Please accept this short submission on the Native Vegetation Regulation Review, from the volunteer Eurobodalla Koalas project.

The key point of this submission is to suggest revision of koala habitat classifications in the light of emerging evidence that low-density koala populations could be adapting to previously unrecognised mixes of eucalypt types. Certainly the eucalypt types and classifications in the NSW Recovery Plan are insufficient, and appear to be based on old research and a faulty assumption (ie core habitat is habitat where koalas actually persist, rather than viable habitat from which koalas have for other reasons disappeared, or which can be shown to have potential).

A fundamental question from our point of view, is whether regulations should now ensure that vegetation types previously thought to be irrelevant should be included, in the interests of koala recovery rather than simply the maintenance of persisting higher density populations.

The viability of newly recognised patterns amongst browse species has implications for the PNF Code of Practice and options for using koala habitat mapping in PNF regulation. The relevant research is still ongoing, so a quick decision on the regulations will be premature.

Our small project is testing a predictive habitat model for the Eurobodalla LGA. Part of its rationale includes acknowledgement that the Eurobodalla was home to healthy koala populations in the 19th Century, but records since then have been scarce and 21st Century evidence suggests possible localised extinction despite the presence of large State Forest and National Park estates. Potential disappearance of the koala from the LGA is taken to be an indicator of the landscape's poor general health.

Using field surveys, GIS mapping of potential extant habitat and a search of contemporary literature, the volunteer project's longer-term purpose is to predict the capacity of the modern Eurobodalla landscape to sustain a low density koala population again, if a recovery plan was implemented. (We accept that the legacy of clearing, urban development and other disturbances dictates that high density populations will not again be a realistic outcome in this LGA.)

It follows that habitat classification and the ability of koalas to use alternative browse species are important factors in our research.

We have observed findings from South Coast surveys [Allen, 2010] that do not directly match the browse species classifications in the Recovery Plan. There are indications from previous research [Jurskis & Potter, 1997] and our local knowledge sources that the role of Spotted Gum as part of an overall mix should be taken seriously (eg observed as a favoured browse for captive animals in October to December, and speculated as a supplementary browse in the wild during Winter tipping). Allen's Southern Tablelands surveys [2012] seem to show that Southern Tablelands koala activity appears to be more likely, and activity levels appear to be higher, where there is a diversity of "secondary" and "supplementary" species .... E. viminalis appears to be functioning as a "secondary" rather than "primary" browse species, and E. rossii, which is not listed in the NSW Recovery Plan, appears to be either a "secondary" or "supplementary" browse species. It is suggested local factors such as browse species availability, topography, microclimate, disturbance history, size-class and regrowth rates are perhaps more important.

Eurobodalla vegetation types differ somewhat from those in the Bega Valley and Southern Tablelands, and we are only just at the beginning of our preliminary analysis. By the end of 2012 the volunteer Eurobodalla Koalas project would like to use its local findings as a basis for negotiating a major interagency funding application, to support several years of intensive future research work including the design of the recovery plan.

Accordingly, our submission requests that the Native Vegetation Regulation Review:

- addresses habitat classification, alternative browse species and the issue of potential habitat, from the point of view of recovering low density koala populations; and,
- designs any new regulations to ensure they accommodate future research findings that might throw existing assumptions about the value of certain habitat types into question.

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