



The Australian Brumby Alliance

ABN : 90784718191

Submission to the Natural Resource Commission: Part-1 Pest Animal Management Review (NSW) 12th May 2016

Thank you for the opportunity to provide feedback on NSW's Pest Animal Management draft plan released April 2016.

The Australian Brumby Alliance (ABA) Inc. was formed in April 2008. Its mission is to act as a National Body for the Recognition, Management, Preservation and Welfare of Australian Wild Horses (Brumbies). Member groups have developed a solid understanding of the skills and complexities required to collect Brumbies trapped by park removal programs, then gentle and rehome them. Rehomed brumbies are suited to a range of general equestrian activities including endurance riding, horse shows, children's ponies, carriage work and/or simply the family 'special'.

ABA members have worked with park staff in New South Wales, Victoria and Queensland to implement the most humane method of brumby control *if* respective park/forestry management plans require Brumby numbers to be lowered.

The ABA applauds the plan's comprehensive pest strategy and for acknowledging that Brumbies are seen by many as a cultural icon with strong cultural and historical importance.

The ABA submission in response to the draft Natural Resources Commission (NRC) – Pest Animal Management Review (PAMR) for NSW consists of three parts which are titled;

- **Part-1;** ABA responses to Wild Horse information in the NCR-PAMR draft report,
- **Part-2;** ABA responses to NRC-PAMR Recommendations, and
- **Part-3;** ABA response to the Independent Technical Reference Group (ITRG) report to the NPWS KNP wild horse management plan. We have also added to this report (as an attachment) the ABA submission to the ITRG.

Key

NRC Natural Resources Commission

PAMR Pest Animal Management Review

ABA Australian Brumby Alliance Inc.

KNP Kosciuszko National Park

ITRG Independent Technical reference Group [report to the KNP Wild Horse review]

NPWS National Parks and Wild Life Service (NSW)

References, A comprehensive list of references is provided at the end of this document

NRC - 7.2 VALUING SCIENCE AND HERITAGE – FERAL HORSES

NRC - *Issues surrounding feral horse management are complex and often contentious, attracting much public interest. Feral horses or brumbies are seen by many as a cultural icon with strong cultural and historical importance.*

We request there be formal recognition of Wild Horses, also known as Brumbies, as a cultural icon with strong cultural, social and historical heritage values.

The ABA does not support the use of the NRC terminology “feral horses” throughout the document and request it be changed to Wild Horse or Brumby.

NRC - *An independent technical reference group is currently reviewing the Kosciusko National Park Wild Horse Management Plan. The plan will identify objectives for managing the feral horse population within the park, and provide wide-reaching guidance on the most effective and appropriate control methods.*

In this regard please refer to ABA Part-3, i.e. our response to the ITRG report.

NRC - *There are no known predators of feral horses, although dingoes or wild dogs occasionally take foals (Markula et al. 2009).*

Brumbies have several predators including snakes, dogs, and humans (opportunistic shooting and brumby running) and they are also impacted by climatic events such as drought, snow dumps and wild fires e.g., severe wildfires in 2003 reduced Brumby numbers by 64% in KNP. However we acknowledge these predators and climatic events may be in-sufficient to control numbers.

NRC - *A recent report by Worboys, Freudenberger and Good (2015) found that feral horses have an adverse impact on the ecosystems of national parks, in particular the Australian Alps.*

Both native and non-native species spread weeds, e.g. birds, kangaroos, wombats, deer, goats, and humans. Claims by Worboys (2015) of negative Brumby impact in KNP, ignore the wealth of overseas and some Australian research which refutes these claims, [refer to **Ref-1**], such as;

- Humans introduced exotic weeds, (Scotch/Spanish Broom, Lupins, willows to KNP);
- Seeds are primarily dispersed by gravity, wind, surface water movement, soil erosion, birds, ants, dung beetles and rodents;
- The invasion and success of exotic and introduced species in rivers is facilitated by the alteration of the Snowy Hydro Scheme flow regimes;
- Clothing on 33,000 annual hikers visiting Kosciuszko significantly spread seeds

NRC – *The Brumby population has increased by 30 percent in just 5 years from 4,200 (2009) to 6,000 (2014) despite authorised control methods being in place.*

This statement does not recognise that NPWS trap skills have significantly improved during this five year period to the extent that NPWS can now remove 670 in one year.

The Parks Victoria draft management plan, June 2014 “Greater Alpine National Parks” (page 28) refers to a target population of 5,000 which was the population level in 2001, and states “*Modelling suggests that to return the population size to 2001 levels (around 5,000 horses)*” and “*Once this target population size is reached approximately 900 horses would need to be removed each year to maintain the population at this level*”.

Therefore if the existing authorised control method i.e. “Passive Trapping” is effectively implemented annually, complemented by fertility control applied by dart gun on free roaming Brumbies, a target population of 5,000 can be sustained.

With regard to fertility control PZP has been used to control birth rates on USA Mustangs for 30 years, and the Dartmoor Hill Pony Association is in its final three year trial of GonaCon, applied by dart gun to wild Dartmoor ponies. A foal not born is a Brumby that does not need to be removed.

The ITRG advise a 2 tier approach;

- Short term (5 years) – removal of horses from key zones for the purpose of asset protection, and moving towards acceptable numbers across the park, and
- Long term (20 years) – strictly managed presence of horses in designated parts of the park, unacceptable environmental impacts minimised, and the need to remove large numbers of horses minimised.

The short term could be to reduce the population to 5,000, and the longer term to work on impact level indicators (of all species) and conduct research on the ecology of horses in KNP, as suggested by the ITRG because “*Surprisingly little is known about the ecology of horses in KNP, and very useful information would come from funding PhD projects on behavioural ecology, demography, movement ecology, habitat preference, and abundance*”.

NRC - *In 2015, this distribution has spilled over into the ACT from NSW and into the water supply catchments of Canberra.*

The presence of Brumbies in water supply catchments does not represent a risk to humans or water quality. This statement is based on the research undertaken by Adda Quinn (1998) who researched the potential risks of horse manure, and concluded “*The chemical constituents of horse manure are **not toxic to humans**. Horse guts do not contain significant levels of two waterborne pathogens of greatest concern to human health risk, *Cryptosporidium* or *Giardia*, neither do they contain significant amounts of the bacteria *E. coli* 0157:H7 or *Salmonella*.*” Please refer to **Ref-2** for further information.

NRC - ENVIRONMENTAL IMPACTS OF HORSES

NRC - *As an introduced, hard-hooved and large herbivore, any established populations would be expected to impact on the native vegetation and environment. While there are no peer reviewed studies of the situation in Australia, globally, there is documented evidence (Nimmo and Miller) (2007) for substantive review and references, of feral horse impacts.*

The above statement is not balanced as it does not take into consideration the impacts to native vegetation and the environment across KNP caused by climate, humans and other species, for example:

- DPI Victoria reported in February 2003 that major flooding, affected water quality and increased the risk of long-term erosion;
- High and fast flows have caused destabilisation and erosion of river banks, scouring and removal of vegetation;
- Thousands of people flocked to mine sites in the Australian Alps, including Kiandra and Walhalla particularly after 350 kms of tracks were built to link the goldfields; and
- Seeds are primarily dispersed by gravity, wind, surface water movement, soil erosion, birds, ants, dung beetles and rodents, to name but a few sources of impact that are significant, compared to any caused by Wild Horses.

Please refer to Ref-3 for further information.

NRC - KEY STAKEHOLDERS IN FERAL HORSE ISSUES

NRC - *There is always a strong human dimension to feral horse management, given the place brumbies have in Australian folklore. Management techniques to control overabundance can draw equal amounts of criticism from animal welfare groups lobbying for their preservation, farmers who view them as a resource to be harvested, and conservationists concerned about their impacts on native habitats. Yet there are currently no peer-reviewed studies that focus on the social dimension of feral horse management in Australia (Nimmo 2007).*

We agree with this statement and would support targeted social dimension studies on Wild Horses.

NRC - *The solution to date has been to develop collaborative feral horse management plans, typically through a workshop process (NSW National Parks and Wildlife Service 2008).*

While NPWS NSW have had separate discussion between groups of differing views, during their long consultation process, views will remain polarised. The ABA supports the need for plans to be *developed collaboratively* because, until all key parties can sit around one table to gain consensus, management plans will remain polarised and swayed by politics.

NRC - MANAGEMENT OBJECTIVES AND TECHNIQUES FOR FERAL HORSES

NRC - *Aim of feral horse management is to reduce the damage caused to an acceptable level.*

We support sustainable Brumby population in healthy environments. However to determine an “*acceptable level*” the damage caused by all species in an area and from natural elements e.g. severe wild fires, wind, frost, climate change etc. must be clearly identified through appropriate studies and then management objectives can be developed based on facts.

NRC - *Techniques currently used in NSW do not appear to be effectively managing numbers (and) the recent Worboys et al. (2015) report noted that ‘current wild horse control actions in NSW and Victoria are inadequate, underfunded and inconsistent with Federal and State legal Responsibilities to protect threatened Australian species’.*

NPWS’s failure to sustain their effective trap rate of 670 Brumbies annually, has significantly compromised NPWS Wild Horse management strategies.

NRC – (Feral Horses) damaged *heavily disturbed wetland, Pilot Wilderness, Kosciuszko National Park, New South Wales, Australia.*

Horses do not like wet ground, they like sure footings to retain their agility and to be able to easily flee from danger. Pigs love wet ground to root around in and to wallow in. What evidence does Worboys use to identify which species have contributed to the damage he refers to? What proportion, if any, of the damage is directly due to horses?

NRC - Worboys 2015 (page 506) talks of *old breeds of cattle and horses that mimic extinct herbivores roam the area and, together with beavers, deer and geese, control vegetation to improve spatial variety and create habitats for other species* [in Millingerwaard, the Netherlands.

The ABA **supports** the need to mimic extinct herbivores and sees the Australian Brumby as the closest herbivore to be able to mimic Australia’s Megafauna such as;

- The giant short-faced kangaroo with a hoof-like toe that cut into soil and gave protection to growing native seedlings.
- Diprotodon optatum, Zygomaturus trilobus and Palorchestes azael weighing between 1,000-2,000 kgs and 9 species weighing 100-1,000 kgs. By comparison, Brumbies weigh around 550 Kgs. [Ref - http://en.wikipedia.org/wiki/Australian_megafauna].
- Procoptodon goliah weighed up to 230 kilograms. It had a flat shortened face with jaw and teeth adapted for chewing tough semi-arid vegetation, forward-looking eyes, stereoscopic vision and a hoof-like, fourth toe.

Please refer to **Ref-4** for further information.

In addition:

- studies overseas have shown that Wild Horses, in managed numbers, add to the ecology’s bio-diversity [refer to **Ref-5**];
- we are concerned that those species already adapted to the broader bio-diversity niche that has evolved with Brumbies for around 200 years will be disadvantaged if Brumby levels drop below sustainable levels;

- the NPWS exclusion plots with highly inflammable dry tall grass inside the plots, surrounded by short green grass indicate what will happen if grazing animals are removed, the outcome of such action may have serious consequences to property and life.

Consequently there is an urgent need to do a thorough impact assessment before making changes, and to monitor and review results if changes are subsequently made.

NRC – NPWS uses long-term monitoring enclosures to determine the impacts of introduced species such as wild horses in the Victorian Alpine National Park, Australian Alps.

The use of long-term monitoring enclosures does not take into consideration firstly the many areas of park that are occupied by wild horses that do have healthy ecology and stream banks, and secondly the fact that wild horses do not generally occupy an entire park, for example they are only located in approximately 45% of KNP.

NRC - Aerial shooting – Conditionally acceptable - Effective Relatively expensive, Can be cost-effective when horse density is high - Target-specific Suitable for extensive areas and inaccessible country. Most effective way of achieving quick, large-scale culling.

We are **strongly opposed** to aerial shooting for the following reasons:

- it fails to meet the RSPCA definition of humane killing i.e. “when an animal is either killed instantly or instantaneously rendered insensible to pain until death supervenes”;
- it is not possible to guarantee a kill, first shot, every time, when shooting horses, from helicopters, as they are a moving target, there are shifting draughts, and often vegetation to contend with;
- rough, steep, canopied terrain markedly increases injury risk & foal separation;
- it is impossible to ensure ground back-up can promptly kill each wounded horse; and
- more humane removal methods are available; e.g. passive trapping & fertility control.

Note; the RSPCA in 2002 laid 12 charges of cruelty against NPWS NSW for aerial culling undertaken in Guy Fawkes National Park (NSW) in 2000 [see next page for more detail].

NRC - Trapping – Conditionally acceptable. Cost efficient method of capture.

We **support** passive trapping as the preferred option where a need to lower Brumby numbers, to a specified level, in order to reduce impact levels that directly arise from Brumbies, has been proven and forms part of an overall species removal strategy.

NRC class - Mustering – Conditionally acceptable.

We **support** Slow Mustering, where the horses are moved forward at pace of the slowest horse, either by aerial or ground mustering, where a need is proven.

NRC class - Ground shooting – Acceptable.

We **reject** the ground shooting of unrestrained Brumbies because of the inability to follow up an escaping wounded horse and inability to gain a single kill head shot. [Please refer to Part 3. ABA submission to the ITRG for more detail]

NRC class - *Immobilisation and lethal injection* – Acceptable

We **reject** using tranquilisers and lethal injection on wild, unhandled horses for the purpose of killing them due to;

- the unnecessary stress caused by restraining the horse to safely inject it;
- horses being fearful of falling to the ground;
- brumbies requiring significantly higher tranquilliser dosage than domestic horses; and
- the lethal drugs used will enter the soil.

We **recommend** NPWS trapped Brumbies, unable to be collected by relevantly skilled rehomers, be euthanased at the trap site, by a head shot in an adequately screened knock box

NRC class - *Fertility control* – Conditionally acceptable, not currently effective, expensive, and not practical for large-scale control.

We **accept** fertility control as a humane option, such as PZP and GonaCon which can be accessed in Australia and administered by dart gun. We can access these two drugs that have been proven safe and are currently used overseas and applied at a cost of less than 5% of the costs NPWS quote to trap one Brumby [NPWS website \$1,000 per Brumby]. Overseas applications are effective on groups of wild horses between 200 and 500 in size. [see the ITRG ABA submission which is an attachment to this submission]

We would also **recommend** that fertility control should be used to complement passive trapping programs, especially for Brumbies in hard to access areas or hard to trap areas.

NRC - All control techniques proven to be effective should be available to bring populations to acceptable levels.

We **reject** this statement, rather only the most humane option should be used. Any control method being considered must:

- ensure that, if management of wild horses is justified, any stress or injury risk is avoided and only the most humane option is selected;
- work to an agreed target population of sustainable, genetically viable, numbers;
- be consistent with the RSPCA definition of humane killing which is when an animal is either killed instantly or instantaneously rendered insensible to pain until death supervenes;
- ensure lethal methods are only used when all other, non-lethal, humane and effective alternatives that achieve management plan goals have been reviewed.

NRC - However, an independent review of the protocols and procedures used in the operation subsequently found that the aerial shooting was both appropriate and carried out humanely (NSW National Parks and Wildlife Service 2003).

We are very **concerned** regarding the inclusion of this statement within the document. The “independent” review failed to take into account that the RSPCA NSW reviewed 224 counts of cruelty and laid 12 charges of cruelty against NPWS NSW, to which the NPWS plea bargained to one account of cruelty and paid RSPCA’s costs.

NRC - *What constitutes a successful feral horse management program? Dawson et al (2006) suggest that feral horse management programs work well when they:*

- *are adequately resourced*
- *have clear objectives based on sound science, best practice guidelines and local knowledge (i.e. community)*
- *set control targets*
- *determine appropriate methodology*
- *consider the welfare of feral horses*

To *consider the welfare of feral horses* is not sufficient, **Humaneness** *must* be the top priority. We **recommend** that “only the most humane methods must be used” be added to the list.

NRC - *Good relationships with land owners, animal welfare groups, horse and conservation advocates, and professionals (such as horse handlers and scientists) are essential if a program is to be successful.*

We **agree** with this statement provided the professionals list be extended to include experienced Wild Horse rehomers.

NRC-*Future management plans for feral horses should balance the need to minimise impacts on sensitive ecological areas via population control, while also recognising the heritage value of horses across the wider landscape.*

We **agree** with the above paragraph.

NRC - *Any further changes to the management of feral horses across NSW, including using best practice management techniques, should be based on the research and consultation currently being undertaken for the Kosciusko Plan of Management.*

We have **significant concerns** regarding the research and consultation process being undertaken by NPWS for the Kosciuszko Draft Plan Of Management. In this regard please refer to ABA Part-3, response to ITRG report.

NRC - THE ISSUE - ONE PAGE HORSE IMPACTS AND MANAGEMENT SUMMARY WORDING.

It is requested the full draft and subsequent summary be updated taking into consideration the matters raised by the ABA above.

NRC - DRAFT REPORT (3) RECOMMENDATIONS

NRC - *The draft report recommends the NSW Government should finalise the work of the [ITRG] Independent Technical Reference Group and respond to the groups' findings.*

In this regard please refer to ABA Part-3, response to ITRG report.

NRC - *Feral horses should be removed in ecologically sensitive areas, using best practice management techniques after consideration of the recommendations of the ITRG panel.*

We **reject** this statement. Wild Horses should only be removed after comprehensive assessments have been conducted on all species that may impact on areas considered “sensitive”, and an agreed, viable, sustainable population level is identified. Further clarification of what areas are considered “sensitive” should also be provided.

NRC - *The heritage value of feral horses should be recognised within the feral horse management program, and an acceptable feral horse population level should be maintained across the landscape.*

We **agree** the heritage value of Brumbies must be recognised within the park. However we are seriously concerned regarding the process used to determine what is an “acceptable” wild horse population. The NPWS draft plan, just released, will reduce the current wild horse population by 90%, ie from 6,000 to 600. This is totally unacceptable, and equates to a *manage to extinction* program.

The ABA strongly advocates for an acceptable population level that will ensure the Snowy Heritage Brumby will be ongoing and still around to show future Australians a living part of early settlement history.

Survival of robust Brumby populations is dependent on the ability for a wild horse population to roam free over at least 70% of the area they live in, which in the KNP is only 45% of the overall park. This is necessary to;

- a. maximise the essential genetic mix,
- b. maintain their social family groups, and
- c. allow for a 64% (or higher) death rate such as occurred in the 2003 severe wild fire.

We trust the above will be given due consideration during the revision of the draft plan. Please do not hesitate to contact myself via pickjill@hotmail.com or, Anne Wilson on awilson151011@hotmail.com or mob: 0400-544-955, if you have any queries regarding the above.

Kind Regards

J. Pickering

President, Australian Brumby Alliance Inc.
11-May-2016

References

Ref-1 Weed Dispersal

- Seeds are primarily dispersed by gravity, wind, surface water movement, soil erosion, birds, ants, dung beetles and rodents.
http://www.bcha.org/media/uploads/2015/11/13/files/Gower2008_Forest_Ecology_Eastern_US_weeds-horses_full_article.pdf
- In the 1950s and 1960s Scotch or Spanish Broom, Lupins, willows and other exotic trees were introduced during the building of the Snowy Scheme. While NPWS was not involved in introducing these weeds, a major restoration program treating and removing these species is in place. [Reply by NPWS NSW to their online chat website query 2015]
- Hikers spread invasive plant seeds (2011)
<http://weedsnetwork.com/traction/permalink/WeedsNews1938>
- Compares vegetation on Horse dung.
<http://link.springer.com/article/10.1007/s11258-008-9468-0#/page-1>
- Janzen is the researcher who has done the most studies on seeds in horse manure.
<http://www.americantrails.org/resources/wildlife/horseenvironment.html>

Ref-2 Horse Manure is not toxic to humans

- Adda Quinn's manure paper <https://www.bayequest.info/static/pdf/manure.pdf>

Ref-3 Soil loss, compaction and erosion

- Detecting stream health impacts of horse riding and 4WD vehicle water crossings in South East Queensland: by Sally-Anne Redfearn, Wade Hadwen (Griffith School of Environment). Peter Negus, Joanna Blessing, Jon Marshall, (Water Planning Ecology, Qld Environment and Resource department)
- Fire Management in the Alpine Region; Vic Jurskis, Paul de Mar (Forests NSW) and Barry Aitchison (NSW Rural Fire Service).
- Invasive Species discussion paper Greater Alpine National Parks 2010
http://parkweb.vic.gov.au/_data/assets/pdf_file/0009/534096/Invasive20Species1.pdf
- Post
http://www.depi.vic.gov.au/_data/assets/pdf_file/0007/192949/The-recovery-story-body.pdf
- 2003 severe fires recovery program by DPI Victoria. Asset Repair and Replacement Snowy Hydro-electric and irrigation scheme: A situational and critical analysis by Diane Cousineau and Nathan Cammerman.
https://www.google.com.au/search?q=Kosciuszko+mining+erosion&ie=utf-8&oe=utf-8&gws_rd=cr&ei=51IEV-qIK8i30ASDioSoBQ

Ref-4 Megafauna

https://en.wikipedia.org/wiki/Australian_megafauna

Ref-5 How Wild Horses can increase bio-diversity

- The ecological forces—herbivory, physical impact, and deposition—of grazing ungulates have shaped natural grazing ecosystems around the world. Grazing ecosystems evolved with and depend upon herbivory, heavy hoof action, nitrogen deposits, and decomposing carcasses of large migratory ungulates. When introduced into ecosystems that did not evolve with frequent grazing, these forces can alter biological communities and ecosystem function.

Grazing animals contribute to nutrient cycling by depositing nitrogen-rich urine and dung, and their carcasses can provide an important contribution to the food web and their hoof action, pawing, and wallowing, grazing animals trample plants, break up soil surfaces, incorporate seed into the soil, and compact soils.

<http://www.fws.gov/invasives/staffTrainingModule/methods/grazing/impacts.html>

- Horse faeces contain less thoroughly decomposed vegetable matter than would a ruminant's which more greatly aid in building the nutrient-rich humus component of healthy soils. This leads to better water retention and nutrient level for root absorption. http://www.naturalhorse.com/archive/volume7/Issue3/article_5.php
- Manure from livestock may contribute as much as 35 % of soil organic matter [Steinfeld et al.1996] and helps maintain soil structure, water retention and drainage capacity.
- Organic components of faeces and urine from grazing animals can build soil organic matter reserves, resulting in soils having increased water-holding capacity, increased water-infiltration rates, and improved structural stability. These changes can decrease soil loss by wind and water erosion (Hubbard et al. 2004).
- “When Livestock are good for the environment: Benefit-sharing of environmental goods and services” - Robin Mearns explains “The passage of herbage through the gut and out as faeces modifies the nitrogen cycle, so that grazed pastures tend to be richer in nitrogen than ungrazed ones”.
- Grazers enhance mineral availability by increasing nutrient cycling within patches of their waste and increasing nitrogen availability to plants (Holland et al. 1992).
- <http://www.agr.gc.ca/eng/science-and-innovation/agricultural-practices/soil-and-land/riparian-areas/grazing-a-natural-component-of-grassland-ecozone-riparian-systems/?id=1220563603657>
- Niche construction, co-evolution and biodiversity. Laland, K.N., Boogert, N.J., Niche construction, co-evolution and biodiversity, Ecol Econ (2008), doi:10.1016/j.ecolecon.2008.11.014

Why picking our battles helps save our species Viv & Ayesha Tulloch, ABC Environment 30 Apr 2015.

<http://www.abc.net.au/environment/articles/2015/04/30/4226211.htm>

- There is wide acceptance that grazing wetland sites can be a valuable tool in creating the right conditions for certain species to thrive. [Wicken Fen NNR/Carol Laidlaw] Carol Laidlaw is the conservation grazing warden working at Wicken Fen for the National Trust. Contact: National Trust, Wicken Fen NNR, Lode Lane, Wicken, by Ely, Cambs CB7 5XP; e-mail: carol.laidlaw@nationaltrust.org.uk; website; www.wicken.org.uk
- Livestock grazing is essential for the management of many of England's important wildlife habitats. Grassland, heathland, wood pasture, floodplain and coastal marshes all require some grazing to maintain the structure and composition upon which a variety of plants and animals depend for their survival. Livestock grazing plays a key role in maintaining species-rich habitats by controlling more aggressive species which would otherwise dominate these areas and by preventing scrub encroachment.
- Ponies preferentially graze grasses and generally avoid eating flowering plants, allowing them to thrive and multiply.
<http://www.wildlifetrusts.org/conservationgrazing>
- The absence of grazing, open spaces will lose their rich diversity of plants and animals. Small fragile flowers and grasses will disappear as aggressive and competitive woody plants out-compete them for water and sunlight. Conservation Grazing email: cathy.wainwright@wildlifebcnp.org, The Wildlife Trust, Lings House, Billing Lings, Northampton, NN3 8BE Telephone: 01604 405285.
- Ponies are ideal for conservation grazing on heath and moorland. On wet grassland and wetlands, pony grazing is critical to maintain open, tussocky vegetation on which many rare species depend. Ponies instinctively avoid deep boggy areas and negotiate difficult terrain with ease. To find out more email admin@dpht.co.uk