NSW Wild Horse Management Plan August 2016

Submission from the Australian Veterinary Association Ltd

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The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia.

Our 8500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

Summary

The wild horse population in the NSW Kosciuszko National Park has been associated with adverse impacts on natural, cultural and visitor values. We understand that that NPSW has an obligation to protect native habitats, fauna and flora, geological, historic and cultural features within the park. We argue that this approach should be evidence-based and, given all considerations, prioritise the welfare of animals (horses and other potentially impacted species).

Key points of concern regarding the Draft Management Plan (DMP) are:

- There are significant discrepancies between the DMP and the Independent Technical Reference Group (IRTG) reports, the reasons for which are unclear and should be explicitly addressed;
- The practical application and the relevant management details on how to achieve the management of these wild horses is not available in the report.
- The AVA was not consulted and is not listed as a stakeholder or expert in the field although the AVA has expertise in the field via individual veterinarians and special interest groups as well as a policy in place on the welfare, behaviour and management of feral horses and other equidae.
- The DMP is missing details on how the plan will be audited; how the outcomes will be measured over the years; and the practical application of the draft plan across the diversity of the KNP environment and terrain. In particular, the outcome or success of the program should not only be measured by the number of horses killed, but also the improvement in biodiversity of the park;
- The DMP in its current form does not provide adequate justification for the plan, nor does it appropriately address animal welfare considerations.

Points of concern

Animal welfare

The AVA understands that in certain contexts the management of wild horses and other equidae populations is considered necessary to achieve fauna and flora conservation goals as well as economic goals (such as reducing competition with livestock for finite food and water resources). All methods of vertebrate pest control have direct and indirect impacts on target as well as non-target species, all of which must be considered.

Where culling is indicated on scientific assessment of the relative merits the most humane methods must be employed, with consideration for target and non-target species.

The AVA understands that a similar plan was implemented in 2008 but there is concern that actions in the 2016 plan will have the same outcome as the 2008 plan and would not wish to see these repeated. The ITRG produced an excellent report that detailed sound recommendations, which if followed should safeguard the welfare of the horses and ensure humaneness in the process. Although the ITRG report has been referenced, the practical measures from it seem to have been lost from the Draft Management Plan, and indeed some important recommendations appear to have been ruled out from consideration altogether.

We are concerned about the lack of auditing, particularly around biodiversity, since this is one of the key justifications for the DMP.

While the ITRG has provided an animal welfare assessment of various methods of controlling the KNP horse population, we are concerned that veterinarians with expertise in animal welfare were only consulted about relative humaneness of culling methods, and not wider welfare impacts. One of the oversights in the assessment is that while it addresses impacts on individual horses, it does not address impacts on horse populations. There is no evidence of a welfare risk assessment being undertaken nor consideration of any "worst-case scenarios" which is important in a welfare assessment.

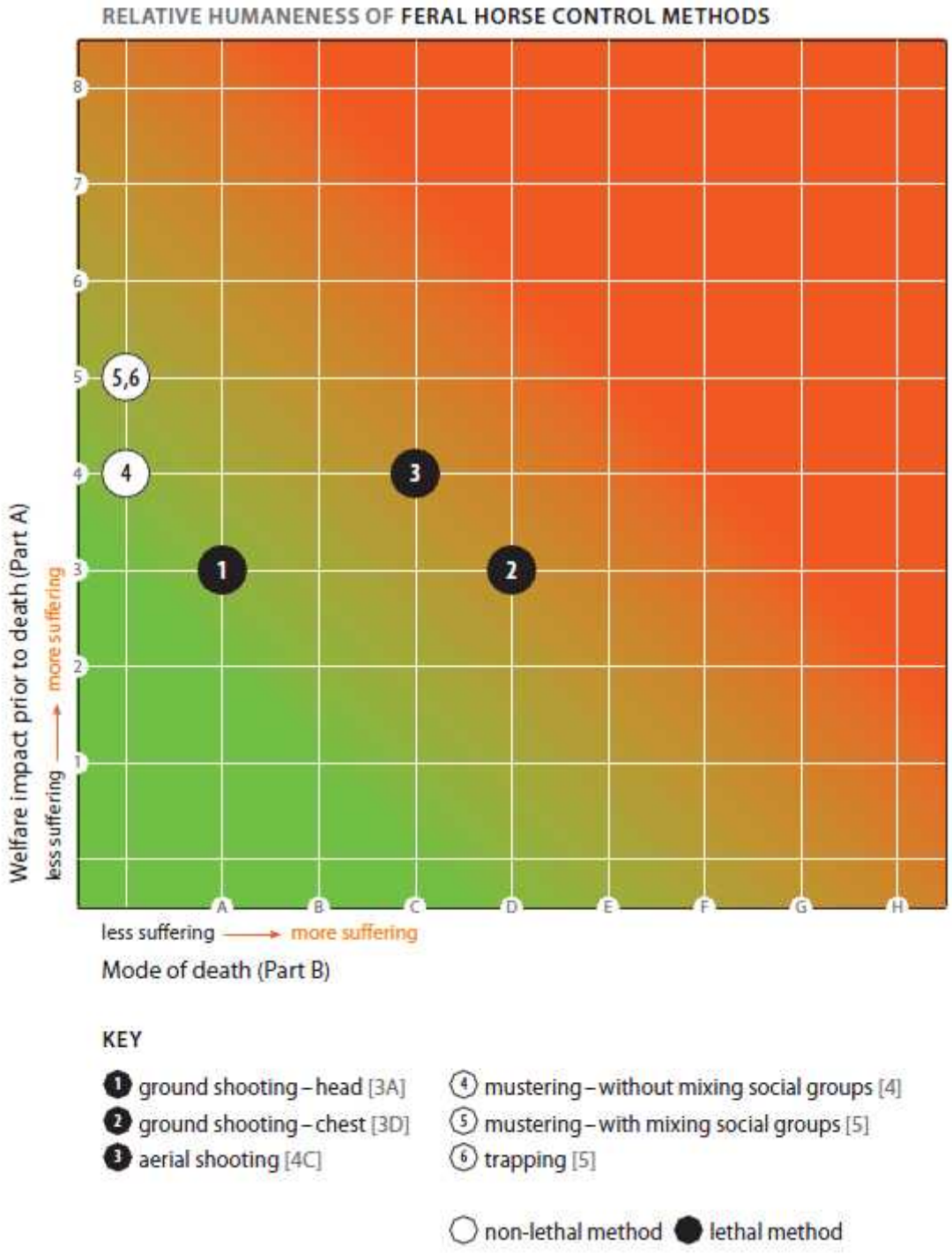
The DMP does not give due consideration to key potential adverse effects of ground shooting, including the possibility of a single shot failing to render an animal unconscious, and causing that injured animal to flee, leading to prolonged suffering, pain and distress. While the ITRG does to some extent consider the impact of ground shooting on the remainder of the mob, it does not take into account the strong social bonds formed between horses. We believe that the welfare impact of this method of culling in terms of direct and indirect impacts on non-target species has not been adequately taken into account.

A very inhumane approach is identified as a "natural process" where it is stated that in cases of drought and environmental difficulties, affected horses will not be given help, cared for or treated. At best the animals will be euthanised, but there is no action statement or commitment as to how this will be performed, how often, and at what stage of suffering a horse will need to be before it will be euthanised. The welfare impacts of such a natural process include prolonged hunger and thirst, weakness, inability to engage in species-specific behaviour and susceptibility to disease.

A model for assessing the relative humaneness of pest animal control methods (Sharp & Saunders, 2008) has been developed to enable the evaluation of methods in use and to allow the most humane methods to be identified based on scientific evidence.

The model examines both: the negative impacts of a control method on an animal's welfare and the duration of this impact (Part A); and, if a lethal method is employed, the intensity and duration of suffering of the killing technique. The information used to develop the matrix for feral horse control techniques is provided at: http://www.feral.org.au/animal-welfare/humaneness-assessment/horse/

This model has been used to assess the humaneness of a variety of pest animal control methods used in Australia, including for feral horses (see Figure 1, below).



Even then, the context of culling, including animal, herd, ecological and geographic factors, is a key consideration.

Control techniques

Available control techniques for wild horses include trapping and mustering, capture and removal, fencing, and aerial and ground shooting. Fertility control is not a currently practicable option.

The AVA supports feral horse control provided it is humane and justified. An understanding of the humaneness of the methods selected to manage the population of wild horses, and their application in the diversified terrain; accessibility; and micro-environmental factors should be outlined and documented.

Lethal and non-lethal control programs should be well coordinated, planned and resourced, and use of personnel trained and accredited in the chosen control method. All programs should be audited to determine that desired outcomes are achieved. The outcome and success of programs should not be

measured by the number of horses removed/killed, but by the improvement of biodiversity in KNP. Thus for example if all horses are killed/removed and park biodiversity continues to decline, then , nothing has been achieved despite a significant welfare cost to horses and other non-target species, in addition to financial costs incurred. Thus for example it is important to develop an auditing plan that assesses populations of threatened species, for example the broad-toothed rat (*Mastacomys* fuscus) and the mountain pygmy possum (*Burramys parvus*).

Supply and demand gap

Despite significant effort, years of action, and considerable cost, the wild horse population in the area is increasing and the suffering of the horses involved is magnified (the stress of trapping, yarding, acclimatisation, transporting to the knackery, etc). The demand for domesticated wild horses for sport, recreation or work is minimal in comparison with the magnitude of the over population in the park and the number of animals needing or planned to be culled. We are concerned that the actions listed in the DMP cannot bridge this supply and demand gap.

Recommendations

The AVA urges a review of the DMP in the light of the ITRG report, and the involvement of veterinarians with expertise in animal welfare and conservation biology in developing an acceptable and viable plan and auditing process. All animal control strategies have direct and indirect consequences, some of which are unpredictable and may have adverse welfare impacts. Therefore any animal control strategy must be evidence-based. We recognise that the culling/removal of these horses is a contentious issue within the community and therefore requires scientific justification. We do not believe due consideration has been given to the ITRG report, nor to appropriate monitoring of the program's outcomes.

Strategies

- Establish information on the NPWS website on the heritage values of the wild horse population in the park, their impacts on other values and the objectives of the wild horse management program. Involvement of veterinarians with expertise in conservation biology is recommended, and the AVA can provide assistance through its Australian Veterinary Conservation Biologists Special Interest Group.
- Establish an independent scientific panel to design a survey methodology to underpin wild horse surveys to be conducted every five years in order to quantify the environmental damage caused by wild horses, in addition to estimating horse numbers, with the results of these survey to inform future reviews of this plan. This should also take into consideration impacts from other species, biological factors such as disease, and anthropogenic factors including infrastructure, pollution and traffic (vehicle and pedestrian).
- Continue and expand the program monitoring wild horse and other impacts on environmentally sensitive areas and areas with cultural heritage values;
- Integrate the wild horse management plans planning and operative activities with other introduced species management programs wherever possible, and in particular those for deer, pig, goat and rabbit control;
- Work with Roads and Maritime Services to minimise risks to motorists caused by wild horses, and minimize environmental damage done by vehicles in this ecologically sensitive area.
- Review the plan in conjunction with the Kosciuszko National Park Wild Horse Management Reference Group in five years.
- Commit to auditing the impacts of any feral animal management plan on biodiversity.

Responsibilities

The AVA supports NPWS, DPI and LLS being actively involved in the control methods and the need to work on the program together. The LLS already have well qualified and experienced staff to establish and maintain control programs.

It is imperative that veterinarians be consulted during the implementation of the plan particularly on horse and animal welfare issues.

The AVA believes that it is critical for the success of any plan to be based on the most robust scientific evidence available.

Cooperative control

Continue to participate, encourage and support the research and management programs established under the cooperative arrangement of the Australian Alps Liaison Committee Wild Horse Working Group, which promotes cooperative and coordinated management programs across state, territory and tenure borders. The involvement of veterinarians with expertise in animal welfare is strongly recommended.

Liaise and collaborate with Parks Victoria and ACT Parks and Conservation Service to develop complementary planning objectives, zoning and operational control programs for the Southern and Northern management regions of the park. Continue to liaise with park neighbors, including NSW Forestry Corporation, regarding cooperative and integrated control of horses across boundaries.

The Feral horse management plan for Oxley Wild Rivers National Park (NSW NPWS, 2006) is a good example of a site-specific management plan.

Involve the community

Establish and formalise a Kosciuszko National Park Wild Horse Management Program Reference Group.

Consult with the community about acceptable solutions. Acknowledge the heritage and cultural values of the horses. Involve the community in ongoing management of wild horses in the park through volunteer and extension programs. Work with local communities to establish appropriate information and interpretive material on the heritage values associated with the wild horse population in the park.

Carcass disposal

Encourage research and undertake investigations on best practice carcass management and disposal.

Investigate, seek expressions of interest and test the market for any commercial interest or viability for use of carcasses (e.g. for pet food, composted material, blood and bone or other carcass products) to minimize wastage.

Fate of removed horses

Work with the community and stakeholders to maximise, where possible, the rehoming or domestication rate of wild horses that are removed from the park.

Encourage proposals for establishing local wild horse rehoming or domestication programs and appropriate facilities. Conduct an expression of interest process periodically to determine annual numbers of wild horses to be removed for rehoming or domestication.

Investigate and test the market to try and minimise the transport times and distances for horses that are removed from the park and destined for knackery or abattoir.

Ensure all wild horse rehoming or rescue groups meet all current animal welfare legislation, regulations and codes rehoming and domestication operations.

Establish, incorporate and promote information on the wild horse management program and domestication process via the NPWS website.

Further Research

We believe additional review of the ITRG report, and further research, should be conducted prior to implementing a culling program.

Regularly monitor and measure the effectiveness of the management protocols selected for the numbers in the reduction phase of the plan.

It is critical that target numbers selected and timing for achievement of the reduction of the animals are justified.

It is similarly essential to understand and see the practical steps applied and the monitoring of the outcomes envisaged for the post reduction phase. Inappropriate management at this phase will quickly see any gain achieved dissipated and may have severe unintended impacts on non-target species of fauna and flora (for example due to dispersal of herds).

References

NSW National Parks and Wildlife Service (NPWS) 2006, Feral horse management plan for Oxley Wild Rivers National Park, NSW National Parks and Wildlife Service, Hurstville

Sharp, T & Saunders, G, 2008, A model for assessing the relative humaneness of pest animal control methods. Australian Government Department of Agriculture, Fisheries and Forestry, Canberra. Available from: http://www.daff.gov.au/_media/documents/animal-plant/animal-welfare/aaws/pest-animal/humaneness-pest-animals.pdf