



Draft Kosciuszko National Park Wild Horse Heritage Management Plan 29 October 2021

The Royal Zoological Society of New South Wales (RZS NSW) is Australia's oldest and largest zoological society, including professional zoologists and ecologists and members of the broader community passionate about the conservation of Australia's unique animals. The Society 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]

RZS NSW 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. RZS NSW also acknowledges that feral horses are of heritage value to some people and that there is a need to retain such values into the future.

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 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.

While the draft plan represents a significant step in the right direction, RZS NSW 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 an urgent need to reduce feral horse numbers more quickly in order for the Park to recover from drought, extensive bushfires and overgrazing. In addition, 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 where threatened species occur. In addition, feral horses will not know the arbitrary boundary where they are protected or not, and they will continue to move back into areas that they previously occupied. This will set up the need for a never-ending control/management program to keep feral horses within the retention areas. RZS NSW is concerned that this approach will fail, will consume scarce and valuable resources needed for other aspects of conservation management, and ultimately require the need for fences 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 should be identified as a priority, so that all of the Park can be protected from the impacts of feral horses. National Parks have been set up, after all, to protect the natural environment.



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.

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 Park. 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 why 3,000 horses need to be retained across 32% of the park to retain heritage values. Indeed, we are not aware of any precedent in Australia or globally where policy has been created to deliberately maintain an environmentally destructive introduced species in a national park. We would be concerned if this were to be the case here.

Summary

In summary, RZS NSW 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.
- 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.

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