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## Submission

# Senate Inquiry into the Impacts and management of feral horses in the Australian Alps

### 1. Background

On **9 February 2023**, the Senate referred the impacts and management of feral horses in the Australian Alps for inquiry and report by **9 June 2023**. The inquiry comes as feral horses in the NSW Alps have exploded to more than 18,000 based on the latest science. It also comes as the Victorian eastern alps survey data has been released.

### 2. My Background

My wife and I have been visitors to the Snowy region extensively since we came to Australia in 1973. In fact, we spent our first Christmas at Jindabyne and camped at Island Bend. This has been followed by a fortnight or two in the area over many years, usually in the summer months and often over the Christmas period. So we are very familiar with the area and the changes which have occurred over the years.

We are also very familiar with operations of the NPWS in NSW and have been dismayed that the follow on effect of the inability to control feral horses effectively in the Snowies has had a knock on effect so that feral horses have been inadequately controlled in National Parks in NSW as well.

### 3. Outcomes from Inquiry

I would like to see three outcomes from the federal inquiry:

1. **Put a spotlight on the feral horse issue** and the failures of state governments to take adequate action to protect wildlife and ecosystems by rapidly reducing feral horse numbers in the Alps.
2. **Encourage federal government intervention**, including regulations to force state governments to act and federal funding. Importantly, Minister Plibersek has

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[https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Environment\\_and\\_Communications/FeralHorses47](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/FeralHorses47)

explicitly backed the inquiry as a way for her “to ensure that we are doing everything we can”.

3. **Push for important changes to national environmental law** which will ensure places like the Australian Alps are better protected. The government has promised changes to environmental law this year and this inquiry will inform both the government and the Senate crossbench’s consideration in that process.

#### 4. Specific issues for Committee:

1. All jurisdictions should use the full suite of control tools available, ensuring they meet standard operating procedures and animal welfare requirements, to reduce the significant impacts of feral horses on the Australian Alps. This should include ground and aerial shooting by professionals.
2. The Federal Environment Minister should develop National Heritage management principles under 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.
3. 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. This should include updates to:
  - a. Ensure that ‘actions’ defined in law include a policy, plan or program of a government 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).
  - b. Strengthen the framework for threat abatement planning, including creating a clear, scientifically-led process for listing and abating major threats like feral animals.
  - c. Create new triggers for the federal assessment of actions, including:
    - i. actions that exacerbate a key threatening process;
    - ii. actions that negatively impact on Australia’s national parks and reserves
  - d. 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.
4. The Federal Water Minister should investigate powers under the Water Act 2007 to ensure that feral horses are not damaging and polluting the catchments of the Murray and Murrumbidgee River.

5. The Murray Darling Basin Authority should undertake an assessment of the impact of feral horses and other hard-hooved invasive species on water quality and erosion and any actions required to prevent, mitigate, or repair the damage.
6. The Australian Government should develop a national feral horse Threat Abatement Plan. And the Australian Government should co-invest with state and territory governments in feral horse management in the Australian Alps, which is a priority place under the Threatened Species Action Plan.
7. The Australian Alps Ministerial Council should be reinvigorated, and the Australian Government should fund an officer reporting to the Australian Alps Liaison Committee to focus on interstate collaboration for feral horse control.
8. The NSW Government should repeal the *Kosciuszko Wild Horse Heritage Act* which prioritises feral horses over native wildlife in a National Park and undermines Australia's national and international environmental obligations. This act is causing feral horse to be inadequately controlled by NPWS in other national Parks in NSW

Thank you for the opportunity to bring these issues forward to this Inquiry

Don White

Friday, 7 April 2023

## 5. Additional Supporting Material

### Best practice approaches to feral horse population reduction

#### *Terms of Reference:*

*(a) Identifying best practice approaches to reduce the populations of feral horses in the Australian Alps and their impact on:*

- i. biodiversity, including threatened and endangered species and ecological communities listed under Commonwealth, state or territory law,*
- ii. the ecological health of the Australian Alps national parks and reserves,*
- iii. Indigenous cultural heritage, and*
- iv. the headwaters of the Murray, Murrumbidgee, Snowy and Cotter Rivers, including their hydrology, water holding capacity, water quality, habitat integrity and species diversity;*

#### **Key points to consider:**

- The Australian Alps National Parks and Reserves which extend from the ACT through NSW down to Victoria cover 1.6 million hectares of public land in eleven national parks and nature reserves. The Alps contain Australia's only mainland mountain peaks above 2000m and make up less than 1% of the Australian mainland.
- The alps contain species and ecosystems that occur nowhere else on Earth and are unique in their evolutionary history. For example, the mountain pygmy possum, which only occurs in isolated populations across the alps, has been identified as the most evolutionary distinct threatened mammal species globally.
- The Australian Alps are a vital refuge for many threatened and endangered species, including the Alpine She-oak Skink, Southern Corroboree Frog, and Mountain Pygmy-possum. The alpine bogs and fens in the region are important for maintaining water quality, regulating water flow, and providing habitat for unique plant and animal species.
- The Australian Alps contain the headwaters of some of Australia's greatest rivers, including the Murray, Snowy and Murrumbidgee. It has been estimated the Alps contribute an average of 9,600 gigalitres to the Murray-Darling Basin, or about 29% of the Basin's total annual flows. This water supports 2.1 million Australians and had an estimated economic value of \$9.6 billion in 2011.

#### ***Best practice management approaches***

- The current Alps-wide population of feral horses is estimated to exceed 20,000, with the vast majority of these estimated to occur in Kosciuszko National Park in NSW (over 18,500 at the most recent NSW government survey in 2022).
- With adequate resources, appropriate methods and consistent control, eradicating feral horses from the Australian Alps is possible. However, every year that control is delayed

or deferred will increase the number of animals required to be removed and the cost of an effective control program.

- The best practice approach to feral vertebrate control is to ensure there is the maximum number of humane control methods available that rapidly reduce populations of invasive species.
- For a control program to be effective it must be multi-year, with consistent commitment to adequate resources to ensure reductions are above the population growth rate (about 15-20% per year for feral horses in the Alps).
- The effective reduction of feral horses in the Australian Alps will rely on integrated invasive species management, including through the utilisation of ground and aerial shooting. These methods are regularly used in other states for feral horses and in NSW and Victoria for other feral animals such as deer and pigs. They have been proven to be effective, efficient and humane when implemented by professionally trained shooters and following standard operating procedures.
- A recent independent animal welfare review of the NSW Government's feral horse control management plan for Kosciuszko National Park found that for ground shooting:
  - "The Standard Operating Procedure has been followed in detail, and the implementation has resulted in better than expected welfare outcomes (<1% of horses not killed immediately), which has been verified by a highly skilled independent observer."
  - "The welfare outcomes are better than predicted based on best practice by the AWA. The skill of the operators was key to this success."
  - "There was no evidence of non-kill shots having been taken"
- Trapping and rehoming of feral horses have been utilised in the Alps for more than a decade and have consistently failed to reduce the population. There are too many feral horses in the Alps for trapping and rehoming to be relied upon for the reduction of the population.
- Fertility control as a management tool is only effective for a small, geographically isolated population of feral horses where the management outcome sought is to maintain the population at its current size. It is not a viable option to reduce the feral horse population in the Alps.
- Feral horse management policies should also:
  - Monitor and evaluate the effectiveness of control methods, using appropriate indicators such as population size, distribution, and impact on the environment.
  - Implement ongoing monitoring and adaptive management to ensure that feral horse control efforts are achieving their goals and objectives, and adjust management strategies as needed.

- Conduct research to improve understanding of feral horse behaviour, ecology, and control methods, and share the findings with other management agencies and stakeholders.
  - Maintain public education and awareness campaigns to help people understand the impacts of feral horses on the environment and the need for their control.
- A best practice approach to managing feral horse impact in the Alps would see an integrated approach to vertebrate invasive species management, including effective and joined-up control of other invasive threats, notably feral deer that are also decimating alpine ecosystems. Coordination with control operations on neighbouring private and crown land is also important to prevent populations re-establishing after eradication.

## Commonwealth Powers and Responsibilities

*Terms of Reference:*

*(b) Commonwealth powers and responsibilities, including:*

- i. the protection of matters of national environmental significance under the Environment Protection and Biodiversity Conservation Act 1999, including listed threatened species and communities and the National Heritage listed Australian Alps national parks and reserves,*
- ii. obligations under international treaties, such as the Convention on Biological Diversity, and*
- iii. the commitment to prevent new extinctions under the threatened species action plan;*

**Key points to consider:**

### ***EPBC Act 1999 and matters of National Environmental Significance.***

- Australia's national environmental law, the EPBC Act, is designed to protect matters of national environmental significance. The Australian Alps has a significant number of matters of national environmental significance:

#### *National Heritage*

- The Australian Alps National Parks and Reserves were listed under the Environment Protection Biodiversity Conservation Act as a National Heritage Place in 2008. The unique natural environment of the Alps was integral to the National Heritage listing and the Alps are one of eleven sites recognised in Australia by the IUCN as a major world centre of plant diversity.
- The natural landscapes of the AANP contain extremely restricted alpine and sub-alpine environments and flora and fauna species, with the alpine zone occupying a very small area (approximately 25,000 hectares). The AANP contains glacial lakes and includes plateaus and peaks that are prominent and unparalleled in the Australian continent with an average elevation of only 330 metres above sea level. The AANP includes most of

continental Australia's peaks over 1,700 metres and all of those over 1,900 metres and experiences extensive snow coverage on a seasonal basis.

- In 2020 the federal court rejected the contention that the ongoing presence of brumbies are part of the National Heritage values of the Australian Alps and accepted the evidence that feral horses cause substantial environmental damage.

*Nationally listed threatened species and ecological communities*

- The Australian Alps are home to more than 100 nationally threatened species and threatened ecological communities, ranging from iconic species such as the mountain pygmy possum and northern corroboree frog through to less well-known species of plants and animals, such as the Kiandra greenhood.
- Feral horses have been listed as a key threatening process by the NSW Threatened Species Scientific Committee under the Biodiversity Conservation Act and are acknowledged as a key threat under the EPBC Key Threatening Process *Novel biota and their impact on biodiversity*.
- There are at least 29 threatened species listed under the EPBC Act in the Australian Alps where feral horses are identified as a direct threat to the survival of the species or ecological communities. This number is likely to be higher as updated information on species threats becomes available. Additionally, there are a number of species currently being considered by the Threatened Species Scientific Committee for listing where feral horses are a threat to their ongoing survival.
- There are also a number of threatened ecological communities listed under the EPBC Act for which feral horses are identified as an ongoing threat, including the endangered alpine sphagnum bogs and fens and the critically endangered river-flat eucalypt forest.
- The Commonwealth government has set a goal of no new extinctions under their Threatened Species Action Plan. They will struggle to meet this goal if feral horses are not controlled effectively in the Australian Alps.

***UN Convention on Biological Diversity***

- The Commonwealth Government has specific obligations under the UN Convention on Biological Diversity for the protection and management native biodiversity and protected areas. Specifically Article 8 (h.) of the CBD requires that each state party shall:
  - Prevent the introduction of, control or eradicate those alien species which threaten ecosystems, habitats or species;
- In December 2022, the Kunming-Montreal Global Biodiversity Framework was finalised. This included specific goals and targets for the prevention of the extinction of native wildlife (Goal A, Target 4), the management of protected areas (Target 3), the management of invasive species and prevention of their impacts (Target 6) and for the restoration of native ecosystems (Target 2).

EPBC listed flora impacted by feral horses	EPBC Status
Mauve Burr-daisy ( <i>Calotis glandulosa</i> )	V
Shining Cudweed ( <i>Argyrotegium nitidulum</i> )	V
Kiandra greenhood ( <i>Pterostylis oreophila</i> )	CE
Anemone Buttercup ( <i>Ranunculus anemoneus</i> )	V
Monaro Golden Daisy ( <i>Rutidosia leiolepis</i> )	V
<i>Prasophyllum bagoense</i>	CE
Brandy Marys Leek-orchid ( <i>Prasophyllum innubum</i> )	CE
Kelton's Leek Orchid ( <i>Prasophyllum keltonii</i> )	CE
Clover Glycine ( <i>Glycine latrobeana</i> )	V
Rice flower ( <i>Pimelea bracteata</i> )	CE
Pale pomaderris ( <i>Pomaderris pallida</i> )	V
Blue-tongued greenhood ( <i>Pterostylis oreophilla</i> )	CE
Feldmark grass ( <i>Rytidosperma pumilum</i> )	V
Swamp everlasting ( <i>Xerochrysum palustra</i> )	V
Brindabella midge orchid <i>Corunastylis ectopa</i>	CE

EPBC listed fauna impacted by feral horses	EPBC Status
Alpine Tree Frog ( <i>Litoria verreauxii alpina</i> )	V
Broad-toothed Rat ( <i>Mastacomys fuscus</i> )	V
Smoky Mouse ( <i>Pseudomys fumeus</i> )	E
Southern Corroboree Frog ( <i>Pseudophryne corroboree</i> )	CE
Northern Corroboree Frog ( <i>Pseudophryne pengilleyi</i> )	CE
Pale Golden Moths ( <i>Diuris ochroma</i> )	V
Alpine She-oak Skink ( <i>Cyclodomorphus praealtus</i> )	E
Guthega Skink ( <i>Liopholis guthega</i> )	E
Alpine bog skink ( <i>Pseudemoia cryodroma</i> )	E
Spotted tree frog ( <i>Litoria spenceri</i> )	CE
Stocky galaxias ( <i>Galaxias tantangara</i> )	CE
Mountain Skink ( <i>Liopholis montana</i> )	E
Kosciuszko Galaxias ( <i>Galaxias supremus</i> )	CE
Dargo Galaxia ( <i>Galaxias mungadhan</i> )	CE

V = Vulnerable, E = Endangered, CE = Critically Endangered



### ***Powers under the Water Act 2007***

- The Australian Alps contain the Murray and Murrumbidgee Rivers and it has been estimated the Alps contribute an average of 9,600 gigaliters to the Murray-Darling Basin, or about 29% of the total basins annual flows.
- Feral horses alter the ecosystem processes governing water quality and supply for the sources of the Murray and Murrumbidgee Rivers through track creation, stream bank erosion, compaction and disturbance of peat bogs and wetlands, pollution with faecal matter and grazing of riparian vegetation. Removal of feral horses from catchment areas in Namadgi National Park has been shown to have increased the quality of water downstream.
- Under the federal *Water Act 2007*, the Commonwealth Government has obligations which are relevant to the management of feral horses including to:
  - address threats to Murray-Darling Basin water resources,
  - promote the use and management of the Basin water resources in a way that optimises economic, social and environmental outcomes,
  - protect, restore and provide for the ecological values and ecosystem services of the Basin.
  - ensure that the management of the Basin water resources takes into account the broader management of natural resources in the Basin.
- Hume Dam is the main supply storage and one of the two major headwater storages for the River Murray system and the Water Act 2007 contains explicit provisions for the protection of its catchment, which includes much of the Australian Alps.
- Section 51 requires the Governments of New South Wales and Victoria to “take effective measures to protect the portions of the catchment of the Hume Reservoir within their respective States from erosion.”
- The Murray Darling Basin Authority should undertake an assessment of the impact of feral horses and other hard-hooved invasive species on water quality and erosion and any actions required to prevent, mitigate or repair the damage.

### ***Stronger National Heritage Management Principles under the EPBC Act***

- The Environment Protection and Biodiversity Conservation Act 1999 provides for the making of management plans for National Heritage Places (s324Y) and the making of National Heritage Management Principles (s324X) as regulations set out under the Act.
- Section 324X (2) of the EPBC Act requires that:

*‘The Commonwealth must use its best endeavours to ensure a plan for managing the place, that is not inconsistent with the National Heritage management*

*principles, is prepared and implemented in co-operation with the State or Territory.'*

- Specifically s324Y (2) provides for the Commonwealth to '*prescribe obligations to implement or give effect to the National Heritage Management Principles*'.
- The Australian Government should develop specific management principles that relate to the management of feral horses, and invasive threats to the Australian Alps under section 324Y and outline through regulation how these should be given effect to.
- Such principles should specify that feral horses, and other invasive ungulates, should be removed from the Australian Alps National Heritage Place in order to protect the unique biodiversity and natural and Indigenous cultural heritage values of the place.
- Strengthening the National Heritage Management Principles was a key measure flagged by the previous federal government (including in correspondence to the NSW Government), but never followed through.

#### ***Strengthening the definition of an 'Action' under national environmental law***

- Sections 523, 524 and 524A of the EPBC Act outline what is, and is not considered an action respectively for the purposes of the referral, assessment and approvals functions of the Act. The legislation is silent on the assessment of plans of management, but s524A outlines that government authorisations are not 'actions' for the purposes of the EPBC Act.
- It is important that the Commonwealth has a mechanism to intervene in circumstances where a plan of management for a particular listed place is unlikely to protect or restore key values of that place, or where such a plan would likely lead to the ongoing decline of listed values of that place. Whilst strengthened National Heritage Management Principles would hopefully avoid this situation arising, ensuring that where a plan of management is developed, and such a plan is likely to harm matters of national environmental significance, the Commonwealth has recourse to intervene effectively is critical.
- Expanding or clarifying the legislated definition of an 'action' to include a policy or plan of management for spatially defined matters of national environmental significance, including National Heritage Places like the Australian Alps, as well as World Heritage Areas, or wetlands of international significance (Ramsar wetlands) would significantly improve national oversight and create national safeguards for these areas. .

#### ***Developing a National Threat Abatement Plan for Feral Horses***

- Australia has 400,000 feral horses - the largest feral horse population in the world. There is a clear need for improved management of feral horses across the country. They are not

only a threat to the Australian Alps, but also a threat to the Ramsar listed Barmah forest and World Heritage areas including the Blue Mountains, Kakadu and Gondwana forests.

- A national threat abatement plan should be developed for feral horses to drive improved action, direct funding and coordinate management.
- Despite being captured under the Novel biota key threatening process, current interpretations of the EPBC Act by the federal government have meant that only one threat abatement plan may be issued for a singly key threatening process, rendering the Novel biota listing largely ineffectual.
- Major reforms are needed to Australia's threat abatement system, including enabling multiple threat abatement plans to be listed for any listed key threatening process, developing a scientifically led approach to listing key threats, and the establishment of national taskforces for tackling major threats.

### ***The Australian Government's Nature Positive Plan***

- The Australian Government has announced an overhaul of our national environmental laws through its Nature Positive Plan, centred on the development of a set of National Environmental Standards. The Government has stated:
  - 'The standards will apply to all decision-making under national environmental law and be administered and enforced by an independent Environment Protection Agency (EPA). They will also have a normative effect, informing and guiding non-regulatory activities.'
- It is critical that the Australian Government develop strong national environmental standards that require the effective management of invasive threats and that such standards apply to the management of National Heritage Places like the Australian Alps, as well as World Heritage Areas or Ramsar wetlands.
- There have been a number of cases of protected areas being poorly managed or protected by state government agencies. For example, moves to implement cattle grazing in Alpine National Park by the previous Victorian government triggered outrage and concern amongst protected area managers, the community and scientists.
- It is recommended that in order to ensure stronger commonwealth oversight and engagement on threats to matters of national environmental significance, like feral horses in the Australian Alps, new 'triggers' are established under national environmental law.
- We recommend two new triggers are established, for:
  - actions that exacerbate a key threatening process; and

- actions that negatively impact on Australia's system of national parks and reserves (Parks Trigger)

### **Australian Alps National Parks Cooperative Management Program**

- The [Australian Alps National Parks Cooperative Management Program](#) has been in place since 1986. It is formalised through a [memorandum of understanding](#) (MOU) between ACT, NSW, Victoria and the Commonwealth.
- The vision for the program is to achieve excellence in protected area management across the Alps, including the
  - a) protection of the unique mountain and cultural landscapes.
  - (b) protection of the natural and cultural values and caring for Country of the Australian Alps.
  - (c) provision of an appropriate range of education, recreation, and tourism experiences that encourage the enjoyment, appreciation, understanding and conservation of the natural and cultural values.
  - (d) protection and restoration of mountain catchments and connectivity.
  - (e) amelioration of the effects of climate change.
- Under the MOU there is an Australian Alps Liaison Committee (AALC) in which each state is represented by a senior officer which aims to facilitate development, coordination, and implementation of co-operative management programs for the Alps. This forum provides an opportunity for greater collaboration, coordination and focus on the issue of feral horses and other hard-hooved invasives in the Alps.
- To maximise this opportunity, the Commonwealth Government should fund an officer reporting to the Australian Alps Liaison Committee to focus on interstate collaboration for feral horse control.
- The Australian Alps Ministerial Council used to be another body under this MOU for Ministers to engage directly with each other on issues affecting the Australian Alps. In recent years this has been disbanded. The Ministerial Council should be reinvigorated to facilitate better management of the Australian Alps, protection of its heritage values and a focus on the issue of feral horses and other hard-hooved invasive species.

## Adequacy of state and territory laws, policies, programs and funding

### *Terms of Reference:*

*(c) the adequacy of state and territory laws, policies, programs and funding for control of feral horses and other hard-hoofed invasive species in the Australian Alps, and their interaction with Commonwealth laws and responsibilities;*

### ACT

- The ACT portion of the Alps, including Namadgi National Park and Tidbinbilla Nature Reserve, are currently feral horse free. Control of feral horses is undertaken under the Namadgi National Park Feral Horse Management Plan 2020.
- The ACT Government should be commended for its routine and effective approach to integrated feral ungulate management, using an array of control tools appropriate to the situation and terrain. This includes the use of ground and aerial shooting to ensure the effective management and protection of the ACT Alps. It has a zero-tolerance approach to feral horse incursions.

### NSW

- The latest government survey of wild horse populations in Kosciuszko National Park found that the feral horse population has increased by 4,434 or more than 30% in just two years - from 14,380 in Spring 2020 to 18,814 in Spring 2022.
- NSW is the only jurisdiction that affords legal protection to feral horses inside a national park and national heritage place through the *Kosciuszko Wild Horse Heritage Act 2018*.
- The Kosciuszko Wild Horse Management Plan was released by the previous NSW Government in November 2021, following years of inaction. The plan:
  - sets a target for the reduction of horses in the park to 3,000 by 2027.
  - envisions 3,000 feral horses being retained in the park beyond 2027 in three horse retention areas, which make up 32% of the park - a level that will still see ongoing degradation of ecosystems and wildlife in the National Park.
  - provides for the use of trapping and rehoming, trapping and transport to knackery, aerial mustering and ground shooting, but rules out the use of aerial shooting.
  - was formed under the Kosciuszko Wild Horse Heritage Act 2018 which explicitly prioritises the management of feral horses over and above the natural environment.
- Early indications are that the implementation of the plan has been insufficient to meet the goal to reduce the feral horse population to 3,000 by 2027.
- From February to December 2022, 859 feral horses were removed professionally and humanely by NPWS under this plan - well below the level required to reduce the population.

- A November 2022 evaluation of animal welfare outcomes of horse control operations found that animal welfare outcomes are prioritised, are better than predicted, meet all legislative requirements and there is no evidence of non-kill shots having been taken.

## **Victoria**

- Feral horses in the Victorian Alps occupy two separate portions of the parks, the Eastern Alps, which extend up to the NSW border with Kosciuszko National Park, and the Bogong High Plains in Alpine National Park. Current estimates of feral horses in the Eastern Alps are 2456 in the eastern Alps. In 2018 surveys on the Bogong High Plains identified 109.
- Feral horses in the Victorian Alps are managed under the Feral Horse Action Plan 2021. The plan does not adopt numerical targets such as the NSW plan, but does set overall objectives, including
  - prevent new populations of feral horses establishing across the planning area; remove isolated populations of feral horses where eradication is feasible;
  - contain and reduce feral horse numbers in core, larger populations in the Alpine National Park to prevent spread and minimise impacts on high-value vegetation communities and fauna habitats;
  - consider all control options and use the most humane, safe and effective techniques, including lethal and non-lethal methods; and
  - cooperate with the Department of Environment Land Water and Planning and NSW National Parks and Wildlife Service to remove populations from adjacent forest areas and Kosciuszko National Park
- The plan provides for the deployment of a range of control measures including trapping and rehoming and ground shooting, noting:
  - Independent experts consider ground shooting as the most humane, safe and effective method available and is an acceptable technique for the removal of individual, or small groups of horses from a location, when performed by skilled operators who hold the appropriate licences and accreditation.
- The plan also provides for the use of aerial shooting in 'exceptional circumstances'. Noting the complexity of terrain, particularly in the eastern Alps, aerial shooting is likely to be a necessary tool to effectively drive down feral horse populations.
- There are some key strengths to the Victorian approach, including commitments to the eradication of small or isolated populations and the inclusion of a number of key control measures.
- A major limitation of the Victorian plan is the absence of specific targets for feral horse reduction, particularly in the Eastern Alps.

## Measures to repair and restore native habitats

*Terms of Reference:*

*(d) measures required to repair and restore native habitats for species impacted by feral horses and other hard-hoofed invasive species in the Australian Alps, including for iconic species like the corroboree frog and the platypus;*

- Early and substantial 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.
- Rapidly reducing feral horses in the Alps needs a consistent, well-funded program across Victoria, NSW and the ACT, using best practice methods.
- Feral ungulate impacts had a significant negative effect on post-fire regeneration and restoration in the Australian Alps following the 2019-20 bushfires.
- The Australian Alps have been identified as a priority landscape under the federal government's Threatened Species Action Plan. Feral horse removal should be coupled with investment in ecosystem monitoring and restoration through an integrated program of threat abatement and species recovery.
- The AALC should develop a comprehensive ecosystem restoration plan for the Australian Alps that identifies key environmental areas for restoration, costs for implementations and timeframes.

## 5. Additional resources:

### Science of feral horse impacts:

[\*Australian Academy of Sciences: Feral Horse Evidence Brief\*](#)

[\*Journal of Ecological Management and Restoration\*](#)

[\*Feral horses are destroying fragile post-fire habitat in the Australian Alps\*](#)

### ACT:

[\*Namadgi National Park Feral Horse Management Plan 2020\*](#)

### NSW:

[\*2021 Kosciuszko National Park Wild Horse Heritage Management Plan\*](#)

[\*Final Report of the Kosciuszko Wild Horse Scientific Advisory Panel\*](#)

[\*Final report of the Kosciuszko Wild Horse Community Advisory Panel\*](#)

[\*Aboriginal cultural values report\*](#)

[\*2022 survey of the wild horse population in Kosciuszko National Park\*](#)

[\*Wildlife at risk: Reclaim Kosci\*](#)

[\*Reining in feral horses in Kosciuszko National Park - Frontier Economics\*](#)

### Victoria:

[\*Feral Horse Action Plan 2021\*](#)

[\*Feral Horses in the Alpine National Park: VNPA\*](#)

### Commonwealth

[\*Australian Alps National Parks and Reserves National Heritage Listing\*](#)

[\*Threatened Species Action Plan\*](#)

[\*Nature Positive Plan\*](#)

[\*Novel Biota Key Threatening Process Listing\*](#)

[\*Environment Protection and Biodiversity Conservation Act\*](#)

[\*Water Act 2007\*](#)