



**Submission to the
Project Team of the
Kosciuszko National Park Wild Horse
Heritage Management Plan**

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Murray Darling Association Inc.

Region 1

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Executive Summary

Thank you for the opportunity to provide feedback to the Project Team on the Kosciuszko National Park Wild Horse Heritage Management Plan.

We acknowledge the key points of the plan are to reduce wild horse numbers from the estimated 14,000 to 3,000, retaining the remaining population in 'Wild Horse Retention Areas' amounting to 32% of the park.

The MDA has serious concerns that this number of wild horses in the park will continue to have devastating consequences on the ecological values of this fragile environment; that the plan fails to comply with the State's obligations under *National Parks and Wildlife Act (1974)*; and that the plan is inconsistent with related management plans and instruments.

Introduction

The Murray Darling Association is the peak body representing Local Government across the Murray-Darling Basin, with our membership base divided into 12 separate regions in which Councils have common interests.

Region 1 of the Association consists of the following Councils:

- Cities of Albury, Wodonga, Wangaratta, and Benalla
- Shires of Indigo, Towong, Greater Hume, Alpine, Snowy Valley and Snowy Monaro

As a result, the management of the Kosciuszko National Park is a matter of concern to our members and so we have written the following submission relating to the management of wild horses.

Context

- The NSW Department of Planning, Industry and Environment has released its [NSW NATIONAL PARKS & WILDLIFE SERVICE Draft Kosciuszko National Park Wild Horse Heritage Management Plan](#).
- Draft Kosciuszko National Park Wild Horse Heritage Management Plan 2021 [Key factsheet](#)
- The draft plan has been prepared to meet the requirements of the Kosciuszko Wild Horse Heritage Act 2018.
- Public submissions are open until November 2, 2021.
- Further information on submissions can be found [here](#).

Submission

1) Unchecked damage to the environment

The Kosciuszko Wild Horse Heritage Act 2018 is deeply flawed by allowing the continued damage to the delicate environment by large numbers of wild horses. This Act should be repealed as a matter of urgency. It is clearly not compatible with the National Parks and Wildlife Act 1974 nor with an evidence-based approach to managing these horses.

The presence of large numbers of feral horses causes significant impacts on the catchment of several rivers and streams at the head of the Murray and Murrumbidgee and on many



threatened species of flora and fauna. Based on a 2020 survey it is estimated that there are more than 14,000 horses in the park and with a reproduction rate of ca. 20% they will double in number every 3 – 4 years. Significant damage is being caused by trampling and track creation leading to erosion, soil compaction and wetland destruction. In years of low rainfall, it also becomes an animal welfare issue with many horses in poor condition.

Recommendation 1: That the Kosciuszko Wild Horse Heritage Act (2018) be repealed as a matter of urgency and redrafted to be consistent with the National Parks and Wildlife Act 1974.

2) Feral horse reduction and confinement

The proposal to retain 3,000 horses in the park is not based on any credible science. We strongly support all humane methods to reduce the number of feral horses to a significantly lower number by all appropriate control methods including aerial and ground shooting.

Detailed investigations should be commenced to determine if there are other methods to reduce the numbers and to confine them to areas of the park without environmental assets such as wetlands and critical habitat for threatened species.

Recommendation 2: That the NSW Government:

- ***reduce the wild horse numbers via all humane methods, including aerial and ground shooting, and***
- ***that detailed investigations should be commenced to determine alternate methods to reduce wild horse numbers and confine them to certain areas of the park.***

3) Introduction of a Control Plan and investment in the ecosystem

The Murray Darling Association calls for the NSW Government to repeal the Kosciuszko Wild Horse Heritage Act 2018 immediately and to implement a control plan without delay. The plan should also include a greater investment in ecosystem monitoring and restoration of the damaged parts of the park.

Recommendation 3: That the NSW Government implement a control plan that includes greater investment in ecosystem monitoring and park restoration.

4) Compliance and Operational and Strategic Alignment

The Murray Darling Association calls for the NSW Government to ensure that the Kosciuszko National Park Wild Horse Heritage Management Plan; the Kosciuszko National Park Plan of Management and all related plans and associated legislation comply with the National Parks and Wildlife Act 1974 and are consistent with each other.

All approved plans must demonstrate operational and strategic alignment with each other – including consistency with the State’s obligations under the Murray-Darling Basin Plan and related Water Resource Plans and Water Sharing Plans.

Recommendation 4: That the NSW Government ensure that:

- ***all related management plans comply with the National Parks and Wildlife Act 1974, and***
- ***approved plans must demonstrate operational and strategic alignment with each other – including consistency with the State’s obligations under the Murray-Darling Basin Plan and related Water Resource Plans and Water Sharing Plans.***

