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Koala Strategy Submissions  
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Dear Sirs

### **Submission on New South Wales Koala Strategy**

Thank you for the opportunity to comment on the proposed New South Wales Koala Strategy that is being developed.

I live close to Lismore in the Northern Rivers and volunteer regularly at Friends of the Koala (FOK) care facility, where koalas are rescued, treated and hopefully rehabilitated and returned to the wild. Koala populations in this area are under extreme pressure from habitat loss, due to human development, and associated issues including largely vehicle strike, dog attack and disease. From the koalas that pass through the care facility, the percentage of those that either die before treatment or have to be euthanized, greatly exceeds the percentage which can be returned to the wild (approximately 15%). It is abundantly clear to all at the care facility that koalas, particularly in this area, are in dire need of governmental support to ensure suitable legislation and policy is put in place to protect sufficient habitat to prevent the ongoing rapid decline of this iconic species.

With the high numbers of koalas that regularly pass through the care facility in Lismore, FOK is acutely aware of the pressure on the few local veterinarians that have experience of treating this complex species. As well as protection of habitat, the government should compensate local vets who treat koalas, and ensure sufficient training opportunities are available to increase the number of vets available locally with the knowledge to be able to effectively treat koalas.

That Government is proposing to adopt a whole-of-government koala strategy for NSW, with the objective of stabilising and starting to increase koala numbers, is a good starting point to securing the long-term future of the koala. However, for it to be successful, it must be based on a detailed and accurate programme of field surveys, and be developed in consultation with local government and key koala groups, such as FOK, who have the most detailed on-the-ground information on the current status of local koalas and where and what risks they are currently subjected to. Not only is it critical to ensure that all legislative and regulatory instruments, directly or indirectly, impacting on koalas and their habitat be strengthened, but strong penalties for non-compliance must be made available and be enforced.

The government intends to produce a state-wide predictive koala habitat map, but for this to be of any value, the scale of mapping must be very carefully considered. Broad scale mapping will not capture important habitat for koalas, such as scattered paddock trees or windbreaks, which not only provide permanent habitat for koalas in this locality, but also act as stepping stones for koalas dispersing from one colony to another. Most predictive mapping would totally miss these important features, leaving them vulnerable to clearance for development which would have severe impacts on the local koala populations. The predictive mapping system must therefore be designed to ensure such important habitats are not overlooked. The mapping must also identify large areas of currently unoccupied, but potentially suitable koala habitat, so that these are also protected to mitigate the effects of future climate change.

I understand that new sensor technologies, such as remote sensing to identify the chemical composition of leaves, may be used in the koala habitat mapping project. How much ground truthing will be carried out to check the viability of this method? Also, as previously stated, habitat mapping must be prepared on a small enough scale to pick up valuable scattered habitats which are crucial to the survival of koalas, so the scale of mapping using remote sensing is likely to be too broad.

The proposed changes to the NSW planning system must ensure the absolute protection of koalas and their habitat and “no go” zones must be identified in Local Environment Plans to prevent development in important koala areas. How will the new planning system deal with small development projects compared to large scale? A number of small developments can result in greater impacts on local koala populations through cumulative effects, which are often overlooked. The need for cumulative assessments must be incorporated into planning policy, rather than having a specific threshold before impacts on koalas are considered.

The proposed Biodiversity Conservation Bill and associated Regulations are totally insufficient to halt the decline of koala populations, particularly due to its dependence on biodiversity offsets. Koalas have relatively fixed home ranges, thus habitat loss through vegetation clearance means koalas using that area are impacted. Retaining some habitat (often suboptimal), planting trees (that take years before use), and acquiring habitat nowhere near their home range will be detrimental to that population’s survival. At best offsets can achieve no more than the survival of one koala population at the expense of another. Impacts on the best quality koala habitat must therefore be assessed as ‘serious and irreversible impacts’. Legislation must also ensure that sufficient monitoring programmes for koalas are included in all planning permissions so that the full impacts of developments, and the effectiveness of mitigation measures, can be properly assessed. Further development must not be allowed in areas of known koala populations, nor in areas identified as preferred [although unoccupied] koala habitat.

Due to development pressures, particularly in the far north coast of New South Wales, government must give priority to protecting koala habitat on public land and extend such protected areas by strategic “buy backs” of logging licences. The government should also pursue the acquisition of private land to increase connectivity across the landscape for koalas. The feasibility of using parks and reserves as release sites for rehabilitated koalas whose habitat is unviable must be also be explored.

The Chief Scientist’s report identified that some koala populations may not be viable in the long-term, so conservation efforts should be targeted where they will be of most benefit. While I agree that conservation efforts should be concentrated on those populations capable of being saved, I am concerned that this may then hasten the demise of ‘at risk’ populations by allowing unrestricted development in those areas. Although resources are limited, we must do all that we can to retain each and every population of koalas for as long as possible, and not abandon those in most need.

While the current proposals from the government to try and halt the decline of the koala are admirable, the delay in realising its significance and responding to it is not, particularly as the decline has been facilitated through inappropriate development practices.

This is a wonderful opportunity to make sure sufficient measures are in place to protect and preserve koalas in the wild, ensuring their long term survival. Australia cannot allow development to take priority over the continued survival of such a popular and unique species. The world is watching!

Yours faithfully

**Linda Ambrose**

