

Comments on Draft Wild Horse Management Plan Kosciuszko National Park by AVCB June 2016

This document was forwarded to Sue McGrath, AVA Executive Support for NSW and ACT, on 17/6/2016 to be used in conjunction with NSW Division material in producing a response to the Draft Wild Horse Management Plan Kosciuszko National Park prepared by Office of Environment & Heritage NSW Government, due for submission by 19th August 2016.

<http://www.environment.nsw.gov.au/protectsnowies/>

Summary

The Draft Wild Horse Management Plan (Draft Plan) and the supporting documents released on 31/4/2016 by the NSW Office of Environment & Heritage provide a review of data available and opinions expressed by stake holders.

AVCB support the need to control feral animals where such control targets a threatening process on one or more threatened species where the consequence of the threatening process is moderate to severe in severity. This process of prioritising actions has been documented and discussed in the [Threatened Species Strategy](#) and [Threatened Species Summit](#) 16/7/2015. This ensures that limited budgets and animal welfare 'costs' are optimised.

AVCB believes that the Draft Plan can be improved by reviewing the following issues:

- The Independent Technical Reference Group (ITRG) needs to identify and describe the key threatened species and the evidence which links wild horses as the threatening process. They need also to look at the other threatening processes which impact on the target species and rank the relative importance of the wild horse in this threat. This would provide justification for any action to control wild horse densities where horses are a key component in the threatening process. There is no justification to target horses where more severe threatening processes have a dominant impact, for example ski developments and the mountain pigmy-possum. It would also provide sentinel species to monitor the outcome of any program.
- The outcomes must be measured in terms of their control of threatening processes and the abundance of the sentinel species. Measuring the number of horses killed is not a meaningful objective.
- Impacts should be graded such that those which have impacts on threatened fauna, flora and ecosystems have the highest priority and the impacts on cultural and visitor values having the least priority.
- The Plan should ensure that a significant proportion of the budget is allocated to rigorously monitoring outcomes.
- The opportunity to divide the wild horse populations into groups should be used to test the benefit of culling wild horses at different densities or impacts, zero, moderate culling, no culling.

Details and Case Examples

Objectives

The objective of the Draft Plan should be to mitigate threatening processes (feral animals, human impacts, fire regimes, weeds) not to reduce wild horse numbers. It may be that wild horse numbers need to be reduced but in conjunction with and after determining priorities

against all the threatening processes. Objective 1, p7 suggests that the reduction of wild horse numbers is an objective in itself and that a priority is given to impacts on natural and cultural heritage values.

“To reduce the impacts of wild horses on the natural and cultural heritage values of Kosciuszko National Park by reducing the overall population of wild horses using a range of cost-effective and humane control measures.”

Grading of Impacts

The Broad-toothed Rat (*Mastacomys fuscus*) is a mammal represented in the Kosciuszko NP with a conservation status of *Near Threatened* (The action plan for Australian Mammals 2012: Woinarski, Burbridge and Harrison, 2012). The severe threats identified for this species are: predation by Red Fox, inappropriate fire regimes, global climate change and habitat loss and fragmentation. Moderate threats include: Predation by feral cats and habitat change and resource depletion due to livestock and feral herbivores (Woinarski, Burbridge and Harrison, 2012, p587).

Thus, while wild horse grazing (feral herbivores) may have an impact on the Broad-toothed Rat, control of wild horses on its own is unlikely to benefit the Broad-toothed Rat. Efforts to ameliorate the threatening processes should be directed to the severe threatening processes first, as these are likely to result in the maximum return for the money and welfare ‘cost’ inherent in any feral management program.

This issue is discussed by the ITRG, p15 “While studies on herbivory are widespread, there is less information specifically on the effects of horses. This is because controlled experimental studies are rare, and most rely on a correlational approach and are often complicated by the presence of other herbivores (Beever & Brussard 2000). Exclosure plots that exclude all grazing herbivores are likely to exaggerate the impacts of horses (Linklater et al. 2002). Some studies fail to find an effect, or may even find a positive impact (e.g. Fahnestock & Detling 1999).”

The same applies to the **mountain pygmy-possum**. The conservation status of the mountain pygmy-possum (*Burramys parvus*) is Critically Endangered, however the threats listed by Woinarski, Burbridge and Harrison, 2012 do not mention feral herbivores. They assign the catastrophic threats to habitat loss, fragmentation and destruction caused by human intervention in and around ski resorts. Fire regimes are also listed

Prioritising Actions

Minimising adverse impacts on cultural and visitor values should receive a low priority. Endangerment and loss of unique species can never be reversed. Cultural values and visitor perceptions change with generations. It seems imperative therefore that limited budgets are not directed to ephemeral impacts.

Monitoring Outcomes

The expert panel at the [Threatened Species Summit](#) (Melbourne Zoo 2015) were clear in their opinion that a significant portion of any budget for feral animal control needs to be spent on monitoring the outcomes. Proportions of 20% of the budget have been mentioned. This ensures that any plan put in place builds for the future and ensures that subsequent plans are more efficient and targeted.

Three Control Zones – Impacts Based on Threshold Numbers

Page thirty of the ITRG Report discusses impact based thresholds rather than numbers (densities), “Thus, it may be preferable to adopt thresholds of concern, i.e. with an emphasis on impact-based thresholds for action rather than density-based ...”.

The recommendation to divide the area into three zones appears to have merit and provides the opportunity to monitor impacts based on impact/density of the remaining horses. The ability to do this and the period over which monitoring would be necessary to assess the outcome will depend on how long operationally it takes to achieve the desired outcome. The concept of using these zones in a deliberate experiment to measure outcomes appears sound.

Physical Effects on Drainage Lines, Compaction and Erosion

It is noted that the Draft Plan is concerned about the appearance of banks, compaction and erosion. While these effects are noted the overall magnitude needs to be assessed realistically against the environmental impact of change brought about by human activity, including access roads, ski fields, power lines, dams and aqueducts.

Welfare

The ITRG examined the welfare aspects of culling wild horses or control their fertility. Their review is balanced and appropriate. AVCB believe that any justified culling conducted within the existing guidelines should meet welfare standards.

Veterinary Advice

AVCB believes ongoing veterinary advice is important to complement the input of the ITRG and to be involved in the day-to-day implement of the Plan. While independent expert advice can always be sought having veterinary involvement in all aspects of the Plan would be beneficial to the welfare and outcome of the program.

References

The action plan for Australian mammals 2012/ John CZ Woinarski, Andrew A Burbridge and Peter L Harrison.