



The Manager
P.A. S. Project
NSW Department of Environment pas.amendment@environment.nsw.gov.au

Dear Manager,

Brisbane Region Environment Council wishes to offer some preliminary comments which may be relevant in commonalities within the McPherson Macleay Overlap.

The Chief Scientist's Report, which is supported, and subsequent reports may affect structure and aggregation of items in the PAS.

There are some items which deserve more scrutiny.

1 Euthanasia. It is indicated that sick koalas from NE NSW taken to Currumbin Sanctuary Koala Lab (Qld) have had a record 97% euthanasia rate.

2. The Koala Habitat Mapping in SEQ has had a poor history. Qld Govt has just unfortunately dispensed with accurate Essential Koala Habitat Mapping. The statutory mapping had poor extents and nil enforcement. The KRN (Qld University) was paid \$200,000 to do some modelling /koala habitat mapping for South East Queensland. This was thankfully not implemented. The subsequent predictive modelling /mapping in N E NSW (Santika et al.) and elsewhere appears to be suppositionary in methodology and lacks **sufficient transects, systematic observation and koala tracking**. The predictive path is a mistake. The Meta data surveys by NPA NSW have yet to be undertaken in Qld.

3. The dog predation stats. for Coffs Harbour appears very low for reasons you may know. However I have seen the profusion of wild dogs near Busbys Flat (NSW) deleteriously affecting Rock Wallabies & arborials etc. Wild dogs at Moreton Bay Rail construction (qld) have killed 161 koalas of 281 dead of 503 tagged.

4. The use of numerous fauna overpasses and underpasses and Case Studies in NSW needs documentation and wider promulgation across Australia. The alternative is Qld and Victorian quangos will build 80-130 metre long fauna tunnels only fit for snakes as opposed to successful Fauna Overpasses.

Yours Sincerely

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