



NSW NATIONAL PARKS & WILDLIFE SERVICE

Summary of Representations

**Draft Kosciuszko National Park Wild Horse
Heritage Management Plan**



© 2021 State of NSW and Department of Planning, Industry and Environment

With the exception of photographs, the State of NSW and Department of Planning, Industry and Environment are pleased to allow this material to be reproduced in whole or in part for educational and non-commercial use, provided the meaning is unchanged and its source, publisher and authorship are acknowledged. Specific permission is required for the reproduction of photographs.

The Department of Planning, Industry and Environment (DPIE) has compiled this report in good faith, exercising all due care and attention. No representation is made about the accuracy, completeness or suitability of the information in this publication for any particular purpose. DPIE shall not be liable for any damage which may occur to any person or organisation taking action or not on the basis of this publication. Readers should seek appropriate advice when applying the information to their specific needs.

All content in this publication is owned by DPIE and is protected by Crown Copyright, unless credited otherwise. It is licensed under the [Creative Commons Attribution 4.0 International \(CC BY 4.0\)](#), subject to the exemptions contained in the licence. The legal code for the licence is available at [Creative Commons](#).

DPIE asserts the right to be attributed as author of the original material in the following manner: © State of New South Wales and Department of Planning, Industry and Environment 2021.

Cover photo: Kosciuszko National Park. Stuart Cohen/DPIE

Published by:

Environment, Energy and Science
Department of Planning, Industry and Environment
Locked Bag 5022, Parramatta NSW 2124
Phone: +61 2 9995 5000 (switchboard)
Phone: 1300 361 967 (Environment, Energy and Science enquiries)
TTY users: phone 133 677, then ask for 1300 361 967
Speak and listen users: phone 1300 555 727, then ask for 1300 361 967
Email: info@environment.nsw.gov.au
Website: www.environment.nsw.gov.au

Report pollution and environmental incidents
Environment Line: 131 555 (NSW only) or info@environment.nsw.gov.au
See also www.environment.nsw.gov.au

ISBN 978-1-922738-42-4
EES 2021/0550
November 2021

Find out more about your environment at:

www.environment.nsw.gov.au

Contents

Executive summary	1
Overview	3
A summary of submissions received and their content	3
Consideration of points raised in public representations	4
Theme 1: The heritage value of the wild horse population	4
Theme 2: Other environmental values	6
Theme 3: Wild horse population target	8
Theme 4: Wild horse management areas	10
Theme 5: Wild horse capture and control methods	12
Theme 6: Plan implementation	14
Agency corrections and updates	16
Additions to reference list	16
Species names corrections	16
Update to Tables 3, 4 and 5	16
Update to Section 5.3	16
Updates to Section 6.1	16
Update to Section 8	16

Executive summary

The Kosciuszko National Park Wild Horse Heritage Management Plan has been prepared to meet the requirements of section 5 of the *Kosciuszko Wild Horse Heritage Act 2018*.

The plan:

- identifies the heritage value of sustainable wild horse populations within identified parts of the park
- sets out how that heritage value will be protected while ensuring other environmental values of the park (including values identified in the plan of management for the park) are also maintained.

The process for preparation of this plan is set out in the *Kosciuszko Wild Horse Heritage Act 2018* and includes the public exhibition of a draft plan for not less than 30 days. The Act also requires that the National Parks and Wildlife Advisory Council and the Heritage Council are provided not less than 30 days to comment on a draft plan.

The *Draft Kosciuszko Wild Horse Heritage Management Plan* was publicly exhibited between 1 October 2021 and 2 November 2021. Representations were received from the National Parks and Wildlife Advisory Council and the Heritage Council. In addition, a total of 4066 public representations were received on the draft plan.

Given the large number and importance of representations received, the New South Wales National Parks and Wildlife Service (NPWS) formed a dedicated team to review all representations. A total of 26 staff were tasked with reviewing the submissions over a 3-week period. Over 700 hours of staff time was taken to complete this important task. This summary of representations summarises the representations provided during public exhibition and broadly summarises NPWS' response to this feedback.

Representations were received from individuals as well as a broad range of organisations. The community's interest in this draft plan, and the effort the public have made to make representations is greatly appreciated. Representations reflected a broad range of viewpoints and interests.

The draft plan will now be partly revised in response to the representations received. The current approach in the plan has been developed after considerable input from stakeholders and is consistent with the objects and requirements of both the *Kosciuszko Wild Horse Heritage Act 2018* and the *National Parks and Wildlife Act 1974*.

- Change to the boundary of the Cooleman karst removal management area to include parts of the limestone areas and catchment of the karst. This adds an additional 1044 hectares onto the total of the removal management areas.
- Inclusion of the Yarrangobilly karst into a removal management area. This adds an additional 2562 hectares onto the total of the removal management areas.
- Inclusion of 731 hectares at Tom Groggin and Riley's Flat onto a retention management area.
- Changes to the boundaries does not change the percentage of areas, since the changes are small.
- Acknowledgement that rehabilitation may occur in wild horse removal management areas (section 5.2).
- Acknowledgement that monitoring and research will be undertaken over the life of the plan (section 7).

- A small number of corrections and omissions were also made by NPWS, as outlined in the summary of representations.

Some representations are inconsistent with the objects of the *Kosciuszko Wild Horse Heritage Act 2018* and/or objects of the *National Parks and Wildlife Act 1974* and therefore have not resulted in fundamental changes to the approach set out in the draft plan.

All submissions received are valued, have been carefully considered and will assist NPWS and partners to better understand the community's views and assist in the protection of sustainable wild horse heritage values while also maintaining the other environmental values in Kosciuszko National Park.

Overview

A summary of submissions received and their content

A total of 4066 submissions were received via email/post (2223 submissions) and an online survey (1843 submissions) that was promoted on the NPWS website. Submissions were also received from the National Parks and Wildlife Advisory Council and the Heritage Council.

Each individual submission was registered, read and analysed by NPWS. Through the analysis of the submissions the following major themes were identified:

1. the heritage value of the wild horse population
2. other environmental values
3. wild horse population target
4. wild horse management areas
5. wild horse capture and control methods
6. plan implementation.

Consideration of points raised in public representations

Theme 1: The heritage value of the wild horse population

What did the draft plan propose?

Section 3 of the draft plan describes the heritage values of sustainable wild horse populations in the park and sets out how those heritage values will be protected while ensuring that other environmental values of the park are also maintained.

What points were made in the representations?

Topic	What points were raised in the representations?	NPWS Response
Wild horse heritage values	Suggested that the meaning of 'heritage' had not been defined.	No change necessary. The draft plan identifies the heritage values of wild horses (section 3) using the National Cultural Heritage Values Assessment and Conflicting Values Report: the wild horse population in Kosciuszko National Park (Context 2015) and advice from the Kosciuszko Wild Horse Community Advisory Panel.
	Agreed that sustainable population of wild horses in parts of the park have heritage value.	No change necessary. Already addressed in section 3 of the draft plan.
	Disagreed that a sustainable population of wild horses in parts of the park have heritage value.	No change necessary. The recognition of the heritage values of wild horses in parts of the park is consistent with the <i>Kosciuszko Wild Horse Heritage Act 2018</i> .
	Contended that the objects of the <i>Kosciuszko Wild Horse Heritage Act 2018</i> conflicted with the objects and/or the management principles in the <i>National Parks and Wildlife Act 1974</i> . On this basis it was also contended that the plan was not valid.	No change necessary. The <i>Kosciuszko Wild Horse Heritage Act 2018</i> is not the subject of consultation. The draft plan is consistent with the objects of both Acts and the management principles for national parks under the <i>National Parks and Wildlife Act 1974</i> .
Protection of wild horse heritage values	Claimed that wild horse heritage values would be lost if population control measures were introduced.	No change necessary. Wild horse population control is required to maintain the park's environmental values – as required by the <i>Kosciuszko Wild Horse Heritage Act 2018</i> .

Topic	What points were raised in the representations?	NPWS Response
		Section 5.1 of the plan states that 3000 wild horses will be maintained in the retention areas of the park meaning heritage values are maintained.
	Agreed that the draft plan is adequate to protect the heritage value of wild horses.	No change necessary. Addressed in section 3 and 5 of the draft plan.
	Recommended that the heritage value of wild horses could be conserved through alternative strategies (either at off-park locations or through other means within the park such as cultural events, tours or interpretative signage), and that these alternative strategies were preferable to the retention of a wild horse population in the park.	No change necessary. The <i>Kosciuszko Wild Horse Heritage Act 2018</i> requires the protection of the heritage value of the sustainable wild horse populations in identified parts of the park. Section 5.1 of the draft plan sets out retention areas for the protection of wild horses to maintain their heritage value.

Theme 2: Other environmental values

What did the draft plan propose?

Section 4 of the draft plan outlines other environmental values, defined to include the natural environment, Aboriginal cultural heritage, historic heritage and recreation. The draft plan explains how the heritage values of sustainable wild horse populations will be protected while also maintaining the other environmental values of the park.

What points were made in the representations?

Topic	What points were raised in the representations?	NPWS Response
Impact of wild horses on environmental values	Supported the description in the draft plan about the negative impacts of wild horses on the park's environmental values.	No change necessary.
	Expressed concern that retaining a wild horse population would compromise conservation and/or that the target in the draft plan would be insufficient to ensure the protection of the park's environmental values.	No change necessary. The proposals in the draft plan are designed to protect the other environmental values of the park by reducing the wild horse population.
	Claimed that the information in the draft plan about the environmental impact of wild horses was inaccurate, overstated, or insignificant compared to other threatening processes including climate change, pests and weeds.	No change necessary. The draft plan outlines the scientific evidence that supports statements in the plan about the negative impacts of wild horses on other environmental values, including listing of habitat degradation and loss by feral horses as a key threatening process under the <i>Biodiversity Conservation Act 2016</i> . Management programs are implemented in the park to address adverse environmental impacts caused by weeds and pests, including deer and pigs.
	Recommended that additional impacts arising from wild horses (including water quality impacts and a reduction in the quality of some recreational experiences) should be incorporated into the plan.	No change necessary. A description of negative impacts on water quality and recreational fishing is already included in section 5 of the draft plan. The description of negative impacts in the draft plan is not intended to be comprehensive.
Environmental benefits of wild horses	Claimed that wild horses have environmental benefits (including the reduction of bushfire fuel loads) and that these had been overlooked in the draft plan.	No change necessary. Published scientific research confirms that wild horses negatively impact the natural environment values of the park. There is not sufficient scientific evidence to justify the use of grazing by horses as an ecological management strategy for the park.

Topic	What points were raised in the representations?	NPWS Response
Visitor safety	Expressed concern that wild horse populations could present a risk to park visitors.	No change necessary. The draft plan acknowledges this risk (section 5) and control methods will help to manage this risk.

Theme 3: Wild horse population target

What did the draft plan propose?

Section 5 of the draft plan proposes to reduce the wild horse population from an estimated 14,380 to 3000 by 30 June 2027.

What representations were received?

Topic	What points were raised in the representations?	NPWS Response
Accuracy of population estimates	Claimed the population estimates were inaccurate and overestimated which compromises the validity of the population control target.	No change necessary. Population estimate surveys were last conducted in October – November 2020 using best practice methods and have been peer-reviewed by independent experts.
Justification for the target	Claimed the evidence basis for the population target was based on incorrect information and assumptions or was inaccurate.	No change necessary. The target takes into account advice from the community. The plan provides for the review of this target after 2027.
Target is too low (or should be abolished)	Recommended a higher population target (or the removal of a target all together) is adopted to avoid the use of lethal control measures and/or ensure that wild horse heritage values are better protected.	No change necessary. Wild horse population control is required to maintain the park's environmental values – as required by the <i>Kosciuszko Wild Horse Heritage Act 2018</i> . Additionally, both lethal and non-lethal control measures are available under the plan.
Target is too high (or should be replaced with eradication)	Recommended a lower population target be pursued (or replaced with an eradication strategy) because the retention of wild horses will compromise conservation which is inconsistent with the purpose of a national park under the <i>National Parks and Wildlife Act 1974</i> .	No change necessary. The proposed target seeks to protect the heritage value of wild horses while maintaining the park's environmental values as required by the <i>Kosciuszko Wild Horse Heritage Act 2018</i> .
Support for a target based on adaptive management	Recommended population targets be regularly updated in response to monitoring outcomes, rather than being fixed.	No change necessary. The plan will be reviewed after 30 June 2027 in response to the outcomes of research and monitoring collected over the life of the plan. The target has been fixed to provide stakeholders with an unambiguous figure and scale of wild horse population control that will be implemented over the next 6 years, to maintain the environmental values of the park which is consistent with the Act.

Topic	What points were raised in the representations?	NPWS Response
Support for the target	Supported the proposed population target.	No change necessary.

Theme 4: Wild horse management areas

What did the draft plan propose?

Sections 5.1-5.3 propose the establishment of wild horse retention areas, wild horse removal areas and wild horse prevention areas. The draft plan outlines objectives for each of these areas, their location and the values requiring protection.

What points were made in the representations?

Topic	What points were raised in the representations?	NPWS Response
Size of management areas	Recommended the size of wild horse retention areas be increased and size of removal and prevention areas be decreased in size.	No change necessary. The management areas proposed in the draft plan aims to protect sustainable wild horse heritage values while also maintaining the park's other environmental values. The wild horse retention management areas were selected to capture the suite of wild horse heritage values identified in section 3 of the draft plan. Selection of areas was based on expert advice and advice of the Kosciuszko Wild Horse Community Advisory Panel.
	Recommended the size of wild horse retention areas be reduced and size of removal and prevention areas be increased.	No change necessary. The management areas proposed in the draft plan aims to protect sustainable wild horse heritage values while also maintaining the park's other environmental values. The area occupied by wild horses will be 32% of the park. The wild horse retention management areas were selected to capture the suite of wild horse heritage values identified in section 3 of the draft plan. Selection of areas was based on expert advice and advice of the Kosciuszko Wild Horse Community Advisory Panel.
Location of management areas	Recommendations about the proposed location of wild horse management areas and suggested alternatives to minimise impacts on declared wilderness areas and sensitive sites, including Yarrangobilly and Cooleman karst catchment areas.	The draft plan will be changed. This change will slightly modify an existing wild horse removal area to incorporate parts of the limestone areas and the karst catchment into the Cooleman karst removal management area. This change will protect the Cooleman karst from the negative impact of wild horses. An additional change will slightly modify an existing wild horse retention area at Yarrangobilly to

Topic	What points were raised in the representations?	NPWS Response
		incorporate the Yarrangobilly karst and parts of the karst catchment into a removal management area. This change will protect the Yarrangobilly karst from the negative impact of wild horses. The removal and exclusion of wild horses from designated areas, and the reduction in the overall population, will provide for the effective protection of environmental values.
	Opposed the inclusion of Crakenback, Little Thredbo and Moonbah in wild horse removal management areas in the south of the park.	No change necessary. These areas of the park were chosen as removal management areas to provide a buffer to the sensitive alpine areas. The inclusion ensures environmental values in the park are maintained.
	Recommended that management areas be revised to limit impacts on park neighbours and to ensure an interstate and bioregional approach to wild horse management.	No change necessary. The need for cross-border and cooperative management with park neighbours and neighbouring states is acknowledged in the draft plan (section 8) and can be accommodated without a change in the boundaries of management areas.
Fencing	Submissions questioned the feasibility of restricting wild horses to retention areas without permanent fencing.	No change necessary. Already addressed in draft plan. The draft plan (section 6) explains the use of fencing. Fencing is not practicable or economic in all areas of the park and can negatively impact other fauna species and affect visitor use. Reduction of the wild horse density in retention management areas and removal of all wild horses from removal management areas will limit the movement of wild horses across management area boundaries.
	Recommended the use of fencing to protect sensitive sites.	No change necessary. Addressed in draft plan (section 6.2).
	Expressed concern that fences could affect ecosystem function and should not be constructed.	No change necessary. Already addressed in draft plan. The draft plan explains that fencing would have limited application (section 6.2). Any fence construction would be subject to environmental assessment.

Theme 5: Wild horse capture and control methods

What did the draft plan propose?

Section 6.2 of the draft plan outlines the capture and control methods that will be available for use in the park. These include:

- passive trapping
- aerial and/or ground mustering into yards
- removal from the park for domestication (rehomeing)
- removal from the park for transport to abattoir or knackery that meets specific animal welfare criteria
- shooting in trap yards
- tranquillising in trap yards followed by euthanasia via a captive bolt or lethal injection
- ground shooting
- reproductive control.

What representations were received?

Topic	What points were raised in the representations?	NPWS Response
Lethal control	Opposed the adoption of lethal control methods on ethical and/or animal welfare grounds or on the premise that it is contrary to the intent of the <i>Kosciuszko Wild Horse Heritage Act 2018</i> .	No change necessary. A combination of non-lethal and lethal control methods is required to achieve the draft plan's population target. The draft plan proposes a suite of control methods that will maximise animal welfare outcomes. <i>The Kosciuszko Wild Horse Heritage Act 2018</i> does not prevent the use of lethal control methods on wild horse populations.
	Recommended non-lethal methods such as rehomeing, reproductive control and fencing be used as an alternative to lethal control.	No change necessary. The draft plan proposes a range of non-lethal (and lethal) control methods. This suite of methods is required to address the range of practical management constraints that exist throughout the park while also maintaining the park's environmental values.
	Expressed support for the control methods outlined in the draft plan (including lethal control methods).	No change necessary. Control methods are addressed in the draft plan.
Rehomeing and reproductive control	Recommended more funding and/or research is focused on rehomeing and reproductive control.	No change necessary. The draft plan recognises that non-lethal control methods including rehomeing and reproductive control will be available for use in specified circumstances. The draft plan also acknowledges the practical constraints associated with these methods. Financial assistance for research and/or

Topic	What points were raised in the representations?	NPWS Response
		rehoming is not within the scope of this plan.
	Expressed support for rehoming.	No change necessary. This is addressed in the draft plan.
	Recommended it would not be economically feasible to adopt rehoming on a sufficiently large scale.	No change necessary. The draft plan acknowledges the limitation of rehoming on a large scale and includes additional population control methods.
Aerial shooting	Support for aerial shooting should be adopted, particularly in inaccessible areas.	No change necessary. Aerial shooting was not proposed as a population control method in the draft plan and is contrary to current NSW Government policy.
	Opposition to aerial shooting.	No change necessary. The draft plan notes that aerial shooting is not provided for in the plan.
Brumby running	Support for brumby running.	No change necessary. The draft plan does not propose the use of brumby running as a control method due to safety risks for those undertaking the activity and poorer wild horse welfare outcomes.
	Opposed brumby running.	No change necessary. The draft plan notes brumby running is not considered for use in the management of control of wild horses in the park.
Pests and weeds	Recommended the control of pest animals such as deer and goats should be a focus rather than wild horse control.	No change necessary. <i>The Kosciuszko Wild Horse Heritage Act 2018</i> requires protection of the wild horse heritage values whilst also maintaining the park's environmental values. As such, wild horses are the focus of the plan. The control of other introduced animals is also a focus for the park but is beyond the scope of this plan.
	Recommended that wild horse control be undertaken as part of an integrated pest management program.	No change necessary. Wild horse management will compliment other management programs in the park.

Theme 6: Plan implementation

What did the draft plan propose?

Section 5 of the draft plan identifies that by 30 June 2027, the population of wild horses will be reduced to 3000 in the retention management areas and that all wild horses will be removed from removal management areas.

Section 7 of the draft plan also identifies that the plan will be reviewed after 30 June 2027, in accordance with the concept of adaptive management. The review will consider any available monitoring and research data. Subject to the outcomes of the review, the *Kosciuszko Wild Horse Heritage Act 2018*, requires any amendment to the plan to be subject to public consultation, consultation with the Heritage Council and Advisory Council, and consideration and adoption by the Minister.

What points were made in the representations?

Topic	What points were raised in the representations?	NPWS Response
Targets	Recommended the plan should be implemented quicker to limit further impacts on environmental values arising from wild horses and/or to limit the number of wild horses requiring control.	No change necessary. The draft plan proposes a pragmatic and realistic population target in recognition of the logistical constraints associated with controlling the wild horse population in this landscape, consistent with maintaining the environmental values in the park as required under the Act.
	Recommended the plan include intermediate targets and a review of targets based on adaptive management principles.	No change necessary. The draft plan proposes a wild horse population target that provides clarity and certainty for stakeholders and is consistent with the maintaining the environmental values in the park as required under the Act. The draft plan also proposes a review after 30 June 2027.
Resourcing	Raised concerns that resources would not be sufficient to implement the plan.	No change necessary. Details about resourcing are beyond the scope of this plan and are addressed in NPWS operational plans.
Monitoring and evaluation	Recommended the plan clearly identify requirements for monitoring and evaluation and ensure that the results are available to the public.	A change is proposed to the draft plan (section 7). This change will note that monitoring and research will be undertaken over the life of the plan. The results of research and monitoring will be reported to the community as part of the ecological health framework for the park.
Site rehabilitation	Recommended the plan is expanded to encompass the rehabilitation of areas impacted by horses.	A change is proposed to the draft plan (section 5.2). This change will highlight that rehabilitation of other environmental

Topic	What points were raised in the representations?	NPWS Response
Community engagement	Recommended ongoing engagement with the community during implementation.	values may be implemented in retention management areas. No change necessary. Already addressed in draft plan. The plan provides for ongoing scientific expert and community involvement through an advisory group and for ongoing engagement with Aboriginal representatives.
Community awareness	Recommended further raising of awareness in the community about the plan and the management of sustainable wild horse populations.	No change necessary. Already addressed in draft plan. Raising awareness with stakeholders and the broader community will be considered during implementation.

Agency corrections and updates

Additions to reference list

Add: NSW Office of Environment and Heritage 2016. *Draft Wild Horse Management Plan: Kosciuszko National Park*. Office of Environment and Heritage, Sydney NSW.

Add: NSW Department of Primary Industries 2013. *Welfare scoring nutritionally deprived beef cattle, dairy cattle and their crosses, sheep and horses*. NSW Department of Primary Industries.

Species names corrections

Table 1 – Change: Pale goat orchid to Pale golden moths

Table 3 – Change: Gland daisy to Mauve burr daisy (*Calotis glandulosa*)

Table 3 – Change: *Burramys parvus* to *Mastacomys fuscus*

Table 4 – change: *Burramys parvus* to *Mastacomys fuscus*

Update to Tables 3, 4 and 5

Change: Aboriginal heritage sites listed under the NSW *National Parks and Wildlife Act 1974* to All Aboriginal heritage sites including those listed under the NSW *National Parks and Wildlife Act 1974*

Update to Section 5.3

Add: Reference to the following Threatened Ecological Community in Table 5: Aquatic Ecological Community in the catchment of the Snowy River in New South Wales

Updates to Section 6.1

Delete: *Model Code of Practice for the Welfare of Animals: Land Transport of Horses (SCARM 2003)*. This code of practice was replaced by the 2012 guidelines for the land transport of livestock (AHA 2012) which is already referenced in the plan

Add: *Prevention of Cruelty to Animals Regulations 2012*

Add: Welfare scoring nutritionally deprived beef cattle, dairy cattle and their crosses, sheep and horses (*NSW Department of Primary Industries 2013*)

Update to Section 8

Change: 'The wild horse advisory body will be established as soon as practicable after the adoption of the final plan' to 'The wild horse advisory body members will be appointed as soon as practicable after the adoption of the final plan'