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Committee Secretary
Senate Standing Committees on Environment and Communications
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Dear Standing Committee,

Some Background

Thank you for the opportunity to contribute to your inquiry. My experience is dated but may still have some relevance to this inquiry as it includes:

- research into the establishment of Kosciuszko National Park (KNP) in the 1940s and patterns of its recreational use in the 1970s¹, 1976-79;
- a contribution to preparation of the 1982 KNP Plan of Management while Regional Planning Officer, South Eastern Region of the NSW National Parks and Wildlife Service, 1980-83;
- a contribution to establishing the Australian Alps National Parks Cooperative Management Steering Committee while working for the ACT Parks and Conservation Service of the Commonwealth Department of Territories, 1985-88; and
- a range of policy advising and implementation roles while a SES Band 1 officer in the Commonwealth Environment Department (by various formal names), including negotiation of the Biodiversity Convention and management of Australia's role in the World Heritage Convention, 1988-98.

Horses do not monopolise our cultural heritage even if grazing cattle were excluded from KNP 50 years ago while feral horses remain in 2023. William McKell, Premier of NSW (1941-47) and Governor-General of Australia (1947-53), exercised leadership to establish Kosciuszko State Park² in 1944 amid the distractions of World War II. Nevertheless, protection of KNP from the impact of cattle grazing was not secured until its 1943 exclusion from the Summit Area was extended to the entire Park in 1969.

¹Turner, Andrew (1979), *National Parks in NSW, 1879-1979; Participation, Pressure Groups and Policy*; unpublished PhD thesis, Australian National University, Canberra; and Turner, Andy (1981), *National Parks and Pressure Groups in NSW*, pp156-69 in Mercer, David (ed), *Outdoor Recreation – Australian Perspectives*, Sorrett Publishing, Melbourne.

² The change of name to National Park followed passage of the NSW *National Parks and Wildlife Act, 1967*.

Choices still have to be made: even today not all expectations for the Alps' catchments can be fulfilled. It's true that horses and cattle are exotics with their place in the hills and hearts of Australia; but is the place of feral horses to continue to include the catchments on the roof of NSW where evidence showed 50 years ago that cattle grazing was too damaging?

Enduring disputes are an inevitable consequence of debates about what is appropriate use of this tiny fraction of Australia when evidence of what happens when, in this case, horse hooves hit these hills remains hidden. Long overdue are both explicit use of a 'technical tool kit' to measure impacts on the catchments, and the leadership to use that information to minimise the degeneration of 'impact' into 'damage' across the Australian Alps.

Hence, I offer some suggestions about tools for measuring 'impact' and 'damage', along with some observations about the relative contributions of political leadership and legislative reform in managing Australia's natural and cultural heritage.

Best Practice Repair and Restoration?

There is a sufficient literature about horse impacts across the Alps to render redundant another detailed review of that evidence. A recent example gives enough of the flavour.

The reports of the scientific (SAP) and community advisory panels (CAP) associated with the 2021 KNP Wild Horse Heritage Management Plan have identified the core of the policy and management planning challenges: basing management of wild horses within KNP, as with the rest of the Australian Alps, on the monitoring and assessment of environmental and cultural/social impacts. For example, page 11 of the SAP report states that "... *environmental impacts need to be identified and monitored to ensure that horse population reduction efforts are having the desired outcome*". Likewise, the CAP report states, "... *horses should be managed by their adverse impacts ...*" (page 7), and "[a]ny management plan needs to focus on the desired outcome of reducing adverse natural and cultural impacts" (page 8).

It is specific measures of the impact of feral horses at specific locations, and the interpretation of those measures to judge when inevitable *impact* becomes unacceptable *damage*, that may provide the best hope for substituting light for the heat generated by horse management within the mountain catchments.

Existing land management documents are hobbled by an absence of detail on how objectives are to be achieved. It's possible that Governments and/or their agencies may have a sophisticated handle on what needs to be done by whom and by when, but the required guidance has not been published in sufficient detail to provide useful tools for land managers and/or interested public(s), as is demonstrated in Chapter 16 of the 2006 KNP Plan of Management and by the absence of environmental standards, such as water quality and soil compaction, as the basis for the respective boundaries of the three horse management zones identified in the 2021 Wild Horse Plan. Publishing sufficient detail to inform managers, users and other observers about what is required to deliver laudable if vague objectives, and specifying the circumstances in which prescribed management intervention(s) will be implemented, could provide reassurance that 'impact management' is more than magical thinking. This is news to few management agencies.

Informed debate among interest groups would be better focussed on impacts and assessments of the consequent management intervention options rather than, for example, noisy exchanges of assertions about the superiority of heritage conservation preferences.

What is to be measured, and how, and at what points does the monitoring of these indicators identify that 'unacceptable damage' necessitates management intervention?

The 'impact management process' described in the attachment to this submission (Turner, 1994) (i) is outdated as *current* best practice, and (ii) provides inadequate detail for application to contemporary horse management in the Australian Alps. On the other hand, the attachment does indicate what could be included in a more current and comprehensive impact management regime. It should be within the capacity of land management agencies throughout the Australian Alps to add enough of the missing theory and practice to develop a workable version of the process, even if this is no trivial challenge!

Interaction with Laws and Powers

It is probable that the inquiry's report will include detailed descriptions of the legal, policy and administrative innovations required to implement its recommendations. Whatever they are, such innovations may be necessary but they are unlikely to be sufficient to effect lasting change. Legislation authorises things to be done (or not done); it seldom guarantees such action is taken, due to the constraints on available resources and/or other priorities.

The early history of KNP is an exemplar of the need for unambiguous leadership in the successful implementation of sustained change. Various groups, such as the Australian Academy of Science, bushwalking and skiing organisations, and the Snowy Mountains Authority, provided the ideas, while Premier McKell and his advisors were the leaders with the authority to meld those ideas into a plan they could implement.

Change needs champions! Whatever the intrinsic merit of any idea about desirable change, it lies impotent in the absence of leadership. Across the Australian Alps some land management ways are past their time; a fresh start seems essential. By all means incorporate details of a legislative and related reform agenda into your report, but please avoid mis-identifying the making of such lists as all that is required to get the job done.

A Conclusion

You have my best wishes for your inquiry, report and whatever may follow.

Regards,

Andy Turner

... **Attachment:**

Turner, Andy (1994); *Managing Impacts: Measurement and Judgement in Natural Resource Management*. Pp 129-40 in Mercer, David (ed), *New Viewpoints in Australian Outdoor Recreation Research and Planning*, Hepper Marriott & Associates, Melbourne.