

19 August 2016

**Submission to the NSW National Parks and Wildlife Service,
Office of Environment and Heritage**

Re: Draft Wild Horse Management Plan for Kosciuszko National Park

The Victorian National Parks Association (VNPA) welcomes the opportunity to make a submission to the Kosciuszko National Park *Draft Wild Horse Management Plan*..

Introduction

The VNPA is Victoria's leading non-government, member-based organisation advocating for the protection of Victoria's natural heritage.

We have had a long involvement in both formal and informal inquiries and policy development in relation to biodiversity management in Victoria since 1952.

We congratulate the NSW National Parks and Wildlife Service, Office of Environment and Heritage on the way the draft plan recognises the great damage cause by wild/feral horses to Kosciuszko National Park (KNP), and are impressed that the plan seriously attempts to deal with the problem. However, we believe the plan must be more ambitious if the remarkable natural attributes of the park are to be protected and restored.

In that respect:

- We support the recommendations made in the combined submission by the National Parks Association of NSW and the Nature Conservation Council.
- We would like to emphasise a few points in particular

Some particular recommendations

1/ Cross-border integration.

Given that the wild horse population in the Pilot/Byadbo region of NSW is essentially the same as (or inextricably linked to) the population in the Davies Plain/Cobberas etc (ie 'East Alps') area of Victoria, co-operative cross-border planning and management is essential. As such we support the general thrust of the section headed 'Cooperative control' on p. 29 of the draft (including reference to the AALC MOU), but believe it should be strengthened.

It will be impossible to control feral horses in the border regions of NSW unless the program is strategically applied by both NSW and Victoria, with the same targets, timelines etc. As Parks Victoria is still in the process of developing targets and timelines, the integration of policy objectives and strategies should be an urgent priority for the NPWS.

2/ A clear listing of legislated obligations.

We think the plan should begin with a very clear statement of all legislative and other obligations under which Kosciuszko National Park is managed, which are central to this issue. Any consideration of expectations of particular community groups should be framed in that context, and where those expectations are incompatible with the imperatives of national park management, opportunities for accommodating those expectations should be found outside the park.

The statement of legislative etc. imperatives should include:

a) the **International Convention on Biological Diversity** which Australia has signed and ratified. According to Article 8 of the Convention (in-situ Conservation), signatories must, among other things:

- *Establish a system of protected areas or areas where special measures need to be taken to conserve biological diversity;*
- *Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;*
- *Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, inter alia, through the development and implementation of plans or other management strategies;*
- *Prevent the introduction of, control or eradicate those alien species which threaten ecosystems, habitats or species; etc.*

b) relevant sections of the **EPBC Act**, especially:

- the listing of '*Alpine Sphagnum Bogs and Associated Fens Endangered Ecological Community*'. While this is mentioned on page 6 of the draft, it should appear up front in the context of all governing legislation.
- the National Heritage listing of the Australian Alps National Parks and Reserves. That listing clearly asks for protection of:
 - . Biological heritage: *"The Alps are one of eleven sites recognised in Australia by the IUCN as a major world centre of plant diversity"* etc.
 - . Water harvesting: *"Water harvesting in the AANP has outstanding heritage value to the nation for its contribution to the social and economic development of Australia"* etc.
 - . Scientific research: *"The AANP has outstanding heritage value for the scientific research that has taken place since the 1830s,*

demonstrated by the density and continuity of scientific endeavour”
etc.

Note that while pastoral associations, including cattle grazing and the ‘brumby’ legends, are mentioned in the heritage listing, they are in the context of historical and cultural associations. There is no suggestion in the listing that any activity by hard-hooved animals in the park is at all necessary for heritage reasons.

c) the objects of the **NSW National Parks and Wildlife Act**, including:

“The conservation of nature, including, but not limited to, the conservation of:

- i. habitat, ecosystems and ecosystem processes, and*
- ii. biological diversity at the community, species and genetic levels, and*
- iii. landforms of significance, including geological features and processes, and*
- iv. landscapes and natural features of significance including wilderness and wild rivers.”*

d) Any other relevant legislated obligations.

3/ Stakeholders.

The plan should give increased prominence to the needs of some stakeholders that are scarcely mentioned, particularly Snowy Hydro and the vast population that depend on water throughout the Murray Darling basin, and also catchments to the east.

4/ The feral horse population.

We strongly advocate a faster timeline for removal of horses, and recommend that populations maintained for heritage reasons should be located in suitable areas outside the park. We do not believe it is the responsibility of the manager of a national park to maintain a population of non-native animals, especially an animal that has proved to be highly damaging to the park. Importantly, maintaining a population of any size will take valuable management resources away from other important projects, indefinitely.



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