



Nature Conservation Council

The voice for nature in NSW

13 September 2023

Submission on the proposed changes to the Kosciuszko National Park Feral Horse Management Plan

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 170 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC strongly supports the proposed changes to the Management Plan.

These actions are required to reduce the number of feral horses across the Australian Alps, in order to protect threatened species, ecosystems, river catchments and Indigenous heritage.

NCC wishes to highlight that:

- Feral horse numbers are unrestrained and growing rapidly due to insufficient control actions, with recent estimations of around 18,000 horses in Kosciuszko National Park alone – a 30% rise in two years.
- Feral horses are listed as impacting at least 25 threatened alpine flora and 14 threatened alpine fauna species, including the iconic corroboree frog, the broad toothed rat, and rare alpine orchids.
- Feral horses disrupt natural ecosystem functioning, damaging habitats and water catchments in the Alps by trampling, track creation, soil compaction, wallowing, erosion of streambanks, sphagnum bog and wetland destruction, and overgrazing.
- Every year the government fails to take effective action means more horses must be removed, the damage to ecosystems, threatened species and Indigenous heritage will increase, and the cost to taxpayers will rise.

To respond to the specific [proposed amendments to the Kosciuszko Wild Horse Heritage Act 2018](#):

Amendment 3, Section 5: Protecting wild horse heritage values while maintaining other environmental values (pp.8)

Updates the information regarding the population of feral horse numbers in the park, increasing from 14,280 (November 2020) to 18, 814 (November 2023) individuals.



The NSW government's policy of feral horse protection has led to devastating impacts on native wildlife, and clearly requires updating. The Australian Alps are protected under national environmental law, being listed as a National Heritage Place since 2008, and yet feral horse numbers in the park continue to grow. NCC supports this amendment, which further recognises the expanding nature and extent of the issue.

Amendment 4, Section 6.1: Animal Welfare (pp.18)

Includes the addition of 'aerial shooting of feral horses' as a method of humane population control within Kosciuszko National Park.

NCC supports this amendment, which aligns the management plan with the national standard operating procedures for the aerial shooting of feral horses. Controlling the population of feral horses in the park is the most humane course of action for both the horses themselves as well as local native wildlife, given the vast extent of relevant environmental destruction. Both the RSPCA and Australian Veterinary Association support the humane culling of feral horses, in the absence of any other feasible solutions.

Amendment 5, Section 6.2: Capture and control methods that are available for use in the park (pp.20-21).

Expands existing ground shooting initiatives to include all areas of the park and removes section against aerial shooting.

NCC supports this amendment as a necessary initiative to effectively manage feral horse populations and stop negative environmental impacts. Fertility control, as well as trapping and rehoming, are not viable options for feral horse population reduction due to the size and geographic spread of the current population in the Alps. This amendment is necessary to ensure a decrease in population size from 18,000 to 3,000 by June 2027, in line with the [Wild Horse Heritage Act, 2018](#).

NCC recommends that the NSW Minister for Environment and Heritage, Penny Sharpe, approve these proposed amendments to the *Kosciuszko National Park Wild Horse Heritage Management Plan*, which are conducive to reducing the population of feral horses within the boundaries of the park to the 3,000 individuals established in the *Wild Horse Heritage Act, 2018*.

NCC further recommends that the NSW Government work with the Australian Government develop a National Feral Horse Threat Abatement Plan, and seek co-



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investment in feral horse management in the Australian Alps, which is a priority place under the [Threatened Species Action Plan](#).

Thank you for the opportunity to participate in the consultation.

Your key contact point for further questions and correspondence is Clancy Barnard, Communications Director, available via cbarnard@nature.org.au and (02) 9516 1488. We welcome further conversation on this matter.

Yours sincerely,

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