



The Bogong High Plains Brumbies need our help

The public have until Friday 16 February to provide feedback on the report.

Your words, thoughts and feedback are needed by Friday 16-Feb-18

The Brumbies need every one who cares about them to speak up NOW

Providing feedback that is clear and polite, and can be quick and easy.

Check VBA link below for more background information

<http://www.victorianbrumbyassociation.org/information-you-need-to-know.html>

Write your submission which can be as little or as much as you want to say

- focus on what seeing Wild Horses means to you,
- say why you want moderate, sustainable Brumby population retained where they have lived as truly wild horses do up to 200 years
- What future generation can learn from seeing Alpine Brumbies
- What you think about Parks Victoria's Strategic horse plan,
- What problems you see with the plan and the impact study it relies upon
- How Brumbies are a valuable part of their Alpine environment, etc

Read about Parks Victoria's plans for the Brumbies in the *Protection Of the Alpine Parks National park-Feral Horse strategic action plan (2018-2020 Draft)*

https://engage.vic.gov.au/application/files/1715/1372/7568/Protection_of_Alpine_NP_-_Strategic_Action_Plan_2018-20_Draft.pdf

Submit your submission - anything from one paragraph to several pages.

Each submission will be counted

ALSO

Email feedback addressed to Mathew Jackson, CEO, Parks Victoria in letter form, highlight key areas that resonate to you via Parks Victoria info@parks.vic.gov.au

Below is the ABA position on the Bogong High Plains Brumbies and the Draft Management Report which may help you in your own submission.



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ABA Position on the Bogong High Plains Brumbies

ABA has three key messages in relation to the current situation with the Bogong High Plains Brumbies:

1. [A managed population should be retained in the BHP region](#)
2. [The Draft Plan is based on flawed research](#)
3. [ABA would like to work with the Government and relevant agencies to conduct proper and robust research into the true Impacts \(both positive and negative\) of Wild Horses in conservation areas.](#)

These messages are discussed more fully below:

A managed population should be retained in the BHP region

- Bogong High Plains are within the Alpine National Park, just south of Mt Bogong. It is close to Falls Creek and the ski fields.
- The ABA supports managing moderate Brumby populations where they have lived wild for 150 plus years, but we totally reject managing to extermination
- The BHP Brumbies have been part of the heritage, and the environment, of the Victorian Alps since the 1800s.
- Currently there are an about 60-80 Brumbies in the area
- There is an opportunity to use Fertility Control as part of the management of the horses and the VBA have offered to provide assistance in a FC Program. Together with passive trapping and rehoming we believe this population can be well managed.
- The unique *attribute* Brumbies bring to Bogong High Plains history will be lost for ever if parks Victoria remove every last Brumby from this Bogong areas where they have evolved within, and still live, wild and free for all to see.

There is strong precedent for the Heritage Value of the Bogong High Plains Brumbies:

- Following the October 2000 slaughter of Brumbies in the Guy Fawkes River NP, the then Minister for the Environment commissioned a Heritage Horse Study (2002) which concluded that the GF Brumbies had significant local heritage value.
- The heritage Context review was commissioned by NPWS NSW, with Parks Victoria's support, to assess NSW/Vic Alpine Brumbies against Australia's National Heritage List criteria. Context 2015 found that Wild Horses are *attribute* associated with the cultural heritage significance of Kosciuszko National Park and *Alps Victorian* regions.



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- The Burra Charter states that “places of *cultural significance* enrich our lives and give a deep and inspirational connection to community and their landscape and to past & lived experiences”, and that “places of cultural significance reflect diversity of our communities, tell us who we are, the past that formed us, irreplaceable, precious and must be conserved for present and future generations in accordance with principle of intergenerational equity.

Tourism - Many people love seeing wild horses

A place in the environment

- Horses have been in this environment for over 150 years and have arguably had less impact than human beings.
- **It is impractical** to try to restore ecosystems to some ‘rightful’ historical state ... it is time for conservationists to focus much more on the **functions of species**, and much **less on where they originated** (Davis 2011: 154).
- Damage and impact are assumed wrongly to be the same in the BHP impact report. For people who hold strong beliefs that horses should not be in National Parks because they are introduced, hard hooved animals that did not evolve in Australia, any sign of Wild Horses is seen as damage.
- However, we know that long ago Megafauna (*one species with a hoof like foot*) roamed the Australian continent, including the alpine areas. J. Flood’s PhD. Thesis on the Bogong Moth explains “large game such as the diprotodontids, macropodids (Sthenurus, Macropus etc), Thylacoleo and Sarcophilus might have been found roaming the alpine shrub and herbfields of the tablelands.”
- The evidence is mounting in regard to the positive effects of moderate grazing on the environment.

The Draft Plan is based on flawed research

The Draft Plan was released during the 2017 Christmas/school holidays. The Impact Assessment Report, published in Jan 2018 informs the decision to remove all BHP Brumbies & halving the main alpine area over 3 years.

Key Points of the Draft Plan:



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- Remove all BHP Brumbies because as **pest** species they can – ignores the context 2015 recognition Brumbies are part of the Alps heritage.
- 400 trapped annually for 3 yrs, exceed rehoming capabilities so well over three quarters of the passively trapped Brumbies will be *euthanized*.
 - Ground and Aerial Shooting will not initially be used for free roaming horses but may be used after year 3 if other methods not sufficient.
 - Passive Trapping is preferred primary method of control with horses offered to volunteer organisations.
 - Remote area passive trapping- horses will not be collected for rehoming but euthanized on site - better than truck to abattoir be killed.
 - Mustering to be trailed as a secondary control method
 - Roping suspended while evaluated.
 - Fencing and exclusion areas may be looked at
 - Fertility Control will not be used
- Plan will *never reduce* alps damage as until studies identify real causes of what is going on, why, by whom - knee jerk reaction – politically OK
- We have verbally been told that any BHP Brumbies that they cannot trap (trap shy) will be shot. ABA disagrees with any shooting of free roaming wild horses, no accuracy, mobs take off, foals left behind, injured Brumbies cant be followed up etc. Parks plan says those not able to be trapped will be dealt with *by other means*.

The plan was informed by an Impact Study undertaken in November-December 2017. A report of the Impact Study published in January 2018.

The Impact Report is Biased, for example:

- The word Impact is used equivocally with Damage. Therefor any impacts, be it dung, or tracks are considered damage whether or not it truly damages the environment. In addition, there was no consideration to observe positive effects. Furthermore, this distortion of language leads readers to draw similar biased conclusions.

Weak methodology was used, for example:

- **Site selection** was biased to areas where horses were thought to be and ignoring where they were not thought to be. Some sort of grid or less selective approach would have provided more realistic and true information
- **Data from the 2017 study were compared to two previous studies**, one in 2006-8 and the other in 2012. However, the methodologies, criteria etc from the previous studies were not presented. Other relevant information such as climate/weather, time of year etc was not provided so and **it is impossible to truly compare the date temporally**. Furthermore, the 2006-8 data are unpublished and held by the Vic Government's Arthur Rylah Institute.



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- **Data were not clearly referenced** spatially so photographic evidence was difficult to locate in most cases.

The Study used incorrect assumptions and jumped to conclusions, for example:

Horse behaviour – The Impact Report states that feral horses have a preference for wet areas. This is false. Horses need to drink so obviously will go to water but they prefer hard ground and do not generally congregate in wet areas for long periods.

Cattle dung vs horse dung – an assumption was made that horse and cattle dung deteriorate at the same rate of around 5 years.

“The amount of dung across the plains is expected to increase several-fold over the coming years if horse numbers remain at the current level, because dung takes around five years to decompose under alpine conditions (Meagher 2004)” (p25):

We note that D. Meagher 2004’s study was on **cattle droppings** in Pretty Valley, Bogong High Plains. Horse dung in the alps area decomposed in a quarter of the time, averaging just over one year. See studies below :

- Zabek (2015) found dung disappeared at a rate of 444 (\pm 150.7 SD) days in the Toolara forest.
- Linklater (2001) found the average rate (\pm SE) in alpine conditions was slightly less at **424 \pm 34** days in his study on New Zealand’s Alpine Kaimanawa Heritage Horses.

Bare patches of ground were only attributed to horse roll pads despite the fact that deer, kangaroos and other animals will also create bare patches to roll or lie in. In fact, horses do not lie on the ground for long periods like kangaroos.

Tracks attributed to horses were in some cases clearly shod, domesticated horses or likely to be deer. This shows either bias or ignorance or both.

Data are not properly quantified for example:

- The key targets of the study – damage to habitat such as sphagnum bogs were not quantified in both area and through time.
- It is meaningless to say that horse “damage” has increased when the true effect on the target habitats and species are not even measured and shown.
- “Dung deposition was common” (p15) - **A scientific report should be able to quantify this better.** How common? How many deposits per square km? What proportion of the land is covered by dung? What proportion of the vegetation is near dung? In Argentina



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where there was an incredibly high density of horses (approximately 32 per square km) and there was still 97.5% of the area not covered by dung.

- “with 18 discrete piles of dung counted along a single 50 m” (p15) : Where is the table with data on all dung deposits found in each 50 m transect. 18 is a big number but **is it a lot of dung in terms of mass?** The report viewed an area of 2000 sq. m, with the average area covered by a dung deposit [$18 \times 2 = 36 \times 100 = 1.8$ rounded to 2%] that is under 2 square metres which is **under 2% of the area**. That **means that more than 98% of the area has no impact from horse dung**.
- The other point about this is what actual damage does dung do? It is basically broken up pieces of dead grass in piles. If the horse didn't eat the grass the grass would die and dead pieces of grass would fall on the ground. **What is the difference? How does the dung damage native plants and animals?**
- It is very difficult to separate factors that cause erosion or what looks like degradation and assign a cause. Some of these changes are natural. **Without controlled experiments the evidence is circumstantial. Consider, for example “Improvement in condition will occur in the absence of grazing.”** (Wahren et al. 1994)

Considering the significant flaws in the report, **a key concern** is its conclusion that *“There is unlikely to be a minimum population size for feral horses that would not lead to incremental, on-going degradation”*.

ABA would like to work with the Government and relevant agencies to conduct proper and robust research into the true Impacts (both positive and negative) of Wild Horses in conservation areas.

- It would be tragic to remove all horses and find that this causes the decline or extinction of some native plant or animal.
- Do we really want to replace Wild Horse grazing with mechanical, costly alternatives such as Parks Victoria slashing long grass in park areas? This is what is said on Park Visitor Info signs!
- Without robust and proper, peer-reviewed research, it is quite possible that the intended environmental outcomes will not be realized and at great cost to the taxpayer.
- The Victorian Brumby Association is willing to provide assistance in establishing a Fertility Control Program in the BHP