

# Responses to consultation feedback

During March-April 2021, the *(Draft) Protection of the Alpine National Park – Feral Horse Action Plan 2021* was available on Engage Victoria for consultation and feedback by the community. Following the responses received by Parks Victoria in the form of the Engage Victoria survey and other written submissions, the major themes raised by the community are listed below, as well as Parks Victoria's response to these points.

These themes are grouped into three sections: 1) Overall feedback on the Draft Plan from the Engage Victoria survey report; 2) Feedback specifically relating to the rehoming of horses from the Engage Victoria survey report; and 3) Feedback from written submissions where the points raised have not already been covered.

1. Overall feedback on the Draft Plan (from the Engage Victoria survey report)	Response
1.1 Supportive of the horse control mechanisms in the Draft Plan as the most humane and practical	Feedback has been noted
1.2 Prioritise protecting the environment (ecosystems, flora and fauna)	Feedback has been noted
1.3 Object to lethal management via ground and/or aerial shooting (on the grounds that it cannot be done humanely)	<p>Independent animal welfare experts have advised that ground shooting is the most humane method of control, and will result in the least duration and severity of suffering of any method, when performed under strict controls.</p> <p>Parks Victoria uses animal control methods that are assessed using consistent standards of humaneness. These standards are applied to all the feral species that Parks Victoria controls by lethal means, including pigs, deer, goats, rabbits, foxes and cats.</p> <p>More information is available in the <i>Feral Horse Action Plan 2021</i>, section 4.1 Humaneness of feral horse control methods.</p>
<p>1.4 Questions regarding:</p> <ul style="list-style-type: none"> <li>• quoted horse numbers, counting methods</li> <li>• damage attributed to horses</li> </ul>	<p>Due to the large area occupied by horses in Victoria (over 330,000 hectares), a sampling method using piloted aircraft is required to determine a population number. The survey and analysis methods have been independently reviewed and validated by experts in the analytical techniques used from the CSIRO and St Andrews University in Scotland. The consistent use of a technique across time allows for comparison between years.</p> <p>Drones are not suitable as they must be kept in the visual line of sight of the operator.</p> <p>Parks Victoria plans to undertake regular population surveys, including in 2021, and will publish summaries of horse counts and reports of survey counting methods on its website.</p> <p>Parks Victoria relies on scientific studies to determine the adverse environmental impact of feral horses on the environment. For the Australian Alps this has been particularly well-documented, including by the Australian Academy of Science. Leading Australian scientists have presented evidence demonstrating that feral horses in alpine national parks have already caused widespread and, in some cases, irreparable damage to wetlands and streams, and threaten Australia's native alpine plant and animal species and their habitats, some of which are endangered and found nowhere else in the world.</p> <p>More information is available in the <i>Feral Horse Action Plan 2021</i>, section 2 Threats from feral horses.</p>

## 1. Overall feedback on the Draft Plan (from the Engage Victoria survey report)

### Response

#### 1.5 Exploring non-lethal methods such as:

- trapping and rehoming,
- fertility control

A comprehensive discussion on the range of potential feral horse control methods is available in the *Feral Horse Action Plan 2021*, section 4 Feral horse control methods.

Parks Victoria will trap and rehome horses to the extent that suitable homes can be found. See Section 2 of this document (Feedback on rehoming opportunities).

Fertility control will not stop the damage being caused by feral horses to sensitive ecosystems and would not achieve the immediate population reduction objectives as described in the plan. To give sensitive alpine ecosystems the best chance of recovery after the 2019-20 Black Summer bushfires and as they face new pressures from climate change, it is imperative that feral horse damage is promptly reduced by removing feral horses. There is a high level of difficulty and cost associated with keeping a mare infertile for a lifetime, assuming that it is even possible to re-capture a mare every 5 years for a booster.

More information is available in the *Feral Horse Action Plan 2021*, section 4.3 Population reduction.

- sanctuaries

Parks Victoria supports in-principle the rehoming of feral horses to private sanctuaries that can meet necessary animal welfare standards. Wild feral horses placed in a sanctuary are deemed to be owned, placing a responsibility on the owner for their welfare.

Under the *National Parks Act 1975*, Parks Victoria is obligated to manage the Alpine National Park in a manner that will, amongst other things, preserve and protect indigenous flora and fauna in the park. The setting aside of an area of the national park as a sanctuary for feral horses contradicts that obligation.

Even if it were possible, the population of feral horses in such a sanctuary would still require population control, due to natural increase in population size through births and any sanctuary having a limited livestock carrying capacity.

#### 1.6 Perception that other invasive species (e.g. deer, pigs, etc) cause more damage than horses

Surveys of 186 wetland sites across the Australian Alps found condition was worse in horse occupied areas. The impacts from other mammalian herbivores (especially feral deer) appeared to be minor, therefore, the differences in condition between horse-affected and horse-free areas could confidently be attributed to horses, as opposed to past damage by cattle, or current damage by deer (<https://onlinelibrary.wiley.com/doi/10.1111/emr.12359>).

Parks Victoria takes coordinated action to control a range of threats in the Alpine National Park, simultaneously delivering programs targeting invasive plants and feral animals to protect biodiversity.

Extensive control programs are underway for feral animals including deer and pigs. More information is available in the *Feral Horse Action Plan 2021*, section 3.2 Control of deer and feral pigs.

Find out more about Victoria's biggest coordinated feral animal control program at the Parks Victoria website:

[www.parks.vic.gov.au/projects/deer-and-feral-animal-control-in-response-to-bushfire](http://www.parks.vic.gov.au/projects/deer-and-feral-animal-control-in-response-to-bushfire).

## 1. Overall feedback on the Draft Plan (from the Engage Victoria survey report)

### Response

#### 1.7 Horses should remain in the park due to heritage, cultural and tourism reasons

The history of horses is important to some members of the community as a living link to the pioneer and grazing history in the Alps and adjacent cultural lands, and the 'brumby' is considered by many to be a part of Australian folklore. However, wild horses are not unique or native to the Victorian Alps, whereas many native species in the Alps are rare and endangered. Parks Victoria therefore has an obligation to protect the native species that are restricted to alpine environments. The removal of feral horses from the Alpine National Park will have little impact on the Australian population of feral horses, which is estimated to be 400,000<sup>1</sup>.

The judgement of the Federal Court of Australia accepted that feral horses had severe impacts on the biodiversity values of the Victorian Alps and decided that the removal of feral horses would not have a significant impact on the national heritage values of the Australian Alps.

#### 1.8 Support for more research and ongoing monitoring

Parks Victoria is committed to the regular monitoring of horse numbers and sensitive habitats so the effectiveness of the program can be understood.

Parks Victoria is planning another population survey in 2021, and will publish summaries of horse counts and reports of survey counting methods on its website.

More information is available in the *Feral Horse Action Plan 2021*, section 6.1 Monitoring and evaluation.

#### 1.9 Comments on ceasing the use of roping (either for or against it)

Roping will not be used on parks due to human safety risks. Parks Victoria is responsible for the health and safety of its staff, contractors or volunteers, and cannot permit the use of management methods where the risk cannot be mitigated.

More information is available in the *Feral Horse Action Plan 2021*, section 4.2 Capture and removal of live horses.

## 2. Feedback on rehoming opportunities (from the Engage Victoria survey report)

### Response

#### 2.1 Increase awareness of rehoming opportunities and liaise with rehoming groups

Parks Victoria will seek advice from various rehoming groups and other experienced brumby advocates on where and how to advertise and call for rehoming and other improvements.

Parks Victoria welcomes community initiatives to expand rehoming capacity or to increase the rate of removal to meet that capacity while meeting appropriate safety and animal welfare standards, which could include privately run horse "hubs" that would receive horses to train and pass on.

<sup>1</sup> *Feral Horse (Equus caballus) and Feral Donkey (Equus asinus)*, Australian Government, Department of Sustainability, Environment, Water, Population and Communities, 2011.

**2.2 Reduce costs by providing grants, financial support or incentives**

Parks Victoria’s contribution to rehoming is to remove horses from the park and transport to rehoming properties or mutually agreed holding properties within five hours of the trap site, and this must comply with strict animal welfare standards and regulations. It is not feasible for Parks Victoria to provide financial support beyond the trapping and transport of horses and to fund the training, or the facilities required to train feral horses on private land.

**2.3 Reduce requirements for adoption**

Parks Victoria’s rehoming requirements are designed to ensure that there will be a humane outcome for the rehomed horse. There is no requirement to adopt a minimum of five horses.

Parks Victoria will improve the online process for submitting expressions of interest in taking feral horses for rehoming.

**2.4 Establish a holding facility/allow more time for potential rehomers to prepare**

Parks Victoria will not capture horses for which it has not already secured suitable homes. Parks Victoria will establish a forward planning schedule to allow rehomers to prepare to receive horses.

### **3. Feedback from written submissions (where different from the above)**

#### **Response**

**3.1 Differing views about the application of the “feral” descriptor to horses (and deer).**

The term ‘feral’ applies to non-native (‘alien’) or domesticated species that have established themselves in the wild. This term can equally apply to horses and deer, as well as pigs and goats.

**3.2 Rehoming has an insignificant effect on overall population for the level of resources it consumes, and rehoming options should not be subsidised.**

Parks Victoria will capture and transport the horses within certain areas, but cannot provide financial support beyond the trapping and transport of horses.

**3.3 Re-homing to organisations should require that they provide documentation outlining their practices and should report on outcomes of each horse taken (homed, euthanised, slaughtered etc)**

The current expression of interest process requires rehoming applicants to demonstrate their suitability and capacity to rehome feral horses and outline their reasons and intentions for wanting to become an Approved Rehomer. Once in an Approved Rehomer’s care, feral horses become the responsibility of the rehomer and must be provided with feed, shelter, clean water, veterinary care and be microchipped.

Parks Victoria will record data from the rehoming process to a centrally maintained database. Including the name of registered rehomer receiving the horse/s, date and location of exchange, horse photo, microchip number, contractor name and name of staff member involved in the process.

When the registered rehomer sells or provides an animal to a third party, the registered rehomer is expected to keep a record of the handover/sale of the horse to the new owner. This must include contact details, property location, and condition of the horse.

**3.4 Horses should not be captured and transported if the ultimate destination is the knackery.**

Parks Victoria will not capture horses for which it has not already secured suitable homes.

### 3. Feedback from written submissions (where different from the above)

### Response

**3.5** The plan lacks goals and commitment, with targets that are unambitious, vague and ineffective.

The plan's goals are driven by the overarching objective of reducing feral horses' impacts on conservation values. Removal activities will be underpinned by monitoring and research that measures whether the level and location of horse removals are having the desired effect.

The plan has a life of 10 years, during which time Parks Victoria will implement an adaptive management program to ensure that it regularly reviews the efficiency of different removal methods and their effectiveness in preventing further damage.

More information is available in the *Feral Horse Action Plan 2021*, Table 6.1: Summary of monitoring, evaluation and review actions.

**3.6** A goal should be to eradicate, not reduce. There is no place in legislation for the allowance of horses in national parks. Oppose the continued presence of a small population of horses in Eastern Alps – eradication should be the goal

The plan proposes to completely remove the small feral horse population from the Bogong High Plains, an objective that is operationally feasible within the life of the plan.

Control of well-established feral horse populations across the larger and more remote areas of the eastern Alps is more difficult, and in the 10-year life of this plan, an adaptive management approach will allow Parks Victoria to review the efficacy of different management approaches and collaborations with neighbouring agencies, and respond accordingly.

**3.7** Minimum of 3,000 horses should be removed in the first year from Eastern Alps and to achieve this aerial shooting is needed

The efficiency and effectiveness of ground shooting in relation to the conservation values to be protected have yet to be tested. While aerial shooting of free-ranging horses is routinely used in open terrain in the northern states of Australia, its relative efficiency has also not been established in alpine areas. It will be considered if it becomes clear that the other methods cannot meet objectives, or under exceptional circumstances (such as post-fire recovery).

**3.8** Concern about carcasses attracting other invasive species (such as pigs and dogs)

Carcasses will be left where they fall, as it would be when feral horses and deer die by natural causes. Carcasses are likely to be in remote areas away from walking and vehicle tracks. The safe and efficient removal of carcasses - especially in remote areas - is not achievable. Care will be taken to ensure that carcasses are not left near streams or wetlands, to minimise impact on water quality, or near tracks, to avoid public nuisance. Carcasses left in place will decompose quickly, particularly in summer. The number of horse carcasses will not be so large in any one area at any one time that they are significantly more numerous than the number resulting from death by natural causes. There may be incidental use of carcasses but insufficient to increase predator numbers<sup>2</sup>.

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<sup>2</sup> *How Does a Carnivore Guild Utilise a Substantial but Unpredictable Anthropogenic Food Source?* DM Forsyth et al., 2011.

### 3. Feedback from written submissions (where different from the above) Response

**3.9** FHAP fails to address potential risk to biosecurity from spread of disease to domestic horses and contamination of drinking water

The plan refers to catchment water quality and a biosecurity approach and has been amended to include the biosecurity risk of the spread of livestock diseases (such as equine influenza) from large and uncontrolled populations of feral horses, for which feral horse control would be a preventive or mitigating action.

**3.10** PV should invest in education to inform the community of the damage caused to native species (by feral horses), and the rationale for removing feral horses by shooting

Parks Victoria contributes to a coordinated approach from multiple organisations to inform the community about the importance of conservation programs (including animal control).

The rationale for feral horse control, including the scientific evidence of the damage to biodiversity and catchment values is referenced in the Feral Horse Action Plan and is available on Parks Victoria's website at: <https://www.parks.vic.gov.au/get-into-nature/conservation-and-science/conserving-our-parks/feral-animals/feral-horses>.

For educational purposes, teachers could use these links to inform any curriculum activities.

**3.11** Shooting accuracy data should be available to scientific community for independent assessment and further refinement

Strict protocols and licensing requirements exist for professional shooters who are engaged to control feral animals on Parks Victoria estate, including regular and independent assessments of their capability to conduct safe and humane culling activities.

**3.12** The humaneness of aerial shooting is dependent on:

- its use on flat/open terrain,
- regular review, and
- cessation if any adverse animal welfare outcomes arise.

Expert advice, guidance and protocols for review will form part of operational planning for aerial shooting prior to the technique being used.

**3.13** Horses provide benefits to biodiversity, including the reduction in bushfire intensity/frequency by reducing fuel load, and increased seed dispersal.

A 2005 report on cattle from the Alpine Grazing Task Force concluded that there is currently no scientific support for the view that 'grazing prevents blazing' in the High Country. Evidence from the past 60 years show that sheep, cattle and horses cause alpine soil erosion and reduce vegetation cover from selective grazing and trampling, and decades of peer-reviewed ecological science demonstrate that high levels of vegetation cover are needed to minimise soil erosion in alpine ecosystems.

**3.14** Humans have a worse impact on the high plains through tourist activities, 4WD tracks and damage to indigenous cultural sites. Climate change also needs to be addressed.

The subject of this plan is managing the impacts of feral horses for which there is clear evidence.