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Australian Academy of Science submission to the New South Wales Department of Planning, Industry and the Environment public consultation on the draft Kosciuszko National Park wild horse heritage management plan

The Australian Academy of Science welcomes the opportunity to contribute to the consultation on the Draft Kosciuszko National Park wild horse heritage management plan.

The scientific evidence is clear

The Academy considers that the scientific evidence on horses in Kosciuszko National Park is sound, clear and sufficient to inform management decisions. The strength of this evidence is reflected in the draft management plan (for example: “The [NSW Threatened species] listing acknowledges the negative impact of wild horses on wetlands, watercourses and riparian systems; alteration of the structure and composition of vegetation; and reduction in plant biomass”; “Scientific evidence shows that the distribution and abundance of wild horses in the park is causing significant negative impact on the environmental values of the park”). It is also reflected in the report of the Scientific Advisory Panel (SAP). This evidence is not unclear or in doubt – multiple lines of evidence point to the same conclusion. While scientific evidence is not the only input into government strategic processes, it should nevertheless not be ignored, and the Department must give it due regard.

The impacts of feral horses have led the Academy to support a policy position of removing horses from Kosciuszko National Park.^{1,2} In 2018, the Academy hosted *Feral Horse Impacts: The Kosciuszko Science Conference* to showcase and communicate the science of feral horse impacts in Kosciuszko National Park.³ The Conference, and the special edition of the scientific journal *Ecological Management and Restoration* published in parallel,^{4,5} established that feral horses have substantial impacts on the environmental values of Kosciuszko National Park, including its unique landscape, vegetation, fauna and hydrology. We have subsequently prepared a briefing paper summarising recent scientific developments, which is attached to this submission.

Reduce feral horse numbers beyond the target

Evidence from the Victorian High Plains indicates that even small numbers of horses can continue to damage environmental values.⁶ The growth rate of wild horse populations is estimated at about 18% per year, and maintaining the provisional target population requires the ongoing removal of horses through animal control methods. Maintaining a population of horses while simultaneously excluding them from certain areas of the park and acting to protect endangered species within their range is likely to prove expensive and difficult.

Use effective methods of animal control that meet animal welfare standards

Any animal control method taken to control wild horses should be done in accordance with ethical principles and meet animal welfare standards. Best practice will ensure that animals do not suffer needlessly. As noted in the SAP report, this may include ground shooting or aerial shooting (under appropriate circumstances).

Rethink horse retention areas; consider extra-park options to preserve heritage

The Academy is concerned that maintaining horse retention areas, even with reduced populations, will cause continued damage to the native Australian ecosystems, flora and fauna. This is counter to the role of the National Park in preserving these environments. Consideration should be given to preserving the heritage values of the horses outside of the National Park system, such as on private land.

Repeal the *Kosciuszko Wild Horse Heritage Act 2018*.

As previously noted by the Academy¹, the *Kosciuszko Wild Horse Heritage Act 2018* is a flawed piece of legislation, which creates an imbalance between the scientific and cultural advice presented to the Department, clearly prioritising the latter. The hierarchy of advice established under the Act means non-scientific, non-evidence-based considerations are afforded a privileged status. This will inevitably lead to the situation where decisions made by the Department do not reflect the reality of Kosciuszko National Park, with the outcomes of these decisions being unclear and opaque due to a lack of established baselines for monitoring them.

Clear gaps between the monitoring required and monitoring encompassed in the plan.

The Scientific Advisory Panel (SAP) is an important and relevant input into developing a wild horse management plan. The SAP final report describes a coherent, actionable approach to the management of wild horse populations in the National Park. Importantly, the SAP report provides a strategic, evidence-based, adaptive management approach that prioritises the National Park's scientific and ecological properties, as measured by objective criteria.

An evident deficiency in the SAP is its subordinate position to the Community Advice Panel under the *Kosciuszko Wild Horse Heritage Act 2018*, as noted above. This leads to the situation where the scientific advice provided to government is inappropriately downgraded. This is most clearly demonstrated by the discrepancy between the SAP's recommendation for ongoing monitoring and the draft management plan's lack thereof. The SAP recommends extensive, frequent and continuous monitoring of horse populations, environmental outcomes and impacts on Indigenous heritage sites, supporting an adaptive, responsive management strategy. This recommendation aims to answer questions that remain about the impacts of management strategies, to make them more efficient and effective. By contrast, the draft management plan provides for a review, not to take place until June 2027, which will merely "take into account any monitoring and research data that is available at that time."

Ongoing management of wild horses in Kosciuszko National Park and preservation of its ecosystems will require extensive monitoring, scientific observations, and research, as well as a strong commitment to collecting and acting on such data. It will require active, responsive, well-informed management of the feral horse herds with the aim of removing them from the Park entirely. Inaction on the part of the NSW government has already allowed the herds to grow and the damage to continue. The draft management plan pretends otherwise and is seriously flawed because of it.