

RESPONSE TO THE KNP DRAFT PLAN

On Friday October 1st the NSW Government released the draft <u>Kosciuszko National Park Wild Horse</u> <u>Heritage Management Plan</u> (*draft plan*) with a community consultation period until the 2nd of November. The draft plan was prepared to meet the requirements of the <u>Kosciuszko Wild Horse Heritage Act 2018</u>. The Australian Brumby Alliance (ABA) has the following response to the draft plan.

Overall, the ABA acknowledges this draft plan is a change in direction from previous plans and we are grateful for the more balanced approached. Whilst there is still much work to be done to protect our Heritage Brumby for future generations, the ABA is confident that this draft plan can provide a platform for positive action to achieve our goal of sustainable populations of Brumbies in the wild.

The ABA views the following examples of the draft plan as positive:

- > Agreement to retain population of 3,000 wild horses.
- > The reason to retain wild horses is embedded in the plan as reflecting heritage values.
- > Details the specific areas for 3,000 wild horses to be retained.
- > Provides a (reasonable) 5 year time frame to reduce numbers.
- > Explains how other environmental values of the park are maintained.

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- Acknowledges that wild horses do not inhabit 47% of the park.
- Recognises some types of wild horses represent specific heritage value and these are located in areas identified to retain the wild horses.
- > Acknowledges Aboriginal people are an integral part of Australia's wild horse heritage.
- Promotes Context (2015) findings, including wild horse populations are an attribute associated with the cultural heritage significance of the park.
- Lists Commonwealth and NSW state COPs to comply with.
- > Does **not** allow aerial shooting (in this plan) and prohibits brumby running/roping.
- Mustering and fencing may be trialled.

The ABA has the initial following questions of the draft plan:

- <u>Environmental Impact Studies</u>: Will they also include the trapping of wild horses? If so, how long will these studies take? To expedite the process, can these studies commence immediately?
- <u>Rehoming</u>: Of the areas where wild horses are to be removed and then kept horse free, the ABA would like a strong emphasis on trapped for rehoming as the preferred removal process.
- <u>Population count</u>: It has always been a contentious issue and draws significant criticism from groups on different sides of the debate, therefore, the ABA would like a reputable Brumby Support group to be involved in the population count as oversight to ensure transparency in process and support from all sides of the debate.
- <u>Population Density Research</u>: A recent study by the University of Southern Queensland (USQ) and the ABA has proven that density levels are the key to sustainable wild horse populations and to manage environmental protection. This study can inform wild horse management strategies.

- <u>Depth Scientific Research</u>: The draft plan relies on a limited pool of scientific data to guide it, the ABA would like more depth of scientific research used. For example, not just Brumby numbers, but recording Broad-toothed rat run ways and scats and critically endangered Alpine tree frog including tadpoles in wallows, where horse density was high in the USQ-ABA study.
- Impact of Climatic events on population numbers: Wild horse populations are subject to natural climatic events and can see a fluctuation in numbers, in the draft plan there is no provision for extra feed/water for wild horses during these times. The plan states that; Wild horses will not be introduced/reintroduced or translocated between different areas of the park to supplement any reduction in population. The ABA is concerned there is no safety net provision in the draft plan to ensure genetic viability as population numbers recover after such natural events.
- <u>Control methods</u>: The draft plan allows for lethal & non-lethal methods used to achieve 3,000 wild horse population number. There is allowance for rehoming, however the ABA would like Parks NSW to increase flexibility and support to increase rehoming.
- <u>Fertility Control</u>: The draft plan does not support fertility control, however it notes that it could be considered once the target of 3,000 wild horses is achieved. The ABA would like to see the adoption of fertility control as soon as possible, it is a method with a proved history in successfully managing population size and will prevent countless foals being born, reproducing - only to be killed..

The ABA will make a formal submission to the Community Consultation process and we encourage everyone else to also make one. IT is important that people have their voice heard in order to ensure the draft plan can effectively safe guard our Heritage Brumbies long into the future.

The ABA is dedicated to the recognition, management, preservation and welfare of Australian wild horses, we are a charity organisation.

Quotes attributed to Ms Jill Pickering, President of the ABA

"We welcome this draft plan and look forward to an opportunity of working with Parks and Wildlife NSW to achieve sustainable populations of wild horses in the KNP."

For all comments, please contact Jill Pickering, President of ABA, pickjill@hotmail.com / 0400 558 772



Horses of KNP in winter. Photo credit Michelle Brown