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## **RE: New South Wales Koala Strategy 2016-21**

The whole of government approach to this new koala strategy is very welcome as many agencies manage koala habitat and it will certainly help koala conservation that they will all have access to the same data and mapping and will use the same definitions of koala habitat. The following comments are therefore mostly positive and supportive of the strategy.

- **Habitat loss is the most significant threat to koalas.**

This includes habitat loss from development- major infrastructure, industrial, residential, rural residential.

Land clearing for agricultural purposes

Habitat loss from logging. The timber industry has never been koala friendly and both the IFOAs and the PNF Koala Code of Practice need some serious changes which I understand are in progress.

Fire is also a serious threat to koalas causing temporary and permanent habitat loss and degradation as well as injury and death to koalas.

### **Strategies to protect koalas from habitat loss**

1. Stop logging in koala habitat
2. Stop clearing of koala habitat
3. Supportive legislation
4. Private land conservation
5. Educate and legislate for protection of koala habitat from hazard reduction burns and wildfires

## 1. Habitat loss from development

SEPP44 is only triggered by a DA and land owners are still able to remove koala food trees in both urban and rural areas in the absence of an enforced Council TPO or by RAMAS which will still be able to be used by rural landowners. SEPP44 has been recently reviewed and the proposed changes to the definitions of koala habitat simplify the process but it's what happens next that concerns me.

**Biodiversity certification** is a misleading term which allows for the destruction of koala habitat in exchange for protection of habitat somewhere else or a donation from the developers to the Biodiversity Conservation Fund. So easy! This is not really koala habitat protection for koalas – it is koala habitat protection for developers.

**Offsets** have been useful for major infrastructure works such as the Pacific Highway and some good koala habitat has been protected under this scheme. Whether it has really compensated for the huge impact on koala populations from habitat loss and fragmentation and disruption of the natural movement of koalas, only time will tell. The exclusion fencing is fantastic and will stop the appalling koala mortality which has been happening in the past.

**Koala Plans of Management** should be mandatory for all LGAs listed in Schedule 1 of SEPP44. There have been legal issues for some Councils so I hope they are being addressed. Funding should be available to Councils to review and update their KPoM

**Translocation of koalas** should only ever be the last resort. There are many welfare, ethical and ecological issues and it is quite costly to do it properly. The selection of the release site has to be independently and scientifically evaluated and should not be done on the basis of a Councillor who has a mate who has some land to offer. (e.g. Port Macquarie airport expansion proposal)

There have been some relatively successful translocations in Port Macquarie and South-east Queensland recently (Phillips S. and J. Callaghan et al, pers.com.) and a translocation protocol should be developed for NSW based on the knowledge gained from these.

The protocols will also enable the translocation of koalas from over-populated urban areas, which has been done for decades by koala care groups, to be done in a more strategic way and designated release sites could be registered to boost koala populations in other areas.

## 2. Habitat loss from land clearing for agricultural purposes.

The draft LLS Amendment Bill 2016 is a mean document when it comes to protection of threatened species like the koala. My main concern is the self-assessment process which landholders will have to do before they clear native vegetation on their land. There is a clear conflict of interest with this and if there is not adequate data or mapping for properties an independent ecologist will need to do a ground survey particularly if there are koalas in the general area. It has been my experience since I moved to the Kempsey area that some landholders are quite secretive about koalas on their property for different reasons. Some are protective and worry about

shooters, some are wary of government agencies for a variety of reasons and some just quietly despatch them.

I recommend there be a moratorium on all land clearing approvals in all LGAs listed in the amended SEPP44 until they have adequate vegetation mapping of the standard done in Queensland (AKF-pers.com.)

### **3. Habitat loss from logging**

This is a serious problem particularly in coastal areas of NSW and one which I have been observing in the Kempsey shire for decades.

It is disappointing that logging is not recognised as a Key Threatening Process for arboreal mammals in Schedule 4 of the draft Biodiversity Conservation Bill 2016 because I believe it is. The increase in frequency and intensity of logging since the Regional Forest Agreements were introduced has had a detrimental impact on koala populations in SF. Koalas residing in SF have been forced to the peripheral areas of the forests where they are impacted not just by the loss of their food trees in the SF but also by being forced to cross roads like the Pacific Highway, usually unsuccessfully, or by moving into adjacent private land where private native forestry moves them on again. The forestry people love to tell me that koalas can just move into the NP but unfortunately the NPs have either been previously logged or do not contain much koala habitat due to poor soils. I would like to take this opportunity to dispel this myth that koalas just “move on” when their habitat is disturbed or removed. Well of course they move because they have to but it is not good for them. Conservation of energy is very important to koalas, particularly female koalas who have the extra burden of lactating and carrying a joey. Moving on exposes koalas to other threats such as road kill, predators and chlamydial disease. Koala numbers are declining not just because of premature mortality of adult koalas but also because of unsuccessful recruitment of young koalas which are struggling to find suitable habitat areas. Koalas need lifetime tenure of their food trees.

The strategy for koala protection then in SF is to have more protected areas and designated corridors. All the threatened species prescriptions need to be reviewed but for koalas I recommend more preferred and secondary koala food trees be retained per hectare and their selection based on species, size, crown size, scats, scratch marks **and palatability measurement**. Regrowth trees do not offer much shelter from sun and wind and koalas will often sleep in non-food trees including Blackbutt.

I have recently had some productive discussions with Forestry Corporation NSW which is logging in the SF near where I live. (Cpt. 31 Maria River SF) Some of the points we agreed on could be used in a model for best practice for logging in koala habitat and incorporated into the license agreements. Koalas do not always use the whole forest because of variations in forest type.

- i. Riparian zones are protected depending on the order of the stream but often do not contain many koala food trees. Increasing the riparian protection zone to 50 metres in koala habitat areas may protect more KFT.

- ii. Selection of trees for retention- this has been my main issue with forestry practise. Looking for scats is always important and informative and the EPA pilot study showed how much better a dog is than a human in finding scats and FC should invest in trained ecology dogs.
- iii. Even more exciting is palatability testing and mapping which will improve the identification of food trees not only for koalas but also other arboreal mammals
- iv. If there is significant koala activity in a SF compartment then it should be transferred to NP. However this would not be necessary if SF commit to more protected areas as well as retaining palatable KFT in the harvest areas.
- v. Technology has already improved the ID of retained trees so that they are now all recorded and mapped
- vi. My main concern now is the prescriptions and how many Tallowwoods are still being removed. Palatability recognition for individual trees would definitely be useful because koalas do not use every Ta and we now have a better understanding about why that is.
- vii. Post- harvest burns should not be carried out in any SF where there is koala activity.
- viii. Clearing the debris from felled trees which have fallen next to the trunk of a marked koala food tree so that the koala can still access the tree. How much debris to leave for the protection of soil moisture needs to be defined?

### **Private Native Forestry**

Big changes needed to the Code of Practise and improved koala habitat mapping, including palatability mapping will be a great help.

Koala habitat mapping and protection must be done at the Property Vegetation Plan stage and all approved PVPs must be reviewed. It is better to protect KH areas but individual trees should also be marked and recorded in perpetuity.

Self- assessment is not an option. PNF officers from the EPA must be informed when logging is going to commence and logging contractors must know their obligations. Trees cannot be put back once they are felled so prevention is better than punishment

**Enforcement-** Illegal logging and breaches of PVPs and prescriptions must be given fines or jail time which are severe enough to be a deterrent. **Rogue contractors must be removed from the industry permanently- all local forestry officers know who I mean!**

Landholders should also be educated about weeds and be required to control weeds after logging operations to avoid degradation of protected koala habitat areas.

Hazard reduction burns must avoid protected areas.

#### **4. Habitat loss from Fire**

The Rural Fire Service need to be aware of koala habitat areas and also be required to have a strategy for koala habitat protection in conjunction with NP, SF and EPA. Too often they leave fires burning "in scrub" once properties have been deemed safe or back burn in koala habitat. This of course may be necessary in a wild fire situation but not so in hazard reduction burns. Fire permits should be required at all times for HRB in koala habitat areas and protocols developed for optimal time to burn or even is it really necessary to burn and notification when it is happening. Amendments to the relevant legislation should be considered.

Fire is the main threat to koalas in National Parks. I have walked in National Parks where controlled hazard reduction burns have been done in koala habitat and food trees have been scorched to the crown. National Park management need to focus more on protecting their asset i.e. the NP and its flora and fauna from fire instead of all these hazard reduction burns that they do. Smoke inhalation and foot burns are serious consequences for koalas from any type of hot fire. Certainly adjacent private properties should have a protective buffer zone but adjacent landholders also have to take responsibility for fire protection on their properties.

#### **Private Land Conservation**

**This could be the saviour for koalas if enough landholders come to the party.**

Landholders should be encouraged, given incentives and rewarded for permanently conserving land for wildlife.

Land values should not decrease because a property or part of it have conservation agreements as was stated to me by a real estate agent.

Local Land Service rates should be reduced or cancelled for land under any kind of conservation agreement.

#### **Research**

There has been some great research done in the field of koala health and conservation in the last decades. Palatability measurement of individual trees and mapping of koala habitat areas is very exciting, as is the use of trained dogs to find scats. Vaccination of captive and urban koalas against Chlamydia hopefully will be available in the near future.

Funding for continuing wildlife research is very important if we are to protect the amazing biodiversity we have and it has to be proactive and reactive if we are going to be successful in confronting the challenges ahead.

Finally I am pleased this koala strategy has a time frame (2016-2021) and I hope the NSW government will be monitoring and evaluating the effectiveness of this strategy by measuring the outcomes so we can actually see an increase in the areas of protected koala habitat and a decrease in the area of habitat lost and then hopefully some indications that koala numbers are increasing.

Thank you for the opportunity to comment on the NSW Koala Strategy and for your consideration of this submission. I apologise for it being a bit late.

Yours faithfully

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