



**TIMBER NSW**

3 March 2017

Koala Strategy Submissions  
PO Box A290  
Sydney South NSW 1232

Email: [koala.strategy@environment.nsw.gov.au](mailto:koala.strategy@environment.nsw.gov.au)

Dear Sir/Madam,

**Submission on the NSW Koala Strategy and the NSW Chief Scientist & Engineer's Report into the Decline of Koala Populations in Key Areas of NSW**

We make this submission as the peak representative body for NSW sawmilling and processing, private native forest managers, harvest and haul contractors and forestry professionals.

Please be aware that our organisation was not consulted as a stakeholder in the preparation of the Chief Scientist & Engineer's (CSE) Report. Implementation of the recommendations in the CSE Report has the potential to have a major impact on this industry that employs over 22,000 people and provides \$2.4b to the NSW economy.

Timber NSW and its members possess extensive knowledge and expertise in managing native forests for multiple-use values including biodiversity and timber production. Although we are not koala experts we endeavour to keep abreast of koala research and have a genuine interest in seeing koalas thrive in their natural habitat. We are sufficiently well informed about koalas to know that there exists prevailing uncertainty about their conservation status and that critical knowledge gaps remain.

We note that, in the document prepared for the CSE (NSW koala population case studies by Martin Predavec) the limitations of the current knowledge are clearly articulated. We quote:

- the case studies should only be taken to reflect what was thought to be occurring at the time that the studies were completed (our emphasis).
- it is well recognised that koala population trends can change within a relatively short period of time.
- it is only through long term and repeat studies of koala populations that we start to understand the patterns of population change.

We firmly agree that the true conservation status of koalas will only be revealed through long term scientific monitoring and through a much better understanding of the species'

ecological history (pre and post European settlement). We believe the award winning work undertaken by Bill Gammage (2015)<sup>1</sup>, which dispels the myth that pre-settlement Australia was an untamed wilderness, may illuminate this understanding.

In the interim, it seems the debate around a koala management strategy centres on whether a precautionary attitude (towards perceived risks) should prevail over an evidentiary approach.

We believe the koala is not in decline for want of more regulatory protection. Extensive legislation and planning policies pertaining to threatened species conservation, native vegetation protection, biosecurity and planning development controls already exists. All this legislation is built upon precautionary principles which contain multiple layers of built-in conservatism. The koala strategy should focus on the development of an evidence base. This evidence should seek to clarify the animal's conservation status, identify the nature and magnitude of its key threats and facilitate the effective resourcing and mitigation of these threats.

The title 'Chief Scientist & Engineer' implies an inclination toward an evidentiary approach. We were therefore surprised to find that the CSE's Report contains non-evidence based thinking.

We strongly support the CSE Report's statement that the strategy needs to start from a strong evidence base including direct detection, mapping existing koala habitat, likelihood of occurrence data and threat assessment and mapping.

On the other hand we are deeply concerned by the unsupported arguments provided for Recommendation 7 (That Government agencies identify priority areas of land across tenures to target for koala conservation management and threat mitigation). We quote:

- Under a landscape approach, strategic park additions could complement increasing protection of habitat on other crown land and private land over time.
- the NPWS should include potential areas of high quality koala habitat in their long term acquisition program.
- by systematically applying data on the likelihood of koala occurrence, the predictive koala habitat model and threats, it can identify key areas to target for conservation management and action.

These statements seek to offer a solution to a problem that is yet to be clearly defined. Under its own admission the CSE Report acknowledges the uncertainties around both the status of koala populations and the extent and nature of the threats which impact on them. We believe the decision to propose tenure changes as a solution is premature and at odds with the CSE's own guiding principles, namely:

- Act on evidence:- Koala management strategy principle no.1;

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<sup>1</sup> Gammage, B. (2015) The Biggest Estate on Earth

- Encourage economic development, including by supporting regional and rural communities without devaluing koalas and their habitat.

We suspect that the CSE may have been hoping for a simple answer to a complex problem. In doing so we believe that the CSE may have fallen into the 'tenure trap'. Tenure based conservation (creation of hierarchical tenure based divisions to prioritise conservation funding in certain areas) is underpinned by a belief that directing limited investment into conservation reserves provides the best form of biodiversity protection. We do not subscribe to this view.

The weakness in the tenure-based management approach is that wildfires, introduced pests and weeds and climate change do not respect cadastral/paper boundaries. Further, the control of these threats cannot be effectively or efficiently managed within the reserves themselves. Lastly, the reserve system can only ever represent a small proportion of the koala's extensive habitat.

In New South Wales, koalas are extremely widespread persisting predominantly in very low densities across 22 million hectares of native forest. The issues that affect the state's koala populations over its broader range are quite different to those that are experienced along the urban/industrial development interface.

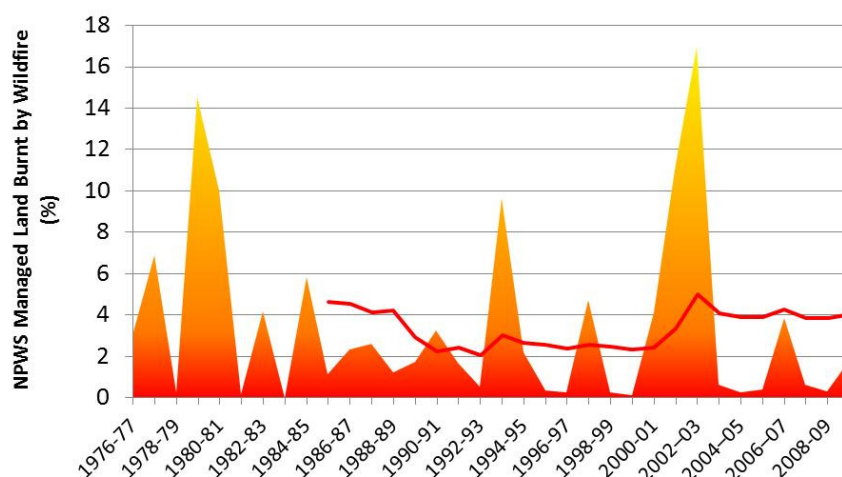
In forested landscapes the importance of actively managing fire, along with introduced pests and weeds cannot be understated. These threats pose a significant challenge to the koala conservation effort. Conservation of the koala, more than any other listed threatened species, requires a 'holistic' and 'active and adaptive' approach. Improved fire management practices are the key to the koala's future, as is the more effective control of wild dogs and noxious forest weeds. Creating new National Parks and expanding environmental zoning will not lessen these threats; in fact it may well lead to poorer conservation outcomes.

Recent (unpublished) predictive modelling of koala habitat on the NSW north coast (undertaken by NSW Department of Industry-Lands) found that the absence of historic wildfires was the single strongest predictor of koala presence. This finding is consistent with research on the effects of fire (e.g. the 2006 fire in the Pilliga, the 2009 fires in Victoria and the 2013 fire in the Warrumbungles) which reveal that koala populations are ill-equipped to survive even moderately intensive wildfire.

Most conservation reserve management plans severely restrict or prohibit the use of controlled fire. For example, in any given year the National Parks & Wildlife Service control burns less than 2% of its 7.2 million hectare estate. Over the last three decades highly conservative fire regime guidelines have resulted in broad scale woody thickening and fuel accumulation across millions of forested hectares. This in turn has supported ideal conditions for high intensity wildfire.

We refute the Office of Environment and Heritage (OEH) claim referenced in the CSE report that there has been a downward trend over 20 years in the overall size of wildfires, due to planning and response time. (Refer figure 1)

Percentage of National Park burnt by wildfire (1976 - 2010)



\*Note – red line is 10 year rolling annual average

Data source: NPWS Annual reports <http://www.environment.nsw.gov.au/whoweare/decannualreport0304.htm>

New remote assessment technology has enabled the full extent of the impacts of forest wildfires in our National Parks and reserve system to be revealed (refer Annexure A).

In summary, we believe that existing fire management policies being applied in National Parks and reserves likely pose a major threat to koala populations. Indeed there is also widespread neglect by nearly every other land management agency due to a lack of funding, resources or priority being given to control burning. The easy option is to defer to the centralised control by Rural Fire Service (RFS) but they are primarily a fire suppression agency and not a leader in strategic fire protection. We urge the CSE to investigate this issue in more detail. It would be a genuine tragedy if fire policies that threaten koalas become embedded in a strategy which is meant to halt their decline.

Improving understanding of wild dog populations and their effective management (in the context of a koala threat) is another issue that requires more thorough investigation. In recent years favourable climatic conditions have according to numerous reports, enabled wild dog populations in northern NSW to achieve record levels. Similarly, more needs to be known about the effect of understory thickening by introduced weeds (notably lantana and blackberry species) as a barrier to koala movement.

We do not believe that selective timber harvesting poses a threat to koala populations but nonetheless would welcome a strategy that recommends further research and long term monitoring on this topic.

Anecdotally, we know that koalas are currently doing well on State forests benefitting from the high level of regrowth and protection from wildfires. We are eagerly anticipating

the release of more koala monitoring data by the NSW Department of Industry-Lands that may support this assertion.

Thank you in advance for the opportunity to comment and for considering our submission. Please note that our submission should be read in conjunction with the one we made in December 2016 on proposed changes to the State Environment Planning Policy (SEPP) 44: Koala Habitat Protection which is enclosed with this submission.

Yours faithfully,

A handwritten signature in black ink that reads "Maree McCaskill". The signature is written in a cursive, flowing style.

Maree McCaskill  
**General Manager**

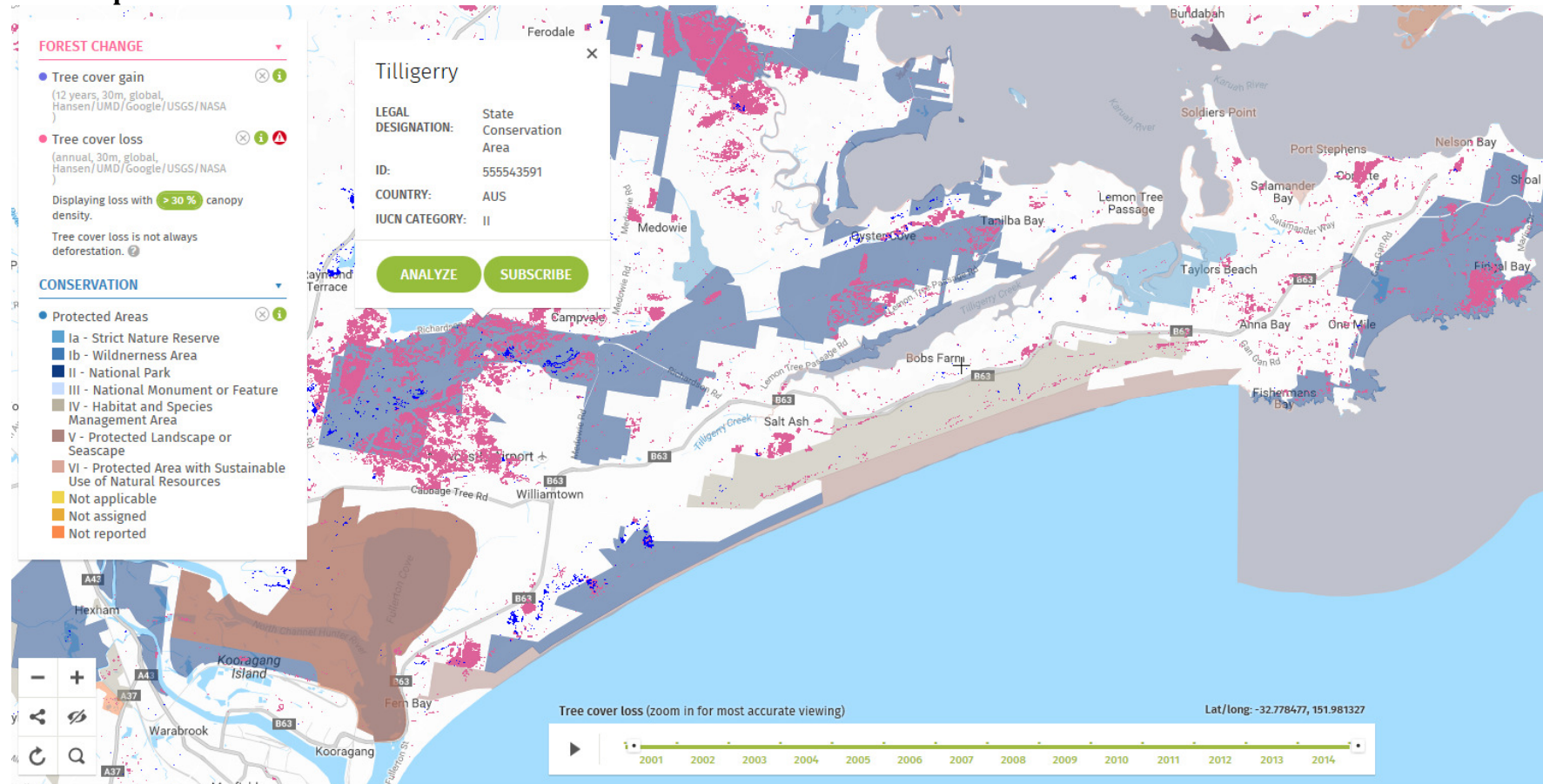
Annexure A

## Extent of forest canopy loss from wildfires in selected NSW National Parks and Reserves (2001-2014)

All material in this annexure has been sourced from Global Forest Watch

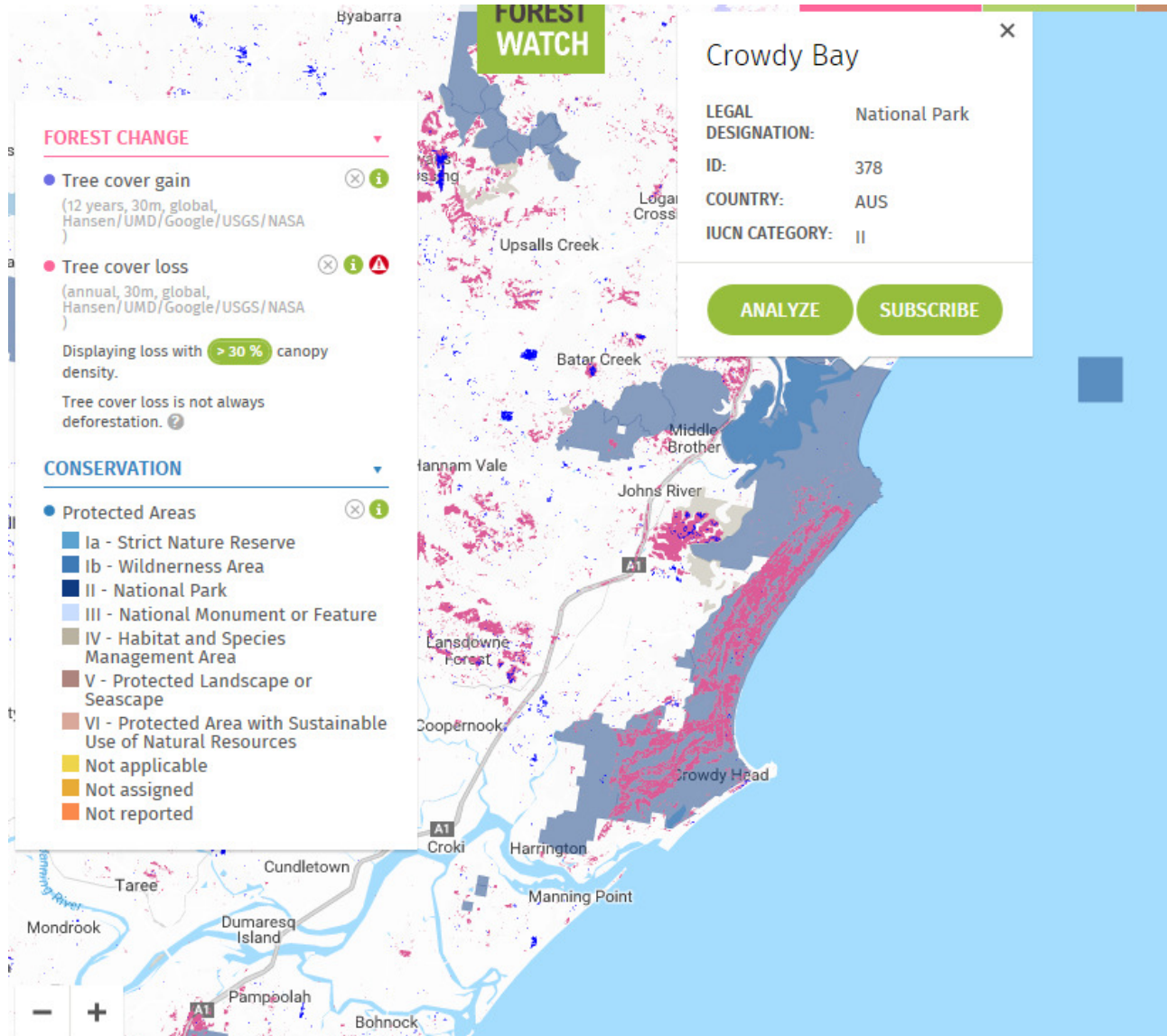
[http://www.globalforestwatch.org/map/3/15.00/27.00/ALL/grayscale/loss.forestgain?tab=analysis-tab&begin=2001-01-01&end=2015-01-01&threshold=30&dont\\_analyze=true](http://www.globalforestwatch.org/map/3/15.00/27.00/ALL/grayscale/loss.forestgain?tab=analysis-tab&begin=2001-01-01&end=2015-01-01&threshold=30&dont_analyze=true)

### Port Stephens

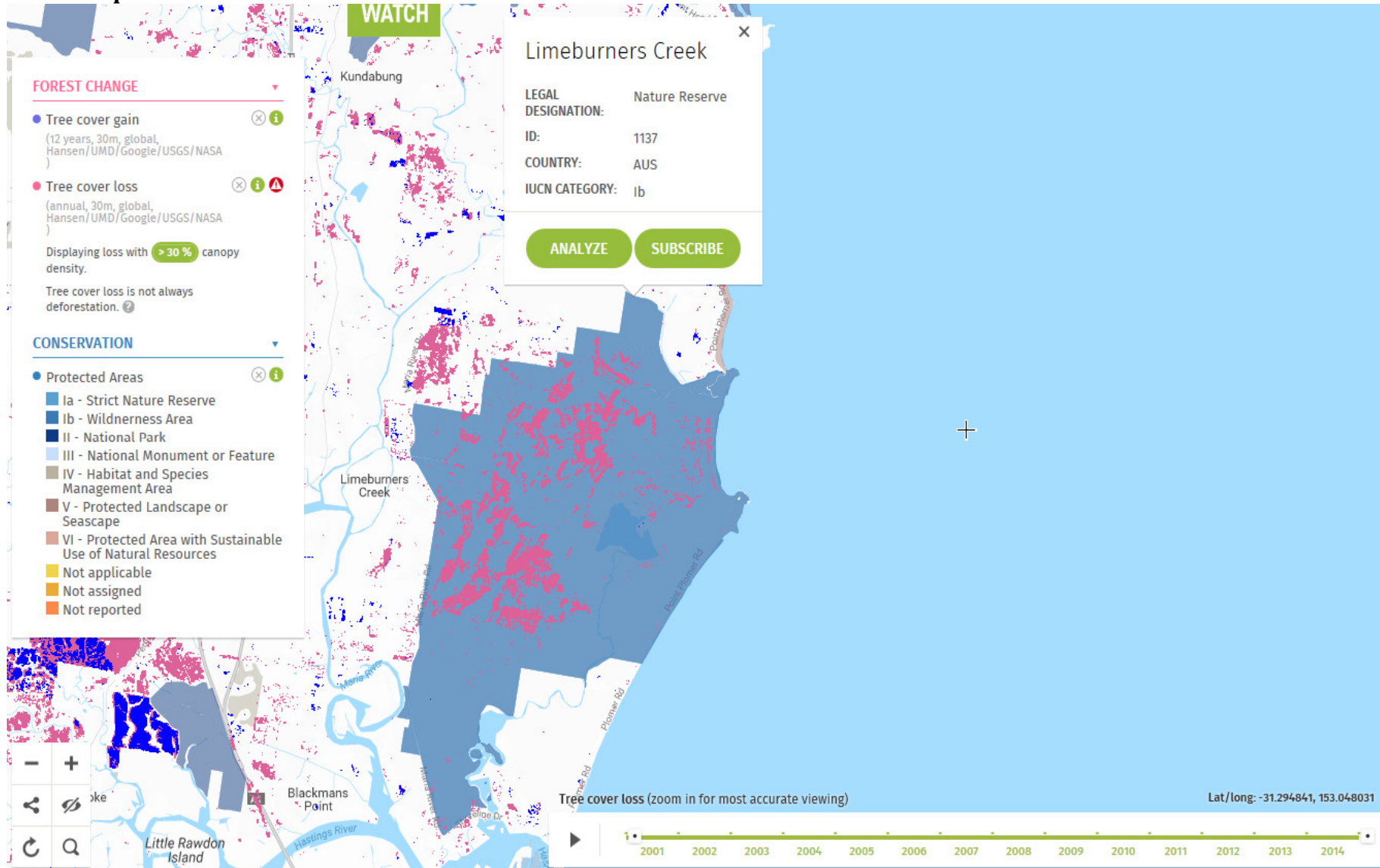




## Taree

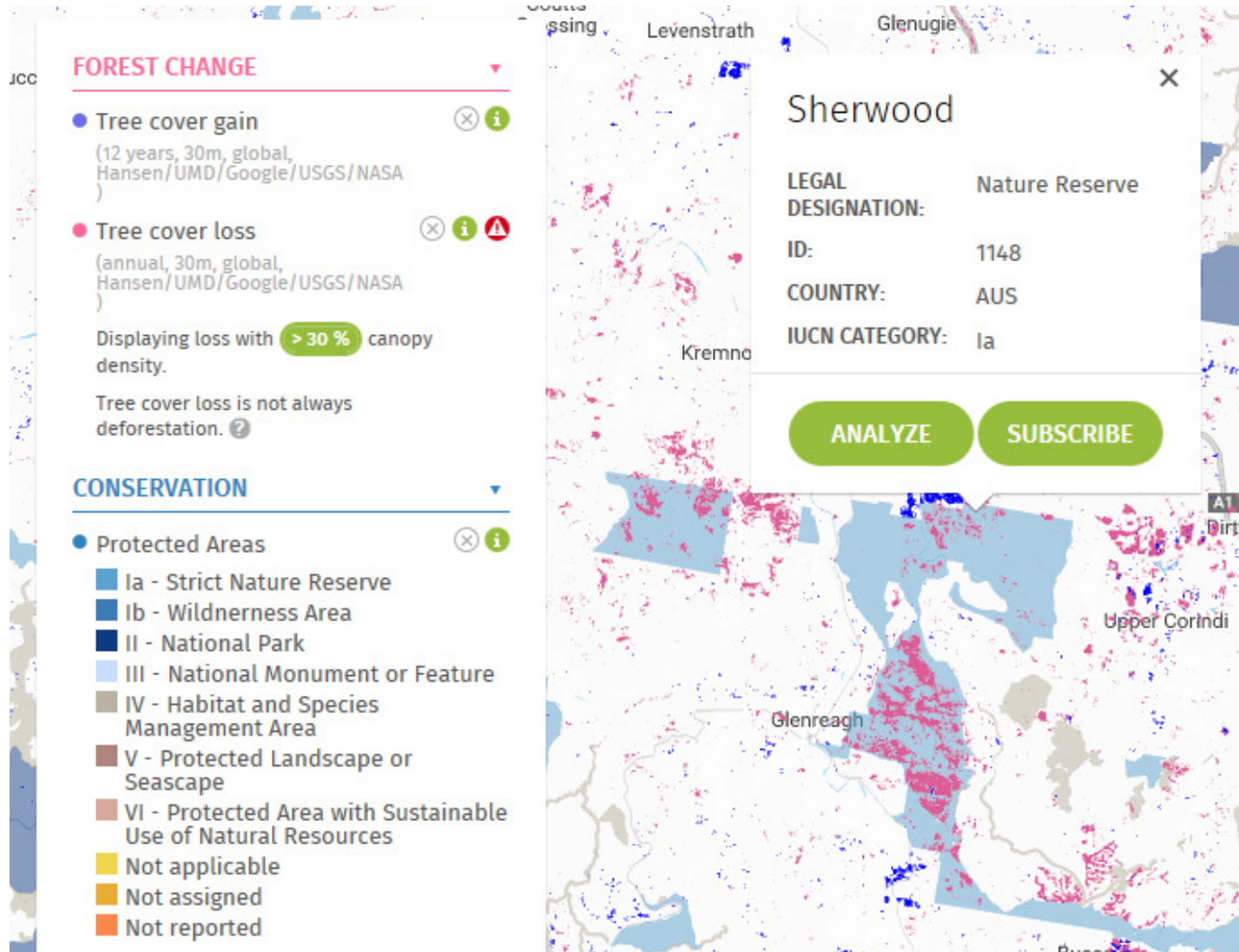


## Port Macquarie

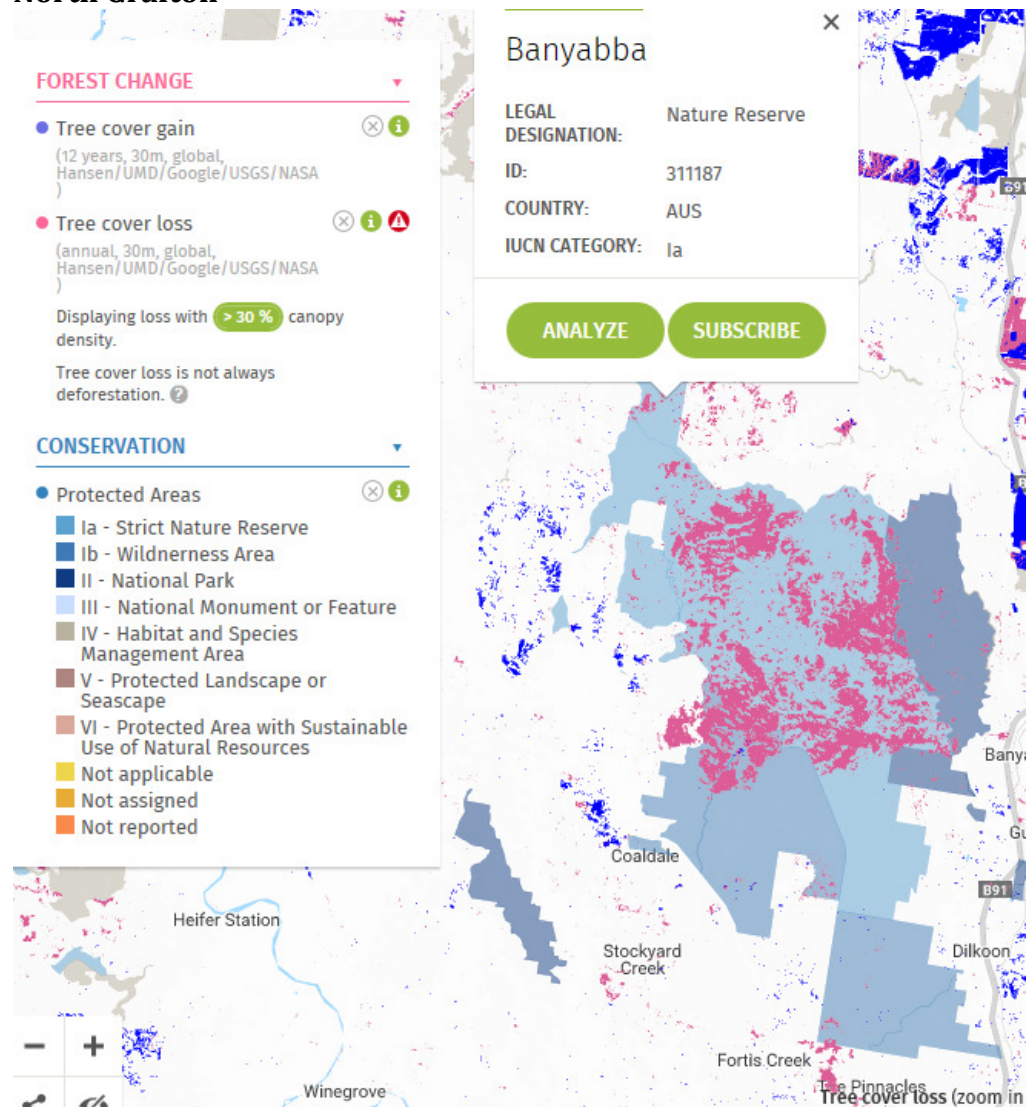




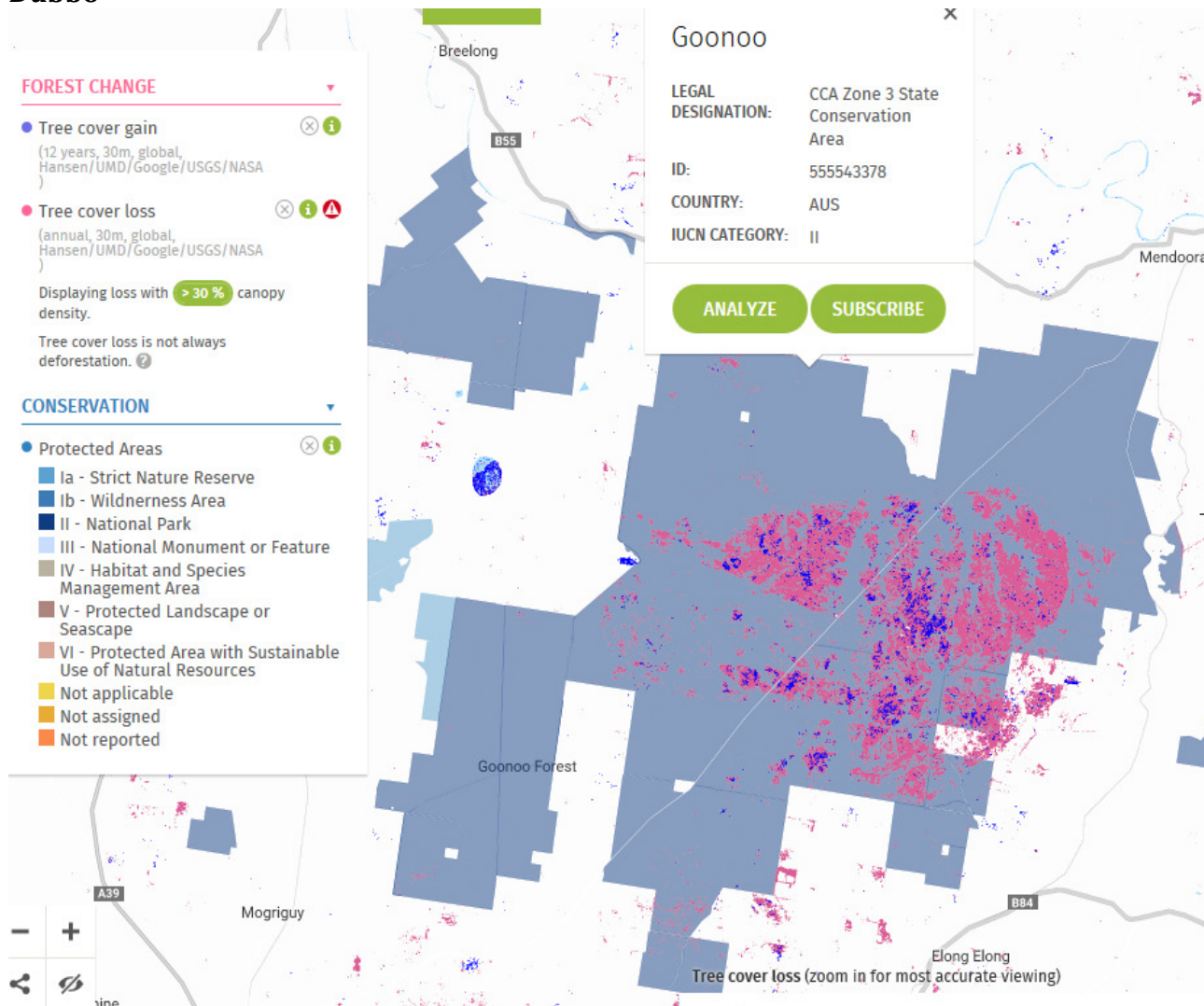
## South Grafton



## North Grafton

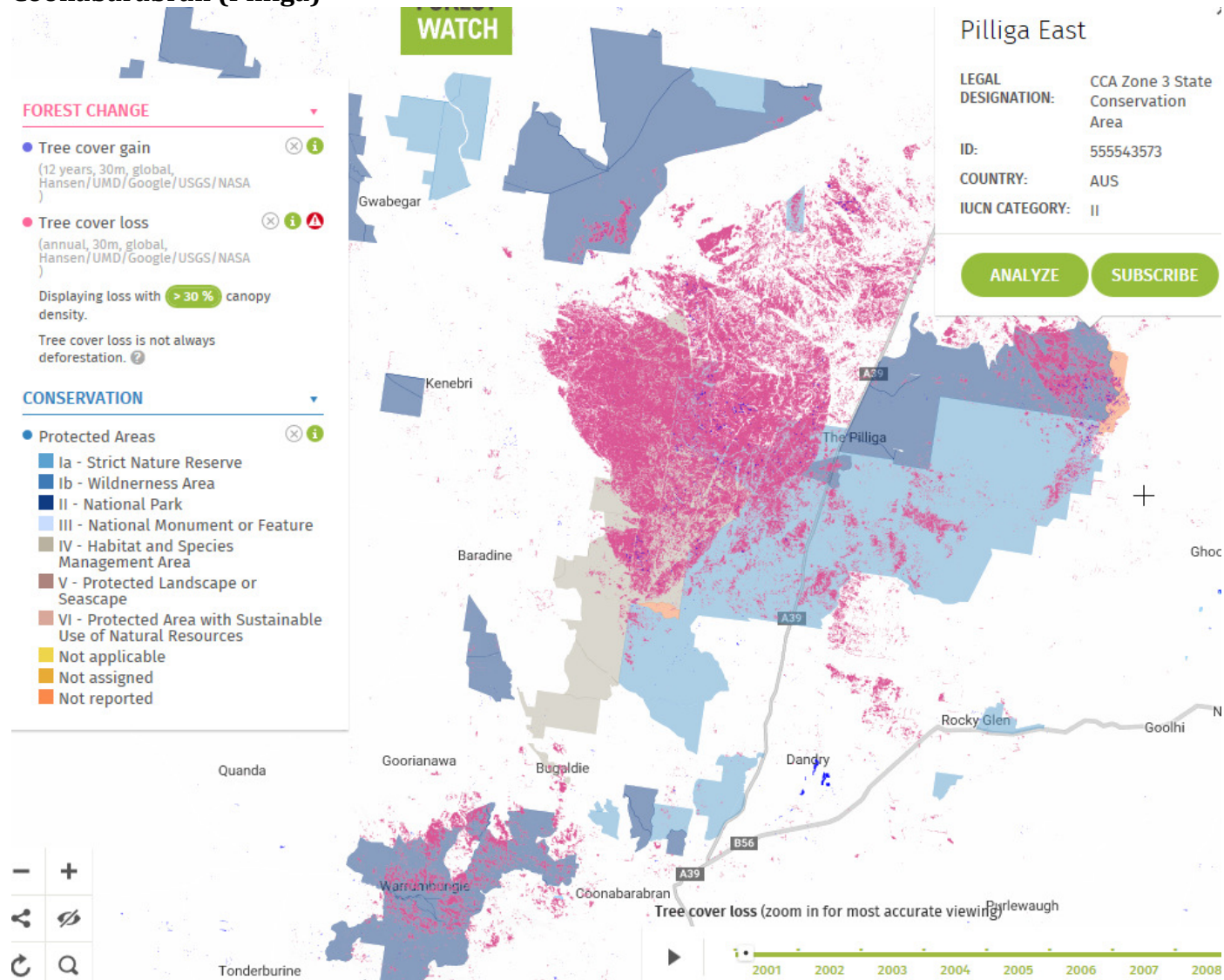


## Dubbo

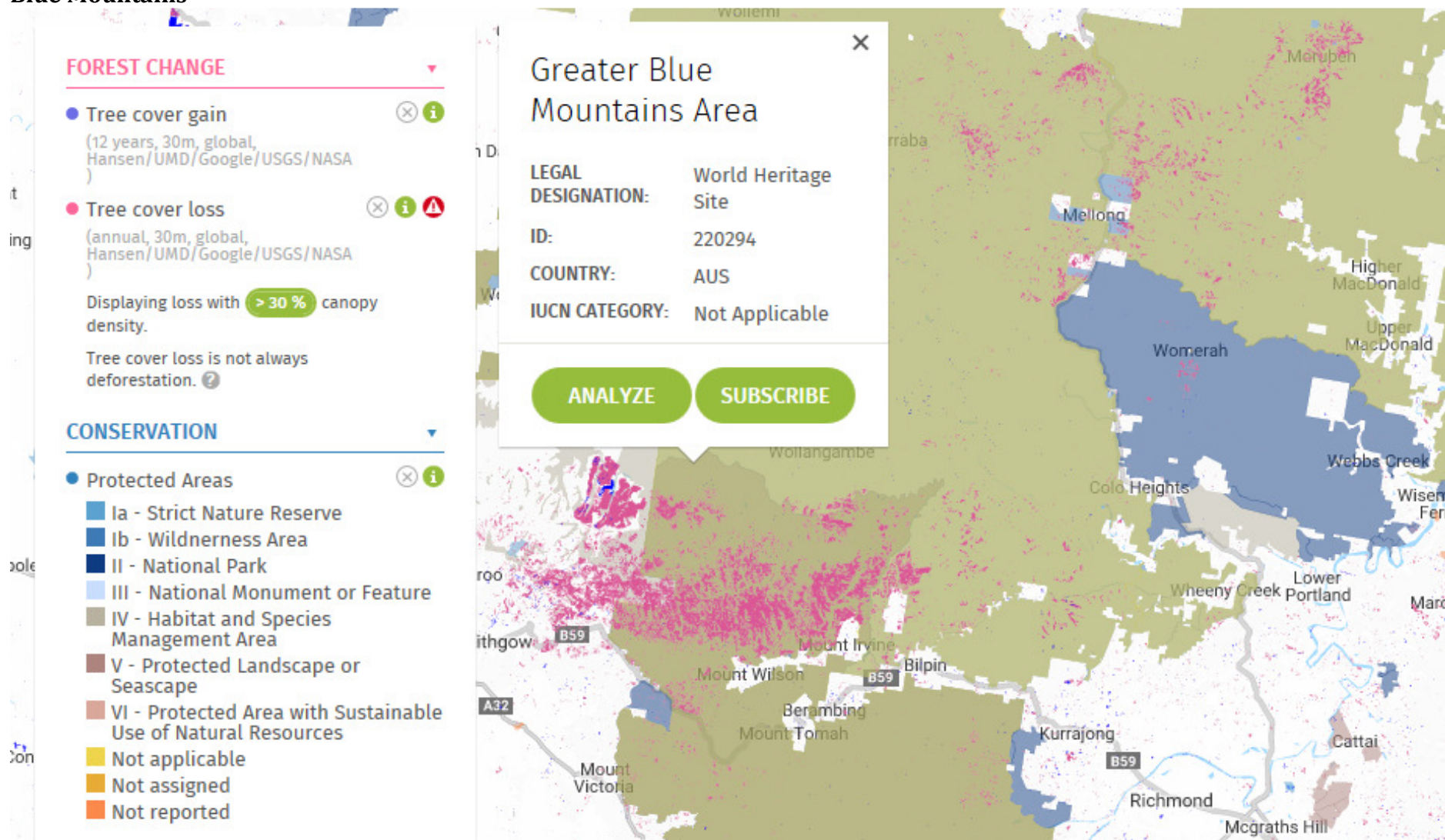




## Coonabarabran (Pilliga)

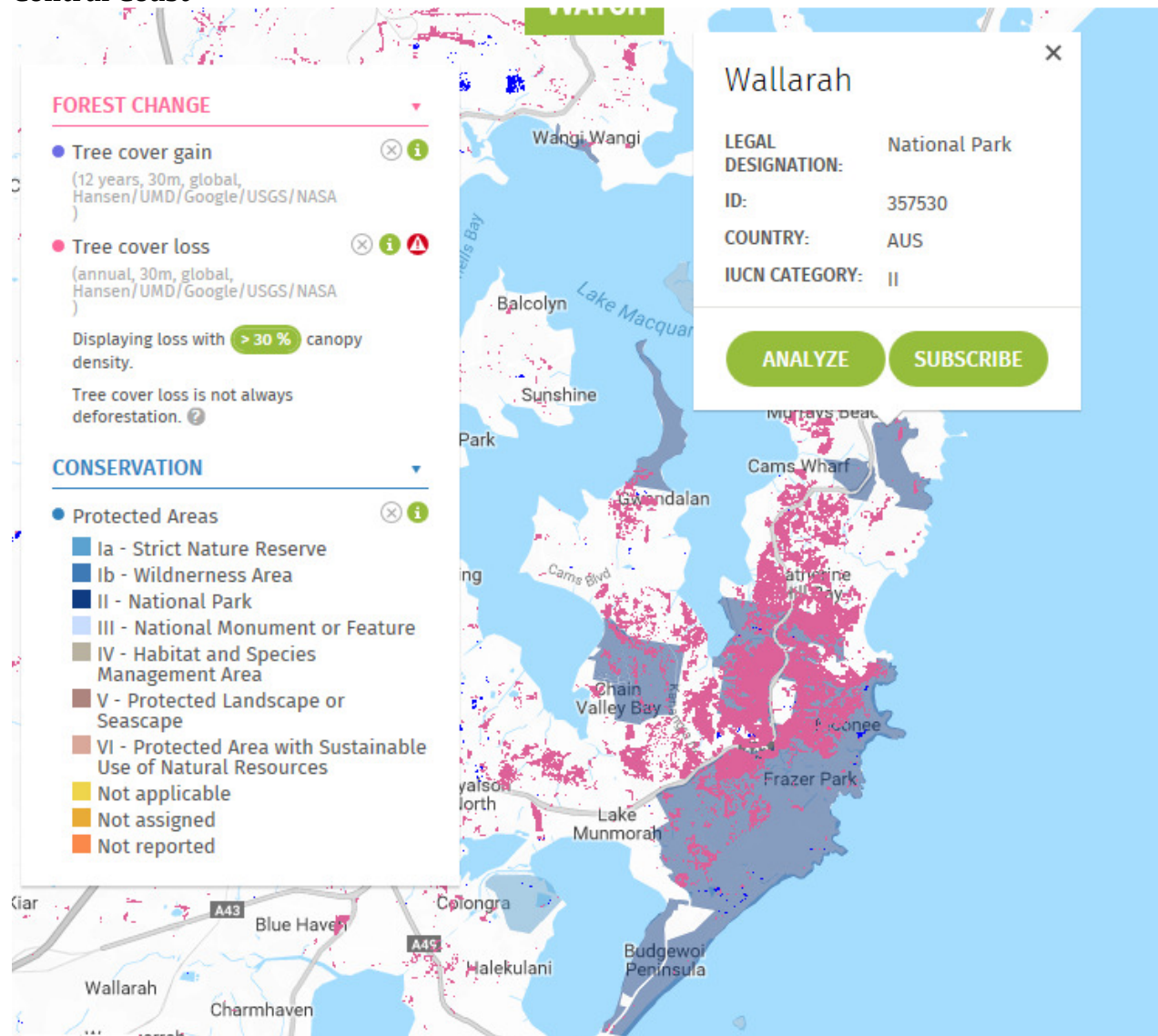


## Blue Mountains

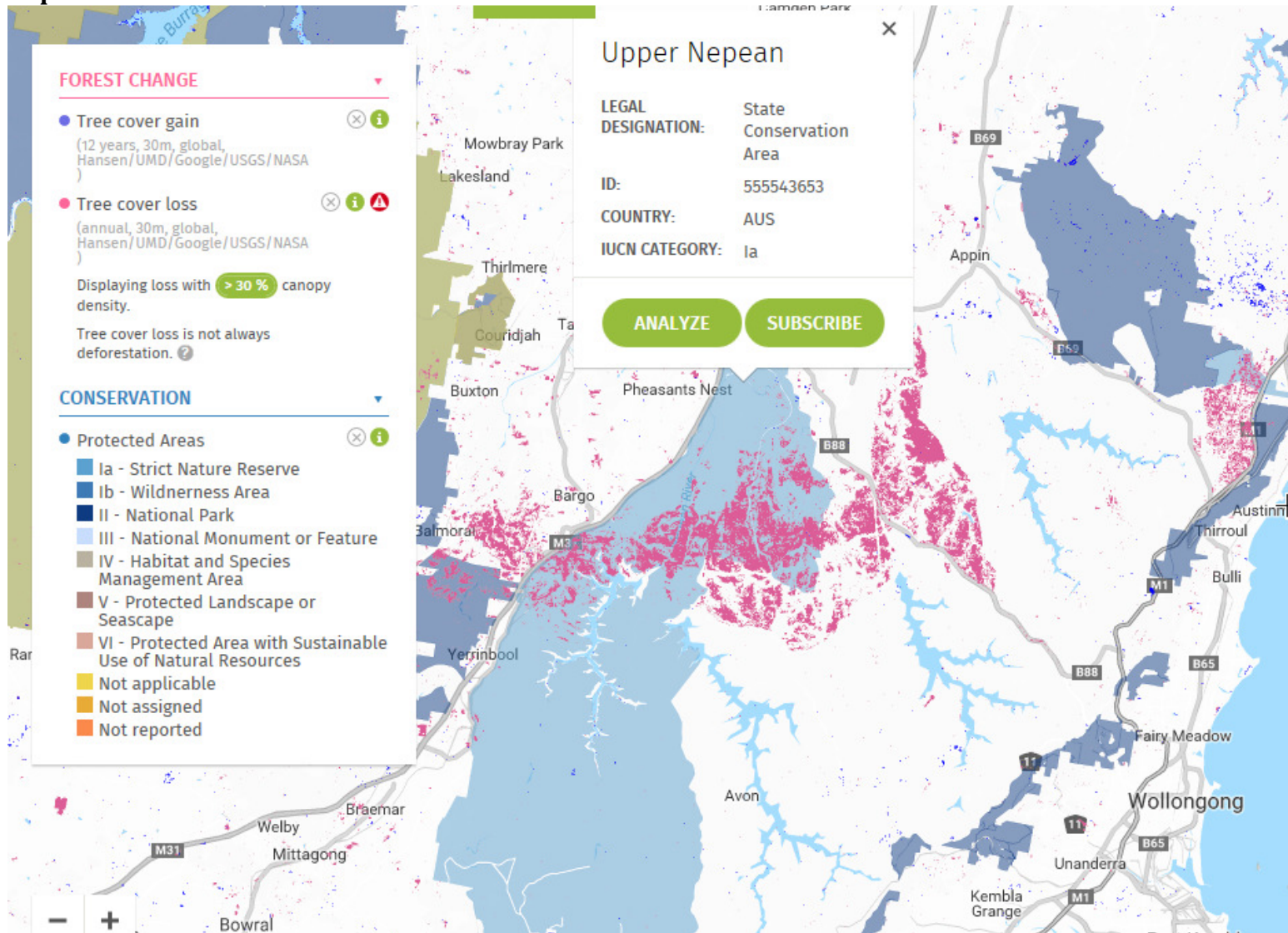




### Central Coast



## Nepean



# Kosciuszko

