Review of the Native Vegetation Regulation 2005 - PNF

Submission from
The Australian Koala Foundation

Introduction
The Australian Koala Foundation (AKF) welcomes this opportunity to provide comments on the Review of the Private Native Forestry Code of Practice (PNF). AKF particularly welcomes the specific consideration given to the Koala in the Review.

Since previous PNF submissions by AKF in 2006 and 2009 the major development in koala protection has been the Commonwealth's vulnerable listing under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) which came into legal effect on 2 May 2012. Activities which are likely to have a significant impact on a matter of national environmental significance must be referred to the Federal Minister for Environment and includes threatened species such as the koala. The listing will take precedence over present koala and koala habitat management requirements as defined under the Vulnerable listing in the NSW Threatened Species Conservation Act 1995 and SEPP 44.

Specifically, DSEWPC’s “Interim Koala Referral Advice for proponents” (IKRA) issued in June 2012 broadens the definition of koala habitat i.e. “habitat critical to the survival of the koala is also considered to be any form of landscape corridor which is essential to the dispersal of koalas between forest or woodland habitats”. In other words, critical habitat does not have to have resident koalas. This requirement goes much further than previous PNF guidelines based on SEPP 44 which under NSW Government policy will be abolished in any case as a result of the current Planning Review.

Thus it seems likely that EPBC Act requirements will become the de facto standard for establishing whether development, i.e. PNF, may have an impact on koalas and their habitat.
Habitat Mapping Developments

The Senate Inquiry into the Status of the Koala identified a lack of consistency in koala habitat mapping which the PNF Koala Discussion Paper also identifies and which will be a requirement for any referrals under the EPBC Act.

Comprehensive Koala Plans of Management (CKPoMs) are in place for Port Stephens, Coffs Harbour, Lismore and the eastern portion of Kempsey Shire LGAs, and are nearing completion for parts of the Port Macquarie/Hastings, Tweed, Byron and Clarence Valley LGAs. As noted in the PNF Koala Discussion Paper several different definitions of koala habitat can lead to confusion about which rules apply where. AKF views this as largely due to different terminology rather than underlying differences in the make-up of different habitat classes. Since the various habitat schema are ultimately based on the underlying vegetation mapping, it should not be that difficult to adopt a consistent approach to habitat definitions.

The Koala Habitat Atlas (KHA) developed by AKF (Callaghan et al 2011) provides a consistent method of mapping different classes of habitat based on the percentages of koala food trees within each vegetation community. AKF is gratified that methodology developed by AKF has been adopted and recommended by IKRA, firstly by recommending the use of the Spot Assessment Technique (Philips and Callaghan 2011) to establish and rank the relative use tree species by koalas, and secondly by using AKF’s Primary and Secondary (Class ‘A’) habitat categories to define “critical habitat”. The same categories are suggested as appropriate in Option 2 in the NSW Recovery Plan for the Koala (pages 93-94). These habitat classes are capable of supporting high to medium density koala populations.

As well as the habitat classes referred to previously, there are two lesser quality classes of habitat and a third class which does not contain any food trees but has “…important supplementary koala habitat values such as habitat
buffers and habitat linking areas”. This class is also recognised in IKRA as also being critical habitat.

AKF also believes that Option 1 in the RP is “too loose” in defining the relative values of koala habitat is. AKF agrees with the definition of Primary Habitat (>50% Primary food trees), however the other categories in Option 1 do not provide the finer distinctions for slightly less, and lesser habitat values that Option 2 does, especially in the proportion of Primary food trees. To summarise, Option 1 does not sit well with the recommendations for definition of koala habitat adopted by IKRA.

AKF has KHAs for Tweed (entire LGA), Greater Taree, Walgett and the former Richmond River LGAs, Namoi CMA, Guyra 1:100,000 map sheet. KHAs are currently being developed for the Central Western/Lachlan CMA, Lismore LGA, Sydney CMA and Sydney 1:100,000 map sheets. Other KHAs will be developed as adequate vegetation mapping becomes available.

In contrast to the straightforward approach in the KHA methodology, Koala Planning Maps (KPMs) developed for Coffs Harbour and Port Stephens combined the results of field surveys with community surveys. Community surveys may be useful in urban and peri-urban areas where people see koalas more often, they are less likely to be useful in PNF situations with limited public access and correspondingly less lightings.

Koala Prescriptions

In NSW koalas have the highest densities on quaternary soils (alluvial flats and coastal sands), these soils are predominately east of the Pacific Highway on the North Coast. West of the Highway and throughout the remainder of NSW koalas are in demonstrably lower-quality habitat (with fewer Primary food trees available) and a corresponding lower density of koalas, or, in the case of the South Coast, South West Slopes and Northern Tablelands, extremely low densities. The PNF Code should reflect the fact that PNF will be primarily conducted in these lower-density habitats.
PNF Koala Pellet Prescription

With regard to the specifics of the Koala Prescription, AKF argues that the requirement to search for koala faecal pellets should be extended to include all areas of Primary or Secondary Koala Habitat (Classes A, B and C) rather than Core Habitat (SEPP44) which requires the physical presence of koalas to trigger the Prescription. This approach would be consistent with the aims of the RP and the requirements of IKRA.

Review of the Prescriptions will also have to acknowledge IKRA’s recommendations for site koala surveys which include “other indicators of koala use such as faecal pellets”. The number of pellets required by IKRA is not stated, and so the Prescription requirement for 20 pellets under a tree in some Koala Management Areas (KMA) should be changed to one pellet for all KMAs regardless of whether it is under a primary or secondary food tree. This also makes sense with regard to the fact that PNF will mostly be carried out in low-density koala habitats. As in a previous submission AKF repeats that, “in the personal experience of AKF researchers gathering data from approximately 700 field sites in NSW over the last 10 years, it is extremely rare to find 20 koala pellets under one tree, even within habitats which would be defined as “Core” under SEPP44.”

Food tree retention

With regard to primary food trees, AKF supports the minimum requirement of the retention of 10 primary food trees over 30cm dbhob per ha. Primary food trees provide a fundamental basis for the persistence of breeding Koala populations. It is also known (and recognised in the RP) that secondary food trees (for example the Grey Gums), when in sufficient densities, also provide food resources sufficient for breeding populations. The Prescription does not recognise this fact - it proposes 10 primary + 5 secondary trees over 300mm dbhob per ha, implying that primary and secondary tree species always occur together. This is demonstratably not the case. Where secondary food trees alone occur at a site, the number of retained trees should reflect the food resource distinction between primary and secondary food trees. Retention of 20 secondary food trees would better reflect this distinction. In fact, the
number of primary and secondary food trees retained should ensure that the percentages of trees retained should not fall below the thresholds defining Primary and Secondary Habitats as described in Option 2 of the RP.

**Field Assessment**
In addition to the SAT technique AKF has developed the Rapid Assessment Technique (RAT), primarily for vegetation assessment and mapping but which also incorporates a koala scat search. It is a very simple technique and requires no skills other than the ability to identify tree species and the ability to identify koala scats. The procedure is as follows:

- Choose a representative site for the vegetation community
- Record site by GPS or on a suitable scale map with written location/landscape description (e.g. gully, ridge, slope etc)
- Count the number of stems > 10 cm diameter for each different species within a representative site radius (e.g. 20 – 30 m for woodland, 15 – 20 m for forest)
- Convert to a proportion (e.g. percentage) for each species
- 10 minute faecal pellet search at each site, or until a pellet is found
- Estimate age of pellets: old, fresh, mixed. Mixed ages are indicative of resident koalas

The RAT would be ideal for assessing prospective PNF sites – it establishes whether koala tree species are present, what the proportion of each species is to determine the koala habitat class, and whether koalas are actually present. Using this method the proportion of each species can be directly converted to the habitat classes referred to above. For a PNF site AKF would suggest one RAT site per hectare as adequate if the landform (i.e. gully, ridge or slope) is uniform in that hectare, with additional sites as required where landforms change. The RAT could actually be used in the Property Vegetation Plan mapping process, and could also provide an efficient means of desk-top review by the relevant State Agencies.
Koala Food Tree Species
As with many other koala researchers AKF considers the list of tree species in the RP to be very much in need of revision. This list was written in 2003, since then much field research by AKF and others has added immensely to our knowledge of tree species koalas use. We have added to this submission a list of trees that AKF believes embraces the most commonly-used eucalypt species used by koalas in NSW.

Conclusion
Finally, the AKF believes that the PNF Code has to finally “get it right” for koalas on private lands, which contain the largest area of remaining koala habitat. Private Native Forestry is specifically recognised in the Recovery Plan (page 41) as a threat to koalas, particularly on the North Coast of NSW. The RP specifically mentions the selected logging of Tallowwood on private lands as a major issue affecting the quality of koala habitat. AKF research confirms just how crucial Tallowwood trees are to koalas, and strongly recommends specific restrictions on the harvesting of this species, which, incidentally, State Forest of NSW’s Research Note 19 (“On the regeneration of the Sydney Blue Gum-Tallowwood mixed forest type”) shows is one of the slowest growing eucalypts.

On behalf of the Australian Koala Foundation, thank you for the opportunity to present this submission. Please feel free to contact me regarding any aspect of this submission.

yours faithfully,
on behalf of the Chief Executive Officer,
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References: