



Amendment to the Priorities Action Statement  
Office of Environment and Heritage  
PO Box A290  
Sydney South NSW 1232

2 March 2017

Dear Sir/Madam

**RE: Submission on *Saving our Species* Iconic Koala Project**

The Nambucca Valley Conservation Association (NVCA) is a voluntary community group which has operated on the mid north coast for over 30 years and which maintains a long standing interest in the protection of koala habitat and survival of the koala in its natural habitat.

Our submission is based on the questions and information contained within the brochure *Saving our Species – Securing the koala in the wild in NSW for 100 years*.

**1 Tell us what you are doing to help manage and conserve koalas**

NVCA volunteers have devoted many thousands of hours over the past 30 years identifying koala habitat and occurrence and lobbying for protection on both private and public land. Our organisation participated in the Regional Forest Agreement process in good faith back in the 90's and was bitterly disappointed with the outcome for koala protection in public state forests. To date only 14ha of koala habitat per year is protected from logging across NSW and that is only until the next logging cycle. We continue to lobby Government agencies to stop clear-felling and intensive logging operations in koala habitat, to date with little effect.

**2 Do you have comments on the draft action toolbox?**

It is weak, insufficient and under resourced. As such the draft action toolbox is little more than feel good tinkering around the edges. That is not to say that proposed actions are not of use, but they do not address the core issues of habitat loss, modification and fragmentation, despite this being acknowledged as the primary *'critical threat to koalas across the landscape'*.

The action toolbox might make less informed members of the community feel warm and fuzzy, but in its current form, the NVCA has no confidence that it will make much if any difference in the survival of our beleaguered koala in NSW. Only permanent protection of identified koala populations and habitat in a well connected reserve system based on solid science will save the NSW koala. We know this and we believe the government knows this too, so it is particularly disappointing to see continued avoidance of the obvious solution to this shameful situation.

The toolbox only makes reference to ‘negotiate agreements with landholders’, which we assume to be private landholders, not the government itself as manager of public native forests and crown land. This is a major failure. We strongly believe that the NSW Government should aim to purchase key identified areas on private land AND permanently reserve areas of public land necessary to protect remaining koala populations and provide for the increase of their numbers and distribution.

Whilst we recognise that constraining development and natural resource extraction on private land will, in most cases, meet with strong resistance, on public land it is another matter. The NSW Government has a significant opportunity before it to stop logging and clearfelling in public native forests and transition the timber industry into being 100% plantation based. This is achievable and will go a long way to addressing the horrendous and relentless loss of koala habitat currently occurring in our public native forests, despite strong public opposition and outcry.

Undertaking *‘koala habitat studies and mapping using standardised method and terminology to identify key koala populations and rank and map koala habitat’* is commendable providing it is based on on-ground survey by suitable qualified experts. Also *‘monitoring change’* is commendable, but without the critical next step – **PROTECTING IT FROM DEVELOPMENT AND LOGGING**, nothing will change. In fact, our experience with NSW Forest Corporation is that its Lidar mapping is being used to target remnant mature forests in public native forests - the very forests which koalas prefer!

Road exclusion fencing and community education about domestic dogs etc are also worthy exercises but do not address the core problem.

Likewise, it is not enough to *‘Liaise with relevant authorities or land managers to ensure that any unavoidable prescribed burns within koala habitat are conducted in a way that minimises impacts on individual koalas’!* So, the poor koala might survive the prescribed burn (because best practice was observed) but it’s food resource is likely to be reduced and being territorial the koala will subsequently become food and fluid stressed, is more likely to come to ground and be at risk of dog attack and vehicle strike and eventually chlamydia will set in. The downward spiral begins – death by a thousand cuts. No burning should occur in identified koala habitat.

It is not surprising that the Action Toolbox identifies the critical threat of loss, modification and fragmentation of habitat, there is volumes of scientific evidence proving this, but then the action toolbox carefully tip toes around and avoids addressing the issue. We have witnessed this for years and years.

It is distressing that the NSW Government continues to allow land clearing, development and intensive native forest logging and clearfelling operations in identified koala habitat. This Association believes that any genuine effort to reverse this dismal situation must have as its basis, mechanisms which identify and protect koala habitat and resident koala populations insitu in perpetuity. These mechanisms must be based on solid science and include comprehensive on ground koala monitoring.

It is farcical that the SOS Iconic Koala Project is advocating and funding tree planting and habitat rehabilitation whilst the same State Government allows clearfelling of koala habitat across areas of NSW far in excess of any tree planting program.

The time is long overdue for NSW Government to draw the line and recognise that there cannot be a cosy ‘win-win’ for koalas and those whose interests involve the destruction of koala habitat ie developers, logging industry, mining and agriculture - the koalas lose every time. Strong, clear and enforceable laws are needed to ensure koalas and koala habitat are identified and protected in perpetuity. These laws must be informed by a comprehensive scientifically based strategy.

Given that the SOS program *'aims to address threats that are critically affecting the koala's long-term viability'*, it is beyond belief that no mention is made of the obvious elephants in the room – logging and clearfelling of koala habitat on both private and public land and land clearing for development.

### **3 Is there an important population of koalas that we should prioritise for conservation action?**

Yes. Compartments 384 & 385 of Buckrabendinni State Forest in the headwaters of the Nambucca Valley – it is due to be logged in April this year. In the Ecology Report for this area 106 records of Koalas were listed. This organisation has undertaken many surveys of these compartments, found koala evidence which Forestry Corporation failed to find and we hold strong concerns about the impacts of the proposed logging operation on the survival of the local population. These compartments lie immediately to the north of Gumbaynggirr State Conservation Area which is contiguous with Dunggir National Park to the south (Dunggir is a the local Gumbaynggirr Aboriginal word for koala). They also lie within the well documented proposal for a Great Koala National Park for the Coffs Harbour region. We can provide more information if required.

### **4 Are there any state-wide, regional or local actions that should be prioritised through the Iconic Koala Project in the coming years?**

Yes. Create the Great Koala National Park as proposed by the NSW National Parks Association and place a moratorium on logging and development in known areas of koala populations across NSW.

### **In conclusion**

The NSW government's announcement of \$10m to be used for purchase of important koala habitat is a step in the right direction, but is it such a tiny step that in the face of all the koala habitat loss due to intensive logging and clear-felling of public and private native forest, coastal development and land clearing for mining it does not go nearly far enough to make a difference. We strongly recommend that a much larger budget be set aside for this critical aspect of addressing the plight of the koala in NSW.

Any land purchased must have National Parks tenure and be managed by National Parks and Wildlife Service.

If *'for the next five years on-ground management of the koala in NSW will be guided by [this proposed] SOS Iconic Species Program'*, then our strong fear for the survival of the NSW koala population disappointingly remains unchanged.

Yours sincerely

Paula Flack  
President