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Nature Conservation Saves for Tomorrow

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NPWS Planner

Horse Riding in Wilderness

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Proposed horse-riding in wilderness amendments to plans of management

1. Overriding position on the proposal

The Blue Mountains Conservation Society (variously referred to as The Society or BMCS herein) comprises between 800 and 825 members. It has a substantial interest in fully retaining the existing levels of wilderness-protection in the Blue Mountains and throughout NSW. It views any attempts to weaken such protection in response to pressure by special interest groups as a negation of OEH's environmental responsibilities. BMCS opposed the original trial of horse riding in wilderness as a process devoid of logic; the concept of wilderness should be paramount.

The Society now contends that, in the face of the failed original trial¹ (2014-2016) and, indeed, irrespective of any outcomes that the trial could conceivably have produced, the proposed horse riding amendments to the plans of management for Far South Coast Parks, Kosciuszko National Park and Mummel Gulf National Park and State Conservation Area **should be abandoned**. The simple reality is that horse riding inescapably creates environmental damage. The magnitude and extent of that damage will vary from place to place and with different times/seasons of the year; **but as horse riding will inevitably degrade wilderness, acceptance of such an outcome is condemned as unconscionable**.

2. The aim of the trial

The aim of the trial was to "...test whether horse riding is appropriate in wilderness areas"². Up to now, it has generally been recognised by NPWS that horse riding in wilderness is most inappropriate; that it conflicts with the very notion of wilderness. Yes, there have been some concessions to horse riding in national parks on selected trails, but there is widespread recognition that declared wilderness needs a higher level of protection³. This is so with the size and potentially the frequency of walking groups, utilisation of mountain bikes in parts of parks but not in wilderness, and the limited use of cars and 4wd vehicles in parks but not in wilderness.

¹ Trial (singular) is used throughout, but it is acknowledged that the trial was carried out in three different regions and could equally be termed trials (plural).

² <http://www.environment.nsw.gov.au/policies/HorseRidingTrial.htm>

³ A notable compromise involves horse riding on the BiCentennial National Trail where it passes through wilderness.

What has changed to justify asking whether horse riding is appropriate in wilderness? The concept of wilderness and why it is recognised has not significantly altered from the viewpoints of preservation and conservation: the horses and their riders will still weigh about the same; horses will still eat and defecate as nature intended; their hooves will still be shod; the horses coats will still transport certain types of seeds and spores (native and exotic) which are alien to the wilderness at large, and/or to the ecosystem in the particular part of the wilderness where they are dropped; and the scientific and observational studies which have justified restricting horse-riding access are still extant.

To elaborate, the scientific literature⁴ shows that horse riding in natural areas has the capacity to be environmentally disastrous. Recognised impacts include the spread of weeds, soil compaction, soil erosion, spread of pathogens, and damage to the habitats of threatened species and endangered ecological communities. Horses are not ruminant herbivores, so viable seeds of ‘weeds’ and other species exotic to the local environment may be passed via their faeces over a period up to two weeks following ingestion. Horses are steel-shod, so their hooves can disrupt topsoils and destroy the soil profiles around watering holes and creek crossings, as well as fracturing delicate rock features; where horse riding is confined to specific tracks, it takes little time for the track to be down-cut such that it focuses rain run-off and further gullyng. And finally, horses are a recognised vector in relation to two key threatening processes, these being “Infection of native plants by *Phytophthora cinnamomi*” and “Invasion of native plant communities by exotic perennial grasses”.

The evidence opposing the introduction of horse riding to wilderness has not changed. It is therefore overwhelmingly inappropriate to use inadequately constructed and regrettably misinterpreted trials as a basis for justifying the indefensible.

Despite the above, the trial has gone ahead, so one must surely ask what changes could be pertinent to OEH’s apparent volte-face over horse riding in wilderness? Three things spring to mind:

- the existence of an aggressive horse-riding lobby which seems to have gained the ear of government, or at least a powerful sector within government;
- the trend within the public service to be more compliant with ministerial fiats despite this disregarding contrary evidence; and,
- the development of governmental policies which seemingly abhor ‘underperforming assets’ – the policies promote visitation and economic benefits, irrespective of the consequences.

Where is the vision which recognises that wilderness has a near-limitless value when seen in terms of the future of all life-forms on this planet?

3. The trial at the half way point

On August 26, 2015, BMCS attended a meeting at OEH⁵ in Goulburn St to discuss the results to that date of the trial of horse riding in wilderness. The agenda provided by Keith Muir is attached to this submission as *Appendix A*. The answers provided to many of the agenda items were far from impressive in BMCS’s opinion. This is despite many allowances being made for the trial being only half way to completion.

The feelings of BMCS and other environmental representatives prior to and following the meeting were that:

- the trial was inadequately designed and poorly monitored;
- the level of ‘horse riding’ participation was low and woefully inadequate despite the horse-riders lobbying to gain access to wilderness;
- the statistical data were of little value;
- horse riding in wilderness is against the available scientific studies, so there was little justification for extending the process; and,

⁴ Principally: Newsome, D., Smith, A. and Moore, S.A. (2008) Horse Riding in Protected Areas: A Critical Review and Implications for Research and Management. *Current Issues in Tourism* 11(2):144-166; and, Ansong, M. and Pickering, C. (2013) A global review of weeds that can germinate from horse dung. *Ecological Management and Restoration* 14(3):216-223

⁵ With Keith Muir, Anne Reeves, Dianne Thompson, and Albert Renshaw – the meeting was organised by Matt Colahan of OEH – OEH was represented by several others on the ‘planning team’.

- the most sensible approach would be to recognise the stupidity of even contemplating horse riding in wilderness.

Despite the above, we were told that OEH felt obliged to complete the trial, and that (at least within the room!) the report to the minister would most likely oppose opening wilderness to horse riding. We were also assured that there would be a second meeting sometime during May-June 2016, at which point we would be updated on the general findings, basis for those findings, and what will happen next. It was nevertheless emphasised that we would not be able to see the final report before it went to the minister.

This would now seem to have been an exercise in ‘tell them what they would like to hear’, before returning to the political agenda! The Society realises that this judgement may be harsh, but perceptions are important in terms of retaining (or losing) confidence in the process.

4. The trial at (in)completion

The NPWS website⁶ indicates that the trial finished in April 2016. It states that: *“Initial monitoring results indicate there has been low usage and low environmental risks. It is now proposed to amend the plans of management to allow horse riding to continue in the same wilderness locations until 31 December 2017, while the full evaluation of the trial is undertaken.”* It further states that: *“Monitoring data from the two-year trial is available on the OEH Wilderness horse riding trial webpage. The monitoring outcomes will be evaluated once final data has been collected for each trial location.”*

The Society makes the following observations in relation to the above:

- the statement that the *“results indicate there has been low usage and low environmental risks”* is unsurprising – the low usage was identified at the half way point and clearly hasn’t disproportionately increased;
- with **no horse riding usage**, the associated environmental risks will correspondingly diminish! This is surely the desirable outcome for wilderness?
- ‘Monitoring data’ are available, but final outcomes will depend on final data being *“collected for each trial location”* – in other words, some data collection and analysis have still to be done – the trial and its evaluation must therefore be **incomplete**.
- The full evaluation of this incomplete trial will take until December 31, 2017, so the plans of management are to be altered to allow ongoing horse riding in the trial areas up to that date. The logic of this action is almost Monty Pythonesque⁷, unless the outcome has been politically pre-determined and the data are little more than window dressing.

It seems that the only conceivable justification for changing the plans of management ahead of completing the trial is that it will save time later. This implies that the trials have already been assessed as justifying horse riding on selected trails in wilderness. It therefore means that: the impacts on wilderness values are deemed ‘manageable’ by the desk-bound experts driving this pernicious process; and the real aim is the politically promoted provision of ‘sustainable’ horse riding in wilderness.

The Society consequently contends that this incomplete trial is riddled with a range of deficiencies which compromise the integrity of the whole process.

5. Summary of concerns and deficiencies

This section will, to some degree, follow the matters raised in *Appendix A*. **It will thereby demonstrate that little has been done to alleviate concerns over the period spanning the start of the trial, through its half way stage, to its notional (in)completion and proposed amendments to the plans of management.**

⁶ <http://www.environment.nsw.gov.au/publications/parks/proposed-wilderness-horse-riding-amendments-plan-management.htm>

⁷ <https://www.quora.com/What-is-the-Monty-Pythonesque-application-of-the-principles-of-logic-and-etymology>

5.1 Baseline data and trial-design

Baseline data are an essential component of any meaningful study. For this trial, collection of such data was at best limited to the specific tracks and campsites, paid little attention to the potential for dispersion of impacts, insufficiently accounted for seasonal variations, and was not developed over a suitable number of years. Despite the environmental damage caused by horses and horse riding, a targeted species survey was not undertaken and was deemed unnecessary. **Such a cavalier approach to baseline determination is only comprehensible if the trial was a form of window dressing to cover a predetermined outcome.**

Much emphasis was placed on the role of adaptive management at the meeting with OEH in August 2015. This seemed to be in relation to why aspects of the trial had been changed, and how any impacts arising from horse riding would be managed. Changing aspects of the trial is akin to moving the goalposts and is an indicator of poor trial-design; it potentially makes a mockery of any statistical interpretation. In the context of the management of horse-riding impacts, it seemed to be assuring the environmental groups that should impacts be greater than anticipated, they would be handled through adaptive management processes. This gave, and still gives, two messages: a rigorous trial is unnecessary because limited horse riding in wilderness is a senior management/political imperative; and, whatever the environmental consequences, NPWS will either live with them, or learn how to counter them.

The trial was designed to apply to specific tracks and camp sites. It made no concessions for the probability that horse riders will deviate from the constraints and, in any case, that processes associated with the dispersion of weed species and excrement are not bound by artificial constructs. The Review of Environmental Factors (REF) for the trial is therefore compromised because the sites and study areas are unscientifically restricted; this in turn causing inadequate consideration of endangered ecological communities and threatened species.

The Society views these deficiencies as examples of not wasting funds on rigour when the outcome is predetermined.

5.2 Data collection and assessment

Apart from the lack of any separate control sample and the inadequate length of the trail (2 years is too short), the data collection was beset with problems which were partly excused by NPWS in terms of the remoteness of the trial sites, equipment failures and vandalism.

The problems included:

- changing the methods of collection and adding collection sites during the trial's progression – whilst some of this may have been unavoidable, it compromises meaningful comparisons;
- damaged and stolen cameras resulting in very intermittent records – such occurrences should be anticipated to the extent of increased field-checks and having replacements available – excuses render trials meaningless;
- collection of soil compaction data (a principal indicator of the consequences of horse-riding traffic) was discontinued – this was despite a substantial amount of compaction being recorded – the reason for abandoning this element of the trial is unclear;
- removing 'illegitimate' riders from the data – this is a strange decision based on such things as having a dog along and the notion that legitimate riders would know they were being recorded – the Society considers that this approach creates a significant distortion of the data; and,
- to the extent that a legitimate horse-rider's behaviour is critical to the likelihood of causing unacceptable impacts, the purpose of a trial is defeated if the participant knows it is taking place and acts accordingly.

The results from the trial are devoid of predictive capacity due to the data being too few and substantially compromised. Any detailed assessment of the trial is therefore baseless and a pointless exercise without credibility, unless the desired outcome (justification of horse riding in wilderness) is known and will happen regardless.

5.3 Unacceptable conditions and assumptions

The trial [despite being (in)complete] has seemingly provided the required outcome in that plans of management are to be changed.

Any such outcome reflects the following unacceptable conditions and assumptions:

- An aim of the trial, as emphasised in the REFS (p3) is to determine whether potential impacts on wilderness values can be managed within 'acceptable thresholds'. Elsewhere, it is clear that the acceptable threshold is defined as impacts which "...can be managed without causing irreversible damage"⁸. This raises the matter of how irreversibility is defined, as there are few impacts which sufficient funds and time are unable to suitably ameliorate or fix. It again shows that the whole exercise has been necessary to substantiate a political decision. **From the Society's viewpoint, horse riding and wilderness are an oxymoron and no amount of fiddling with trials will justify the predetermined decision.**
- The apparent decision to allow horse riding in wilderness is based on not creating irreversible impacts (which is no protection whatsoever) and horse riders complying with environmental safeguards comprising: keeping to the prescribed tracks; only using designated campsites; and following the NPSW's 'Code of practice for horse riding in parks' in general. The latter stipulates the size of groups but says nothing about the frequency of groups.

The Society believes that some may accept and comply with the code's voluntary standards, but as utilisation increases, many riders will seek better experiences and disregard the constraints. Rather like self-regulation in business, it is inevitably flouted. And in the middle of wilderness, who's to know?

6. Conclusion

A formal conclusion is barely warranted. The Society's uncompromising position on horse riding in wilderness is conveyed in Section 1, whilst its dissatisfaction with the (in)complete trial, the pre-emptive move to change the plans of management, and its belief that the process is a response by senior management to a political imperative, are addressed throughout this submission.



***Dr Brian Marshall,
For the Management Committee.***

Appendix A

Proposed agenda – 2014 meeting at OEH

1/- Provision of baseline data collected before the 'horse riding' trial commenced in April 2014.

2/- Extent of results of 'horse riding' riding trial in declared wilderness, including usage numbers of 'horses and riders' that have used the approved trails and measurements of impacts associated with that use.

⁸ Monitoring Framework, April 2014, p4

3/- Level of use for each route, noting that members of the 'horse riding' consultative group and each local stakeholder in the working groups had identified these wilderness 'horse riding' trial routes.

4/- "Triggers" in relation to the trial, including level of use, and that adaptive management of 'horse riding' use is incompatible with wilderness.

5/- Monitoring results, including photographic records, recorded against fundamental objectives.

6/- Extent of trail clearing prior to the trial and whether that prejudiced the independence of NPWS scientific monitoring process.

7/- Extent of clearing on trails in the trials, if any.

8/- In the case of Wolia-Deua and Burra-Oulla Wilderness Areas in the Deua National Park, the horse riding trails in wilderness have not been undertaken since the park establishment, yet 'horse riders' are allowed a size limit of 20, while bush walkers are limited to 8 in order to protect the environment and whether that indicates a bias.

9/- Review of monitoring framework

10/- Extent of illegal activities associated with the trials.