aerial control programs that already occur for other pest species.

Implementation

Early and substantial resources and investment is needed to have the best long-term benefits for tax-payers, land managers, ecosystems, threatened species, Indigenous heritage, park visitors and the horses themselves.

Recommendations for implementation of the plan

- (1) Finalise and implement the plan immediately without further consultation, noting significant resources have already been invested in extensive community and scientific consultation since 2013 when drafting began for the disregarded 2016 wild horse management plan.
- (2) Clearly indicate budget and resources available to implement the Kosciuszko Wild Horse Heritage Management plan to achieve the population reduction to 3000, including funding and staffing.

Ecological restoration

The ecological impact of the consistently increasing feral horse population has been significant. The condition of streambanks and the Alpine Sphagnum Bogs and Associated Fens ecological community is of particular concern along with the threatened species that depend on these ecosystems.

Recommendation for ecological restoration

- (1) Couple horse removal with investment in ecosystem monitoring and restoration activity with a focus on streambanks, the alpine sphagnum bogs and associated fens ecological community along with the threatened species.

Diseases

The draft Kosciuszko National Park Wild Horse Heritage Management Plan presents the threats from feral horses to ecosystems, catchments, cultural heritage and visitors 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*.

Recommendation for feral horse as vectors for disease

- (1) Include in the plan a discussion about the risk and threats of transfer of disease to domestic horses and humans from feral horses.

Conclusion

Thank you for the opportunity and comment on the draft Kosciuszko National Park wild horse heritage management plan. Reclaim Kosci has been closely tracking the development of the plan and we hope these comments and recommendations will be considered constructive for finalisation of the plan. Reclaim Kosci looks forward to the program of substantial feral horse removal getting underway as soon as possible.

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Appendix – Summary of recommendations

Recommendations for wild horse retention areas

- (1) Classify all wilderness areas in Kosciuszko National Park as wild horse prevention or wild horse removal areas. This will have multiple positive outcomes:
 - The plan will be compatible with the objectives and provisions of the *NSW Wilderness Act 1987*;
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 - The plan will align with the intent of the Australian Alps National Parks MOU in regard to cross border management with Victoria and the ACT.
- (2) Incorporate reference to the *Wilderness Act 1974* and the *Biodiversity Conservation Act 2016* in section '2, Matters considered' of the plan in describing the plan's legal framework. This should include a description of how the plan meets the relevant requirements of the respective Acts.
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- (5) Remove the Kalkite Mountain wild horse retention area and reclassified as a wild horse removal area as retaining this isolated population will continue to be high maintenance and a risk to the Jagungal Wilderness Area.
- (6) Create a larger horse removal buffer area around the Cooleman Karst removal area.

Recommendations for wild horse population reduction

- (1) Include annual removal targets in the plan. The planned reduction of the feral horse population in Kosciuszko National Park of more than an estimated 9000 feral horses by June 2027 is supported but the plan should include annual targets are needed to monitor progress and ensure this is on track to be achieved.
- (2) Include in the population reduction the removal of feral horses from all wilderness areas, all assets of intergenerational significance, the Currango Plain and the Kalkite population by 2027 (see horse retention areas above).
- (3) Note that, the primary position of Reclaim Kosci is that feral horse damage should be eliminated from Kosciuszko National Park over the longer term. We do not support the target of 3000 by 2027 and

believe this target should be lower. Continued ratcheting down of feral horse populations should occur followed by continued sustained removal until feral horse damage is non-existent.

- (4) Note that, any retention of feral horses in Kosciuszko National Park after 2027 must be based on a science-based evaluation of impacts on biodiversity and Indigenous cultural values and thresholds of acceptable impact.

Recommendations for feral horse capture and control methods

- (1) Note that Reclaim Kosci supports the addition of aerial and/or ground mustering into yards and lethal control methods including shooting and tranquilising in yards and ground shooting, performed in accordance to standard operating procedures and animal welfare protocols.
- (2) Note that shooting must only be conducted by professional shooters and pest controllers. The program cannot be compromised by the actions of non-professionals.
- (3) Note that capture and rehoming of feral horses is supported provided it can remove required volumes of feral horses in the park required rapidly drive down the population. This program must be implemented cautiously and not divert attention from rapidly applying other measures that are more effective at rapidly driving down numbers.
- (4) Note that the trapping of feral horses for delivery to a knackery and ineffective and has significant animal welfare issues. Thus, Reclaim Kosci supports that trapped horses should be put down humanely killed in- situ if not being pre-arranged for rehoming.
- (5) Incorporate into the plan the allowance to use aerial shooting when circumstances require. When death is the end-point, in-situ aerial shooting can have the lowest animal welfare impacts and should be added to the methods available and be an equally preferred method to ground shooting for inaccessible landscapes. This may include trials of aerial culling with independent animal welfare assessments.
- (6) Implement an intensive education program with the community to gain social licence for aerial shooting by presenting the rationale for why feral horses must be removed from Kosciuszko National Park, the applicability and effectiveness of lethal and non-lethal control methods in difference circumstances, and the relative humaneness of the range of control methods when used in specific circumstances. Education on lethal measures should contextualise the use of aerial shooting as standard practice for integrated aerial control programs that already occur for other pest species.

Recommendations for implementation of the plan

- (1) Finalise and implement the plan immediately without further consultation, noting significant resources have already been invested in extensive community and scientific consultation since 2013 when drafting began for the disregarded 2016 wild horse management plan.
- (2) Clearly indicate budget and resources available to implement the Kosciuszko Wild Horse Heritage Management plan to achieve the population reduction to 3000, including funding and staffing.

Recommendation for ecological restoration

- (1) Couple horse removal with investment in ecosystem monitoring and restoration activity with a focus on streambanks, the alpine sphagnum bogs and associated fens ecological community along with the threatened species.

Recommendation for feral horses as vectors of disease

- (1) Include in the plan a discussion about the risk and threats of transfer of disease to domestic horses and humans from feral horses.