



The Australian Brumby Alliance

ABN : 90784718191

Note: We reserves the right to add to our submission after the March 2014 Brumby population count report is released.

Response to the Draft Management Plan of June 2014 on The

Greater Alpine National Park (Victoria)

The Australian Brumby Alliance (ABA) Inc. was formed in April 2008. Its mission is to act as a National Body for the Recognition, Management, Preservation and Welfare of Australian Wild Horses (Brumbies). The following submission is the ABA's response to the Victorian "Greater Alpine National Parks draft management plan" released June 2014.

Thank you for the opportunity to provide feedback on the Alpine National Parks management plan draft – *June 2014*. The ABA appreciates the draft plan's more inclusive emphasis on recognising the contributions both Aboriginal and post-settlement cultures offer, such as to:

- Balance natural, cultural, heritage & recreational values for future generations,
- Protect Living Cultural Heritage,
- Value Post-Settlement park history and promote iconic routes,
- Involve Traditional Owners, groups and post settlement traditions, knowledge, skills and land conservation of the High country in future national park management plans,
- State that Bogong Brumby populations are stable and moderate in the Snowy River National Park and Mount Buffalo National Park,
- Establish an Alpine Cultural Centre to present social values and living history, and to
- Recognise bushfire, extreme weather, climate change are major threats.

ABA Response and Recommendations follow:

Tourism (P.vi) Increasing numbers of pest animals, particularly feral horses and deer (Pvi), are degrading sensitive alpine environments, water catchments and major tourism assets.

ABA Response - Brumbies are themselves a major tourism attraction.

ABA Recommends that Parks Victoria – Promote Brumby tourism.

Pages (v),(1)&(6) "Subject to" The use of the words "*subject to*" on the Alpine draft - *infers* that national parks can only be used for *enjoyment, recreation, education research* where this does not conflict with *protecting the natural environment, flora, fauna & features of scenic....*

ABA Response;

Words '*Subject to*' as stated in section (4)(b)(ii) of the National Parks Act 1975 (the Act) applies only to the provisions made under sub-section 4(b)(i). Section (4)(b) of the Act relates only to those parks described in Schedule Three, page 209 of the Act. The only park listed in schedule 3 of the Act that falls within the Alpine area of this draft plan is 'Tara Range Park'.

Consequently, but for the Tara Range Park, the objective of the Act stated in subsection (4)(c) "*for the use of parks by the public for the purposes of enjoyment, recreation or education and for the encouragement and control of that use*" is a **stand-alone objective**, that is not subject to the provisions listed in section s(4)(b) or any other objective of the Act and *will apply to all other Alpine areas*.

ABA Recommends that Parks Victoria;

- **Remove** words ‘*subject to*’ on page (v) Legal..., page (1) Para 1.2 and page (6) Land Tenure... in the draft management plan to accurately reflect the objectives of the Act.
- **Ensure** the draft reflects that the objective in subsection (4)(c) “*for the use of parks by the public for the purposes of enjoyment, recreation or education and for the encouragement and control of that use*” is a **stand-alone objective** which is afforded **equal** consideration with other objectives of the Act to reflect the intention of the Act.

National heritage (p.8) - Environment Protection & Biodiversity Conservation Act 1999.

ABA Response;

EPBC Objective 4 states *enhance the protection and management of important natural and cultural places*. EPBC cultural places state: *Heritage is all the things that make up Australia's identity - our spirit and ingenuity, our historic buildings, and our unique, living landscapes*. Brumbies are a longstanding part of our identity and our unique, *living landscape* and as such are covered by EPBC objective-4. Many countries value ‘Brumby’, heritage ie USA,UK etc.

ABA Recommends that Parks Victoria;

- Protect the Brumby because it is a prime example of our ‘spirit’ & ‘living landscape’.
- Acknowledge Heritage Brumby values, as England does its Moor Ponies (Ref:1).

Resilience (p.23) Resilience capacity of an ecosystem to absorb disturbance and reorganise while undergoing change, and research must be evidence based and plans reviewed.



These two photos, taken early 2014, demonstrate that *resilience* in both the Kosciuszko and Alpine National Park *Davies Plain*’s ecosystem is thriving with local Brumbies grazing. Note the intact stream banks.



ABA Response;

The Alpine ecosystem has proved its resilience by successfully evolving over 200 years to co-exist with Brumbies. Research indicates that *Conditions are shifting in favour of trees over grasses and this has big implications for how we manage landscapes with fire*.

ABA Recommends that Parks Victoria;

- Research how to optimise Brumbies values that support ecosystem resilience,
- Establish both negative and *positive* impacts of perceived fauna and flora threats,
- Use *evidence based research*, not *perceived* threats, to aid ecosystem resilience, and
- Accept that grazing **can increase** bio-diversity (Ref:2) Many countries now use wild horses for conservation grazing to increase bio-diversity & reduce fire risk (Ref:3).

Reduce Fire/Fuel Hazards (p.29&48) using a range of options including ... slashing

ABA Response;

Climate change increases fire injury. Brumbies reduce fire injury. Compare maps p.29 & p.48 Fire frequency is low (map p.48) where Brumby numbers are high (map p.29) and vice versa.

ABA Recommends that Parks Victoria;

- Acknowledge Brumby conservation grazing significantly lowers fire threats,
- Use National Park 1975 Act s(17)(2)(iii) *control* option to support Brumby values, &
- Research ways to identify the right Brumby population balance for today’s Alps,

Introduced (p.28) Used as a primary reason to remove or control Brumby populations.

ABA Response;

When does *introduced* become *indigenous*? Dingoes and Aboriginals arrived centuries ago; Europeans and horses arrived 200+ years ago - Is the transition *time based* or *survival based*? History shows that evolution, adapting, resilience and survival, **becomes** *indigenous*.

ABA Recommends that Parks Victoria;

- Recognise the resilient way the Alpine areas have adapted to Brumbies, and
- Heritage list the Alpine & Bogong Brumbies as Living Cultural Heritage.

Horse Impacts (p.28) Erosion, trampling, reduced plant species, weed dispersal etc.

ABA Response;

Cowambat exclusion zones **prove** that *Brumbies increase species richness and bio-diversity*. Inside zones grow, tall, tough dry grass bio-mass on bare soil. Outside zones grow nutrient rich, fresh grass grazed to create a species rich bio-diverse landscape. Bio-diversity dropped when Australian megafauna disappeared soon after aboriginals came to the continent (Ref:4).

ABA Recommends that Parks Victoria;

- Accept that Brumbies in fact **increase** bio-diversity by providing the grazing benefits originally delivered when Australian megafauna grazed and enriched the landscape.
- Absorb new learning on the benefits of 'Conservation Grazing' (Ref:5), and
- Implement conservation grazing in managed Brumby numbers, in the Alps.

Degradation/Habitat loss (p.28) potentially threatening Flora & Fauna Guarantee Act 1988 Management objectives include *ensure genetic diversity of flora and fauna is maintained*.

ABA Response;

Emerging evidence strongly suggests that Brumbies, in balanced numbers, *assist* Victoria's flora & fauna to survive, manage severe fire threats and increase bio-diversity. (Photo below)

ABA Recommends that Parks Victoria;

- Implement conservation grazing principles (Ref:6), and
- Conserve our unique *living cultural heritage* for the benefit of future generations.



The Greater Alpine National Park 'Tin Mines' (left) demonstrate biodiversity thriving with local Brumby conservation grazing and co-existing with healthy native grasses. It is time for Australians and National Park management to take on *new learning* about the value conservation grazing provides, in sustainable numbers, to bio-diversity and robust ecologies.

2001 Brumby numbers (5000) (p.28) Remove 1500/1900 annually for 5yrs & subsequently remove 900 Brumbies annually to maintain stable numbers.

ABA Response; Note: we will comment further once March 2014 Count is released

Different locations and degree of sensitivity require different solutions; however the final solution must take the targeted animal's welfare to be the *primary* consideration.

ABA Recommends that Parks Victoria;

- Substantiate recent population count results, including area by area population counts,
- Establish a *science based sustainable Brumby number* each area can co-exist with,

- Identify a science based annual removal number, reviewed each year to cover extreme weather variables and; give priority to rehoming Brumbies that are removed- using
- Passive trapping, slow aerial muster (trial first) vet supervised, and **recognise that**
- Neither aerial or ground shooting can be used in the Alps - as reports show it is **not possible** to obtain a humane kill over steep, uneven terrain with significant ground cover. Essential ground crews *cannot reach wounded* animals in the *required time*.

Attachment to alpine horses (p.29) Many people have an attachment to the horses of the Alpine area and do not wish to see their complete removal.

ABA Response;

The draft Alps plan(p.13) states *Historic and cultural heritage is respected and conserved*, & (p.56) states *There are benefits for all in recognising and respecting the significant social associations and living cultural connections that these groups* (high country people) *have with the park*. The frequent reference to community values substantiate why many people want to continue to have managed, viable Brumby numbers living in the Alps National Park

ABA Recommends that Parks Victoria;

- **Immediately stop** removing Bogong Brumbies and manage them by fertility control,
- Respect community *living cultural connections* to the Bogong Brumby (Ref:7), and
- Give due recognition to the **need to keep** sustainable Brumby numbers in the park.

Fertility control (p.29) not achievable, practical or cost-effective for large populations.

ABA Response;

Fertility control *is viable* on groups under 200. Depending on vaccine type, costs are \$3-\$35, last for 1-4 years and delivered by injection or dart gun. This is being trialled in NSW now.

ABA Recommends that Parks Victoria;

- Utilise fertility vaccine to control the small Bogong Brumby population,
- Develop management methods that have been proven many times over in the USA, &
- Contact the ABA for information on supply & application of fertility vaccines.

Aerial shooting (p.29) technical experts/stakeholders advice most humane in rugged terrain.

ABA Response;

RSPCA Victoria's 2013 submission echoes these words. The Alpine Advisory group were not allowed to discuss aerial shooting. Parks Victoria's 2013 survey overwhelmingly rejected aerial shooting. So, **why** does the draft Alpine Plan June 2014 talk of aerial shooting **now**?

ABA Recommends that Parks Victoria;

- Ban aerial culling as the **Alpine area is not suitable** for this technique due to uneven ground; treed areas and difficult access from the ground for back up work (Ref:8), and
- Review why RSPCA fails to specify conditions needed for a humane shot & essential ground back-up. Neither are achievable in *rugged*, steep, rocky & dense foliage areas.

Remove where eradication is feasible (p.31)

ABA Response;

Removing a population just because it is feasible is a **major concern**. Bogong's landscape confirms an ecosystem in prime condition in 2013 and 2014. Why fracture a viable resilient ecosystem by removing a stable (**p.22 plan draft**) part of that successful landscape?

ABA Recommends that Parks Victoria;

- Use fertility control (viable & cost effective) to manage Bogong Brumby numbers, & continue using conservation grazing to manage Bogong fuel levels. Without Brumby grazing, park staff will have to fund grass slashing regimes to manage fire fuel levels.

Research (p.79) Trends, effectiveness, biodiversity outcomes are vital to effective planning
ABA Response;

IUCN 2012 reports that it is concerned; the *conservation community* has as yet *no system into which to publish either data on population trends of species inside & outside protected areas.*

ABA Recommends that Parks Victoria;

- Develop database of all fauna & flora population trends in the Alpine park,
- Compare population trends to management approaches to gauge their effectiveness, &
- Not repeat Newhaven Station's (NT) mistake when they removed all Brumbies, only to lose the *Night Parrot* because its presence was **dependant on Brumby grazing.**

Australian Brumby Alliance Concluding Observations

ABA Summary: (see \$10 Australian note on the right)

The Brumby's unique, living cultural must be recognised as it is totally consistent with the Act obligations to respect culture), by;

- Formalising conservation grazing programs,
- Maintaining viable, co-existing Brumby populations, and
- Removing overabundant Brumby numbers by humane methods such as passive trapping, low stress mustering and fertility control [effective *now* for populations < 200].
- Never use aerial shooting in the Alpine National Park.



Consider the photo (right), taken early 2014, of a National Park sign referring to their 'slashing' program, and

a quote from Dr. Shelia Greenwell
"Population densities, real or arbitrary, can sway the decision making process, and result in wrong decisions being made, then later regretted".

So, why remove Brumbies who by their controlled grazing, enable bio-diversity to thrive - at no charge!

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See Att. document extracts pages 6-8



Extracts from specific documents and related overseas experience

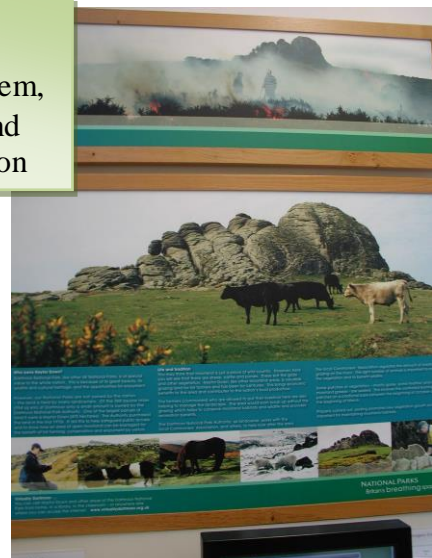
Ref:1 – Dartmoor National Park heritage Ponies living wild

Dartmoor National Park (England) 2010

The Dartmoor National Park Authority is using a herd of ponies as a "habitat management tool" to prevent the wet heath from turning to woodland. Naomi Barker, Ecologist for Dartmoor National Park Authority, said: "We are using native type ponies to graze the heath to maintain the existing community. The ponies are an excellent habitat management tool.

Dartmoor National Park Information Centre

Below Left: National Park Sign has Dartmoor Pony emblem,
Below Mid: Park shop sells Dartmoor Hill Pony DVD, and
Below Right: Park poster has Dartmoor Ponies lower section



Ref:2 - Brumby grazing increases biodiversity

1994 Gilfedder & Kirkpatrick *Australian Journal of Botany* 42(4) 417-430;

- A population of an endangered daisy, *Leucochrysum albicans* (syn. *Helipterum albicans*), was monitored monthly in grazed and un-grazed plots for several years in a paddock near Ross, Tasmania. Adult plants and germinates were more abundant in grazed than un-grazed (exclosures) for most of the period after this decline.
- The frequently **disturbed** margins of the exclosures were the most **favourable sites** for establishment of **new individuals**. The future of this rare species seems to be dependent upon management that maintains open and, preferably, disturbed ground.

How Wild Horses & Burros Help North American Ecosystem – Downer-Wildlife Ecologist
The horse family Equidae has developed many mutually beneficial relationships with the native North American plants and animals with which its members have coexisted for many millions of years.

http://en.wikipedia.org/wiki/Conservation_grazing

- Conservation grazing is the use of semi-feral or domesticated grazing stock to maintain and **increase the biodiversity** of natural or semi-natural grasslands, heathlands, wood pasture wetlands and many other habitats.

- For historic grasslands, grazing animals, herbivores, were a crucial part of the ecosystem. When grazers are removed, historically grazed lands may show a decline in both the density and the diversity of the vegetation. Ecologically, if managed properly, conservation grazing can help to restore these historic ecological assets.
- *Rambo and Faeth* found that the use of vertebrates for grazing of an area would increase the species richness of plants by decreasing the abundance of dominant species and increasing the richness of rarer species.
- The species diversity of native plants was able to respond to grazing and increase diversity.
- The results of the short study showed that areas where grazers were removed had a lower diversity of native grasses, invertebrates and vertebrates in the pools, with an increase in non-native grass abundance and distribution in the area.

Ref:3 – Brumby grazing reduces fire risk

<http://www.npr.org/blogs/parallels/2014/01/08/260777584/after-2-000-years-wild-horses-again-roam-western-spain>

- We've lost all the big herbivores; 'huge, elephant-sized rhinos used to live in Eastern Europe. We've lost a lot of our middle-sized herbivores. But this can be changed, and I think there's a very exciting future for rewilding here.'
- The first thing to come back (as Spaniards abandon rural life) is the underbrush, which used to be grazed by livestock but now grows unchecked & **fuels** increasingly dangerous **wildfires** growing in number and acreage in recent years.
- To control the bush, you need big animals, herbivores, to trample and graze. People have taken their horses and cows away. So this reintroduction [of wild horses] is very important."

Ref:4 – Australian Megafauna grazing pre-Aboriginal period

http://en.wikipedia.org/wiki/Australian_megafauna weight;

1,000-2,000 kilograms on the Australian landscape;

- *Diprotodon optatum* up to two tonnes, it resembled a giant [wombat](#).
- *Zygomaturus trilobus* bullock-sized, appears to have lived in wetlands.
- *Palorchestes azael* (the marsupial tapir) lived during the Pleistocene.

100-1,000 kilograms - 9 species including on the Australian landscape;

- *Procoptodon goliah* grew 2–3 metres tall, and weighed up to 230 kilograms.

10-100 kilograms - 23 species including on the Australian landscape;

- *Propleopus oscillans* carnivorous, 70 kg, 3 metres height with shearing/grinding teeth.

Ref:5 - Benefits of conservation grazing

[*Victoria Forder on behalf of Wildwood trust 2006 page1*](#)

Page1 - Keystone species have the ability to modify their environment to suit themselves and in doing so can benefit numerous plants & animals associated with surrounding landscape, & Page9 - Konik horses increased biodiversity when used as a conservation management tool in marshlands and fens.

From the Guardian - <http://www.theguardian.com/environment/2014/may/21/-sp-european-bison-europe-romania-carpathian-mountains>

As grazers eating a huge amount of grass and herbs each day, bison will create open spaces, meadows and glades, in the forests, which in turn will bring insects and birds. They spread seed in their dung and their hooves break up the soil, **allowing vegetation to grow**.

Ref:5 - Conservation grazing principles

http://www.grazinganimalsproject.org.uk/what_is_conservation_grazing.html

- Conservation grazing is livestock grazing that meets nature conservation objectives and includes everything from extensive, low-intervention grazing schemes meeting welfare needs of livestock while allowing natural processes to occur **to** grazing on improved grassland managed *to optimize sward structure for invertebrates, small mammals and birds*.
- Conservation grazing generally involves less intensive land management techniques on areas that are less commercially productive. Due to their hardiness and ability to cope well on unimproved grassland rare and native breeds of livestock (Brumbies in Australia) are frequently used in conservation and extensive grazing systems and represent an important part of our cultural heritage.
- Livestock affect vegetation communities through **removal of biomass**. This allows less competitive species to become established as dominant plant species are reduced.
- Trampling also creates areas of bare ground, which may be suitable for plant regeneration from seed or seedbanks and are beneficial for invertebrates and herptiles.
- Together with grazing and browsing, physical damage to vegetation from lying, rolling and pushing can also **increase structural diversity**.

Ref:6 - Burra Charter for Places of Cultural Significance 2013

- p.3 - The Charter can be **applied to all types of places of cultural significance** including natural, Indigenous and historic places with cultural values. They are irreplaceable and precious. Places of cultural significance enrich people's lives, often providing a deep inspirational sense of connection to community and landscape, to the past and to lived experiences. The Burra Charter **advocates a cautious approach to change**: do as much as necessary to care for the place and to make it useable, but otherwise change it as little as possible so that **its cultural significance is retained**.
- 5.1 - *Conservation of a place* should identify & take into consideration **all aspects** of cultural & natural significance without unwarranted emphasis on one value.
- Article 13 – Co-existence of **cultural values** should always **be recognised**, respected and encouraged.

Ref:7 Greenwell - Veterinary Report to 2014 Alps National Park review

- Herbivores have been present on all lands during the evolution of species. When herbivores are removed then plant species proliferate, for some this is advantageous but for others they cannot compete and are lost.
- Population densities, real or arbitrary, can sway the decision making process, and result in wrong decisions being made, then later regretted.
- Identify the population density level that serious damage occurs from.
- If trapping is operated in areas of higher population density then the resultant vacuum will attract other groups out of more remote areas.
- From my experience of aerial culling in WA I would suggest that the Vic Alps is unsuitable for the technique. You have uneven ground; treed areas; difficult access from the ground for back up work and a high media presence.
- Final solution must take animal welfare to be the primary consideration.

Australian Brumby Alliance submission – subject to our right to add to our submission after the March 2014 Brumby population count report is released.