



# *The Australian Brumby Alliance*

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## **Part-3 Submission to the Final Report of the Independent Technical Review Group - Supplementary to the Kosciuszko National Park Wild Horse Management Plan**

Whilst not fully supporting all findings and recommendations the ABA would like to congratulate the Independent Technical Review Group on preparing such a thorough comprehensive report.

We would like to highlight that we support many of the findings in the report including those listed below to name a few:

- passive trapping and mustering in small groups has the lowest impact on animal welfare;
- funding PhD projects to undertake research on behavioural ecology, demography, movement ecology, habitat preference, would be beneficial;
- wild horses are culturally significant; and
- care should be taken not to extrapolate findings from high Alpine areas to all drainage line types or types of impacts in other habitats.

However we are very concerned about the obvious disregard to the key findings within the Draft KNP Wildhorse Management Plan.

Below outlines our key areas of concern.

### **Key Finding IV**

We agree that too many of any species, including human, will eventually lead to unacceptable impact levels and therefore intervention methods are required. However the ITRG report infers that environmental harm is sufficient that wild horses must be managed, without showing what proportion of damage, if any, is caused directly by horses versus by pigs, goats, deer, rabbits and the range of pest animals listed in the NRC draft paper.

### **Key Finding VIII**

Fertility control is proven safe and reliable, there can be negative social impacts to Wild Horse social structure, but they can be virtually eliminated by *best practice application*.

## **Key Finding IX**

The ABA **supports** an integrated approach of control methods based on the assumption that Brumbies would continue to be located where they are currently found which only equates to 45% of entire KNP area.

The NPWS decision to cull Brumby numbers to 600 is in direct opposition to the ITRG view that adaptive decisions must be made after reviewing previous actions, and in particular the ITRG position that *surveys of environmental damage* (instead of just horse numbers) and robust measurement of its trends over time, should be applied in future.

## **Recommendation No. 5.**

We would only support a combination of the following control methods passive trapping, fertility control, and buffer zones to protect a few sensitive areas. Trapped Brumbies, unable to be collected by suitable rehoming people, should be shot at the trap site, with suitable screening.

We do not support aerial shooting as an optional control method.

## **Section 2.1 Assessing Trends in Horse Numbers**

We are very concerned that the population increase is based on just ‘foaling to adult’ survival rates without including the adult death rate, which anecdotally averages 10 years, and equates to 10%. This must be deducted from the foaling to adult survival rates to calculate the true population increase.

## **3. Do horses have an impact on park values?**

The first paragraph in this section states that “*the balance of evidence indicates that wild horses are having a significant negative environmental impact is particularly true for alpine bogs, waterways and drainage lines, and that supposed positive environmental impacts are not supported by scientific evidence.*” However the ABA has research which provides evidence of positive horse impacts and these were referenced in Part 1 of our submission.

The report then states that “*on the other hand, the ITRG recognises the cultural significance of wild horses in the region, as detailed in the Context (2015) report*”. We fully support this statement.

### **3.1.2 Environmental impacts**

To avoid repetition please refer to responses in Part-1 of our submission to the draft NRC Pest Animals Management review.

Further we would like to highlight that while the ITRG found the report ‘An assessment of feral horse impacts on treeless drainage lines in the Australian Alps’ prepared for NPWS in 2015 (Robertson et al. 2015) had substantial evidence to indicate that wild horses have a significant negative impact on small drainage lines at high altitudes, they also pointed out that;

- *Despite the study’s encompassing of alpine and sub-alpine regions of Victoria, NSW and the ACT, it focuses only on treeless ephemeral drainage lines (Robertson et al. 2015) within those regions and*

- This focus should be noted and care taken *not to extrapolate* the findings across all drainage line types or types of impacts in other habitats.

### **3.1.4 Do horses have a positive ecological impact in KNP?**

ABA has a collection of reports identifying that horses can and do have a positive impact on the environment. References for some of these reports are provided in Part 1 of our submission.

We do agree that a key factor is managing the horse numbers to an acceptable level.

### **3.2 What is the relationship if any between horse numbers and impact on park values?**

We support the ITRG finding that impacts occur on multiple spatial scales, but usually need management at a local level. However we do not agree that all areas within KNP have such high conservation values that *any* damage is unacceptable. This observation follows field visits and the 2 day visit I attended with NPWS and other lobby groups.

### **4 If horses have to be removed, what methods are currently or potentially available?**

The report states: *If lethal control is required, we found that best practice aerial shooting had the least potential adverse impact on wild horses, noting however that this is currently out of scope for KNP.*

Yet aerial shooting is proposed within the Pest Animal Management Review which we find very discerning, for the reasons we have already stated.

### **5.3.2 What is an acceptable density?**

We support the ITRG finding in this regard, i.e. that once threshold population - impact levels are known, definite target densities can be set in different plant communities.

What we are concerned about is the seemingly non-negotiable level of 600 brumbies set by NPWS which has no regard for the ITRG findings regarding acceptable density measures.

### **5.10 What is the overall management objective?**

The two step management objective utilising adaptive management principles is supported. However the draft KNP target level of 600 is not supported.

We are very concerned that when the next severe wild fire occurs all 600 brumbies may die or those that survive will become interbred and suffer abnormalities and other consequences of inbreeding. In the 2003 wild fire 64% of all brumbies died.

The 600 figure has no apparent scientific basis and gives the terms *integrated approach*, *different combinations of control methods* and *managing to agreed impact thresholds* a totally new meaning.

As we proposed in Part 1 of our submission - The short term could be to reduce the population to 5,000, and in the longer term work on impact level indicators (of all species) and conduct research on the ecology of horses in KNP

We trust you take the above into due consideration during your decision making processes affecting the future of the brumbies within KNP.

Kind Regards

A handwritten signature in black ink that reads "J. Pickering". The signature is written in a cursive, slightly slanted style.

Jill Pickering,  
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This paper is an attachment to the ABA reply to the NRC Pest Animal Management Review