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**Submission by Shoalhaven Bushwalkers Inc. to Senate Standing Committee on Environment  
Inquiry into Impacts and Management of Feral Horses in the Australian Alps**

This submission is made on behalf of Shoalhaven Bushwalkers Inc. The Shoalhaven Bushwalkers is a club of some 250 members that undertakes both local bushwalks and walks further afield – the Kosciuszko National Park (KNP) has long been a much loved walking destination for the club so we have a particular interest in its ongoing environmental health.

We confine our submission to the inquiry's third Term 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.

In particular, our submission relates to the manifest inadequacy of the Kosciuszko National Park Wild Horse Heritage Management Plan (the Plan), adopted in November 2021 by the NSW Environment Minister, for control of feral horses in that part of the Australian Alps.

The club made a submission in 2021 on the exposure draft of the Plan in which we argued that the Plan is so flawed in a number of regards as to render it almost certain to fail in the same way that the NSW 2003, 2008 and 2016 wild horse management plans either clearly failed or in the case of the 2016 plan, failed to be adopted and implemented. Dismayingly, the flaws in the draft Plan were carried over into the final adopted Plan.

The Plan itself is a case study in how *not* to tackle the exponentially growing problem of excess feral horses in KNP and the environmental havoc being wreaked by them. Specifically, the Plan:

- lacks any sustainability-based or other rationale for the choice of the reduction target of 3000 feral horses to be retained in the park;
- is vague and noncommittal about how the reduction target of 3000 feral horses will be achieved by 2027 in (what is now) 4 years' time. In this regard we note that the number of feral horses in the park has since increased 30% to an estimated 18,800 compared to the estimated figure (14,400) cited in the Plan. The Plan's estimate is highly inaccurate with a 95% confidence interval almost as large as the size of the estimate so there may well be many thousands more feral horses in KNP;
- contains no year-on-year reduction targets, taking into account current and projected growth rate of feral horse numbers, nor does it contain any figures for the resourcing and funding required;

- deploys no new culling techniques. The previous (unimplemented) 2016 plan set itself an initial target of 5 to 10 years to reduce the feral horse population in the park from 6000 to 3000 (from which it proposed to reduce numbers to 600 in the longer term). The 2021 Plan deploys no new culling techniques yet somehow seeks to achieve a threefold higher reduction in far less time;
- rules out the most humane and effective lethal culling technique of aerial shooting without adequate explanation. The aerial culling of feral pigs and water buffalo was suspended in Kakadu National Park in 2019 to allow for a safety review and the upshot has been an explosion in their numbers over the last few years causing great damage to the environment and to cultural sites;
- allows for the retention of feral horses in four of the park's designated Wilderness areas – areas that few visitors wishing to have a 'brumby encounter experience' will enter;
- includes an uninformative wild horse *distribution* map of KNP at Figure 1. It should have contained a feral horse *abundance* map;
- includes a Wild Horse Management Areas map of KNP at Figure 2, showing proposed Retention, Removal and Prevention areas. This map should have included as overlays, the park's 9 Wilderness areas and Areas of Exceptional Significance to make clear that under the Plan, feral horses are to be retained in many of these precious areas;
- states that the Retention Area contains sites of particular cultural significance to Aboriginal custodians but there is no detail as to how preservation of these sites can be achieved while exposed to wild horses. Damaging or destroying Aboriginal Objects or Places is unlawful – it is difficult to conceive how a plan could allow for this to occur by deliberately retaining feral horses at such culturally sensitive sites;
- fails to highlight a wide-ranging opposition from various Aboriginal stakeholders to the ongoing preservation of wild horses within KNP.

No doubt the Committee will hear evidence from bureaucrats within the NSW Department of Environment and in particular the NSW National Parks & Wildlife Service during the course of its inquiry. We respectfully submit that the Committee should seek answers from them to the following questions:

1. Which part of the Kosciuszko National Park Wild Horse Scientific Advisory Panel's (SAP) advice was heeded and incorporated into the Plan? [*Comment: the Plan's Executive Summary states that the SAP's advice was considered. A reading of the SAP publicly available report makes apparent that very little of its advice as to what the plan should contain has been heeded.*]
2. Why did it take over a year to appoint the seven-member Kosciuszko National Park Wild Horse Community Advisory Panel in December 2022?
3. Can maps of KNP be provided to the Committee showing: (i) estimated wild horse abundance throughout the park and overlaid with the park's 9 Wilderness area boundaries and Areas of Exceptional Significance boundaries; (ii) the three Wild Horse Management Areas (Retention, Removal and Prevention) overlaid with the park's 9 Wilderness area boundaries and Areas of Exceptional Significance boundaries?
4. How will sites of particular cultural significance to First Nations custodians within the park's Retention Area be preserved from continued exposure to wild horse damage?
5. Can details be provided to the Committee of the ongoing opposition from various Aboriginal stakeholders to the preservation of wild horses within KNP?

6. Why does the Retention Area include a section of the Snowy Mountains Highway, creating an obvious safety hazard for motorists?
7. Why does the Retention Area subsume the Byadbo Wilderness and include parts of three other Wilderness areas when few people will enter those areas in order to encounter wild horses?
8. Why does the Retention Area include areas of alpine sphagnum bogs and associated fens – listed Threatened Ecological Communities particularly susceptible to damage from hooves?
9. Why does the Retention Area include the source of the Goobarragandra River, the headwaters of the Murrumbidgee and Jacobs Rivers, and stretches of the Upper Snowy River, given that these places are particularly susceptible to damage as well as having high ecological and cultural values?
10. What is the scientific rationale for the wild horse retention target figure of 3000?
11. How is a retention target of 3000 and the horses' likely distribution within the Retention Area compatible with the preservation of the park's environmental values?
12. What are the proposed year-on-year reduction rates over the next 4 years to achieve the 2027 target, taking into account the current and likely natural population growth rates?
13. What year-on-year resourcing and funding has been allocated to the reduction task?
14. In regard to aerial shooting, the Plan states (p.20):  
*Animal welfare assessments advise that, if undertaken in accordance with best practice, aerial shooting can have the lowest negative animal welfare impacts of all lethal control methods (Kosciuszko Wild Horse Scientific Advisory Panel 2020; ITRG 2015). However, there is a significant risk 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. In addition, government policy since 2000 has been not to undertake aerial shooting of horses in national parks. Taking these factors into account, this plan does not provide for aerial shooting.*
  - (i) Why would a social licence to remove feral horses from KNP countenance lethal control methods with greater negative animal welfare impacts than aerial shooting, particularly given that aerial shooting is the most effective method of controlling numbers?
  - (ii) If NSW government policy changes in the future to allow for aerial shooting of feral horses, will the Plan be amended to provide for aerial shooting?

We hope the Committee will be able to obtain detailed answers to these questions and thereby extract information that was sorely lacking in the Plan and we look forward to the Committee's published report. Thank you for the opportunity to make this written submission.

John Souter  
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