



6 May 2016

Mr. Bradley Fauteux
Chief Executive Officer
Parks Victoria
Level 10, 535 Bourke Street
Melbourne
Victoria 3000

Dear Bradley,

Re: Removal of feral horses from Barmah National Park

On behalf of the catchment partners in the Goulburn Broken Catchment, we are writing to you collectively with our concerns, and to contribute to your ongoing consultation, regarding the impacts of feral horses on the Moira Grass plains within Barmah National Park having permanent impacts on the ecological integrity and potential Ramsar listing of this critical site.

Moira Grass can be considered a keystone species of floodplain grassy wetlands where it contributes to the ecological function of temporary wetlands through primary productivity and nutrient cycling, and food and habitat provision to fauna (Colloff et al. 2014).

Moira Grass is included in the Ramsar ecological character description of Barmah Forest (DSE 2008) and Millewa Forest (as part of the NSW Central Murray State Forests; OEH 2002). Special management of Moira Grass Plains is recommended within the Barmah Forest Ramsar Site Strategic Management Plan (DSE 2003) and the Barmah-Millewa Forest Environmental Water Management Plan (MDBA 2012) where the natural extent and distribution of Moira Grass is to be restored.

Grazing pressure removes flower heads, and hence removes sexual reproductive capacity (seeds), in addition to frequently consuming entire plants which are easily uprooted during flooding and hence also reduces vegetative reproductive capacity (as the species will otherwise regularly root at the nodes along the stem upon flood drawdown to produce separate plants; Ward 1991).

Counts of feral horse numbers undertaken by Parks Victoria in 2010 found a minimum of 144 individuals grouped into a number of small herds spread mostly throughout the central and western regions of the forest, and these were highly correlated with open grassy-wetland plains (Carboon 2013). With the return of wetter conditions since 2010, there appears to be a high proportion of foals now entering into the population, and this is expected to have increased horse numbers since the last count. Although no formal counts have occurred in other years, numbers are thought to have fluctuated naturally over time but felt not to exceed 300.

A seasonal watering proposal for the Barmah-Millewa Forest for 2016-17 has been collaboratively developed by the Victorian and NSW agencies (Goulburn Broken Catchment Management Authority, NSW Office of Environment & Heritage and National Parks & Wildlife Services). It identifies a floodplain marsh watering (including the Moira Grass plains) as a priority watering action under average to wet seasonal conditions. If these conditions eventuate, this watering action is important for the growth and flowering of Moira Grass, as it has now been three years since this has occurred and currently sits outside its minimum required frequency of flooding in 80% of years.

Unfortunately, we have now received advice from the Commonwealth Environmental Water Office noting they are unlikely to allocate further environmental water to the Barmah Forest icon site due to the environmental outcomes being compromised by the ongoing feral horse impacts on the Moira Grass plains. This could also have implications for the commitment of Living Murray water in 2016-17.

The current trajectory of decline indicates that the Moira Grass plains could be locally extinct within Barmah Forest in a matter of years without the appropriate watering regime.

The Goulburn Broken CMA have previously expressed its concerns on the impacts that feral horses are having on the National Park to the Minister for Environment, Climate Change and Water through letters sent on 30 April 2015 and 29 September 2015. The initial letter proposed a range of options for the removal of the feral horses.

We also note with interest the recent decision of the NSW Government to significantly reduce the current numbers of wild horses in the Kosciusko National Park.

As catchment partners with a keen interest in the health of the Barmah National Park, including as its joint land managers, we are seeking to support you in the removal of the feral horses from this icon site. We would appreciate any advice from you about how we can provide further input into the consultation and implementation of this action.

Yours sincerely,

Chris Norman
CEO
Goulburn Broken CMA

Damien Bulled-Morgan
Acting CEO
Yorta Yorta Nation
Aboriginal Corporation

Beth Ashworth
Executive Officer
Victorian Environmental
Water Holder

John Pettigrew
President
Goulburn Valley
Environment Group