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Australian Brumby Alliance

Submission to Victorian Environmental Assessment Council (VEAC)

Statewide Assessment of Public Land [Draft Aug 2016]

Introduction

Thank you for asking the Australian Brumby Alliance (ABA) to provide feedback to the Victorian Environmental Assessment Council (VEAC). Although Wild Horses/Brumbies are not listed in VEAC's terms of reference, Wild Horses are found on public land that has often started out as Crown Land which is now described as states forest or national parkland.

The ABA defines *Sustainable Wild Horse areas* as;

- Areas where a managed, genetically viable number of Wild Horses continue to live wild, in an
- Environment that can seasonally regenerate and benefit from their positive impacts, such as increased avian richness (*ref1*), species diversity (*ref2*), reduce fire severity (*ref3*) and improved soil water-holding capacity, water-infiltration, improved structural stability which in turn decreases erosion (*ref4*).

Background

The Australian Brumby Alliance (ABA) Inc. was formed in April 2008. Its mission is to act as a National Body for the Recognition, Management, Preservation and Welfare of Australian Wild Horses (Brumbies).

Member groups have developed a solid understanding of the skills and complexities required to collect Brumbies trapped by national park removal programs, to gentle and rehome them. Rehomed brumbies are well suited to a range of equestrian activities including endurance riding, horse shows, children's ponies, carriage work and trail riding.

ABA members have worked with park staff in New South Wales, Victoria and Queensland to implement the most humane method of brumby control *if* Brumby numbers must be lowered.

The VEAC Draft highlights the following considerations

a) the principles of ecologically sustainable development;

For the ABA, ecologically sustainable development includes horse trail riding by individuals or commercial horse trekking companies, and in particular, sustainable numbers of Wild Horses continuing where they currently exist, for the public to see living wild and learn about the horse's contribution to early settler arrivals until replaced by motorised vehicles.

b) the need to conserve and protect biological diversity;

For the ABA, conserving and protecting biological diversity includes recognising the many ways sustainable Wild Horse populations contribute to their environment and especially to supporting biological diversity in their habitat [Refs1,2,3&4].

c) the need to conserve and protect areas which have ecological, natural, landscape or cultural interest or significance, recreational value etc.

For the ABA, conserving and protecting areas which have ecological, natural, landscape or cultural interest or significance, recreational value or geological or geomorphological significance includes the retention of sustainable Wild Horse populations in recognition of their cultural heritage, that early settlers depended on and carry our soldiers to war.

d) the need to provide for the creation and preservation of a comprehensive, adequate and representative system of parks and reserves within the State of Victoria;

For the ABA, a comprehensive, adequate and representative system of parks includes the retention of sustainable Wild Horse populations where they have lived for up to 200 years. Brumbies represent part of Australia's unique heritage that current and future Australians need to see and learn how they were essential to early settlers to work lands we now enjoy.

g) the potential environmental, social and economic recommendations.

For the ABA, environmental, social and economic values includes acknowledging the benefits that sustainable Wild Horse populations provide to their environment, such as increased avian richness, biological diversity and reducing fire damage (refs1,2,3&4) etc.

h) any existing or proposed use of the environment or natural resources.'

For the ABA, having regard for existing or proposed use of the environment or natural resources includes recognising the historic values of retaining sustainable, managed Wild Horse populations in areas where they currently exist as a valued resource.

Public land values of: biodiversity, cultural heritage, recreation and tourism.

(p11-2.2.3 Values of public land)

Biodiversity

The ABA questions the use of native vegetation as the key indicator of the overall state of terrestrial biodiversity. As already stated, the presence of *sustainable* Wild Horse populations will increase biodiversity, for both native flora and fauna.

Cultural heritage

The ABA stresses the vital need to recognise the cultural heritage of Australia's Wild Horses. The review by Context (2015), *National Cultural Heritage Values Assessment & Conflicting Values Report* for the Kosciuszko National Park draft Wild Horse Management Plan, found "that the wild horse population is an attribute associated with the cultural heritage significance of Kosciuszko National Park in relation to five criteria".

Recreation

The ABA recognises the need for a range of recreational uses of public land, and the need to balance any conflicting uses of public land in a sensitive and negotiated manner.

Tourism

The ABA recognises and promotes the need to provide for horse related tourism to all areas of public land whilst recognising some areas are more sensitive to tourist use than most areas.

Shared cultural heritage values

The draft (p13) acknowledges that many sites on public land have shared cultural heritage values and are highly significant to Traditional Owners and also for non-Aboriginal heritage. **The ABA agrees** that it is essential to recognise that shared (Aboriginal and non-Aboriginal) cultural values exist on public land.

The Burra Charter, which also supports this position, highlights how essential it is for all of us to recognise that where *the use of a place is of cultural significance - it should be retained*, and that the *co-existence of cultural values* should always be recognised, respected and encouraged and that *this is especially important in cases where they conflict*.

The ABA therefore considers it vital that any amendments to the use of public land now include formal recognition of Victoria's culturally significant Brumby populations that have lived on public land for well over 100 years.

Recreational Hunting

Draft proposals paper (p14) – states that there is significant hunting (deer, native ducks, quail and pest animals) on public land in Victoria.

The ABA does not support uncontrolled shooting on public lands in Victoria. Currently there are no effective process in place to ensure recreational shooters act responsibly in regard to public safety and follow up of injured animals and at present Parks Victoria do not follow up reports of guns being used illegal or carried illegally, in national parks.

For example, at the start of the 2015 three day Barmah Cattlemen's event a person shot a Barmah Brumby mare dead and put her foal in a vehicle. A member of the public, immediately reported this to Parks Victoria. However the police never arrived, and when questioned later the police said Parks Victoria never contacted them. The failure of Parks Victoria to call the police, having assured several people they *had* called the police, resulted in a person being able to kill a Brumby mare, detain her foal, and still move freely within a large public event. The shooter was never charged or even questioned and the foal died. When the original witness filed a complaint to Lisa Neville, Parks Victoria advised that they had acted correctly in not informing the police or doing any other follow-up. Such total disregard for public safety or animal welfare on Parks Victoria's land must never be repeated.

Community based management

Draft proposals paper (p15) – Need to support community-based committees of management and community-based committees of management in broader Crown land estate.

The ABA agrees with the need to support community-based committees of management.

The ABA strongly recommends that community-based committees of management include members from both Aboriginal and non-Aboriginal heritage values to encourage and build understanding of the need for *cultural values to co-existence* (Burra Charter).

Draft proposals paper (p15) recommends an additional public land use overlay to denote Aboriginal land. The ABA also recommends that additional public land use overlay is also used to denote non-Aboriginal heritage values within Aboriginal lands.

Recommendation 2 (p17) – talks of the need for legislation to reflect recommended land use categories, to streamline implementation, and to **improve management effectiveness**.

ABA response – legislation should reflect public land use to recognise their heritage values and to retain sustainable Wild Horses able to survival for future generations to learn value.

Recommendation 3(b) (p18) align the 1300 or so historical reservation purposes to the purposes of revised public land categories through a schedule that replaces them with the purposes of the relevant revised category.

ABA response – Create a new category to reflect public land use for sustainable Wild Horses to be defined as heritage recognised and agreed numbers to continue living in their homeland ranges that will ensure their survival for future generations.

Recommendation 9 (p18) – States the need to develop new protected area legislation.

ABA response – new protected area legislation to include public land in national parks to use for sustainable Wild Horses with agreed numbers to continue living in their homeland ranges that will ensure their survival for future generations. Also build on local support by entering into agreements with communities who want to support keeping defined healthy, sustainable Wild Horse populations in specified park landscapes.

Please contact Jill Pickering on 03-9428-4709, if you have further questions relating to the Australian Brumby Alliance submission.

Yours sincerely



Jill Pickering,
Australian Brumby Alliance
7th November 2016

References

- Ref1-Nimmo & Miller's 2007's review found that "avian richness and diversity was higher in areas subject to moderate grazing than in areas that excluded horses."
- Ref2-Connell (1978) proposed that species diversity was maximised under inter-mediate levels of disturbance. At low levels of disturbance, diversity is reduced by competitive exclusion, possibly resulting in the dominance of a particular species, desirable or undesirable.
<http://www.agr.gc.ca/eng/science-and-innovation/agricultural-practices/soil-and-land/riparianareas/grazing-a-natural-component-of-grassland-ecozone-riparian-systems/?id=1220563603657>
- Ref3-Horses reduce fire severity in Forest, sub-alpine, montane, semi-arid areas, and horse (grazing) increases species diversity in Sub-alpine and montane environments. (Silvers 1993, Davies 2015).
- Ref4-Organic components of feces and urine from grazing animals build soil organic matter reserves, which increases soil water-holding capacity, water-infiltration rates, improved structural stability which decrease erosion (Hubbard et al. 2004).