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I am writing on behalf of Water for Rivers - a community based network of groups working to support the restoration and protection of rivers, tributaries and catchments of the Murray Darling Basin for environmental and community health.

Water for Rivers backs and broadens local community campaigns in the fight against overdevelopment, over-allocation, contamination, corruption, mismanagement, injustice of water resources which cause ecological destruction, contribute to climate change and jeopardise communities. We believe that clean fresh drinking water for all is a human right, we support First Nations rights to water and river health as urgent priorities.

Water for Rivers strongly support federal action to rapidly reduce the number of feral horses across the Australian Alps because of the threat to this vital river catchment, biodiversity within a National Park and Aboriginal heritage within the Kosciusko and alpine region.

We strongly support action to rapidly reduce the number of feral horses across the Australian Alps to help protect river catchments and Indigenous heritage, threatened species and vital ecosystems.

We strongly disapprove of the failure to control feral horses which are destroying ecosystems and habitats, and which are causing the destruction of the catchment of the Snowy River and declines and extinction of native animals that occur nowhere else on Earth.

By not taking action the governments of Victoria and NSW are allowing increasing numbers of horses to breed making containment more difficult and costly whilst increasing the damage to ecosystems, threatened species and Indigenous heritage.

The Australian Government will not meet its obligations to protect the Heritage values of the Australian Alps, the zero-extinction target, or international commitments under the Convention of Biological Diversity if feral horse numbers are not rapidly reduced.

Feral horse numbers are out of control and growing rapidly due to insufficient control action, with recent estimates of over 24,000 across the Australian Alps - up from about 7,500 in 2013/14.

There are more than 40 threatened species listed at the state or federal level that are directly impacted by feral horses including northern and southern corroboree frog species, alpine she-oak skink, the recently listed mountain skink, broad toothed rat and a number of rare alpine plants, such as the anemone buttercup.

Feral horses disrupt natural ecosystem functioning and damage habitats and water catchments in the Alps by: trampling, track creation, soil compaction, wallowing, erosion of streambanks, sphagnum bog and wetland destruction and overgrazing

The Federal Environment Minister should use powers in the Environment Protection and Biodiversity Conservation (EPBC) Act to require states and territories to effectively and urgently remove feral horses from the Australian Alps National Parks and Reserves National Heritage Place.

The Australian Alps are meant to be protected under national environment law as they were listed as a National Heritage Place in 2008.

The Federal Government should develop National Heritage management principles through regulation that require the rapid reduction of feral horses in the Australian Alps National Parks and Reserves.

Australia's national environmental law should be reformed so the Australian government can rapidly intervene where areas of national and international environmental significance are not being protected or managed effectively.

The current national environmental laws need updating to:

Ensure that 'actions' defined in law include a policy, plan or program where these relate to the management of National Heritage Places like the Australian Alps, as well as World Heritage Areas, or wetlands of international significance (Ramsar wetlands).

Strengthen the framework for threat abatement planning, including creating a clear, scientifically-led process for listing and abating major threats like feral animals.

Create new triggers for the assessment of actions, including:

- actions that exacerbate a key threatening process
- actions that negatively impact on Australia's national parks and reserves.

Develop strong national environmental standards that require the effective management of invasive threats and apply to the management of National Heritage Places like the Australian Alps, as well as World Heritage Areas or Ramsar wetlands.

Thank you for investigating this critical threat to one of our most iconic protected rivers.

Yours sincerely
Tracey Carpenter
For Water for Rivers

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