



I N L A N D  
R I V E R S  
N E T W O R K

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PO Box 528, PYRMONT NSW 2009  
ph 0428 817 282  
email [inlandriversnetwork@gmail.com](mailto:inlandriversnetwork@gmail.com)  
web [inlandriversnetwork.org](http://inlandriversnetwork.org)  
ABN 34 373 750 383

The Project Team  
Kosciuszko National Park Wild Horse Heritage Management Plan  
National Parks and Wildlife Service  
PO Box 472 Tumut NSW 2720  
[npws.wildhorses@environment.nsw.gov.au](mailto:npws.wildhorses@environment.nsw.gov.au)

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## SUBMISSION

**On the draft Kosciuszko National Park Wild Horse Heritage Management Plan**

### 1. Introduction

The Inland Rivers Network (“IRN”) is a coalition of environment groups and individuals concerned about the degradation of the rivers, wetlands and groundwaters of the Murray-Darling Basin. It has been advocating for the conservation of rivers, wetlands, and groundwater in the Murray-Darling Basin since 1991.

Member groups include the Australian Conservation Foundation; the Nature Conservation Council of NSW; the National Parks Association of NSW; Friends of the Earth; Central West Environment Council; and Healthy Rivers Dubbo.

IRN welcomes the opportunity to make a submission to the NPWS on the draft Kosciuszko National Park Wild Horse Heritage Management Plan.

IRN has been closely monitoring the issue of the impacts of feral horses in the catchment of the western rivers of NSW and the Murray Darling Basin for a number of decades.

We were most surprised and concerned when the Kosciuszko Wild Horse Heritage Act 2018 No 24 (NSW) was enacted without any explicit safeguards for monitoring, controlling and restoring the degrading impacts of these horses on the valuable catchments, on which the health of many of the western rivers of NSW and the Murray Darling Basin depend.

The catchment values of Kosciuszko National Park have been documented in the Statement of Significance of the Kosciuszko National Park Plan of Management.

## 2. SCIENTIFIC EVIDENCE OF DAMAGE BY HORSES TO NATURAL ECOSYSTEMS AND CATCHMENT QUALITY

We are very concerned that the current draft plan would mandate the retention of 3000 feral horses in some of the most fragile areas of Kosciuszko National Park: 32% of the Park would be set aside to provide a permanent homeland for these horses. While we are encouraged that removal of 11,000 horses from the national park is planned, the damage of such a large number remaining would continue the erosion in the catchment and damage to wetland ecosystems that have been well-documented by scientists.

*Caring for our Australian Alp Catchments* (2011, Warboys & Good, published by the Australian Government Department of Climate Change and Energy) set out the challenges, tracing the history of impact including the alarming increase of feral horse numbers. Ten years later and the failure to act decisively has further compounded the degradation.

20 refereed scientific papers were presented at the Australian Academy of Science at the conference *Feral Horse Impacts: The Kosciuszko Science Conference* in November 2018 see

<https://www.science.org.au/news-and-events/events/feral-horse-impacts-kosciuszko-science-conference>

In section 5 of the draft Plan the opinion of the NSW Threatened Species Committee is quoted in connection with the listing of a Key Threatening process - *Habitat degradation and loss by feral horses*:

*“Wild horses are listed as a key threat to native plants and animals under the NSW Biodiversity Conservation Act 2016. Habitat degradation and loss by feral horses is listed as a Key Threatening Process in Schedule 4 of the Act. The listing acknowledges the negative impact of wild horses on wetlands, watercourses and riparian systems; alteration of the structure and composition of vegetation; and reduction in plant biomass (NSW Threatened Species Scientific Committee 2018).*

*Scientific evidence shows that the distribution and abundance of wild horses in the park is causing significant negative impact on the environmental values of the park (Robertson et al. 2019; Foster and Scheele 2019; Eldridge et al. 2018; Ward-Jones et al. 2019; Porfino et al. 2017; Schulz et al. 2019; Scanes et al. 2021).*

*Some features of the alpine and subalpine environment are much more susceptible to damage from large, hard-hooved animals than most other Australian environments (Whinam & Comfort 1996)”*

The draft Plan pages 8-9 also acknowledges that the KNP values include peat-forming bogs and fens:

*“Peat-forming bogs and fens – Peatlands form organic-rich soils that are small in size and occupy specific habitats in Australia (Whinam and Hope 2005). The park contains the most extensive peatlands in the Australian Alps. Peatlands are very important to the park environment as native animal habitat for species like crayfish, frogs, skinks and birds. They provide green feed during dry periods to a range of native animals and invertebrates and store sediment and water, gradually releasing high quality flows to the Murray–Darling Basin and other significant rivers (Hope et al. 2012).*

*Wild horses graze fens and other wet areas and can leave a dense network of tracks (Hope et al. 2012; Drying 1990). Wet soils are more susceptible to erosion than dry soils, and hooves displace soils (Drying 1990). Hooved animals walking through bogs and fens can trample vegetation, which leads to further loss of soil. Displacement of soil changes the hydrology of bogs and fens, creating channels through the wetland and potentially leading to draining of the wetland. This draining affects any soft plants such*

*as sphagnum moss which relies on well aerated wet soils. Loss of vegetation in peatlands can affect native animal habitat and food sources (Hope et al. 2012)."*

The only "solution" offered to this "challenge" in the draft plan is (page 9)

*"This plan meets that challenge by dividing the park into three distinct management areas (Figure 2) and, for the management area in which wild horses will be retained, identifying a target (reduced) population for that area."*

The NSW Threatened Species Scientific Committee also found, in its final determination<sup>1</sup>:

*"At the landscape scale the impacts of feral horses alter ecosystem processes governing water quality and supply including at the sources of the Snowy, Murray and Murrumbidgee Rivers. These rivers are significant inland river ecosystems as well as supply significant volumes of water to the Murray Darling basin and the Cotter River catchment which is the primary source of potable water for the Canberra region (ACT Parks Management and Lands 2007). Removal of feral horses from catchment areas in Namadgi National Park increased the quality of water downstream (ACT Parks Management and Lands 2007)."*

**We do not accept that this "solution" will allow conservation of the values of the KNP and protection of the ecosystem services it provides, and the draft Plan offers no further information.**

### **3. CATCHMENT VALUES, DAMAGE AND RESTORATION**

The draft plan acknowledges that the environmental values of the KNP include:

"the headwaters of major rivers, namely the Murray, Murrumbidgee and Snowy" (Section 4 of the draft Plan) and that the values of the KNP include significant soils features, and significant lakes, wetlands and rivers (Section 4 of the draft plan)

The draft Plan not only proposes to leave a huge number of feral horses in the national park, but it makes no provision for restoration of the damage which has already been done by uncontrolled feral horses to the catchments, wetlands, soils, creeks, and rivers, and to the native vegetation of the national park. The integrity of the catchment depends on an extensive and long-term restoration program. The removal of stock from the Kosciuszko National Park in the 1940s took decades to restore, with programs over many decades at great cost to the public purse. Many aspects of the sub-alpine ecosystems have yet to recover completely from this early grazing by hard-hoofed stock.

The draft plan also makes no provision for prevention or repair of the ongoing and future damage which horses will cause if they are allowed to remain in the national park. The intensity of damage has been well-documented and leaving feral horses in this catchment will simply cause more of the same damage: vegetation loss, soil loss, and native fauna habitat loss.

Compacted soils and loss of wetlands will affect the character of runoff from the catchment in terms of water quality (turbidity and nutrients), the loss of water storage as wetlands fail in their slow release of water, and runoff timing, as compacted soils allow rapid runoff, rather than sustained release for greater downstream benefits.

The value of the catchment quality of Kosciuszko National Park, and the way on which it is managed, is important. "In economics, the estimation of total economic values in itself is not as important as

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<sup>1</sup> <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Scientific-Committee/Determinations/2018/habitat-degradation-loss-feral-horses-equus-caballus-final-determination.pdf?la=en&hash=8A5823ECF07BA2DA637B698DC21BE68E6DFD2D6C>

assessing the change in economic values that may result from a change in policy of direction.”<sup>2</sup> The major change in management policy that would result from the adoption of the draft plan would significantly reduce the value of the KNP catchment.

#### **United Nations Decade of Restoration**

The United Nations Decade of Restoration commenced in 2021 and noted the urgency of restoring damaged ecosystems:

*“There has never been a more urgent need to restore damaged ecosystems than now. Ecosystems support all life on Earth. The healthier our ecosystems are, the healthier the planet - and its people. The UN Decade on Ecosystem Restoration aims to prevent, halt and reverse the degradation of ecosystems on every continent and in every ocean. It can help to end poverty, combat climate change and prevent a mass extinction. It will only succeed if everyone plays a part.”*

The NSW Government has the responsibility to play their part and must not knowingly continue to permit ecosystem degradation to occur in Kosciuszko National Park.

## **4. IRRECONCILABLE MANAGEMENT CONFLICT FOR THE CHIEF EXECUTIVE OF NPWS**

The conflict which the draft plan would impose on the Chief Executive of the NPWS would be intense and unresolvable.

The KWHH Act requires the Chief Executive to prepare a draft plan S.5 (1) and, when it is adopted by the Minister, to carry out and give effect to the plan (S.10).

This would place the Chief Executive in an impossible position, as s/he is also required, under the National Parks and Wildlife Act, to manage National Parks according to the objects of this Act and the management principles it sets for national parks.

The National Parks and Wildlife Act sets out the **Management Principles** for National Parks in Section 30E:

#### **30E National parks**

*(1) The purpose of reserving land as a national park is to identify, protect and conserve areas containing outstanding or representative ecosystems, natural or cultural features or landscapes or phenomena that provide opportunities for public appreciation and inspiration and sustainable visitor or tourist use and enjoyment so as to enable those areas to be managed in accordance with subsection (2).*

*(2) A national park is to be managed in accordance with the following principles—*

*(a) the conservation of biodiversity, the maintenance of ecosystem function, the protection of geological and geomorphological features and natural phenomena and the maintenance of natural landscapes,*

*(b) the conservation of places, objects, features and landscapes of cultural value,*

*(c) the protection of the ecological integrity of one or more ecosystems for present and future generations . . .*

Clearly, Section 30E(2) (a) is fundamentally incompatible with retaining feral horses, and it is this subsection which critically important in protecting the catchment quality.

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<sup>2</sup> Young, D., Economic Values (An Assessment of the values of Kosciuszko National Park - Independent Scientific Committee 2003) p.302

## 5. DRAFT PLAN DOES NOT ADDRESS REQUIREMENTS OF THE KWHH ACT

We also note that the KWHH Act requires that the draft plan must:

*S.2 (b) set out how that heritage value [of the horses] will be protected while ensuring other environmental values of the park (including values identified in the plan of management for the park) are also maintained, and . . .*

*(d) take into account the objects of the National Parks and Wildlife Act 1974 and the matters that are required (by section 72AA of that Act) to be taken into consideration in the preparation of a plan of management.*

The draft plan does not set out the requirements of S2(b), including how the environmental values of the park would be maintained; nor does it take into account the requirements of S.2(d).

It is clear that neither of these requirements can be met with the huge number of horses proposed to remain permanently in the national park.

Deliberate retention of a 3,000 base population of an invasive feral species known have an adverse. Impact on water catchment values is incongruous – indeed laughable. The extended timeframe proposed to reduce the horse population, with minimal monitoring provision, is incompatible with best practice catchment management.

## 6. CONCLUSIONS

- 1 Action to substantially reduce the feral horse population in KNP as soon as possible;
- 2 A package of control measures should be used, to maximise efficiency compatible with humane animal welfare procedures including ground and aerial shooting where appropriate;
- 3 The NPW&S should be provided with sufficient resources to both implement the overdue damage control and to rehabilitate the damage to catchment values that has and continues to occur as a result of the proliferation of wild horses;
- 4 An ongoing educational program should be developed to assist community appreciation of the importance of managing Alpine water catchment integrity, including the need to minimise adverse impacts from feral horses and other invasive species and of acknowledging place related heritage without causing adverse impact.

Yours sincerely

Brian Stevens  
Secretary