

2 March 2017

Koala Strategy Submissions
PO Box A290
Sydney South NSW 1232

Our Ref:
Your ref:
Enquiries: Mat Bell

Dear Sir/ Madam,

Re: Submission to the NSW Koala Strategy

This correspondence has been prepared in relation to the NSW Government consultation on the preparation of a whole of NSW Government Koala Strategy.

The consultation seeks views from the community and from stakeholders on those matters that should be included in a NSW Koala Strategy. It follows the publication of a report in December 2016 on the *Independent Review into the Decline of Koala Populations in Key Areas of NSW* by the NSW Chief Scientist and Engineer. The primary recommendation of this review report was that a whole of government NSW Koala Strategy should be prepared and implemented.

This submission has been prepared by the Senior Ecologist of MidCoast Council and represents the views of the individual officer. This Submission does not seek to represent the views of the Council.

I appreciate this opportunity to provide a submission in relation to consultation regarding the proposed NSW Koala Strategy.

In preparing this submission, I have considered a range of reference material including, but not limited to:

- NSW Chief Scientist and Engineer, 2016, *Independent Review into the Decline of Koala Populations in Key Areas of NSW*.
- NSW Office of Environment and Heritage, 2016. *Saving Our Species Iconic Koala Project - securing the koala in the wild in NSW for 100 years*.
- Department of Environment and Climate Change, 2008. *Approved Recovery Plan for the Koala (Phascolarctos cinereus)*.

I attended two (2) Local Government workshops related to the preparation of a NSW Koala Strategy.

A General Critique of Koala Conservation in NSW

In New South Wales, since 1992, koalas have been formally (legislatively) recognised as being threatened with extinction in the wild. This legal protection has been afforded under the *Endangered Fauna (Interim Protection) Act 1991* and then the *Threatened Species Conservation Act 1995*.

The koala has been recognised as threatened with extinction nationally since 2012 and afforded protection under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

An Approved Recovery Plan for the koala was adopted by the NSW Government in 2008 but was (in my opinion) never adequately resourced, implemented or monitored.

The planning policy, SEPP44 was introduced in 1995 to encourage local councils to conserve and manage koala habitat to ensure populations remain stable and population decline is reversed.

Finally, there has been a multitude of strategies, reports, published articles, assessments, conferences, summits, inquiries and management plans across local, regional, state and national scales. This has included but has not been limited to the 1990 *Koala Summit: managing koalas in NSW*, the 1995 *Conference on the Status of the Koala*, the ANZECC 1998 *National Koala Conservation Strategy*, the 2008 *Approved Koala Recovery Plan* and the current NSW Government koala priorities action statement and iconic koala saving our species project.

Despite this history of legislative protection, management planning and investigation and inquiry, the koala population in NSW has declined significantly in both population and extent.

This decline is well-documented scientifically and is recognised in the NSW Chief Scientist and Engineer 2016 report on the *Independent Review into the Decline of Koala Populations in Key Areas of NSW*.

The significance of the decline of the koala in NSW cannot be understated. It must be recognised for what it is - a failure of public conservation policy and practice.

This recognition must instructively guide the development of the whole of government NSW Koala Strategy.

Indeed, in the MidCoast Council area, koala population decline over the last three (3) koala generations has been severe and dramatic.

Parts of this Council area that were sub-regional and local strongholds for koalas such as in Coopernook-Lansdowne, Taree North and Brimbin areas, now appear to contain few koalas. Key threats have been profoundly driven by the clearing of habitat, the simplification of habitat and habitat fragmentation, but also with synergistic impacts on populations because of logging, unsuitable fire regimes, dog attack, roadkill and disease. These threats have seriously depleted the koala population of the MidCoast Council area.

The Endangered Koala Population of Hawks Nest and Tea Gardens, which was listed as endangered in 1999 and which has been subject to a Recovery Plan since 2003, has not been restored to a position of viability in nature. Trends apparently associated with positive recovery in or about 2012/13 in this population appear to have been stymied by the NSW Government's introduction of the 10/50 code (and the subsequent loss of important home range trees), combined with cumulative and ongoing loss of habitat by development and other operational threats (particularly road-kills). Land clearing on feeder habitats into this population over the last 6-months provides a further, significant pressure on the status of the Hawks Nest and Tea Gardens Endangered Koala Population.

A range of factors and mechanisms have conspired to exert an ongoing pressure on the koalas' population and status in NSW and in this Council area, including but not limited to:

- Inadequate reservation of koala populations and habitat in permanently protected and managed areas
- Inadequate understanding and resourcing of effective responses to the range of threats affecting koalas in NSW
- Inadequate data collection and monitoring
- Inadequate conservation frameworks
- Inadequate controls on native vegetation clearing
- Unbalanced and damaging land use frameworks and inadequate or perverse planning controls
- Inadequate legislative protection and recovery
- Inadequate enforcement and compliance

The inability to conserve and recover the koala population in NSW despite the history of legislative protection, scientific inquiry and management effort must be considered in the NSW Koala Strategy, which must consider, describe, adaptively respond to and address this history.

In spite of the serious deficiencies of koala population protection and recovery, there have been localised and sub-regional outcomes and gains. Such gains need also to be investigated and adaptively used to influence the NSW Koala Strategy.

There are quite incredible research institutions, koala practitioners, koala welfare personnel and scientists with a wealth of experience that needs to be engaged to contribute to the development of the NSW Koala Strategy.

The Strategy needs to address the reasons why despite legal protection and extensive management planning that koala conservation efforts have generally not been successful and understand the mechanisms behind the recent koala population declines.

It needs to identify the perversities of the current legislation and meaningfully deal with conflicting legislation (ie. 10/50 code and koala habitat, private native forestry and koala populations, the failure of s5A of the EP&A Act, etc).

Further, the Strategy needs to understand and address the problems associated with the 2008 approved recovery plan and why legal protection and SEPP44 have failed to reverse population decline.

It needs innovation and adaptability with a sound scientific base. It must be a working document; free of motherhood statements and vague, immeasurable targets. Further, it needs commitment, resourcing and a solid monitoring, evaluation and review platform to respond adaptively to trends and outcomes. It must be truly a whole of NSW Government initiative.

The NSW Koala Strategy should collate and publish detailed and effective data on koala habitat, populations and their trends across NSW; and resolve with adequate science and sufficient resources the longstanding data deficiencies that constrain proactive, applied conservation and management.

The Strategy certainly needs to guide changes to the biodiversity conservation, land use planning, threatened species, native vegetation and related legislation; dealing with those areas of conflict, perversity and limited effectiveness or regulation (such as PNF, 10/50 code, development planning, etc).

Koala habitat protection, re-creation and restoration, with buffers and connecting habitats must be of elevated priority in the land use planning and biodiversity legislative framework. An ability to refuse inappropriate or unreasonable developments in and near koala habitat is required.

The Strategy should deal with the funds, mechanism and framework to creating a comprehensive, adequate and representative reserve system for the koala, inclusive of large new protected areas with appropriate management streams. These initiatives should address the issue of "*residual reservation*" via the conservation of current or restored koala habitat on fertile landscapes. It also needs innovative new private conservation outcomes and relationships with NGO conservation partners.

I congratulate the NSW Government on this initiative and look forward to the development of a successful and effective strategy.

Yours faithfully

Mat Bell
Senior Ecologist