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**Performance Audit  
Environmental Management of Victoria's Parks:  
Control of Invasive Plants and Animal Pests**

**Failure to control a large population feral horses  
in the Cobberas section of the Alpine National Park**

This letter outlines a longstanding complaint about Parks Victoria's failure to control large numbers of Feral Horses in the Cobberas section of the Alpine National Park including its Buchan Headwaters and Cobberas Wilderness Zones (the Cobberas).

Unusually for its time the National Parks Act 1975 contains both a preamble (setting out its purposes) and Objectives (s4) and statutory obligations to ensure those objectives are carried out. Section 17 provides that the Secretary shall:

- 17(2)(a) ensure that each national park and State park is controlled and managed, in accordance with the objects of this Act, in a manner that will—*
- (i) preserve and protect the park in its natural condition for the use, enjoyment and education of the public;*
  - (ii) preserve and protect indigenous flora and fauna in the park;*
  - (iii) exterminate or control exotic fauna in the park;*
  - (iv) eradicate or control exotic flora in the park; and*
  - (v) preserve and protect wilderness areas in the park and features in the park of scenic, archaeological, ecological, geological, historic or other scientific interest;*

*And inter alia*

- 17(2)(ba) ensure that appropriate and sufficient measures are taken .....*
- (ii) to maintain the water quality of and otherwise protect the water resources in those areas;*

**These provisions generally restate the objectives contained in s 4a and create a statutory requirement on the Secretary<sup>1</sup> to ensure these things are done.**

For the past 13 years I have regularly visited the Cobberas during spring, summer and autumn. I have an interest in natural landscapes and environments with a particular interest in terrestrial native orchids. I am a member of the Australian Native Orchid Society (ANOS) and the Friends of the Cobberas and with those organizations in conjunction with Parks Vic and/or DSE have in recent years been involved with monitoring horse exclusion plots, creating walking tracks, and conducting surveys of rare orchid populations.

This letter concerns the exponential growth in the feral horse population in the Cobberas post the 2003 bushfires, the damage such numbers cause to delicate ecosystems that should be preserved and protected by their National Park status, and the failure/neglect of the Secretary to carry out the Secretary's functions under the Act.

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<sup>1</sup> The Secretary is not a natural person but is defined as an incorporated body –see s3.

As detailed in my material, damage, particularly horse trampling and alteration by grazing, etc. cause enormous damage to the natural condition of the Cobberas. In particular extensive damage to the delicate alpine/sub-alpine bogs and snow plains, and the plant and animal communities which inhabit them (including rare and endangered flora and fauna as detailed in my material). This extensive damage to water retentive bogs, and water purifying systems, negatively impacts the ability of the alps to provide an all year quality water supply to the Murray and Snowy Rivers.

The horse population in the Cobberas is hard to ascertain. Its population is part of a wider population to the south, north (NSW) and east, that moves about. The general consensus is that there were some 2,000 to 3,000 horses in the Cobberas pre the 2003 bushfires and following a decline the numbers, the population was back to that number by around 2006 and has significantly increased since then<sup>2</sup>.

Not only is the problem obvious to anyone that spends any time in the Cobbaras<sup>3</sup>, there are a range of straight forward, practical solutions available.<sup>4</sup> However any program of effective feral horse control requires a commitment of human and other resources, and a willingness and resolve to carry out the objectives and requirements of the Act.

Over the years a range of what is known as mirror excuses<sup>5</sup> have been regularly put forward, and recycled, to obscure and avoid dealing with issue including:

- The feral horse population is being managed/controlled by an arrangement for the removal of feral horses made with the Alpine Brumby Management Association;
- Senior Management is aware of the problem and is currently carrying out population studies and other investigations to enable understanding of the problem and to enable a means of management/control to be devised;
- Senior Management is aware of the problem and is currently preparing a management plan that will include (or raise as part of the lengthy consultation process associated with such plan) the management/control of the feral horse problem;
- With limited resources control of the smaller and isolated feral horse population on the Bogong High Plains takes priority; and/or that new control methods (such as trap yards) will first be trialed in the Bogong High Plains before being implemented in the Cobberas; and
- Anything else that avoids making a commitment to providing the resources to implement practical actions to effectively deal with a glaringly obvious problem.

Speak to anyone that spends any time in the Cobberas. They will tell you feral horse numbers continue to increase, the damage they cause is increasing, and that feral horses are extending into areas they were once rarely seen. There can be no doubt that senior management of Parks Vic are fully aware of this.

I first informally raised this matter with the then Minister, John Thwaites, in 2006. He informed me the control of feral horses in this area was being undertaken under an arrangement with the Alpine Brumby Management Association (ABMA). I subsequently informed him that, in my opinion that arrangement was not effective, and offered to provide him with material to support that view, and generally describe the situation.

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<sup>2</sup> There are some different estimates/views but no real argument about there being an unacceptably large population.

<sup>3</sup> Not only are horses regularly seen, the presence and smell of horse dung is everywhere. Everywhere sphagnum bogs and delicate stream edges are damaged/trampled and the grassy parts of the snow plains look like horse paddocks.

<sup>4</sup> One solution put forward by many whose opinions I respect is trap yards operated by skilled bushmen contractors. I am told that there are such persons available and that properly set-up trap yards would be effective. The shooting of feral horses is another effective, but controversial alternative.

<sup>5</sup> As in we are looking into it.

I provided that material to him in March 2007. He resigned shortly thereafter. That year I spent 6 months travelling in WA . On my return I wrote to the new Minister in April 2008 reiterating my concerns and supplying further material. The response I received, in May 2008 contained all of the above excuses.

At the same time I arranged to put all my material including papers discussing the situation, research evidence (including many photographs) on a friends web site. I invite you to view this material by following the links from the home page of:- <http://www.retiredaussies.com> or by going direct to:- <http://www.retiredaussies.com/WEB%20Green/Brumbies/Brumbries.htm> .

There is a wealth of material on the subject, including material prepared by or for Parks Vic. The documents on the web site contain references to some of them.<sup>6</sup> Insight into solution of the feral horse problem does not lack for understanding, research, or simple practical means of controlling/reducing the feral horse population. It lacks resolve to ensure the objectives of the act are being carried out, and the statutory duties imposed on the Secretary fulfilled.

Since my material was prepared in 2008 the situation then described has further deteriorated. I don't see any benefit in my reworking my material into a new submission to you. I do take this opportunity to refer to some of those matters below but other than that I ask you to look at the web site and the material I have prepared, and to, if needed, request of me any clarification or further material that might assist your audit.

### **Brumby Running<sup>7</sup>**

The cost and effectiveness of the present arrangements with Alpine Brumby Management Association (ABMA) for the removal of feral horses needs to be examined and considered against alternatives.

The objectives of Alpine Brumby Management Association (ABMA) include management of sustainable and healthy populations of feral horses in the Victorian Alps in perpetuity by sustainable harvesting (and if necessary by introduction of new bloodlines) presumably so its members can continue their sporting activities.

As my material notes in the past ABMA have removed some 80 to 100 horses per year<sup>8</sup>. population studies have shown that removal of these numbers will still allow the population to grow exponentially. And that has been proved by the exponential increase in horse numbers post the 2003 fires despite horses being taken out by ABMA under arrangements with Parks Vic in place since at least 2002.

I am not a purest, there are so many feral horses in the Cobberas that a few brumby runner's horses will not have any significant additional impact. If they take out 80-100 horses a year then that is well and good. But, the arrangement, on its own, it is not, and never can be, a satisfactory method of controlling feral horses in the Cobberas.

On the next page is a photo taken on 3 December 2009 of feral horses that every evening for many years gather across the small stream from my camping spot at Native Dog Flat. They gather within 30m of my camp. At night they cross the stream and graze the grass in the camping area around my camp.

In 2006 only 3 horses came in to graze, a stallion, a mare and a foal. Each year this number is added to by a new foal. There are now 6 horses in this mob.

<sup>6</sup> I can provide access to my extensive file (including recent material/evidence/photographs).

<sup>7</sup> The sport of brumby running per se is not allowed in the Victorian and NSW alpine parks. Victorian brumby running clubs established AMBA to allow brumby running to be continued as a Parks Vic contracted feral horse management/control arrangement.

<sup>8</sup> I am not sure of current numbers removed by ABMA, nor the annual cost of such the arrangement. I am told that a few skilled brumby runners are responsible for most removals. That a per horse removal payment is made, and that some other costs are met by Parks.



***Brumbys seen every evening quite close to, my camp at Native Dog Flat***

Native Dog Flat is a busy formal camping spot. Other horses come into other parts of the camp ground and, at night, graze within a few meters of campers tents. Some can be quite aggressive, particularly when one camps in their territory, or disturbs them at night when going to the toilet. They run at campers, stop a few metres from them, stamp their feet, snort and bellow. It can be quite frightening.

I am now able to recognise particular mobs of horses that I see regularly grazing at Native Dog Flat and other places such as Rocky Plains, the Playgrounds, etc.

Brumby runners look quite impressive riding their fine horses in their distinctive clothing, carrying lassos. They chase horses up and down distant plains sometimes with dogs<sup>9</sup>. But it seems neither Parks nor ABMA care to tackle the apparently simple task of rounding up the feral horses that nightly gather at Native Dog Flat, and other such places.

### **The solution involves resourcing those at the coalface**

As do many locals, and visitors, I have a great deal of respect for the small dedicated staff at Parks Vic, Omeo. With limited resources they have, as effectively as sporadic funding permits, competently tackled such problems as English broom and blackberries.

My material includes reference to the destructive actions of rouge feral pigs, and to the increase in deer numbers. I am pleased to say effective action undertaken by Parks at Omeo has, for the time being, rid the Cobberas of feral pigs<sup>10</sup>

I have no doubt that, properly resourced, local Parks staff have the ability to deal with the feral horse problem. What is currently lacking is acknowledgement of the situation described, and a resolve by the Secretary to carry out its statutory duties.

I ask you to investigate this matter, and not merely consider whether any, or any adequate, management plans have been prepared and adhered to, but consider whether these overriding statutory requirements are being met,.

Regards

Bill Kosky

*PS: See additional photos on next page.*

<sup>9</sup> I understand that brumby runners are now allowed to use dogs even in wilderness areas.

<sup>10</sup> At turned out a few vagrant/rouge feral pigs emanating from a persistent population on the Snowy River were traveling through the Alps causing damage. Parks at Omeo employed a skilled pest control officer who was able to remove them from the Cobberas. I am not aware of any actions or programs to tackle the increasing population of deer.

On 30 November 2008 my wife and I with members of the Bairnsdale Field Naturalists walked to Mt Wombargo. High up in the saddle between Mt Wombargo and a peak called Little Wombargo is a small isolated/remote snow plain/bog complex. It is a place cattle could never be taken to.



***Two of a mob of 12 feral horses that took off as soon as we approached the snow plain complex.***



***Further in we encountered another mob of 9 horses sharing this small complex. We couldn't believe that so many horses were present in such a small remote place.***



***In what should be preserved as a pristine alpine environment we found leek orchids & unusual daisies amongst heavily grazed & pugged plains & wet areas. The puddles in the foreground are caused by trampling/pugging. In the mid ground the wet area's edge is disturbed by a horse wallow. The photos on the web site show extensive horse damage to various bogs, stream edges, etc.***