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Nature Conservation Saves for Tomorrow

Horse Riding Review
Office of Environment and Heritage NSW
P O Box A290
SYDNEY NSW 1232
online: http://www.environment.nsw.gov.au/policies/drafthrsridstrat.htm
email: horse.riding@environment.nsw.gov.au

Dear Sir/Madam,

Re: Draft strategic directions for horse riding in NSW national parks and reserves

I am writing to you on behalf of the Blue Mountains Conservation Society, a community group of over 800 members who work towards improved environmental and conservation outcomes for the Blue Mountains.

The Blue Mountains Conservation Society is opposed to the initiatives proposed in the draft strategic directions for horse riding in NSW national parks and reserves. These initiatives will result in environmental degradation of areas specifically set aside for conservation. The numerous kilometres of trails currently available to horse riders is already causing damage to the park estate.

The Blue Mountains Conservation Society is opposed to any horse riding access through wilderness areas and all existing routes, including the Bicentennial National Trail, should be closed to riders. The integrity of the NSW wilderness estate must be restored, not further compromised by further rounds of access deals for user groups. The National Parks and Wildlife Service (NPWS) should have a policy of reviewing management trails and decommissioning those no longer needed.

Wilderness describes a specific approach to conservation land management, with the governing intent being to minimize disturbance of an area. The management principles of the Wilderness Act specify:

"A wilderness area shall be managed so as:

a) to restore (if applicable) and to protect the unmodified state of the area and its plants and animal communities;
b) to preserve the capacity of the area to evolve in the absence of significant human interference; and

c) to permit opportunities for solitude and appropriate self-reliant recreation."

To quote an NPWS position paper of 1999 on the Bicentennial National Trail (BNT): "The Service considers horse riding is incompatible with principles a) and b) and does not fulfil the definition of 'appropriate self-reliant recreation'. Horse riding is not regarded as self-reliant because the means of travel is not powered by the person and is regarded as inappropriate because it is not undertaken with any formal wilderness areas in Australia and the impacts generally degrade wilderness areas."

We have been told that in May 1988, the Executive Officer of the BNT made a commitment to the Colong Foundation for Wilderness that the route was determined to ensure that the BNT did not "encroach on any existing or future Wilderness Areas." Despite this undertaking, when the Trail was opened the Washpool, Guy Fawkes, Macleay Gorges, Werrikimbe, Curracabundi, Murruin and Tabletop wilderness areas were bisected, compromising wilderness values. These compromises permit continued use for recreation activities, including horse riding, which would otherwise be unacceptable and terminated under wilderness management.

Despite this major concession, the Australian Horse Alliance remained dissatisfied. It now seeks broad-acre access to all wilderness. Unlike vehicles, horses can go just about anywhere, so that the above impacts can cover wide areas. Horse riding impacts are so severe that horse riding should be banned first and foremost, and in accordance with the Wilderness Act, from all wilderness areas, and secondly, national parks and in other areas where nature conservation is a primary objective.

The NPWS 1999 BNT position paper states that "From experience throughout NSW, elsewhere in Australia, and overseas some of the principal environmental impacts of horse riding can be summaries as follows:

- destruction of vegetation caused by horses trampling plants through wandering off trails or widening existing trails;
- accelerated erosion of tracks, especially on highly erodible soils, through loosening and breaking up the trail surface by horses' hooves leaving an unstable surface that may be readily removed by water during the next rain;
- sedimentation due to accelerated trail erosion, causing siltation of water courses, impeding the flow of water, adversely effecting aquatic flora and fauna, and encouraging weed growth;
- altered watercourse patterns where a proliferating track network may impose an altered or entirely new drainage pattern on the natural system and interrupt water flow, which can effect down slope vegetation communities significantly;
- increased rates/risks of weed introduction and spread;
- greater access via track proliferation, the number of unauthorized horse trails is often greatest near a park's boundary and these provide for other damaging activities, such as motor bike riding, bicycle riding, and rubbish dumping;
- water pollution from horse manure which finds its way into water systems and greatly increase the level of nutrient, bacterial and viral input causing potential health hazards; and
- disturbance of native fauna by the noise of horses and riders, the disturbance of vegetation, and the fragmentation of habitat."

The Society is strongly opposed to the establishment of pro-access working groups pressuring for horse riding access in parks and reserves. The nature conservation purpose of national parks and wilderness areas could be lost through a process of further compromises and concessions arising from the three working groups established under the strategic directions document.

We appreciate that the OEH is carrying out the instructions it has received by the Coalition of NSW Horse Riders, via its outdated 2006 MoU with the NSW Government.

However, to allow a small unrepresentative lobby group to redefine wilderness out of existence based on the claims that horse riding is an appropriate '*self-reliant*' activity for reserve areas highlights poor judgment in implementing policy.

The Blue Mountains Conservation Society requests that the draft Strategy be set aside as wrong in law and wrong for reserve management.

The Blue Mountains Conservation Society supports the National Parks Association views on self-reliant activities. Such activities are those that require minimal support and are pursued with high regard for causing minimal impact on the environment. The NPA considers that self-reliance relates not only to the equipment used but also to the conduct of activities. A minimal impact code of conduct should be followed for all activities in national parks. Only self-reliant activities should be permitted in wilderness areas.

Self-reliant at the very least:

- does not require infrastructure (man-made modification of the landscape),
- does not have an adverse environmental impact ,
- does not require a motor or mechanical aid,
- does not involve large groups of people, and
- does not include use of an animal.

Some examples of non-self reliant activities are:

- motor bike riding.
- bicycle riding,
- horse riding,
- fixed infrastructure for camping,
- recreational hunting,
- large groups of bushwalkers.

There are countless peaceful rural roads, forest roads and stock routes that provide riders with endless recreational opportunities. Horse riders, regardless of their background, are mainly interested in the horse and riding, rather than with the preservation of the natural environment.

I call for the OEH to ban horse riding in all national parks and reserves, including wilderness areas. Such a ban would not greatly affect horse riding recreation, as access through 90 per cent of NSW is available to riders.

Release of the draft strategic direction for horse riding in NSW national parks and reserves will shift the onus of proof regarding environmental impacts from the proponents of horse riding to the defendants of national parks and wilderness areas.

The OEH strategic direction is required to apply the precautionary principle to horse riding in its national parks and reserves.

In 2009 Chief Judge of the Land and Environment Court, Brian Preston explained that the precautionary principle would be triggered when "there is a threat of serious or irreversible environmental damage and there is the requisite degree of scientific uncertainty." In this situation "a decision-maker must assume that the threat of serious environmental damage is no longer uncertain but a reality. The burden of showing that this threat does not in fact exist or is negligible effectively reverts to the proponent of the project."

Horses and weeds

Horse-riding in national parks and wilderness areas would increase dispersion of weeds.

Horses that are ridden for pleasure are often given access to a diverse range of feed sources. These sources include pastures that often contain weed species eaten by horses and also dried stock feeds also often contains weed seeds as well (Landsberg et al. 2001).

Weed seeds can survive passage through a horse and for some species it is a substantial proportion (St John-Sweeting and Morris 1991, Taylor 1995, Cosyns and Hoffman 2005). These weed seeds may be excreted several days after ingestion with a peak at 3 to 5 days (St John-Sweeting and Morris 1991). One study found that horses can excrete more than 1000 viable seeds a day (Taylor 1995) and another found almost 400 seeds per litre of dung (Cossyns and Hoffman 2005). Results from 11 international studies show that seed from at least 216 species is viable after passing through horses, and 45 of these species are serious environmental weeds (Pickering et al. 2010).

Horses will even accidentally ingest the seeds of unpalatable weeds. In *Noxious Weeds of Australia*, Parsons and Cuthbertson (2001) note of ragwort: 'Animals do not usually eat ragwort heads when in seed but this can happen accidentally when stock are fed contaminated hay. In such cases, seedlings have been observed growing from horse dung...'

Weed seeds can also be introduced attached to the horse (especially the tail) or horse gear (Liddle and Elgar 1984). Noogoora burr (*Xanthium occidentale*), for example, has been observed to be carried in horse hair 16 days after exposure to a marked paddock.

An adult horse not only a serious weed vector, it is also a virtual mobile fertiliser plant, depositing 17-26 kg of dung and 5-7 litres of urine a day (Matsui et al. 2003, cited in Pickering et al. 2010). Richard Smallwood of the Australian Horse Alliance claim of 'minimal, minimal' environmental impact (SMH, 18 June 2012) is contradicted by the daily amount of equine waste, which is very large relative to that of other weed vectors.

Horse manure and urine provides nutrients, moisture and protection for seed germination and addition of nutrients to soils and waters, particularly in infertile environments, favours weed establishment (Landsberg et al. 2001; Pickering et al. 2010). Horse manure, can for example, insulate weed seedlings from frost.

Weed seeds dropped from horses may survive several years in the soil until conditions suit their establishment (Campbell and Gibson 2001; Torn et al. 2010) and be dispersed into new areas by water flow, erosion or animals.

Horses damage vegetation, create bare patches and cause soil disturbance, which opens up space for weeds, increases solar radiation and increases the availability of nutrients (Phillips and Newsome 2001, Quinn et al. 2010). Soil disturbance is a major contributor to weed invasion, and horse hoofs are far more damaging than boots.

Horse riding in wilderness area will promote the rapid dispersion of the invisible killer, *Phytophthora cinnamomi*, as well as other pathogens, weeds and erosion. Horse riding should be considered to be an important risk factor, especially in wilderness areas where other vectors for this pathogen are less prevalent, for example vehicle tyres.

In 1997 a NPWS survey found that horse riding to be a high impact recreational activityi. At that time the NPWS noted that:

- 59 parks were subject to horse riding, and it was reported as a cause for concern in nine parks; horse riding caused severe impacts in a further seven and is a significant conservation issue for another eight; while 21 parks were subject to commercial horse riding operations;
- Over 70 per cent of parks used by horse riders suffered damage to its vehicle tracks and native vegetation;
- Walking tracks, camp sites and stream banks were also damaged; and
- Weeds were spread and streams polluted by horse riding within parks.

Today, many parks rangers are disappointed in the failure of their leadership to stand up for NSW national parks and reserves, and oppose further horse riding access that will degrade these precious areas. The Blue Mountains Conservation Society support the commonsense understanding that horse riding causes significant environmental impacts to the last remnants of the natural environment protected in our national parks and reserves.

Studies and observations confirm that horse riding causes significant soil loss and vegetation damage in park areas. In Ku-ring-gai National Park for example, horse riding caused a metre deep erosion channel on the Sandy Kooyong horse trail in only five years of use. Similar excavations are found in Garigal National Park. These impacts arise because the average horse weight is seven times the average walker and being steel shod, hooves cause much greater the damage to tracks than the feet of walkers.

The Blue Mountains Conservation Society of course supports the continued access prohibition on horse riding in wilderness, which has explicitly stated NPWS wilderness policy. The 2005 policy states that ‘horse riding and other forms of animal transport will not be permitted in wilderness areas’ (clause 3(d)).

Strategic adaptive management is experimental mismanagement

The Office of Environment and Heritage is considering using an adaptive management framework. Under this approach once certain environmental impact thresholds are reached,

certain activities are initiated, such as restricting horse riding use. These thresholds would be things like erosion or weed invasion. The horse riding activities would then be permitted till this threshold is reached. The Blue Mountains Conservation Society calls strategic adaptive management, experimental mismanagement because there are known risks of environmental degradation from horse riding, and whether an area can recover once degraded is unknown. For example, the removal of a new weed in a wilderness valley is a high risk management action. The Blue Mountains Conservation Society believes that precautionary principle should apply instead of this form of experimental mismanagement.

The Strategic Adaptive Management (SAM) process is proposed by the OEH to assess recreational impacts. The SAM process will create unwarranted expectations in horse riders, that so far include the visiting of wilderness and the redetermination of park management to allow more horse riding.

The Coalition of NSW Horse Riders, comprising the Australian Horse Alliance, Snowy Mountains Bush Users Group and the Snowy Mountains Horse Riders Associations are very keen on the SAM process. The Coalition wants SAM adopted for the preparation of all park management plans.

It is a process that lends itself to the conduct of subsequent management experiments to test the appropriateness of management outcomes, such as the trial of horse riding in wilderness areas.

We hope through these processes that the views of those opposed to wilderness and nature conservation management will not prevail. The SAM process will be regulated by horse riding interests through its MoU with the Government. The SAM is intent only on more horse riding access, regardless of damage to the natural environment until such a time as "scientific based and appropriate evidence shows that there will be serious and irreversible detrimental impacts" (MoU cl 3, pg 2). These provisions undermine the primary nature conservation purpose of parks and reserves. Through SAM the public interest in the conservation of native flora and fauna, and of wild lands becomes subjugated by horse riding interests. It is just a fancy want to dress up the out of date political deal stitched up by the Coalition of NSW Horse Riders.

There is no need to develop these access consultative forums for horse riders, etc, or to broaden the representation on advisory committees. Such a move will only distort park management toward misuse, against the primary purpose of the park, nature conservation.

The bias of the horse riders is revealed by the responses park management plans. Nearly all believe that the risks to flora and fauna, soil, catchments, water conservation are insignificant and overstated.

Those adversely affected by increased access, the conservationists, they take a much more precautionary view of the risks posed by the proposed activities of horse riders.

Experimentation, called adaptive management, may overcome the lack of information by a series of horse riding trials that will measure the impacts for various levels of access. From a objective science viewpoint it would better to have a big increase in horse riding use so that the impacts can be measured. Such experiments would damage the ecological integrity of the national parks and wilderness.

The political problem of getting unsuitable users out again is not well addressed by the trial management approach. In other words, Strategic Adaptive Management is a politically inept and probably a non-reversible experiment in mismanagement.

The retention of shacks in Royal, intrusive and environmentally damaging exotic bee keeping in parks, and the acceptance of severe erosion caused through horse riding in Kur-ring-gai National Park are examples non-reversible mismanagement.

The Blue Mountains Conservation Society considers that continued exclusion of horse riders is the only effective means of protecting national parks and in particular wilderness areas.

The claim by horse riding groups that they can prevent environmental impacts through regulation is just not credible and contrary to the existing scientific evidence.

Yours faithfully

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