Monaro Acclimatisation Society Inc
9 Thompson Drive
Tathra, NSW. 2550

Sustainable future fishing for trout and native fish

Monday 10th of May 2021.

The Hon. Matt Kean, MP,
Minister for Energy and Environment,
GPO Box 5341
SYDNEY NSW 2001

Dear Minister,

I am writing on behalf of the Monaro Acclimatisation Society Inc (MAS) as we are genuinely concerned the delay of the release the Draft Wild Horse Heritage Management Plan for Kosciuszko National Park is resulting in an escalation of damage to the Park.

The MAS is a voluntary organisation primarily concerned with the development and maintenance of freshwater habitat and fisheries in south-east NSW. The MAS is a primary stakeholder with the NSW Department of Fisheries. The MAS has been in existence for over 70 years and participates with NSW Fisheries in the stocking of freshwater lakes and rivers with fish, the maintenance of habitat and policy and legislation development that affects recreational fishing in NSW.

As a group of anglers and lovers of Kosciuszko National Park including its alpine regions, we are dismayed with:

A. The continued obfuscation and delay associated with the release of the Draft Wild Horse Heritage Management Plan for Kosciuszko National Park
B. The failure of the recent "wild horse removal strategy" where only 432 of a northern Kosciuszko population of approx. 10 to 12,000 horses were removed. This is not going anywhere near addressing annual natural increase numbers, let alone being enough to reduce the threat to the aquatic environment. We are also concerned by the action of releasing some 278 horses into the park.
C. The increasing obvious damage to the Currango/Mosquito Creek complex. The Currango Plain resembles a suburban horse paddock with greatly reduced native plant diversity and density. The Currango Creek is massively compromised with almost total bank destruction, bed lowering, aquatic vegetation gone and constantly running turbid water. The Mosquito Creek and Mosquito Swamp are not that much better with the upland swamps being drained by horse tracks.
D. The NSW Government's failure to take action to reduce the threat to sensitive areas or to rehabilitate affected areas.

On the 12th of February 2018 we wrote to the then Minister for The Environment the Hon. Gabrielle Upton MP, regarding our concerns at the damage being caused by wild horses to the rivers and streams of Kosciuszko National Park (Attachment A). The members of the MAS are dismayed that to this date, nothing has been done to address these concerns.

To some extent we believe that the controversy around the size of the feral horse population has delayed or diverted attention, and that this has been a deliberate ploy of the pro-horse lobby and their supporters in Parliament. Whatever the horse numbers are they are obviously too high, as evidenced by the damage that is occurring. Three years ago, in our letter to the then Minister we documented the damage including photo evidence, the damage is now much worse.

In our opinion there are parts of the Kosciuszko National Park that are going through the process of ecosystem change associated with climate change. The intensity of fire is increasing and the duration between major fires is shortening while temperature rises are affecting plant and animal species distribution. The recent fires were frightening in their speed and intensity and came a few short years after the 2002 – 2003 fire. The anecdotal evidence of resultant massive erosion is easy to see when driving through the park. Nature is putting huge environmental pressure on Kosciuszko National Park and it does not need the added pressure of thousands of wild horses.

We believe that New South Wales as a member State of the Australian Federation is bound by both State and Federal law. We note that within the Environment Protection and Biodiversity Conservation Act 1999 that Alpine Sphagnum Bogs and Associated Fens was listed as an endangered ecological community in 2009. The approved conservation advice, approved by the then Federal Minister for the Environment in 2008 is attached as Attachment B. The advice within the EPBC Act indicates that this endangered ecological community is listed in the Biodiversity Conservation Act 2017, What we found was Montane Peatlands and Swamps of the New England Tableland, NSW North Coast, Sydney Basin, South East Corner, South Eastern Highlands and Australian Alps bioregions endangered ecological community. The recovery plan for this endangered ecological community within Kosciuszko National Park is clearly not meeting its objectives. We note there is a National Recovery Plan (Attachment D) of which the only activity we can detect NSW Government undertaking across Kosciuszko in response to that is the areal culling of feral pigs and deer.

The evidence is clear, feral horses are destroying large swathes of Kosciusko National Park, and there appears to be a legal requirement for your Government to act to address this. Even if you deny the legal responsibility there is a moral responsibility to protect what is an iconic and unique NATIONAL Park.

Yours Sincerely,

Kerry Pfeiffer
Vice Chair. Monaro Acclimatisation Society

Attachments

Attachment A. Letter to The Hon. Gabrielle Upton 12th February 2018 (The then Minister for Environment)

Attachment B. The Alpine Sphagnum Bogs Advice approved by the Fed. Minister for Environment 17th December 2008.

Attachment C. Feral horses (*Equus caballus*) increase suspended sediment in subalpine streams. Research article CSIRO, 2021.

Attachment D. National Recovery Plan for the Alpine Sphagnum Bogs and Associated Fens.

CC

The Hon Susan Ley MP
Minister for the Environment
PO Box 6022, House of Representatives, Parliament House, Canberra, ACT, 2600.

Ms. Kristy McBain MP
Member for Eden Monaro
PO Box 6022. House of Representatives, Parliament House, Canberra ACT 2600

The Hon. Terri Butler MP
Shadow Minister for Environment
PO Box 6022, House of Representatives, Parliament House, Canberra ACT 2600

The Hon. John Barilaro MP
Member for Monaro
Deputy Premier, and Minister for Regional New South Wales, Industry and Trade
GPO Box 5341
SYDNEY NSW 2001

Ms. Kate Washington MP
Shadow Minister for Environment and Heritage, and Shadow Minister for Rural Health
PO Box 82
RAYMOND TERRACE NSW 2324

Attachment A

Monaro Acclimatisation Society Inc
9 Thompson Drive
Tathra, NSW. 2550

Sustainable future fishing for trout and native fish

12th February 2018

The Hon. Gabrielle Upton MP
Minister for the Environment

GPO Box 5341
Sydney NSW 2001

Dear Minister,

I am writing on behalf of the Monaro Acclimatisation Society Inc ('MAS'), to call upon the Government of New South Wales to take immediate action to protect from further damage the major river catchments of the Kosciuszko National park. The MAS calls on the Government to urgently begin fencing-off vulnerable riparian corridors and wetlands.

The MAS is a voluntary organisation primarily concerned with the development and maintenance of freshwater habitat and fisheries in south-east NSW. The MAS is a primary stakeholder with the NSW Department of Fisheries. The MAS has been in existence for over 70 years and participates with NSW Fisheries in the stocking of freshwater lakes and rivers with fish, the maintenance of habitat and policy and legislation development that affects recreational fishing in NSW.

MAS holds great concerns regarding the lack of protection afforded the streams and wetlands within the Park from damage caused by the exploding wild horse population. Severe damage has already been done. The images provided show clearly one example: the degradation and destruction of the extensive swamps and wetlands adjoining Currango Creek within the northern part of the Park.

This destruction of the headwaters of some of the most important rivers of Australia will – if allowed to continue – compromise the vital catchments and impoundments relied-upon by the Snowy Hydro Scheme. You would be aware that Currango Creek is a major tributary of Tantangara Dam, which is central to Snowy Hydro 2.

Of far greater concern, though, is the reckless destruction of this irreplaceable iconic area of Australia, which if allowed to continue unchecked, will surely be condemned by the wider community of NSW and Australia.

At the recently-held Annual General Meeting of the MAS on 3 February 2018, a resolution was passed calling on the NSW Government to instruct the National Parks and Wildlife Service to immediately protect the rivers, streams and wetlands within the Kosciuszko National Park.

With that in mind, the MAS calls on the Government to take decisive action to counter the wild horse and feral animal threat by providing riparian protection through fencing. This would require fencing both sides of each river and stream and also, the major wetlands. Damaged areas, such as the Currango Swamp should be fenced-off and rehabilitated. The other alternative is to begin an effective culling programme that recognises the heritage value of the horses, but reduces their numbers to a level whereby the grazing and trampling pressure no longer threatens these unique alpine riverine ecosystems.

The photograph below depicts what the Currango Creek and wetland looked like before the explosion of wild horses on Long Plain just 30 years ago:

A beautiful environment and an intact ecosystem 30 years ago.

In the above photograph, you will notice the top of the fence sticking through the vegetation within Currango Swamp some 30 years ago. This swamp is built on peat which is thousands of years old:

(Notice in these photographs the intact banks of the Currango Creek 30 years ago.)

The Currango Creek in December 2017. Notice the broken-down banks and that the bed of the creek has been lowered and the peat swamp has been drained. Where has the tall vegetation gone?

This is another photograph taken in December 2017, showing what used to be the Mosquito Swamp that drained into the Currango. Before the horse numbers got out of hand this was not a creek, but a chain of ponds within a swamp. You can see the dried-out peat clearly in this image.

Minister, the evidence of the damage to these rare and threatened montane riverine ecosystems is compelling. We hope that your Government can do something meaningful to halt this continuing destruction.

Yours sincerely,

Kerry Pfeiffer

Monaro Acclimatisation Society

C.C.

The Hon. Penny Sharpe, MLC
Parliament House
Macquarie Street
SYDNEY NSW 2000
Shadow Minister for the Environment and Heritage

Mr. Paul A. Broad
CEO Snowy Hydro Limited
PO Box 332
Cooma NSW 2630

The Hon. Josh Frydenberg MP
Minister for the Environment and Energy
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

The Hon. John Barilaro, MP
213 Crawford Street
QUEANBEYAN NSW 2620
Member for Monaro

Hon Dr Mike Kelly AM, MP
Member for Eden-Monaro, New South Wales
PO Box 214
Queanbeyan, NSW, 2620

The Hon. Tony Burke MP
Shadow Minister for the Environment & Water
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

Attachment B

This conservation advice was approved by the Minister on 17th December 2008

A statement for the purposes of approved conservation advice
(s266B of the *Environment Protection and Biodiversity Conservation Act 1999*)

Approved Conservation Advice for the Alpine *Sphagnum* Bogs and Associated Fens ecological community

This Conservation Advice has been developed based on the best available information at the time this conservation advice was approved.

Description

The Alpine *Sphagnum* Bogs and Associated Fens ecological community is usually defined by the presence or absence of *Sphagnum* spp. on a peat substratum. *Sphagnum* is not always a major floristic component, and there are some sites in the community where *Sphagnum* has become depleted or been lost as a result of disturbance. In these cases, the site may still be considered part of the community if other key species are present (see Table 1) and a peat substratum is evident. While most examples are situated within national parks, this community consists of highly fragmented, isolated remnants, and its present geographic extent is restricted.

Conservation Status

The Alpine *Sphagnum* Bogs and Associated Fens ecological community is listed as **endangered**.

This ecological community is eligible for listing as endangered under the *Environment Protection and Biodiversity Conservation Act 1999* (Cwlth) (EPBC Act) because its geographic distribution is restricted and the nature of its distribution makes it likely that multiple demonstrable threats could cause it to be lost in the near future. In addition, the reduction in community integrity and functionally important species is severe. Components of the Alpine *Sphagnum* Bogs and Associated Fens ecological community are also listed under a range of state legislation, as follows:

- "Alpine Bog Community", "Fen (Bog Pool) Community" and "*Caltha introloba* Herbland Community" are listed as threatened in Victoria under the *Flora and Fauna Guarantee Act 1988* (FFG Act);
- "Montane peatlands and swamps of the New England Tableland, NSW North Coast, Sydney Basin, South East Corner, South Eastern Highlands and Australian Alps bioregions" listed as an endangered ecological community in NSW under the *Threatened Species Conservation Act 1995* (TSC Act); and
- "Sphagnum peatland" listed as 'Rare' in Tasmania under the *Nature Conservation Act 2002* (NC Act).

The Alpine *Sphagnum* Bogs and Associated Fens ecological community also includes the Ginini Flats Wetland and Blue Lake, which are listed under the international Ramsar Convention on Wetlands.

Distribution and Habitat

The Alpine *Sphagnum* Bogs and Associated Fens ecological community is found in small pockets across alpine, subalpine and some montane areas of Tasmania, Victoria, New South Wales (NSW) and the Australian Capital Territory (ACT). This ecological community occurs within the ACT, Murray, Murrumbidgee, Southern Rivers, North East Victoria, East management practices. Also facilitate formal conservation arrangements such as covenants or conservation agreements where desirable.

Invasive Weeds

- Eradicate or at least control weed infestations within the ecological community using appropriate methods, especially at sites where new threats (e.g. *Salix* spp. willows) are currently becoming established; and
- Appropriately manage known occurrences of the Alpine *Sphagnum* Bogs and Associated Fens ecological community to prevent introduction of new invasive weeds, which could become a threat.

Trampling, Browsing or Grazing

- Prevent grazing pressure at known occurrences of the Alpine *Sphagnum* Bogs and Associated Fens ecological community on leased crown land through exclusion fencing or other barriers;
- Maintain fencing to control domestic stock and prevent access to national parks from private lands and State Forests; and
- Implement existing management plans for the control and eradication of feral non-native animals in alpine and subalpine regions.

Fire

- Develop and implement suitable fire management strategies to prevent further loss of functionally important species and community integrity from the Alpine *Sphagnum* Bogs and Associated Fens ecological community.

Conservation Information

- Increase public awareness of and appreciation for the Alpine *Sphagnum* Bogs and Associated Fens ecological community.

Restoration and Regeneration of Degraded Sites

- Undertake trials to determine the requirements for successful re-establishment of *Sphagnum*; and
- Implement appropriate restoration and translocation protocols if human intervention in the recovery of degraded sites is considered necessary and feasible.

Existing Plans/Management Prescriptions that are Relevant to the Ecological Community

Numerous management plans have been developed for each of the national parks where the Alpine *Sphagnum* Bogs and Associated Fens ecological community is found. The majority of these contain similar directives and strategies relating to access and activities in or near bogs and fens. These plans also provide overall management direction for bog and fen vegetation. Threat Abatement Plans, Recovery Plans and other specific management strategies relevant to the ecological community are also in place across each of the national parks. Plans and strategies that may be useful in the conservation of the Alpine *Sphagnum* Bogs and Associated Fens ecological community are listed in Table 2.

This list does not necessarily encompass all actions that may be of benefit to the Alpine *Sphagnum* Bogs and Associated Fens ecological community, but highlights those considered to be of highest priority at the time of preparing the conservation advice.

Attachment C

RESEARCH ARTICLE (Open Access)

Previous Next Online Early

Feral horses (*Equus caballus*) increase suspended sediment in subalpine streams

Peter Raymond Scanes [A C], Adam McSorley [B] and Adrian Dickson [A]
+ Author Affiliations

Marine and Freshwater Research - https://doi.org/10.1071/MF20353
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Abstract

Feral horses preferentially utilise aquatic landscape elements. Damage to stream banks by feral horses potentially degrades water quality and affects aquatic ecosystems. Despite the global predominance of horse activity in or near water, there is poor understanding of in-stream impacts. Motion-sensing cameras were used near subalpine streams to quantify frequency and behaviour of horses interacting with streams. Deployed turbidity loggers were used to indicate the presence of suspended sediment from interactions and to assess long-term (3 year) seasonal suspended sediment regime at sites with very small and large amounts of horse activity. In summer, 99.9% of large grazer interactions with streams were horses and we estimate 130 horse interactions per kilometre of stream per day, resulting in stream turbidity increases up to 100 NTU. Long-term turbidity at sites with greater riparian damage from horses was significantly greater than at control sites. Turbidity in horse-affected streams peaked at 50 times the national turbidity guideline and, in summer, averaged eight times the guideline. Suspended sediment leads to a high risk of loss of aquatic diversity and impairment of ecosystem function. Linear relationships between turbidity and riparian damage suggest that any level of horse presence affects subalpine waterways.

Keywords: suspended sediment, turbidity, riparian damage, stream ecology, feral horses.

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Attachment D

Australian Government
Department of the Environment

National Recovery Plan for the Alpine *Sphagnum* Bogs and Associated Fens

- a threatened ecological community listed under the *Environment Protection and Biodiversity Conservation Act 1999*

November 2015

5. Recovery Programme

5.1 Objectives

As indicated in the Introduction to this recovery plan, the objectives are:

Primary objective:
Maintain or extend the current known extent (area) and maintain or improve the condition of the Alpine *Sphagnum* Bogs and Associated Fens ecological community over the life of the recovery plan.

Supporting objective:
Ensure effective and adaptive implementation of the plan.

5.2 Strategies

The objectives of the recovery plan will be achieved by three strategies:

- Implementing the priority recovery actions identified in the recovery plan to address the threats most influencing the ongoing survival of the ecological community;
- Maintaining or improving the condition of the ecological community through supporting research and restoration efforts to enhance the resilience of the ecological community to adapt to climate change; and
- Improving knowledge of the ecological community, monitoring its status, and using adaptive management in response to new information.

The following factors will be important for the successful delivery of the strategies:

- Sufficient and enduring funding to complete priority actions;
- Recognition and appreciation of the significant ecosystem services provided by the ecological community;
- Recognition that maintenance and recovery of this ecological community requires commitment to on-ground actions and long-term effort;
- A community that values the alpine and subalpine environments and their role in biodiversity conservation and ecosystem services;
- A culture of inclusiveness, transparency and accountability for all aspects of the recovery program by recovery program partners;
- Effective mechanisms for cross jurisdictional co-operation and coordination to implement priority actions efficiently and effectively;
- The integration of Alpine bog management with other threatened species recovery actions (e.g. corroboree frog);
- A network of stakeholders and partners that includes relevant experts, delivery partners and affected interests;
- Effective mechanisms for communicating with stakeholders and partners;
- A strong adaptive management framework for program delivery, with the capacity for adaptive and timely decision-making based on monitoring data.

This ecological community will continue to be impacted by climate change. It is outside of the scope of this plan to address the drivers of climate change. Implementing the actions identified in this plan will support the resilience of the Alpine *Sphagnum* Bogs and Associated Fens and its ability to adapt to a changing climate.

The objectives, strategies and actions are consistent with the priority management for landscape-scale responses recommended by the Caring for our Australian Alps Catchments report (Worboys *et al.*, 2011).

5.3 Performance criteria

The plan requires a short review in 5 years and a full review after 10 years. It is intended that any reviews will measure the success of the recovery plan in achieving the overall objective and supporting objective using the following performance criteria.

Overall objective and performance criteria:

> **Maintain or extend the current known extent (area) and maintain or improve condition of the Alpine *Sphagnum* Bogs and Associated Fens ecological community over the life of the recovery plan.**

Achievement of this objective will be measured against the following performance criterion:

> There has been no known decrease in extent or overall condition of the ecological community between 2015, 2020 and 2025 (to be further informed by condition baselines as they become available).

Supporting objective and performance criteria:

> **Ensure effective adaptive implementation of the plan**

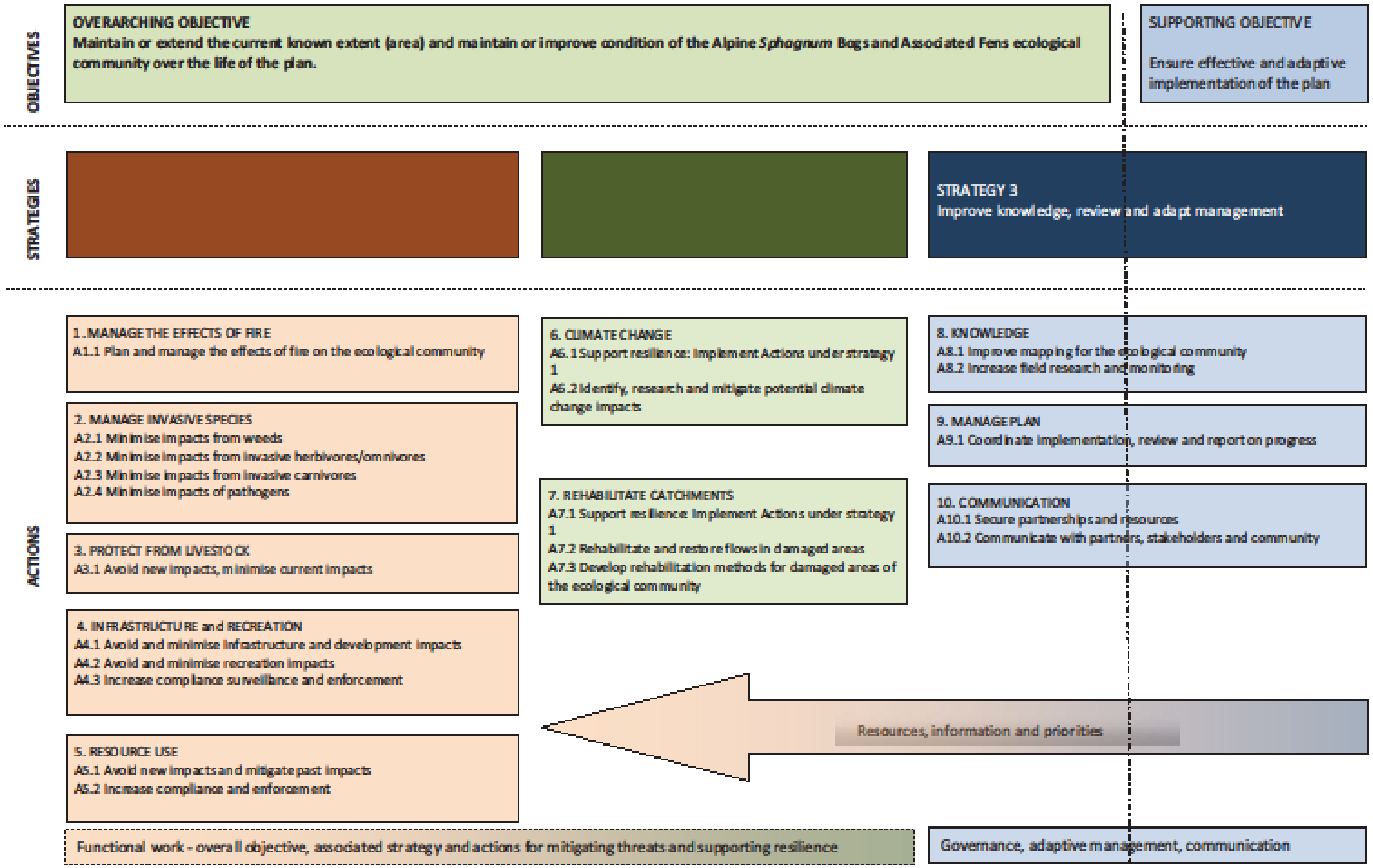
Achievement of this objective will be measured against the following performance criterion:

> Priority actions have been undertaken, the results understood and shared, and any required modifications to priority actions made as new information became available.

The strategies, actions and the specific tasks to be undertaken are outlined below.

Relationship between objectives, strategies and recovery actions

Actions and strategies are summarised. Please refer to the Recovery Actions section below for details.



5.4 Recovery Actions

The Recovery Actions table below (**Table 2**) outlines the actions and associated tasks or activities to be undertaken to implement each of the three strategies and achieve the objectives. The priority recovery actions are informed by current knowledge, threats and regulatory arrangements.

The priority ratings allocated to actions and tasks in **Table 2** have been guided by input from state/territory authorities and other experts taking into account the risk that a threat poses to the ecological community (through assessing the likelihood the impacts of the threat will occur, the severity of the impacts as per **Table 1** and the extent of the impacts) and the likelihood of success in undertaking actions to address the threat.

The actions and tasks have been prioritised separately into 'Australian Alps' (ACT, NSW and Victoria) and Tasmania in recognition of geographic separation, some key differences in the biotic and abiotic elements, and that Alpine *Sphagnum* Bogs and Associated Fens in these two areas have some different threats and management challenges (for example, resources and seasonal timing). Differences in priority between the two main areas do not necessarily indicate that a threat has a different level of impact (or potential impact). Different local conditions, threats and impacts should also be considered for each catchment and occurrence of the ecological community. For example, actions and tasks might be given a lower priority for one of the two main areas because 1) they are already being implemented, 2) they are already considered within existing legislative or planning measures, or 3) the threat may be locally severe but insubstantial across the full range of the community. For this reason, the priorities should be compared within the two main areas but not between them.

The attainment of objectives and the provision of funds necessary to implement actions are subject to budgetary and other constraints. It is recommended that tasks prioritised as moderate to highest are implemented at a minimum.

Consistent with an adaptive management approach, it is intended that the actions, tasks and priority ratings are refined where new information becomes available and/or circumstances change.

Table 2: **Priority recovery actions and tasks**

Strategy 1. MANAGE AND REDUCE THREATS TO THE ECOLOGICAL COMMUNITY			
Action 1 - MANAGE THE EFFECTS OF FIRE	**Tasks to minimise the threat and impacts of fire on the ecological community**	**Priority rating**	
		ACT /NSW/VIC	**TAS**
1.1 Plan and manage the effects of fire on the ecological community.	a. Maintain accurate fire history via mapping of extent, frequency, severity (or intensity) and regeneration (see also Action 8.1).	Moderate-high	Highest
	b. Incorporate appropriate management guidelines for fire suppression in the ecological community as part of fire management plans.	High	Highest
	c. Improve knowledge about the importance and locations of the ecological community for field staff and fire management operators.	High	Highest
	d. Avoid negative impacts to the ecological community from fuel reduction burns.	High	Highest
	e. Avoid damage to the ecological community from activities associated with fire management operations (e.g. control line construction vehicle access, back burning).	Highest	Highest
	f. Develop an ecological procedure for assessing fire impacts and required responses (e.g. additional protection) to mitigate fire impacts and monitor regeneration over time.	High	Highest
	g. Develop and implement targeted management responses for fire affected areas (for example through restricting access in the post fire recovery period).	Highest	Highest

Action 2 - MANAGE INVASIVE SPECIES	Tasks to eliminate impacts of invasive species and diseases where they occur and prevent them from establishing at sites where they do not occur.	Priority rating	
		ACT/NSW/VIC	TAS
2.2 Minimise the impact of invasive herbivores/omnivores on the ecological community, (consistent with national and regional invasive animal plans, where applicable).	a. Prevent establishment of new populations of hoofed animals, particularly feral horses, feral pigs and deer.	Highest (horses) Moderate-high (pigs, deer)	Highest (horses, pigs) Moderate-high (deer)
	b. Manage, contain or control existing populations of feral horses, feral pigs, deer, rabbits and hares.	Highest (pigs, horses and deer) Low-moderate (rabbits and hares)	Highest (rabbits) Low-mod (deer) (horses and pigs not present)
	c. Encourage private landholders, ski resorts and other land managers to prevent, eradicate, contain or control invasive herbivores threatening the ecological community.	Moderate-high	Moderate-high
	d. Undertake surveillance, monitoring and mapping of invasive fauna threatening the ecological community, including new incursions and emerging threats (see also Task 8.1a).	Moderate	Moderate
2.3 Minimise impact of invasive carnivores on the ecological community's fauna (consistent with national and regional invasive animal plans).	a. Eradicate, contain or control existing populations of foxes and cats threatening fauna in the ecological community.	Low-moderate	Low
	b. Prevent establishment of new populations of trout in high altitude streams and water bodies where they currently don't occur and eradicate, contain or control trout in fens where galaxiid populations are known or could be re-established.	High	Highest