



# Amendment of the Kosciuszko National Park WHH Management Plan 2021

Submission of the  
Australian Veterinary Association Ltd

September 2023

## The Australian Veterinary Association

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, livestock, and wildlife. Government veterinarians work with our animal health, public health, and quarantine systems while other members work in industry, research, and teaching. Veterinary students are also members of the Association.

The AVA thanks the NSW National Parks and Wildlife Service for the opportunity to comment on this important issue.

## Summary

The Australian Veterinary Association supports the primary thrust of the proposed amendments to the Kosciuszko National Park Wild Horse Management Plan 2021 (KWHMP 2021), as they align with our [policy on the control of feral horses and other Equidae](#). The amendments are consistent with the AVA submission (April 2023) to an Inquiry of the Senate Standing Committee on Environment and Communications<sup>1</sup>. In that submission we advocated for the adaptive use of the most humane and applicable culling methods and the need for policy to be scientifically based on the environmental health of the park. We also recommended the need for the plan to be adaptive and environmental outcomes monitored and reported regularly.

In preparing this submission we have responded to the specific amendments proposed and noted additional elements which should be modified in the amended plan.

## Specific Responses to the Proposed Amendments

### Amendment 1. Executive Summary

- Subject to the amendments made – *AVA: no comment required.*

### Amendment 2. Matters considered

- Subject to the amendments made – *AVA: no comment required.*

### Amendment 3. Updated population size information

- The replacement of population size data based on Cairns 2022. *AVA: No comment required.*

### Amendment 4. National standard operating procedure

- **Section 6.1 Animal Welfare**

Replace:

- Model Code of Practice Humane Control of Feral Horses (Sharp & Saunders 2014) and associated standard operating procedures:
  - o HOR001 – Ground shooting of feral horses (Sharp 2011a)



o HOR003 – Mustering of feral horses (Sharp 2011b)

With:

- Model Code of Practice Humane Control of Feral Horses (Sharp & Saunders 2014) and associated standard operating procedures:

o HOR001 – Ground shooting of feral horses (Sharp 2011a)

o HOR002 – Aerial shooting of feral horses (Sharp 2011d)

o HOR003 – Mustering of feral horses (Sharp 2011b)

*AVA Comment: Support the addition of HOR002 but we note that these codes (HOR001, HOR002 and HOR003) are in the process of being amended and updated. More recent versions of these documents may be available and should be used. and Dr T. Sharp should be consulted. In addition, consideration should be given to include the SOP 'HOR004 Trapping of feral horses' as this may provide additional flexibility. However, this SOP must be reviewed to include details of shooting of yarded feral horses including assessment of tranquilisers for this procedure to achieve optimal animal welfare outcomes.*

#### **Amendment 5. Wild horse control methods**

- **Section 6.2 Capture and control methods that are available for use in the park**

Replace: Ground shooting - For use in areas of the park which have been closed to ensure safe implementation of ground shooting.

With: Ground shooting - For use in any area of the park.

Reason: To clarify the example application for when ground shooting may be used.

*AVA Comment: Supports the use of ground shooting but withholds its support for this amendment subject to the intention of the amendment. The requirement to close areas of the park in which ground shooting is being conducted seems a reasonable and proper procedure to ensure public safety. The Reason given, "To clarify the example application for when ground shooting may be used." does not make the reason for the change clear.*

Add: Aerial shooting – For use in any area of the park.

*AVA Comment: Supported, with a note that this should only be used when ground shooting is not possible. Provision for closure of the areas of the park where shooting operations are taking place seems necessary for reasons of public safety.*

Delete: reference to Aerial shooting page 20-21.

*AVA Comment: Agreed*



## Amendment 6. Minor amendments

- **Section 8 Community and stakeholder involvement**

*AVA Comment: We support the amendments to require consideration of both a wild horse advisory body comprising community representatives and scientific experts.*

### References

*AVA Comment: Agree that the references need to be amended depending on those adopted finally.*

## Additional Comments

### Monitoring and Review

Section 7 of the KWHMP 2021 identifies several points to be monitored to ensure that the management plan can be adapted to the changing conditions and progress of the plan. The plan foreshadows a review after 30 June 2027. It is clear from the rate of increase in feral horse numbers that the time frame for the 2027 review is too prolonged and that more regular reviews are necessary to maintain public confidence that the plan is on target to achieve its intended aims. Interim reports are required.

The most important element for monitoring is environmental health of the park, including impacts on known threatened species, and all animal welfare outcomes. The effectiveness of management actions should be monitored and reported to ensure environmental health and animal welfare are being met. Management practices should be adapted if the desired outcomes are not being achieved. Monitoring environmental health should take account of the interaction of any other confounding influences. For example, if the damage to waterways and bogs is not being achieved with reductions in wild horse numbers then other factors such as feral pigs and feral deer also need to be reviewed.

### Public Reporting

Monitoring must be transparent, regular, and reported in a publicly accessible format to be useful. This information is essential to build and retain the support of stakeholders. The use of a simple “environmental dashboard” would suffice. This should be maintained in its format to follow progress year by year. For this purpose and to minimise cost, selected sentinel species should be reported together with culling activities. Reporting the numbers of feral animals removed and populations of feral animals does not necessarily reflect any change in the environmental or heritage outcomes.

### Independent Verification of Humaneness

More on-the-ground assessment is required for current control methods, especially regarding use of head vs chest shots<sup>2</sup> and for aerial shooting<sup>3</sup> to help refine the relevant SOPs. In addition, the monitoring of animal welfare and humaneness of actual culling practices as they are being undertaken would build public confidence and acceptance. This would be most effectively conducted by independent assessments of culling activity, including post-mortems of a portion of the cull and faithful recording of



shots per animal and issues encountered. The use of body cameras would increase transparency. The following key parameters for conducting animal welfare audits have been suggested<sup>4</sup> :

- Time to unconsciousness following gunshot
- Time to death following gunshot
- Distance moved between gunshot and loss of consciousness
- Presence of non-fatal wounding
- For aerial shooting, helicopter chase time

### **Conflict Resolution**

The current feral control/heritage horse conflict and the delays it has caused has permitted the number of horses to increase substantially to a population now estimated to be 18,000 (2022). If the culling program required by the Kosciuszko National Park Heritage Horse Management Plan 2021 can achieve its target of 3000 remaining by June 2027, the underlying points of conflict between the stakeholders remains. The culling of approximately 450 horses annually will still be required to maintain stable number and the antipathy between the stakeholder groups will continue because the position of both parties has not been accommodated.

The need for negotiations between the parties to find a longer-term solution remains.

The conflict resolution toolkit must be used and requires:

- all parties recognising and admitting to the issues honestly and transparently
- compromise
- factual and realistic assessments of the options

The ecology/conservation interest are adamant that the horses cannot stay in the fragile alpine areas. The heritage group are adamant that the wild horses will stay in the mountains.

At present some horses are being passively trapped and moved to areas outside the park, indicating that the heritage position is tolerating translocation, to some degree. This accommodates the concern that the blood lines of the brumbies as valued by the heritage horse group can be maintained. The numbers could be controlled, their welfare managed but their presence in the Australian Alps would be maintained in perpetuity. The control of feral horses within the National Park could then proceed effectively and without the necessity of ongoing conflicting objectives. This seems one possible long-term solution to get beyond the current impasse. There may be others, but this process requires independent and professional conflict mediation to explore. Any potential solutions that might be determined at mediation can then be examined to test their feasibility.





## Clarification Required

The Kosciuszko Wild Horse Heritage Act 2018 No 24 makes clear in Sections 4; Object of Act and 5(2) Wild horse heritage management plan, that the Kosciuszko Wild Horse Heritage Act 2018 applies only to **parts** of Kosciuszko National Park. It would seem therefore that the provisions of the Wild Horse Heritage Act only apply to the areas identified as “Wild horse retention areas” and not to the remainder of the park. If this were so, previous operational matters covered under the National Parks and Wildlife Act 1974 would continue to apply to those areas, not part of the “Wild horse retention areas”. We would welcome interpretation of this point.

## References

1. The Australian Veterinary Association. *Submission on the Impacts and management of feral horses in the Australian Alps an Inquiry of the Senate Standing Committee on Environment and Communications*. 2023.
2. ITRG. *Assessing the humaneness of wild horse management methods: Kosciuszko National Park Wild Horse Management Plan*. Sydney, 2015.
3. Hampton J, Edwards G, Cowled B et al. Assessment of animal welfare for helicopter shooting of feral horses. *Wildlife Research* 2017; 44:97–105.
4. SAP. *Final Report of the Kosciuszko Wild Horse Scientific Advisory Panel – Wild Horse Management Plan*. 2020.

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