Submission on the Impacts and management of feral horses in the Australian Alps

An Inquiry of the Senate Standing Committee on Environment and Communications

Submission of the
Australian Veterinary Association Ltd

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The Australian Veterinary Association (AVA)

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

Terms of Reference

The AVA, through its diverse membership, contains extensive professional knowledge and experience in equine medicine and management, conservation medicine, animal welfare and public health. The AVA has a century of involvement with stakeholders across Australia and internationally, and a history of achieving practical solutions to complex problems. These attributes place the AVA in a position to comment particularly on points (a) and (c) of the Terms of Reference.

"a) identifying best practice approaches to reduce the populations of feral horses in the Australian Alps …"

"c) 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;"

Summary

a) Best practice approaches to reduce the population of feral horses.

The acknowledged best practice method to humanely reduce populations of feral horses is shooting (aerial or ground) in accordance with nationally agreed standard operating procedures [1]. Control must be implemented within an adaptive management framework coordinating all aspects of the operation, including continuous monitoring and assessment[2]. Currently in Australia public opinion appears to be a limiting factor in implementing some humane control options, including aerial shooting.

b) The adequacy of state and territory laws, policies, programs and funding.

Jurisdictional issues may contribute complexity, add cost and slow progress in feral animal control[3]. Legislation and policies that attribute 'cultural' or 'game' value to feral species (horses and deer) causes confusion and erodes social focus on the environmental damage these animals cause.

Background

The feral horse, deer and pig populations in the NSW Kosciuszko National Park have been associated with adverse impacts on the environment, native species and cultural and visitor values[4]. In the opinion of the AVA, the *Kosciuszko Wild Horse Heritage Act 2018* has given a disproportionate weight to heritage values over obligations to protect native habitats, fauna and flora within the park. Policy should be evidence-based and aim to preserve the natural environment and biodiversity. Feral animal control should provide high welfare standards. The object of the *Kosciuszko Wild Horse Heritage Act 2018* is to recognise the heritage value of *sustainable* wild horse populations within parts of Kosciuszko National Park (Clause 5 Subsection (2b), however there is no evidence that this can be done sustainably without compromising native species. Alignment of legislation and

committees to include the Wild Horse Community Advisory Panel within the *National Parks and Wildlife Act 1974* would improve the park's management.Feral animals, herbivorous and carnivorous, impact on the environment causing substantial and at times irreversible change[5]. The feral horse was listed as a Key Threatening Process in NSW in 2018[6] for its negative impacts on ecosystems, ecological communities and native species. Factors having environmental impacts, like climate change, the frequency of fire, reduction of plant biomass and biosecurity threats, can facilitate the impact of other feral species in turn making threatened species more exposed. The Mountain Pygmy-Possum an endangered species (EPBC Act Listing) is potentially threatened by feral cats whose threat is increased by habitat degradation. Feral cats have contributed to the extinction of some 27 of the 47 mammal, reptile and bird extinctions in Australia since European settlement[7]. Feral pigs and deer are included in this group. Invasive species can be viewed as a constant environmental threat, whose impact becomes more profound even while their numbers may remain constant. The weakening of biodiversity networks and the removal of some 'redundant' species is thought to precede final ecosystem collapse[8]. Immediate effective management is critical.

The heritage value of feral horses must be considered in the multiple competing management priorities of the Kosciuszko National Park but needs to be assessed against environmental health. The place of Wild Horses should only be facilitated if the environmental health of the park can support their presence. Park management needs to ensure core sustainable ecological communities are preserved. The implementation of the *Kosciuszko Wild Horse Heritage Act 2018* has resulted in unbalanced management of the Kosciuszko National Park and permitted the number of feral horses to increase to over 18,000 horses occupying 32% of the park's area[9]. In considering the requirements of the *Environment Protection Biodiversity Conservation Act 1991* the area allocated to horses and the number of horses needs to be under constant review. Monitoring the environmental health should provide the scientific framework to inform policy.

Monitoring Feral Animals and Sentinel Threatened Species

Monitoring only the removal of horses and their welfare is inadequate. The primary objective for the management of Kosciuszko National Park should be preserving and improving its environmental health, achieved in part by effective humane removal of horses and other feral species. Currently only the welfare and control of operations of the Kosciuszko National Park Wild Horse Heritage Management Plan (the Plan) have been evaluated and reported[10]. The published report gives information on progress towards targets for culling feral horses, but environmental outcomes are not being reported in this ongoing, year-to-year monitoring program. Monitoring and reporting of key 'sentinel' threatened species is required to show the dynamic balance between wild horse impacts and environmental health objectives. The gazetting of the *Kosciuszko Wild Horse Heritage Act 2018* was in response to intense public pressure to preserve the heritage value of the horses. The public needs to be regularly informed about the changing environmental impacts on the park in conjunction with progress of the Plan's objectives. If environmental outcomes are deteriorating despite implementation of the current plan, it will indicate the need to adapt and modify the Plan.

With regular environmental assessments available 'decision points' can be put in place to adapt the Wild Horse Heritage Management Plan as required. These decision points would include a review of the culling methods employed, the number of wild horses tolerated and the respective size of zone areas for Wild Horse Retention and Wild Horse Exclusion.

The welfare of feral animals during culling has been critically reviewed and discussed extensively[1]. From the current humane options available it is generally agreed that the most humane culling method for large herbivores in the Australian context is limited to shooting (aerial and ground), capture and rehoming or capture and slaughter[9]. Consideration of community attitudes and acceptance must be considered when designing a control program. The primary concern should be for the welfare of the horses being managed, and thus the most humane methods of control must be

employed. Best outcomes will be achieved when the community accepts the program, so if there is community resistance to the plan, it is important to educate the community on the need for control and the reasons for the choice of the most humane option. This is important to prevent delaying the management program leading to further environmental damage. Delays (now approaching five years) caused by the interruption of the horse removal program since the introduction of the *Kosciuszko Wild Horse Heritage Act 2018* have resulted in an increase in horse numbers and consequential environmental damage.

Implementing regular, "sentinel" environmental assessments and making them publicly available should, over time, raise community awareness of the balance between feral horse numbers and environmental consequences. The current compromise of using ground shooting may not be technically optimal but if scaled-up by investment in training more independent functional teams who work in different sectors of the park and have intimate knowledge of the horses in the area and the terrain, may achieve a socially acceptable and humane outcome. The next year or two is critical, as delaying implementation of control carries a welfare cost due to the number of horses born in that time only to be subsequently culled. One must be aware of the native animal welfare cost which is inverse to the perceived wild horse welfare cost.

Recommendations

- Implement and report an ongoing 'sentinel' threatened species (animal and plant) program in select sites throughout Kosciusko National Park to facilitate adaptive park management and positive community engagement"
- Establish environmental 'decision points' depending on ongoing environmental outcomes. The program should include triggers for corrective actions such as modifying target areas, methods and/or target numbers of culling.
- Facilitate ongoing public education including the Wild Horse Advisory Body.
- Best practice approach should be determined based on scientific assessment of the relative merits, and adoption of the most humane methods. A model for assessing the relative humaneness of pest animal control methods (Sharp & Saunders, 2012) 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 and suited to the particular situation. See also our comment in Summary (a) above.

References

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