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**THE OFFICE OF ENVIRONMENT & HERITAGE
SYDNEY SOUTH NSW**

**Review of the Native Vegetation Regulation
Private Native Forestry and Koalas**

I have read the discussion paper for PNF and koalas and thank the Minister for the opportunity to respond. I have been involved with koalas for over 40 years as a private property owner, and 15 years as an active member of the Clarence branch of the Wildlife Information Rescue and Education Service (WIRES), including the last 8 years as their threatened species recording officer, and 4 years as the koala coordinator. I believe that experiences gained through interactions with koalas and their habitats affords me some authority to respond to the proposed Review

I understand that the aim of the native vegetation regulation review in regards to PNF and its impacts on koalas, is to enable alteration and/or provision of clauses in the PNF Code of Practice to ensure better protection for koalas and their habitats. The Office of Environment & Heritage recognises a requirement for local and state governments to have access to the most accurate and up-to-date information about the presence of koalas and their habitat in order to ensure the PNF Code operates more effectively in regard to protecting koalas.

I hope my following comments and suggestions are a help towards achieving this important aim.

SEPP44:

SEPP44, though sadly outdated, is a statutory guide that aims to encourage conservation and management of koala habitat, 'to ensure a permanent healthy population over their present range and to reverse the current trend of koala population decline'.

Quite probably the clause 'over their present range' is one of the reasons for the Policy having failed pitifully in achieving its extended aim of reversing koala decline. The only way this extended aim can come about is for areas with known historic records of koalas (no matter how old) to be accepted as koala habitat and managed accordingly.

While SEPP44 remains all we've got, its specific definition and determination of core habitat should, in the author's view, be totally eliminated from private native forestry assessment criteria. Attempting to assess three levels of koala habitat, from Core to Tertiary or Marginal, is clumsy, time consuming, costly and inaccurate, and inevitably leads to downgrading of important supportive and dispersal habitat to second rate, therefore useless and able to be destroyed.

Local councils have provided their own preferred definitions of habitat in their Koala Plans of Management. Port Stephens KPOM categorises habitat as Preferred, Supplementary and Marginal, which is seen as more favourable by the author than SEPP44 definitions. However, if categorisation must persist, then it ought to be in terms of Optimal habitat, Supportive habitat, and Dispersal habitat

Optimal habitat - Areas within a stable, established family group's home range that supports them in health and maintains good weights in preparation for less favourable times.

Supportive habitat - Extended areas of overlapping individual home ranges, which may or may not take in parts of optimal habitat, and which will support individuals adequately even during leaner periods.

Dispersal habitat - Broad areas in which suitable food trees are more scarce, which can support a number of roaming young koalas seeking to establish territory, while reducing interaction and likelihood of stress through conflict during a time of habitat loss and food depletion.

To take the doubt out of determining koala habitat and more safely ensure that no important habitat is overlooked, it is suggested that all proposed private native forestry activities should be required to be assessed for likely use by koalas by this more explicit but simplified method.

However it should be noted that current, and also old records of koala activity are the very best way to gauge the absolute habitat that is most likely to support koalas in all their development phases, and under various environmental conditions. (Ie, cease the practice of putting labels on the natural environment to suit human purposes, and rather recognise the presence of habitat that is selected by koalas themselves as being useful to them).

Mapping

All suggested options A B & C in the preliminary discussion paper involve mapping. Surveys and mapping of koala habitat in remote forested areas may be of some value. However private properties in isolation are relatively few, and then the landowners are generally more interested in retaining koalas on their properties than in liquidating a handful of timber trees into short-term income.

In more densely populated and mostly highly modified rural-residential landscapes, dependence on mapping has to be neither the cheapest, quickest nor the most accurate way to determine the various levels of koala habitat. In particular use of desktop studies will neither result in increased benefit to koalas, nor will they be acceptable to all landowners, for the following reasons:

- △ Desktop studies are already shown to be highly inaccurate in mapping old growth rainforest for state forestry operations
- △ Survey results and maps can be manipulated in favour of any paying client

- △ They cannot possibly correctly identify site specific tree species
- △ Maps will be disputed. Revisions will be time-consuming and costly, and likely to be skewed in favour of avoiding conflict with an angry resident rather than helping koalas
- △ Considerably more funds will need to be injected into the NSW environment dept to allow for scientists, botanists and ecologists to undertake mapping, modelling, and actual on-site ground-truthing. Given the systematic reduction in funding, removal of staff and resources, and general dismantlement of the department by the current government, it is highly unlikely that this will happen

Seen flaws in the Code of Practice

There is now a massive volume of scientific research and knowledge of koalas, their individual behaviour, social structure, and effects of loss of just a small area of habitat or a single dominant animal, all now readily accessible, which should be accessed for informed decisions during any planning and approval process

- 1) All studies and records indicate that clearing and logging are the main causes for continued decline in koala numbers by stress-related deaths, injuries and disease outbreaks. The current PNF prescription of leaving a 20m buffer zone around a high use tree (ie 20+ scats) is now clearly recognised as totally inadequate, and just one factor that may trigger the collapse of an entire koala colony. The trust factor and absence of any requirement for a landholder to undertake surveys for threatened species is another. In a number of regards, private native forestry, in association with human growth and development, is instrumental in the continued rapid decline in koala numbers and the failure by both the Koala Recovery Plan and the National Koala Conservation & Management Strategy to meet their objectives.
- 2) The current Code's broad committed protection of forested riparian zones, wetlands, rocky outcrops, rainforest, steep lands and old-growth forests does not serve to protect koalas.

On this list the only habitat most likely to be favoured by koalas is riparian zones, however these only where

- △ the undergrowth is sparse
- △ feed trees are suitable
- △ the area is not prone to prolonged inundation (pers ob).

Otherwise the Code specifically provides prescriptions for sites with known records and evidence of koala activity. For this to be effective a prescription's implementation must not be dependent on a landholder taking time to make a thorough search for evidence and records, knowing how to do this, and what exactly they are looking for, then actually reporting any positive finds. Logging is a development, undertaken for financial gain, and as such should meet all the same requirements as other proposed developments.

- 3) Evidence of a high-use koala tree is determined by the number of pellets (scats) located under a tree, at the time the landowner or other searcher happens to be looking for them. Yet heavy rainfall or a koala not having used a very significant home base

or forage tree for some days could well result in no scats being found. Certain home base tree species will retain an obvious depth and quantity of claw marks on the bark surface even if not used for some time. This alone should trigger automatic protection for that particular tree and its presence noted as part of a high use area.

Suggested improvements

1) Most branches of the NSW Wildlife Information, Rescue & Education Service (WIRES) now elect a threatened species recording officer, whose job it is to inform National Parks of all threatened species coming into care within a branch. All records include date and location of an animal's collection, its age if known, sex, breeding stage, weight, condition and reason for being in care. Each branch's koala coordinator also maintains a separate record sheet, meaning that wildlife care groups in fact form the most accurate, up-to-date and highly valuable records available for study of koalas and what is going on with them and their habitat. These are available in any LGA that has a WIRES branch or other wildlife care organisation, or a dedicated koala welfare group such as Friends of Koala in Lismore and the Port Macquarie Koala Hospital. In the Clarence Valley all records are lodged by the threatened species recording officer directly with the National Parks GIS unit for atlasing. While it is suspected that other branches might only deliver the information to the local National Parks office for that understaffed, under-resourced department to complete the work, the requirement for comprehensive records means the original details are still in the group's system and can be accessed. These records should not be discounted on account of them not coming from experienced qualified ecologists. Just the opposite, care groups should be the first port of call for anyone seeking information and knowledge about local wildlife, and should be far better utilised than they seemingly are.

Accessing these records will

- ▲ do away with the dubious dependence on landowners and forestry operators to identify the presence of koalas and/or their habitat
- ▲ help councils to accurately identify koala habitat for development of Koala Plans of Management and LEPs
- ▲ resolve question as to whether or not a vegetation community represents koala habitat
- ▲ by-pass the need for extensive, costly and often inaccurate mapping

2) While the above method of determining koala habitat will simplify the main process, there are still large areas of bushland that remain relatively intact and have few to no records of koalas, due to their relative isolation from human impact. These should be automatically viewed as likely valuable koala habitat, where koalas might well exist in large healthy numbers but are not recorded because of lack of contact with humans.

3) With koalas a recognised billion dollar annual industry for Australia, landowners wishing to carry out private native forestry should be encouraged to properly assess their land for koala habitat, then, where habitat is found, contribute to establishment of permanent koala movement links across all Eastern Australian LGAs and state borders. This should be done by a federal government financial support scheme, with additional funding by the NSW OEH, and will meet certain government obligations under the National Koala Conservation and Management Strategy, and the NSW Koala Recovery Plan.

Many koala corridors are already in part existence through private environmental management practices, however the NSW government should also seriously look at annexing remaining travelling stock routes as a ready-established base corridor network, rather than having the Dept of Lands sell them off to adjoining landowners, in many cases for forestry purposes.

For this process there needs to be a return of funding and qualified employees to the state environment department

4) Without legislated requirements to adequately preserve koala habitat, koalas will continue to slide towards extinction. Should the state and federal governments fail to come on side with financial incentives to encourage landholders to retain koalas on their properties, then local councils should, as an alternative, be ordained to place tree preservation orders on all eucalypts preferred by koalas within each LGA, and also on tree species occasionally used as supplementary browse. These TPOs need to be totally secure from logging of any code - and irreversible.

In summary

As a national iconic animal that contributes significantly to the NSW tourism industry, the health and continuation of koalas is paramount, and must be rated over and above small potential short-term financial gains to individuals.

This review now affords NSW an important window of opportunity to finally get it right - to incorporate and strengthen provisions that ensure koalas are secure in perpetuity across NSW with an aim to have them removed from the threatened species schedules. As a priority action the previous DECC made a commitment to approach Forests NSW to: align its policy and practice with the koala recovery plan; exchange info and work on producing local/regional plans.

This must now be done, with private native forestry equally included in the resultant prescriptions

We await this event with urgency.

Patricia Edwards

