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29th October 2021

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Draft Wild Horse Heritage Management Plan

Kosciuszko National Park

Submission 29th October 2021

For several decades The Clarence Environment Centre has been a strong advocate for better laws and approaches by governments at all levels, as well as by the private sector, to protect and create a safe, healthy environment for people as well as for all wildlife species that remain since European settlement.

We fully understand the human condition that has an entrenched affinity with domestic animals and pets, and we strongly support animal safety and anti-cruelty campaigns across the spectrum. As an environmental group working with the general public, we also fully appreciate the difficulties and humane issues around controlling ex-domestic animals, as well as the need to do so.

We therefore are in strong support of the Australian Academy of Science's recommended important steps and comments towards the conservation of the Kosciuszko National Park, listed in their open letter to the NSW Treasurer & Minister for Energy and Environment the Hon (Matt) Kean, these being:

1. Reduce feral horse numbers rapidly to well below the preliminary target of 3,000. ... Evidence from the Victorian high country shows that alpine wetlands continue to degrade even with very small numbers of feral horses. Kosciuszko cannot begin to recover from drought, extensive bushfires and overgrazing if, as currently proposed, 3,000 feral horses remain.
2. To reduce numbers, using all available methods that are effective and meet animal welfare standards.
3. Protect all of Kosciuszko National Park. Do not compromise one third of (the) National Park by designating horse retention areas. NSW has only 10% of its land area in conservation reserves, well below global targets of 30%, and all of that area is needed for conservation.

We also support the Academy of Science's recommendation for a goal of removing all feral horses from all of NSW protected areas

We see the weight of the above letter, and its endorsement by a great number of eminent scientific personnel, as being something that cannot possibly be ignored by the State government.

Summary

1) We find the entire concept of this Plan to be in the first instance irrevocably flawed. Horses are not descended from any indigenous wild stock, as in other countries. They may be bred, kept as pets and enjoyed with impunity Australia wide, even using brumbies from Kosciuszko. They are a completely non-threatened species across all their breeds, and have been an introduced (feral) animal in the High Country for a brief 150 years of white settlement, since the joint introduction of cattle. For these reasons alone they cannot ethically be declared to have Heritage values, and should not be afforded legal or official status or protection by any level of the Australian government, or by the Australian taxpayer. We therefore strongly oppose all plans to maintain a healthy and viable population of any feral (dumped) animals anywhere, specifically in a national park.

2) We find the Plan itself to be totally at odds with The Kosciuszko National Park Act's requirement to conserve the Park's conservation values. We also deplore the fact that this suggestion has come about by pressure on government, mainly by weak reasons of a children's novel; some reckless riding depicted in a movie, and the convenient, heartless use of the brumbies as cannon fodder in the first world war.

We suggest by this that the government take fair warning against potential consequences of setting a precedent by an irresponsible decision in this instance, which could in future see similar pressure brought to bear by cat lobbyist groups who see their loved animal as meeting the criteria for a naturalised status in Australia, so demanding that a set number of cats be left to roam happily wild and free across the landscape. Or similarly the fox, which was imported by the same early settlers by reason of their fixed seen cultural values from the "old country".

3) In sympathy with true historians, we believe the connections and associations around the pioneer high country will always persist, in legend and in tall tales, even without the horses being visible to visitors. While not viewed by some as a particularly splendid era of Australian progress that needs to be immortalised in history, the rest of the mentioned European tangible cultural sites, huts, campsites, yards, traps and tracks, as well as old mining sites, viewing stations, scientific records etc, will nevertheless always remain.

4) We judge this Management Plan to be a typical unfortunate result of an inexperienced Minister making an insensitive decision on a sensitive issue, then leaving an ensuing Minister to clean up the mess. We hope the current decision-makers can now be strong enough to reject this Plan outright, and as a consequence also see fit to abolish the Kosciuszko Wild Horse Management Act 2018, which is our recommendation.

Responses:

We approve of the removal areas (5.2, p15), and appreciate the benefits to the parks natural assets within these sites by this action. We also approve, to a point, the capture and control methods (p19), including lethal, proposed to achieve this aim.

However, in no way would we, or could we, support any plan to dispose of any horse into the terror and trauma of any knackery or slaughter house (listed as a control method, page 20, for horses unable to be rehomed). This type of handling and alien environment from start to finish places any horse, tame or wild, in a totally unacceptable situation that can, and should be, deemed to be cruelty to the extreme

We question the methods that might be used to confine the proposed 3,000 retained horses within the identified areas. We are concerned not only that this will be by the usual Australian traditional use of barbed wire, across kilometres of difficult terrain and wildlife habitat, but also that the cost and feasibility of installing and maintaining a fence of any type has not been considered. Most of us are fully aware that since the advent of Barry O'Farrell, funding for our NSW national parks and the staff that once used to oversee and manage their maintenance has been systematically withdrawn by each successive government, leaving our parks in a gradually worsening state of neglect and disrepair and in need of increasingly costly maintenance. **We therefore would see it as highly inappropriate if a considerable sum of taxpayer money should go towards fencing a large population of feral animals within a national park, while all other national parks have a pressing need for invested funds to keep such animals out.**

Part 3 of the Plan (page 4) considers the European heritage value of the horses, and conveniently drags in the NSW populace at large as well as the full Australian population as being among the sentimental locals. Yet 150 years of myth and build up, without any tangible asset, cannot possibly, in our view, be termed as heritage. Certainly not while buildings of similar age are demolished to make way for development, and thousand-year old Aboriginal sites are destroyed by unsustainable mining activities.

We therefore strongly urge the government to apply further studies to ascertain the true mood of the general taxpayer: ie whether they would prefer to have their hard-earned money spent on maintaining and

protecting inappropriate domestic animals, or on opening up jobs and preserving a lasting museum showcasing a landscape that existed before the 200 years of white settlement.

(Page 6-7) lists just a portion of a profound number of natural environmental and Aboriginal cultural heritage values of the Kosciuszko National Park. We see these as clearly outweighing the simple single suggestion of conserving a population of feral horses within its boundaries.

Part 5 (p 8) adds to this perception by identifying in some depth the corresponding negative impacts and threats to the environment by wild horses. These include risks to visitors and the park's recreational values, as well as damage already caused to cultural items listed for preservation. These listed negative impacts by horses are extensive, and should equally as clearly serve as a far more weighty argument against keeping the horses in the park than any seen positives of keeping them there.

Support conclusions:

The plan to preserve and maintain a population of 3,000 wild horses within a third of the Kosciuszko National Park at what will inevitably prove to be an extreme and ongoing cost, seems to us to be utterly bizarre, while vital habitats for threatened native wildlife can be destroyed, even by the horses themselves in Kosciuszko, and native kangaroos, ducks etc. can be indiscriminately slaughtered, mainly for sport, without any estimate of how many there might be left, or what number might be required to maintain viable, sustainable populations.

A much more practical, less costly and common-sense approach to provide a lasting record of horses in the high country's history would be to remove those numbers now earmarked for retention (and possibly more if feasible) from the Park, and move them to already-cleared, clean pastures provided by those who lobby to keep them. With some support funding then provided by government to keep the horses in health and sustainable numbers, and to ensure their comfortable ends when their lives are done, the horses will be able to be seen by all at will, and their story can be passed on to ensuing generations. The issue then of controlling breeding age stallions and keeping a tab on population numbers would fall on their new owners, with no further impost on the NSW government and the Australian taxpayer.

This cooperative arrangement would:

- ensure the horses are spared an inevitable unpleasant end from being left in the bush to fend for themselves, without the security of domestic care, food if necessary, or veterinary attention;
- ensure young colts aren't killed, and other horses aren't injured by breeding-age stallions;
- ensure that wounds from violent bites and kicks, to mares and foals as well as older males, don't lead to infection, with suppurating maggot infested sores;
- ensure that incidences of overgrown split and painful hooves; failed birthings; inability for aged horses to get to their feet; inability through wounding or weakness to access water; blindness, fly strike and broken legs from accidents, or any of the other numerous ordeals that can lead to prolonged torment and death for a wild horse, are greatly reduced, or eliminated altogether.

We hope that we have been able to offer some useful food for thought by this submission, and that at least some points we have made here will be seriously considered.

Yours faithfully,
Patricia Edwards
(Clarence Environment Vice President)