



Bushwalking NSW

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SUBMISSION TO THE SENATE INQUIRY ON THE IMPACTS AND MANAGEMENT OF FERAL HORSES IN THE AUSTRALIAN ALPS

Dear Committee Secretary,

Bushwalking NSW Incorporated is the peak body for bushwalkers in NSW and the ACT. It represents the interests of over 11,000 bushwalkers from nearly 70 bushwalking clubs throughout the state, and provides a united voice to local, state and federal government agencies and other bodies on issues affecting bushwalkers.

Our affiliated clubs and their members have been enjoying the Australian Alps for generations and it is widely considered one of the premier bushwalking destinations in the country.

We despair at the lack of effective reduction in feral horse numbers, especially in the NSW-managed portion of the Australian Alps. Bushwalking NSW has been active in providing submissions on feral horses to the NSW Government for a number of years now. We have grown increasingly frustrated at the slow pace of horse numbers reduction and the failure of Government to follow through on the actions proposed in various management plans over the last 10-15 years. If action had been taken years earlier to reduce the number of horses, then we would not be now facing the significant challenge in reducing an even larger feral horse population.

Future generations will look back on this period and wonder how we could get this so wrong. How could it be that the needs of a pest species were assessed as more important than the needs of the native species (including those Critically Endangered) existing within the Australian Alps, the water needs of the human communities downstream, the integrity of the precious ecosystems, the significant cultural heritage of the high country and, finally, the needs of outdoor recreationists who wish to camp and pitch a tent in a place that is not contaminated by horse manure and who prefer not to be hassled by territorial horses?

Australians should hang their heads in shame in allowing this to occur. Once more the bushwalking community activates the keyboards to compose yet another submission to politicians. We can only hope that this will have more impact than all the other submissions we have composed.

Not surprisingly, Bushwalking NSW strongly supports Federal action to rapidly reduce the number of feral horses across the Australian Alps. What we expect from all Governments is outlined below.

a) Term of reference: identifying best practice approaches to reduce the populations of feral horses in the Australian Alps and their impact.

Rapidly reduce the number of feral horses across the Australian Alps to help protect threatened species, ecosystems, river catchments and Indigenous heritage.

The tragic reality is that we have a choice to make between urgently reducing the numbers of feral horses in the Australian Alps or accepting the destruction of sensitive alpine ecosystems and habitats, and the decline and extinction of native plants and animals that occur nowhere else on Earth.

Every year that Governments fail to take effective action will mean that more horses have to be removed, the damage to ecosystems, threatened species and Indigenous heritage will increase and the cost to taxpayers will rise.

Feral horse numbers are out of control and growing rapidly due to insufficient control action, with recent estimates of over 24,000 across the Australian Alps - up from about 7,500 in 2013/14.¹

There are more than 40 threatened species listed at the State or Federal level that are directly impacted by feral horses including northern and southern corroboree frog species, alpine she-oak skink, the recently listed mountain skink, broad toothed rat and a number of rare alpine plants, such as the anemone buttercup.

Feral horses disrupt natural ecosystem functioning and damage habitats and water catchments in the Alps by: trampling, track creation, soil compaction, wallowing, erosion of streambanks, destruction of sphagnum bogs and wetlands, and overgrazing.

We strongly support action to rapidly reduce the number of feral horses across the Australian Alps to help protect threatened species, ecosystems, river catchments and Indigenous heritage.

All jurisdictions should use the full suite of control tools available, ensuring they meet standard operating procedures and animal welfare requirements, to reduce the significant impacts of feral horses on the Australian Alps.

Fertility control and trapping and rehoming are not viable options for feral horse population reduction due to the size and geographic spread of the current population in the Alps.

Ground and aerial shooting are humane and effective control options, and the RSPCA has stated that, depending on circumstances, both ground and aerial shooting can deliver better animal welfare outcomes than trapping followed by transport to a knackery.

b) Term of reference: Commonwealth powers and responsibilities.

The Australian Government will not meet its obligations to protect the Heritage values of the Australian Alps, the zero-extinction target, or international commitments under the Convention of Biological Diversity if feral horse numbers are not rapidly reduced.

The Federal Environment Minister should use powers in the Environment Protection and Biodiversity Conservation (EPBC) Act to require states and territories to effectively and urgently remove feral horses from the Australian Alps National Parks and Reserves National Heritage Place

The Australian Alps are meant to be protected under national environment law as they were listed as a National Heritage Place in 2008.

The Federal Government should develop National Heritage management principles through regulation that require the rapid reduction of feral horses in the Australian Alps National Parks and Reserves.

¹ Information from the Invasive Species Council <https://invasives.org.au/>

c) Term of reference: the adequacy of state and territory laws, policies, programs and funding for control of feral horses and other hard-hoofed invasive species in the Australian Alps, and their interaction with Commonwealth laws and responsibilities.

The NSW and Victorian governments have not been effective in reducing the number of feral horses in the Alps and ensuring the protection of natural heritage values, including impacts on habitat for threatened species and threatened ecological communities.

In NSW, legislation protects feral horses over native wildlife. The current management plan seeks to permanently retain feral horses in 30% of Kosciuszko National Park and the target to reduce numbers to 3000 by 2027 is off track with a 30% increase in the past two years to over 18,500. It is difficult to see how the NSW Government will achieve this target without a massive increase in action to reduce horse numbers between now and 2023.

In Victoria, the most recent population survey (in 2019) found approximately 5,000 feral horses in the Victorian Alps (rising from 2,300 in 2014). Recent evidence to the Supreme Court is that Parks Victoria are only removing numbers in the tens every month, which is unlikely to be sufficient to significantly reduce numbers.

d) Term of reference: measures required to repair and restore native habitats for species impacted by feral horses and other hard-hoofed invasive species in the Australian Alps, including for iconic species like the corroboree frog and the platypus.

Australia's national environmental law should be reformed so the Australian government can rapidly intervene where areas of national and international environmental significance are not being protected or managed effectively.

The current national environmental laws need updating to:

- Ensure that 'actions' defined in law include a policy, plan or program where these relate to the management of National Heritage Places like the Australian Alps, as well as World Heritage Areas, or wetlands of international significance (Ramsar wetlands).
- Strengthen the framework for threat abatement planning, including creating a clear, scientifically-led process for listing and abating major threats like feral animals.
- Create new triggers for the assessment of actions, including actions that exacerbate a key threatening process and actions that negatively impact on Australia's national parks and reserves
- Develop strong national environmental standards that require the effective management of invasive threats and apply to the management of National Heritage Places like the Australian Alps, as well as World Heritage Areas or Ramsar wetlands

e) Term of reference: any other related matters.

The Australian Government should develop a national feral horse Threat Abatement Plan and co-invest with state and territory governments in feral horse management in the Australian Alps, which is a priority place under the Threatened Species Action Plan.

This Plan should include:

- Early and substantial investment to have the best long-term benefits for tax-payers, land managers, ecosystems, threatened species, Indigenous heritage, park visitors and the horses themselves;
- Rapidly reducing feral horses in the Alps through a consistent, well-funded program across Victoria, NSW and the ACT, using best practice methods;
- Reinvigorating the Australian Alps Ministerial Council and funding an officer reporting to the Australian Alps Liaison Committee to focus on interstate collaboration for feral horse control; and
- Investment in ecosystem monitoring and restoration.

Finally, Bushwalking NSW remains hopeful that effective management of feral horses (and other pest species) is not beyond the capacity of our governments. We look forward to the findings of the Senate Inquiry.

Yours sincerely,

A handwritten signature in black ink that reads "David Bell". The signature is written in a cursive, flowing style.

David Bell
President
Bushwalking NSW Inc
22 April 2023