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Parks Victoria's Draft VicAlps Brumby Management Plan 2021 - Systemic issues.

Issues highlighted in the Auditor-General's 2016 Ramsar Audit Report on Parks Victoria (such as on Page viii "a lack of oversight and accountability and poor evaluation, compromised by limitations in data."), seem to be continued in Parks Victoria's (PV) 2021 Victorian Alps Horse Management DRAFT plan. Below are some examples ABA will consider in our submission to PV's Draft Horse Management Plan 2021.

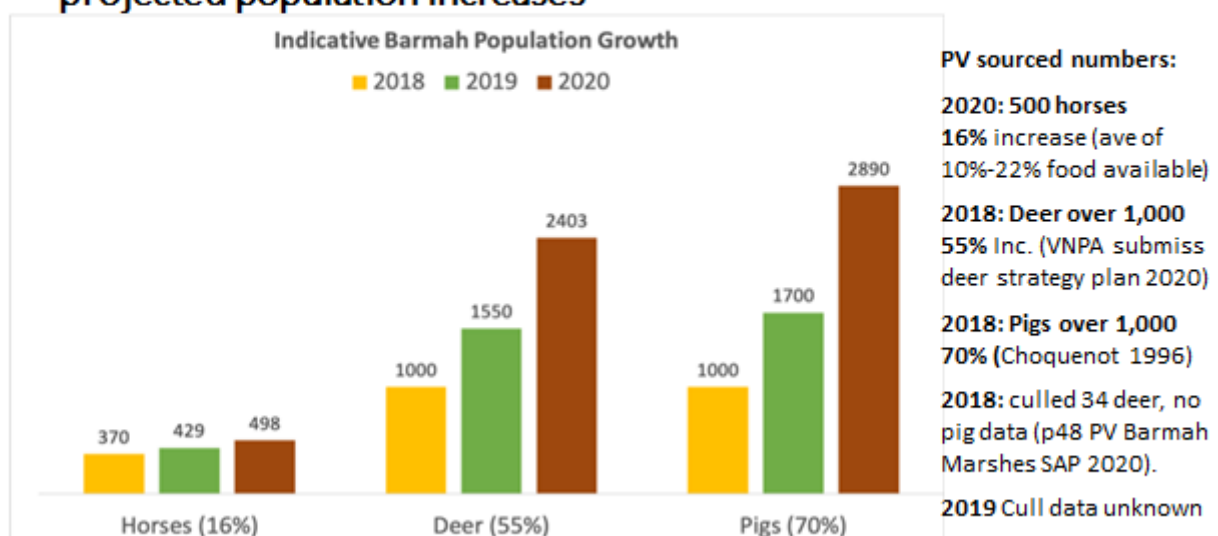
Inability to understand the potential benefits of Brumby grazing in Victoria

Positive example is the 2016 *The interaction of fire and mankind* (Extracts):

- These authors were able to show that the abundance and continuity of fuel is the most important variable in fire regimes in this area and that ancient human influence reduced widespread fire by promoting many small fires that ultimately reduced fuel continuity.
- The importance may not simply be *how* much fuel burns but *how* it burns and much more informed political, environmental and scientific debate is needed.

PV prioritises Brumby extinction above all other ferals, which infers PV have convinced themselves horses are the primary, if not the only, cause of ecosystem system decline. ABA slide :

Brumbies in perspective: Scale of the problem using Barmah projected population increases



- PV ignores the cascading benefits horse dung. For example, the dung provides food for insects which in turn are eaten by native species, such as skinks, and as the dung decomposes it provides nourishment to the soil and micro-organisms. PV also talk of horse pugging damaging the soil. But, as seen in the ABA slides below, frogs were happy to utilise the captured water in the plug holes for both their own protection and to lay their frog spawn. ABA slide :

Alternative paradigms cont... Work together to harness positive horse impact to slow environmental decline



Save energy slashing grass for the Sun Moth - horses will do it for free

[Photo credit: ABA sign 2012? and Skink 2018]



Skinks by Brumby Dung (2018 VicAlps)



Frogs spawning in hoof prints 2020 in VicAlps
[Photo credit: Renee Neubauer 2020]

Dung Insects feed skinks – pugholes shelter frog spawn - Investigate before their horses benefactors are culled

Limited data and inability to evaluate actions

Page 3 & 28 of PV 2021 Draft Horse Plan refer to:

- **Improved distributions and abundances** of vulnerable or threatened native fauna and flora species. (Page 3)
- Significant reduction in the eastern Alps population through annual removals, **particularly in areas of high conservation value**. (Page 3)
- Monitoring and evaluation of feral horse damage to sites of **high conservation value sites**, including mossbeds, peatlands and streambanks. (Page 28)
- Increase the annual rate of removal of horses from the eastern Alps, **particularly from areas of high conservation value**. (Page 28)

Last year ABA requested records on where high conservation areas are to be located, as well as documents that enable PV to identify/quantify species expected to benefit from them. PV, under FOI, said they **did not hold such documents**.

1. ABA requested (late 2020) under PV's FOI process

Location details of each **high-conservation priority location** and criteria that PV used to define each high-conservation priority location including classifications of each species expected to benefit from shooting feral horses in these areas. Since the (2018-2021) plan states **"Monitoring and other research projects will run concurrently with operational activities."**

PV FOI Reply

No documents were found as requested.

2. ABA requested (late 2020)

Copies of PV's annual End of Year Reports which, as stated in their 2018-2021 plan, they were committed to releasing to the public in late 2020.

PV FOI Reply

No documents were found as requested but after conducting internal consultation I have been provided with the following advice:

- End of Year Reports, Parks Victoria has committed to the public release of the End of Year Reports. The reports, for year 1 and year 2, are still being prepared and are not yet ready for public release which is likely to occur in the coming months.
- Seasonal reports have not been prepared by Parks Victoria. Operational information proposed to be included in the seasonal reports will instead be provided in the end of year reports.

3 ABA requested (late 2020)

A copy of the pre-shooting baseline data that Parks Victoria need to compare with the post-shooting data, in order to assess the effectiveness of a feral horse shooting program which they consider essential to be conducted in the sensitive areas identified by Parks Victoria. Such pre and post shooting data is fundamental for Parks Victoria's quality control measures and provides accountability for this taxpayer funded shooting exercise.

PV FOI Reply

After making enquiries, there are no such documents meeting the terms of your request in existence.

Lack of oversight and accountability

PV Draft Horse Plan p.27 states "Over the coming years, management effort in the eastern Alps will be focused on reducing the damage caused by feral horses on vulnerable peatlands and stream-banks (asset-based protection). Management of horses will target those areas that are damaged and are most vulnerable, or are in good condition but have potential to be impacted by the threat."

ABA observation: As PV do not hold quantified data pre/post Brumby removal, PV are unable to quantify how much damage has been reduced or if it has been reduced at all. Neither is there any awareness/recognition by PV that most of the damage could be from **1 million plus deer** in the East VicAlps compared to **up to 5,000 Brumbies**. A ratio of 300 deer to ONE single Brumby.

Flawed studies

PV's Draft horse plan states: *Even low densities of horses can cause substantial damage in a short time, as demonstrated by the substantial damage caused by feral horses during their presence in the Mount Nelse area (Tolsma and Shannon 2018).*

ABA observation: During the ABA-v-PV legal case (2020), PV's expert evidence was shown to be false in that several (3-4 at least) sites in the researcher's field notes recorded that damage was from ONLY DEER; this was changed in the final report (Tolsma & Shannon 2018) where it was reported as HORSE ONLY damage. Robust science includes investigating and reporting all options. If PV were shooting deer at the time of the study, why was deer damage not referred to in the Tolsma report? Once again Brumbies, being the most visible, were blamed for deer and pig damage etc.

Ineffective management strategies

PV's Draft horse Plan states "Ultimately, **complete removal of feral horses** from across the Bogong-Cobungra area would **achieve permanent protection** of environmental values across this area."

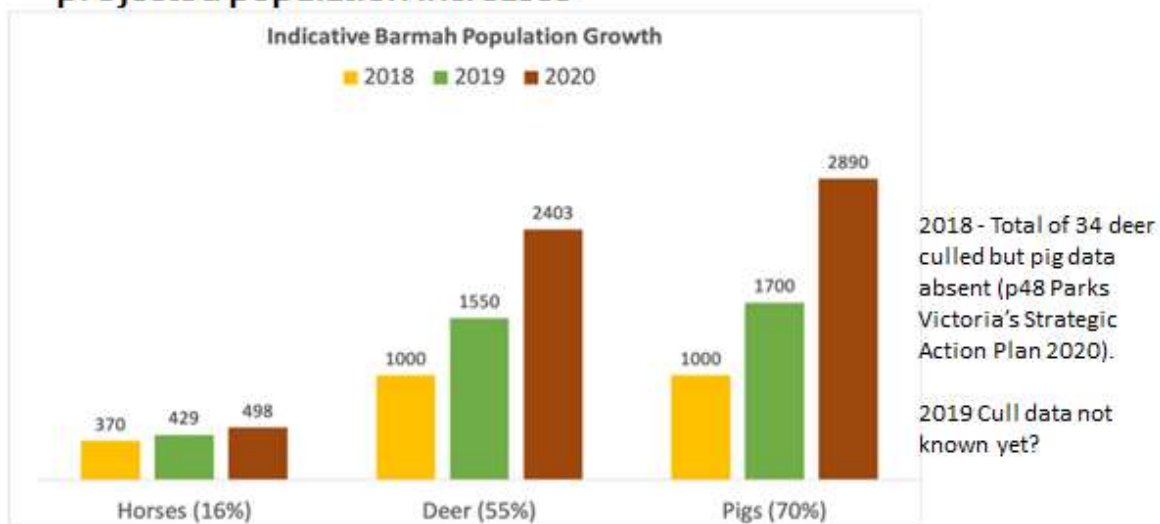
ABA observation: This statement by PV typifies the tunnel view dominating all aspects of PV’s approach to achieving “permanent protection”, because:

- Removing 5,000 Brumbies while hardly denting the 1 million deer population increases (also in the VicAlps), cannot protect the area when 300 deer to one Brumby continue to exist, and
- It infers that PV really does believe 1 million VicAlps deer or pigs don’t exist or cause damage.

Slow to identify emerging threats

PV’s Draft horse Plan states “Over 4300 deer were removed across more than 200,000 hectares to support the recovery of threatened species and habitats”.

Brumbies in perspective: Scale of the problem using Barmah projected population increases



ABA observation: 1 million deer in the East VicAlps, increasing at 55% annually means that lowering the overall population requires AT LEAST 555,000 deer to be removed **annually**. So removing 4,300 while sounding a lot, is LESS than 1% of the number needed to be removed before the population will even be slowed.

Incorrect Information

PV’s Plan states: On 8 May 2020, the Federal Court of Australia delivered its judgement (FCA 2020) on whether the removal of horses by Parks Victoria compromised cultural heritage values associated with horses in the Alpine National Park, as defined by the Australian Alps National Parks National Heritage Listing. The judgement 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.

ABA Observation

PV has regularly published INCORRECT information on the ABA-v-PV Judges findings. In fact, ABA took Parks Victoria to Court to stop **entire** Brumby populations being eradicated (we support sustainable management). Although the Court ruled in favour of PV, the Judge:

- Accepted the continuing presence of brumbies in the Australian Alps contributes to National Heritage Values relating to high country pioneering history, but that
- Culling ALL Bogong High Plains horses, **while 1,200 remain in East VicAlps** is not significant enough (under the EPBC Act) to detract from their overall heritage values.

Exaggerated information

PV's Plan states: large numbers of feral horses were observed and photographed foraging on severely grazed treeless plains and congregating in very narrow strips of unburnt habitat along sensitive high-altitude waterways, where suitable feed for feral horses remained available. P17]

ABA observation: When the ABA's legal team asked PV for what evidence they used to shoot horses 8 May 2020 PV replied that large numbers of horses were observed and provided our lawyers with the following 6 photos of evidence. Of these 6 photos from PV, 3 of PV's evidence photos had NO horses, and the other 3 showed in total **only 11 horses**.



Photo 1 (No horses in PV Evidence photo)



Photo 2 (No horses in PV Evidence Photo)



Photo 3 (No horses in PV Evidence photo)



Photo 4 (4 horses in PV evidence Photo)



Photo 5 (2 horses in PV Evidence Photo)



Photo 6 (5 Horses in PV Evidence Photo)