

Thank you for the opportunity to make a submission to the draft report on pest animal management. In 2002, Tony English (now deceased) and I prepared a report for the NSW Minister for the Environment (Bob Debus) on control of feral animals in NSW National Parks, so I am pleased to see another, and broader report.

Feral control practices to date are failing. Culling and investment in control efforts is fraught with vested interest. It is time to think outside of the box and independent of vested interests.

Key points that I have to contribute are listed below.

Regards,



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Points:

1. The draft report p88 in reference to feral horses notes that "there are currently no peer-reviewed studies that focus on the social dimension of feral horse management in Australia" (Nimmo 2007). A peer-reviewed study of the social dimension of feral horse management in Australia is available here:

https://www.researchgate.net/publication/233866342_The_politics_of_feral_horse_management_in_Guy_Fawkes_River_National_Park_NSW

2. On p87 where it states "In NSW significant populations reside in the Snowy Mountains along with smaller isolated populations on the northern and southern Tablelands (English 2001)." - this should be updated to include the Blue Mountains as having a small isolated population. It should also be noted that a PhD study on the environmental impacts of the population in the Blue Mountains is being undertaken from 2016-2019.

3. On page 91, paragraph starting 'ongoing public consultation...' incorrectly cites NPWS 2003 regarding a review of protocols, when it should be English 2000.

<http://www.environment.nsw.gov.au/resources/pestsweeds/englishReport.pdf>

4. Independent report by English and Chapple 2002 for the NSW NPWS should be cited as a comprehensive review of feral animal control in NSW National Parks.

http://pandora.nla.gov.au/pan/36810/20030731-0000/www.nationalparks.nsw.gov.au/PDFs/english_report_pest_animal_progs_fullreport.pdf

In conjunction with this a Model Code of Practice for the Capture and Transport of Feral Deer was also produced and I did not see this one cited in the draft plan.

5. Re recommendation 20(i-iii) on reducing the impact of feral horses and specifically to "recognise the heritage value of feral horses". I argue that heritage value is not a constructive basis for decision-making. This is a social construction based on mythology and has not proven to help resolve the issue to date, but rather to complicate it and reduce transparency and evidence base. There is no evidence base for their heritage value (see Chapple 2005 as well as the 2015 report on the Snowy Mountains). I propose that these words be removed from the recommendation which be amended to state "maintain an acceptable population level across the landscape".