

Step-by-step guide

How to write an effective submission to strengthen Kosciuszko's wild horse management plan and help protect the Australian Alps

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THIS IS MY FIRST TIME WRITING A SUBMISSION, WHAT DO I DO?

Anyone can write a submission – whether you're an individual, an organisation or want to co-write with a group of friends – your voice matters. The guide is to help people craft their submissions. Remember, you don't have to be an expert on the subject. The more personal it is the better. Every voice matters – so make sure you speak up!



KOSCIUSZKO'S WILD HORSE HERITAGE MANAGEMENT PLAN: WHY SHOULD I WRITE A SUBMISSION?

Kosciuszko is renowned for Australia's highest peaks, its mesmerising vistas, blue alpine lakes and its secret black-and-yellow corroboree frogs. Its springs feed Australia's most important river system and it is a refuge for over 50 threatened native plants and animals, many found nowhere else.

But, Kosciuszko needs our help.

In recent years, Kosciuszko's feral horse population has swelled to around 14,000 animals. Every day, these heavy, introduced animals are trampling through fragile wetlands, muddying freshwater streams and grazing away protective habitat, exposing threatened native species like the broad-toothed mouse that shelter in grassy tunnels.

The NSW Government has finally developed a new draft plan to manage Kosciuszko's spiralling feral horse numbers. This new plan has the potential to finally bring Kosciuszko's horse numbers under control and stop the environmental degradation from thousands of hard hooves.

We have a critical opportunity to help Kosciuszko - just four weeks. Between 1 October and 2 November 2021 the NSW Government is seeking public comment on the draft plan.

This is an important opportunity to advocate to strengthen this plan so that it properly protects Kosciuszko from feral horse damage.

The damage caused by horses is recognised loud and clear by science. In Kosciuszko National Park alone 34 threatened animal and plant species are under stress from the impact of horses. Despite this, feral horses are still granted special protection status by the Kosciuszko Wild Horse Heritage Act 2018 (KWHH).

The new plan will replace the failing [2008 horse management plan](#) that relies on one control method: the passive trapping and removal of horses from the park to new homes or a knackery. The new plan must equip park managers with new strategies to effectively control the horse population.

It's been a long, contested process to improve horse management in Kosciuszko.

If enough of us demonstrate support for a strong, effective horse management plan that prioritises Kosciuszko's natural environment, the NSW Government will have to listen.



Do you know who lives in this burrow? The cute and fluffy native broad-toothed rat can be found in Kosciuszko National Park. Unfortunately, this little guy is vulnerable to extinction. Too often its tussocky grass homes are destroyed by grazing animals like feral horses. Image: David Paul, Museums Victoria.

HOW TO MAKE A FORMAL SUBMISSION

1. Check out the government's website for the plan, it has: the [proposed management plan](#) and a useful [summary sheet](#). There is also a [community advisory report](#), [scientific advisory report](#) and [Indigenous values report](#) (don't worry - you don't have to read them all).
2. Prepare your written submission. We've highlighted [six key discussion points](#) below. It is important you make a unique submission in your own words, and don't just copy ours (copied submissions won't count).
3. Make your submission via one of the following channels:
 - Email your submission to npws.wildhorses@environment.nsw.gov.au
 - Or mail it to:
The Project Team
Kosciuszko National Park Wild Horse Heritage Management Plan
National Parks and Wildlife Service
PO Box 472
Tumut NSW 2720
 - Or you can complete the [NSW Government's online survey](#) (just note that the government is likely to give unique written submissions greater consideration).
4. If you email or post your submission directly to the government, we'd love to receive a copy. You can email us at info@reclaimkosci.org.au

**Submissions are due by
midnight 2 November 2021**



Kelson's Leek Orchid. Tobias Hayashi.

WHAT TO INCLUDE IN YOUR SUBMISSION

1. Introduce yourself

Begin with an introductory paragraph that **explains why you are concerned about this issue** and how management of feral horses in Kosciuszko National Park affects the interests and activities of you or your group. You don't need to be an expert on this issue, but it's important to demonstrate why it matters to you.

If writing as an individual, **add your own personal experience or unique experience** in this matter. If you have any, refer to any relevant qualifications. If making a submission on behalf of an organisation, include the numbers of the people you represent and purpose of your organisation.

2. Identify the key issues you want to raise and why they concern you

Clearly identify the issues and the proposed actions in the plan that matter to you. **Note the section numbers from the plan so you can refer to them in your comments.**

We've summarised some [key discussion points](#) for you to draw on below.

3. Identify solutions and benefits

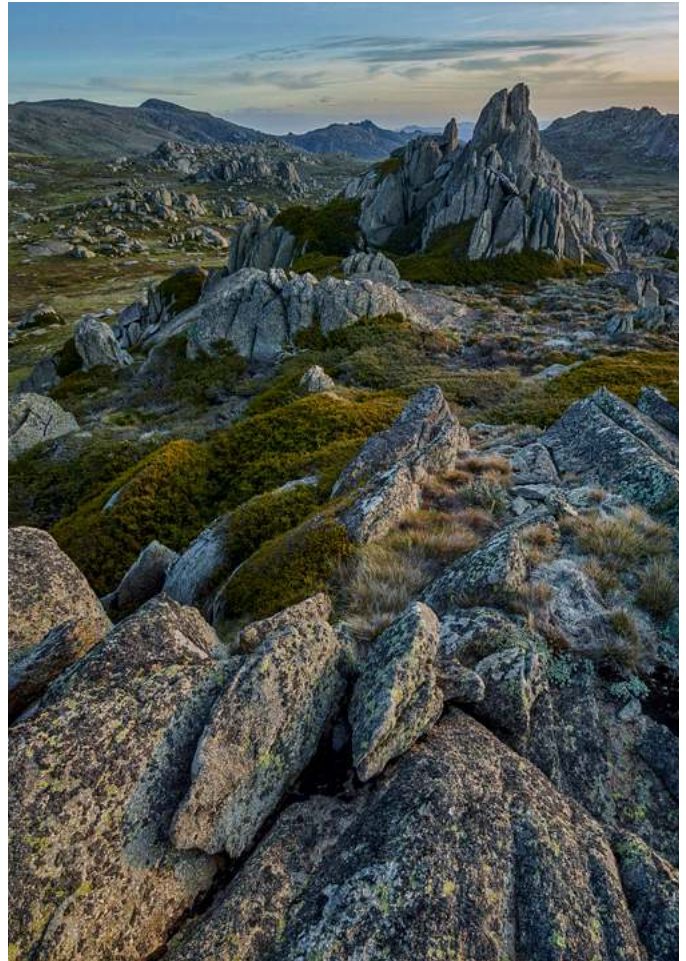
It's a good idea to offer solutions, rather than just problems you have found. Can the plan be re-drafted in any way to satisfy your concerns? How would your organisation, business or community benefit from a strong horse management plan that significantly reduces horse populations?

4. Consider further research to back up your arguments

Where possible, use evidence and data to support your statements. You can find a list of resources, scientific studies and analysis by environmental experts at the end of our submission guide. Anecdotes from your first-hand experience are also useful.

5. Be polite

Keep your submission polite and respectful. The government will ignore any submissions that are rude or target individual public servants or members of Parliament.



Kosciuszko, Rob Blakers



Alpine Sunrays, Mike Bremers

SIX KEY ISSUES TO RAISE IN YOUR SUBMISSION

Please consider the following key issues in your submission. Please try to express them in your own words. Your submissions may be given less weight if you simply copy and paste. We've included additional technical dot points as food for thought.

1. Strongly support a significant and rapid reduction of the number of feral horses in Kosciuszko National Park to help protect threatened species, ecosystems and Indigenous heritage (sections 5.2 and 5.3)

- Horses must be rapidly removed to limit further damage to Kosciuszko's ecosystems and Indigenous heritage.
- Feral horses directly impact 23 threatened flora and 11 threatened fauna species that occur within Kosciuszko National Park.
- Feral horses disrupt natural ecosystem functioning and damage habitats by: trampling, track creation, pugging (soil compaction), wallowing, erosion of streambanks, sphagnum bog and wetland destruction, overgrazing.

2. The plan should focus on minimising feral horse impacts (section 5). The proposed number of 3000 horses retained in the park is too high. Horses will continue to impact the park.

- There is no science behind the choice to retain 3000 horses in the park.
- Final targets should be science-based and include a measurable target to eliminate damage to the park's environmental values.
- Horse removal targets need to be more ambitious.
- To ensure the Plan meets its 2027 target of 3000 horses, interim targets should be included to help assess progress towards the goal.

3. Reject the proposal to retain horses across ~220,000 hectares of the park (section 5.1). Propose that some retention zones should be reduced in size or changed to removal zones.

- Retaining horses permanently in one-third of the park, or about 220,000 hectares, will see ongoing damage to these areas.
- Horse retention zones should not overlap with important environmental assets.
- Additional areas should be considered for horse removal, such as:
 - Areas with important wetlands like Currango Plain
 - Habitat of critically endangered species like the stocky galaxias
 - Important wilderness areas like Byadbo and Pilot in the south of the park
 - A larger buffer area between Kosci and national parks at the ACT and Victorian borders
 - Davies/Botherum/Snowy Plains area, because of its proximity to the Jagungal Wilderness Area 'prevention zone'

4. Support the inclusion of ground shooting as a humane and effective control option and ask for the inclusion of aerial shooting (Section 6).

- The plan should use the most humane available methods to achieve the control program's aims. The RSPCA has stated that, depending on circumstances, both ground and aerial shooting can deliver better animal welfare outcomes than trapping followed by transport to a knackery.
- The Plan notes that aerial culling 'can have the lowest negative animal welfare impacts of all lethal control methods' but that aerial culling is excluded because of a risk of 'loss of social licence' (Page 20). The plan should include measures to gain social licence, such as public education, allocation of spokespeople to address the general public, and trials of aerial culling with independent animal welfare assessments.



Enclosure plot with protected (left) and unprotected sedge and grass wetland (right). Horse impacted vegetation appears outside the enclosure, exposing bare trampled and compacted soil. Within the protection of the fence, swards of native vegetation grows. Image: Ian Pulsford, March 2020.

- You could mention that you support other measures in the plan including a commitment to no long-term fencing, yearly horse surveys and research into fertility control to limit population growth after the population has been dramatically reduced.

5. Call for the NSW Government to repeal the 2018 Kosciuszko Wild Horse Heritage Act 2018 (section 2).

- The Plan demonstrates that the KWHH Act is not compatible with the National Parks and Wildlife Act 1974, nor with an evidence-based approach to managing Kosciuszko's feral horses.
- Biodiversity and conservation planning laws should prevail above the protection of an introduced species that is in no danger of extinction.
- Habitat degradation and loss by feral horses (brumbies, wild horses), *Equus caballus*, is listed as a key threatening process under the NSW Biodiversity Conservation Act 2016. The NSW National Parks and Wildlife Service should not be constrained by the KWHH Act in managing that threat.

6. Call for the NSW Government to implement the plan without further delay, support ecosystem recovery and indicate how action will be funded (sections 6 and 7).

- The planned reduction in horse numbers and in the areas occupied by horses is very welcome, but the destination is too far away. Kosciuszko needs urgent action - the draft Plan will take at least 6 years, and even then will leave precious parts of Kosciuszko unprotected from horse damage.
- Horse removal should be coupled with investment in ecosystem monitoring and restoration.
- Early and substantial resources and investment is needed to have the best long-term benefits for tax-payers, land managers, ecosystems, threatened species, Indigenous heritage, park visitors and the horses themselves.
- There must be a greater transparency in horse removal operations, while ensuring that removal activities are not disrupted by anyone opposed to the program.

MAXIMISE YOUR IMPACT

Now that you've made your submission, there are a number of ways you can amplify your voice and support our campaign:

- [Sign our petition](#)
- Tell a friend about the issue and help them write their own submission.
- If you are a NSW resident, write a letter to your local member of Parliament.
- Submit a letter to your local newspaper.
- Get social: publish the link to this submission guide on your social media accounts.

USEFUL RESOURCES

[2021 Draft Kosciuszko National Park Wild Horse Heritage Management Plan](#)

[2008 Kosciuszko National Park horse management plan](#)

[Habitat degradation and loss by feral horses \(*Equus caballus*\) – key threatening process](#)

[Ecological Management & Restoration journal, special issue: feral horses in the Australian Alps](#)

[Assessing the humaneness of wild horse management methods](#)

[Population trends of feral horses in Kosciuszko National Park, 2000 - 2020](#)

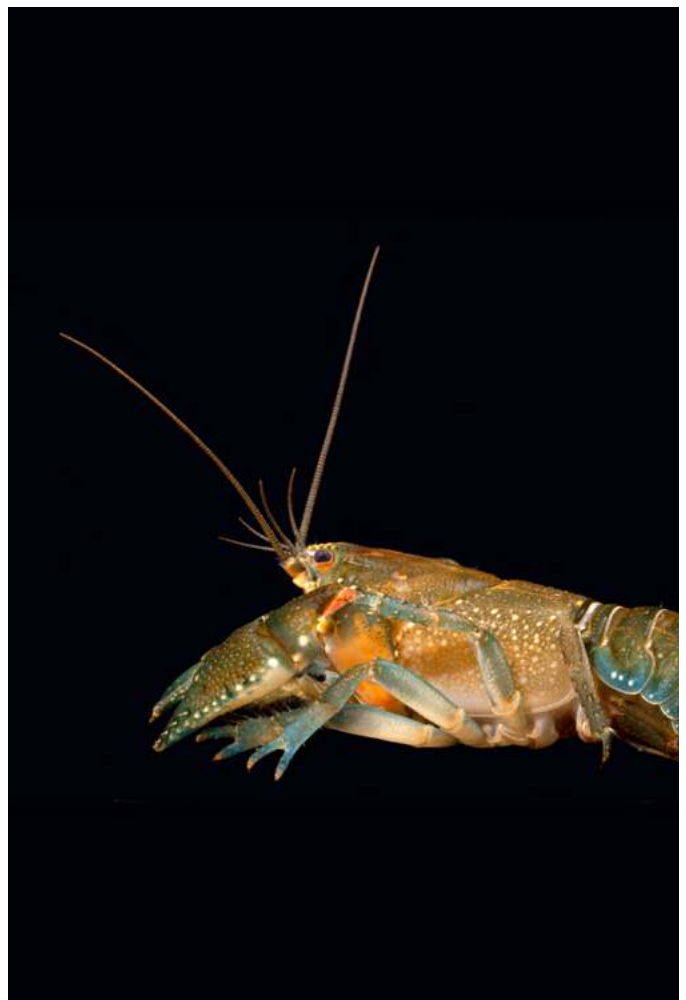
NEED MORE HELP?

If you have further queries about where to source information or writing your submission, please reach out to our friendly campaign team at info@reclaimkosci.org.au

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Alpine she-oak skink. Owen Lishmund, iNaturalist.



Alpine spiny crayfish. David Paul, Museums Victoria.