

Let's face it.

The major reason that our koala populations are in collapse is the removal of habitat allowed through government policies.

Road strike dog attack, diseases like chlamydia and retrovirus brought on through habitat stress and fire are all linked to inappropriate development allowed by Federal, State and local government.

We could look at the operations in forestry as a major factor.

Justice Pepper called Forest Corp on the South Coast of NSW a serial offender and in collaboration with EPA on the North Coast they are able to ignore search rules and if occasionally they are discovered by private individuals EPA will prevaricate for a while and perhaps impose slap on the wrist fines.

Steve Phillips commissioned by PMHC found that Forest Corp had logged out most the koala food trees in the LGA.

There was the furore at Coffs Harbour with the local Council there trying to control PNF but frustrated by government interpretation of PNF PVPs. The rule that ancient fencepost made old growth young again was just plain farcical.

One of the main ways of allowing development in critical habitat is through offsets through BioBanking and Biocertification,

These legal structures allow almost any protected forest open to clearing for development.

You can argue "like for like" and "maintain and improve" through offsets and credits but the plain fact is the government is allowing removal of core and potential habitat, of prime and secondary habitat if you want to call it that.

The point is you start off with 2 patches of koala habitat and one is cleared , over and over again.

It is like the 7 point test which allowed offsets somewhere else, maybe an area well out of the local government area. AND if that species cannot be found credits might be exchanged for another species and even then if that cannot be done then the blood money can be paid to OEHL.

This process is cynical to say the best we can for it. In my opinion the processes have knowingly enabled development while causing the collapse of populations of several species all over NSW and particularly in the NSW coastal areas.

To give you an example from my local area which is Port Macquarie. PMHC have asked for the Biocertification of 444 ha. of threatened species habitat adjoining the Port Macquarie airport.

These are my assessments of the offsets intended which will in effect sterilise the last remaining functioning unit of natural lowland in the Hastings Valley.

The other thing that the NSW Government needs to recognise that most coastal councils are controlled by development interests and will usually do their utmost to facilitate development and where they are allowed to push a development they can do that as long as they do not vote and leave it to their fellow councillors.

Where koala habitat is concerned there should be no logging and no clearing for development!

**Port Macquarie Airport Master Plan-Biodiversity Certification assessment & Biocertification Strategy**

While this Master Plan is written as an ecological study of the area to be biocertified it reads more like a submission which finds not one fault in the potential clearing of threatened species habitat.

It is in fact written by an ecologist for the purpose of supplying a document to the employer which will be used to achieve Biocertification of over 400 ha. of critically important diverse environment prior to development.

At the very least the assessment should be peer reviewed in the field, not just at desktop.

The study claims that red flag EECs, prime and secondary koala habitat can all be offset “somewhere” else and the PMHC intends that resident koalas, no matter what their site fidelity, can be moved to somewhere else where at the time of writing there was nowhere even the credits could be retired.

**P.79** reveals 269.32 ha. of EEC red flag areas including 14.38 ha. of SSF will be impacted.

**Pg 80** Relative abundance of red flagged areas was considered across the entire region on a 2005 map, and then the NSW north coast, Sydney Basin and the S.E. Corner bioregion, not the Port Macquarie area.

**Pg.83** shows the BCA is compared to the Macleay/ Hastings/Coffs Coast and Escarpment which is overwhelmingly escarpment where the red flagged EECs are not found.

**Pg.84** shows the paucity of these vegetation types in the LGA compared to the Macleay north of the Hastings River.

**Pg 85**

Admission that the veg maps for the northern region are out of date and may be inaccurate!

ECA states 40% of Coastal freshwater meadows and forblands of lagoons and wetlands cleared and points out that leaves 60% uncleared (on present maps), as if that is a good thing.

And again 25% of Paperbark swamp forest of the coastal wetlands of the NC is left!

Later ECA claims the 60% remaining of Coastal freshwater meadows and forblands of lagoons and wetlands is high! While the percentage of other EECs in the region is not as high. How on earth does that justify clearing of red flag areas in this small area of Port Macquarie?

**Pg 86** purports to show the Percent (sic) Native Vegetation (by area) is high but the chart shows clearly that the Macleay/Hastings area has a higher percentage cleared than ALL of the CMA regions in the chart!

**Pg 87** attempts to show that the pink BCAA area is very small compared to the vegetated area of the region however it also unfortunately shows it is the last large habitat area (400 ha.) in the Port Macquarie precinct and the river valley habitat north of the Hastings.

**Pg.88** deals with the upper reaches of 2 first order streams and also the riparian buffers other than the origin and attempts to negate the impacts of roads and easements.

The argument by ECA of minimal impact does not seem to account for streams flowing into adjoining habitat such as into the Partridge Creek area where PMHC already has form.

It is ironic that in a famous court case involving the illegal clearing of threatened species habitat *mens rea*, PMHC lost a director who was fined and Council made to rehabilitate ECM and Grass owl habitat over 10 years, but here the same council is bent upon causing even more damage legally.

Regarding those first order streams however there is no address of increased pollution from jets and more frequent use of the area. Nowhere in the assessments did I find address of chemical and noise pollution on the environment and its flora and fauna other than some vague assertion provision will be made for runoff at some time.

Williamtown comes to mind.

The increased air pollution from bigger jets and its effects on water, stream SEPP habitat and forblands is not addressed nor is the increased noise pollution on animals and residents under the flight path. I believe there was objection by residents previously when there were increased traffic over their area through the training of Chinese pilots.

**Pg.90** Shows the proposed damage to EECs and riparian buffers which is a devastatingly huge area.

**Pg 91** Establishes that parts of the Biodiversity Link have already been impacted by fire and management trails and more than half of 36 ha. of vegetation by cropping for the present airport operations. It is noted elsewhere that it is intended to poison the cropped trees to leave stags with hollows (until they fall down and leave nothing in a state biodiversity link). There is no explanation as to the effect of the poison in the environment when the trees are absorbed.

One wonders how a PNF PVP was legally given for part of the biodiversity link and whether it might be retrieved rather than used for “credits”.

ECA claims a moderate portion (31.73%) of the 36.12 ha biodiversity link will be impacted.

Moderate? One third of a biodiversity link removed or damaged is a moderate loss??

It is then claimed that the present koala and squirrel glider population has its connectivity east and west affected by cropping and a future PNF operation but by wiping out that link and conserving land east and west of the runway the “mobile” koalas and squirrel gliders will then be able to connect to the National Parks to the south and gliders by poles and ropes across the bottom of the BCAA runway extension (without endangering planes). Presuming the height of the poles and ropes will be at the same height of the trees this concept is difficult to comprehend.

**Pg 92** This reader had some trouble comprehending the mathematics involved in areas impacted and conserved within the State Biodiversity Land.

I would suggest OEH check all statements in the submission regarding fact and opinion against previous experience with translocation and survival and partial removal of habitat in red flag areas, EECs and Biodiversity links.

**Pg 93** The impact percentages here , if accurate, are alarming:

Blackbutt-Tallowood 40.03%

Grey Ironbark-Grey Gum 80.07 % impacted, yet area conserved is 0%

Paperbark 23.69% impacted

Scribbly Gum-Red Bloodwood healthy open forest 43.35%

The reader asks what on earth can't you destroy in a Biodiversity Link if this can be traded off to credits elsewhere?

**Pg 94.** Map showing breaks in Biodiversity Link.

**Pg 95/96** Mention of the danger of sediments accumulating in streams are negated by various methods including poisoning trees which are alive but cropped, which will eventually die and be absorbed into the wetlands. The problem of the upper limits of one stream will be eliminated when the stream is rendered not functional. There are some unspecified diversions of water around the airport structures.

Apparently there is an intention to transition the SEPP 14 vegetation type to "Coastal freshwater meadows and forblands of lagoons and wetlands" whilst avoiding attracting waterbirds which pose a risk to airport operations!!!!

I ask, Is deliberately changing one EEC environment to another allowed and how will developing "Coastal freshwater meadows and forblands of lagoons and wetlands" discourage birds from using the enlarged airport flight path?

### **Biocertification Credit Assessment**

This section claims understanding of the BCAM is essential to understanding the credit assessment system and I will leave that assessment to OEH.

However I have concerns that it is impossible to achieve "like for like" and "No net loss" if you take one functioning area of the environment and **trade it off to many separate areas and break the continuity.**

Pg 96.

5.1 It seems "Land proposed for conservation (PMHC and private lands) with areas of tree cropping- generates biodiversity credits." I find this difficult to justify in my mind as that habitat is already there and it seems PMHC intend to poison the trees. How can credits be

earned for retaining present habitat and killing some of it? Even the hollows created by tree poisoning are not permanent.

Again where the current land use is “maintained/ not changed” seems to be in conflict with changing a SEPP 44 to forblands classification.

### P.99

Again mentions poisoning of trees carefully pruned by hand tools with (fire hazard) foliage left on the ground and it seems credits will be calculated for leaving the dead trees for raptors to perch and hollows to develop, before the trees fall down without seeding the area.

While I do not understand the methodology of the BCAM I cannot comprehend how this action would create credits instead of **requiring** them.

Under “Land subject to existing conservation measures and potential credit discounting” I can see no address of the Biodiversity Link damage proposed.

It seems at the bottom of page 99 that the calculations are far from complete.

**Pg. 100** now claims a 10% discount for the increase of logs on the ground from the poisoned trees!??

The logs on the ground are temporary and it seems cynical to gain credits by killing live trees.

**Pgs 101 to 109** record habitat to be destroyed and retained.

**Pg 109 5.4.2** Talks of the State Biodiversity Link and water courses riparian zones.

However it seems the Link is just lines on a map and can also be traded for credits and also

**Pg. 110** the 57% cleared area of Adjacent Remnant Area receives a maximum score but will be compensated by an equally scored piece of land. It seems to me that that where the environment started with 2 equal pieces of habitat it will end up with 50%? In the Like for Like the first “Like” disappears and therefore fails to “Maintain or Improve.”.

**Pg 112** shows how the State and Regional Biodiversity Links will be impacted and treated as if they are just “lines on maps”. One wonders why such areas are even mapped for conservation when they can be traded off to something which has little to do with connectivity.

Further looking at **Pg 114** it appears approximately one third of the vegetation within the Regional Biodiversity link will be destroyed and no doubt impact upon the viability of the remaining link. Any offset will not “mitigate any indirect impacts on biodiversity values” (DECCW 2011).

The combination of all the red flag areas put together with the total package of damage shows that **the whole BCA will be impacted as a functioning entity.**

It is the biggest unit of biodiversity still operating as a functional unit in the Port Macquarie Area and indeed on the southern bank of the Hastings River valley.

It is noted that it is proposed to address the impact of weeds, run-off, changed noise and light conditions AFTER Biocertification is awarded and Erosion, sedimentation and run-off, it is suggested, will be addressed at DA stage.

**Pg 115** recognises “there are *NO* management actions or development controls to mitigate the potential impacts from fragmentation of movement corridors for the land proposed for biocertification other than the “potential” to rehabilitate the SEPP 14 wetland area of the southern end of the runway to a wet heathland community whilst avoiding attracting waterbirds that pose a threat to airport operations.”

It is then claimed the artificial transformation of the forested wetland area to wet heathland and/or sedgeland (without attracting birds) will benefit koalas and squirrel gliders and wallum froglet to cross the broken east / west link.

**Pg 116** attempts to cover the credits estimated , firstly with discounting depending upon an “interpretation” for present conditions including rationalising cutting down remaining forest.

That still leaves a whopping 3,741 ecosystem credits owed!

**Pg 116**

Section 8.5 of the BCAM says that in the first instance credits should be obtained within the BCAA but once again the Application slips into avoidance mode with a promise from PMHC to secure a Blackbutt-Tallowwood deficit of 452 credits, if required, prior to any clearing.

It is presumed these are for koala translocation.

It is noted that there will still be a deficit of 323 credits for koala, and it seems to the reader there will be several transfer of credits owed to different species.

It is very important that these koala credits are secured before ANY operations to expand the airport facility as **once that process begins it will become**

**a cumulative effect where the previous clearing necessitates by economic reasoning that the following stages are cleared.**

It is noted that in the PMHC minutes where the Application was approved there is provision for koala credits to be secured **wherever possible** with a Maria River property on the OTHER side of the Hastings River being a potential trade and if even that is not possible then money can be substituted.

It is also noted that anything developed by Council’s CKPoM Committee WILL NOT be considered.

It would be hard for the Committee to contribute anything as they were not informed that koala habitat was about to be cleared in this BCAA. It is difficult to believe that none of the staff who attended the CKPoM meetings ,and the developer representative whose name

appears on the BCAA, did not know of the damage to koala habitat and feel obligated to inform that Committee..

It should be discovered whether the Tallowood-Blackbutt area proposed already has a koala population and if not why not? If it is not occupied then OEH should attempt to discover if there is a dog problem or something deterring colonisation already, or if there is a current population inhabiting the credit retiring forest OEH should estimate the effect of a strange colony being transported into an occupied area.

Then it should be ascertained how a species with extremely high site fidelity will not attempt to return once the airport koalas are translocated with Koala Hospital help.

Council's explanation at the last meeting of the previous Council term which approved progressing the BCAA was that "they" use metal collars to keep them there. As far as I understand it metal collars and plastic tree base coverings are used to stop koalas accessing trees not to starve them to death!

I also understand according to Phillips et al the airport colony is part of the Lake Innes core population which feeds into the Port Macquarie area. There may be consideration of the long term survival of this key population if a breeding colony is removed.

ECA suggests koalas will be able to scamper across the forblands and wetlands the Council will create from SSF but quite possibly the population will be split for however many years it takes to change a natural environment.

If they are removed to somewhere near Thrumster , or Maria River north of the Hastings that process will disrupt or prevent breeding within the key LGA area.

As well of course at the recent Koala Roundtable, to which I was refused attendance, it was revealed in three scenarios that the Port Macquarie LGA koala population will become extinct within 50 years.

Loss of habitat, followed by death through road strike, dog attack and increased disease due to the new close proximity of individuals, is of course a key threatening process.

The Port Macquarie Koala Hospital has already told PMHC that they are not receiving juvenile koalas which indicates there are probably no breeding females left in the LGA!

In the case of the koala at least it seems the population will be split E/W at the southern end of the runway area and/or removed breaking continuity within the local population and the Lake Innes feeder area where the last koala population stronghold exists.

The literature contains several examples where there were deaths in groups of koalas translocated through dog attack, or car strike, trying to return to home range and disease, possibly brought on by stress.

Just one paper by University of Western Sydney 2015 instanced "[One study](#) to alleviate crowded conditions found that translocation to a new site increased koalas' likelihood of dying in the following 12 months by 40%. Another unpublished study from Parks Victoria

suggested that there may be up to 90% mortality in groups of koalas moved to habitat that contains different food trees.

Consequently, translocation is no longer favoured as a koala management tool.

I ask then how will the destruction of the habitat of a “Vulnerable” species already in population crash be even contemplated by PMHC in the full knowledge of this situation.

Again, if the Council charged with looking after the environment and its threatened species will not protect them, in this particular case, OEH must protect the Federal and State listed species along with the Biodiversity links, the 3 red flagged EECs and the last extensive Lower Hastings sensitive environmental remnants.

I really, really doubt that the past council knew the facts of the huge issue they were voting on but they have set this wave of destruction in action.

It is now up to OEH and the Minister.

I cannot see how OEH in all conscience could possibly allow this Biocertification to go ahead after considering the lack of a peer review, the damage to red flag EECs, damage to one third of State and Regional Biolinks, the threatened species at risk, the certain knowledge of the local extinction of a Vulnerable listed population within 50 years even without the Biocertification of koala habitat and the splitting and removal of koalas away from the feeder source, the failure to achieve the credits due and the vague promises of future actions.

John Jeayes