

**INQUIRY INTO KOALA POPULATIONS AND HABITAT IN
NEW SOUTH WALES**

Organisation: Friends of the Koala Inc

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Ms Cate Faehrmann MLC
Chair – Inquiry into koala populations and habitat in NSW

31 July 2019

Dear Ms. Faehrmann,

Re: Submission to Inquiry into koala populations and habitat in NSW

I am pleased the Legislative Council has initiated this inquiry and welcome the opportunity to write on behalf of Friends of the Koala (FOK). FOK is a voluntary organisation widely acknowledged as the lead koala conservation group in the Northern Rivers of NSW. We operate under licence MWL000100225 issued by the Department of Planning, Industry and the Environment (formerly the Office of the Environment and Heritage) to rescue, rehabilitate and release koalas to the wild. Our mission, which we have been pursuing since 1986, is conserving koalas in recognition of the contribution the species makes to Australia's biodiversity. Our core business is: licensed koala rescue, rehabilitation and release; habitat protection and regeneration; community education; advocacy; and research assistance. We maintain a regional *Koala Care & Research Centre* which comprises our *Burribi Education and Administration Centre* and *Triage, Treatment & Pathology Clinic* in East Lismore.

Rather than any detailed analysis of the legislation, Regulations and Codes that are canvassed by the Inquiry I will focus on aspects of those that have a direct impact on our work for koalas. We can comment with some authority on these, particularly in the more urbanised environments close to the coast where the pressures of human settlement impact significantly. Whilst the extension of the *Regional Forest Agreements* and the remaking of the *Coastal Integrated Forestry Operations Approvals* do have an impact on koalas in our Region other groups are more qualified to comment on these than FOK.

Terms of Reference (TORs)

- (a) Koala populations are coming under increasing threat and are now listed as Vulnerable by the Australian Government in all but the southern part of their range, as well as being listed as Vulnerable on the IUCN Red List and Threatened under the United States Endangered Species Act. They are recognised by the IUCN as one of ten species most likely to be adversely impacted by climate change. In New South Wales and Queensland significant populations have declined by 40 - 70% in 10 years and local extinctions are not uncommon. Threats include habitat loss, climate change, heatwaves, bushfires, motor vehicle accidents, dog attacks and disease.

FOK operates in the Northern Rivers Region, rescuing and rehabilitating koalas in the Ballina, Byron Bay, Kyogle, Lismore, Richmond Valley and Tweed local government areas. This area has significant koala populations, but nevertheless koalas here are in a serious situation and in parts of the Region are on the verge of a 'tipping point' which is said leads inevitably into extinction. As Steve Phillips has pointed out in a 2016 report to Lismore Council, it can be a relatively small change, such as a single new residential development, that can push koalas over the tipping point, and once that occurs there is no coming back. That report concluded that there are approximately 1800 koalas within the Lismore LGA and that there was a 75% occupancy of koala feed trees, which demonstrates that there is insufficient koala habitat and that **every** tree is important.

In the past FOK has generally rescued 300 koalas a year, but in 2016/2017 we rescued 429, in 2017/2019 we rescued 368, and this past year we rescued 394, so we're fairly sure that around 400 is the new 'normal' for koalas and us in this Region. We understand that we rescue approximately 50% of koalas rescued in NSW each year, and within the Region 50% of the rescues are in the Lismore LGA. In the past we generally released 15% of those rescued to the wild, but for a variety of reasons, including the presence daily of a Vet Nurse who was a volunteer, last year we released 27%, which is pleasing in an otherwise negative situation. Whilst disease is the major cause of those deaths, followed by car hits and dog attacks, we know that habitat loss is the core driver of the koala's march to potential extinction (which we are determined to prevent). Nevertheless, a concern for us is that many of the koalas that either die or are euthanased are breeding females and young joeys that are, in many ways, the future of koalas.

Koalas are attached to their ranges and their feed trees, and when that habitat is removed it causes stress for the animals which, in turn, stimulates diseases such as Chlamydia and Retrovirus, which are often fatal. In some parts of the Region, for example the coast, urban centres and some rural areas, sourcing suitable koala habitat where koalas can be released as close as possible to where they have been rescued (in line with the *Code of Practice for Injured, Sick and Orphaned Koalas*) is difficult and time-consuming. In rural areas, often there are only isolated paddock trees interspersed with few if any koala feed tree corridors to enable the koalas to move through safely, and many paddock trees are dying with no replacement trees being planted.

In urban areas, for example Goonellabah in Lismore LGA which used to have many koalas, the situation for koalas is now critical. Residential development has seen the removal of substantial koala habitat, and this has been exacerbated by the removal of many individual trees as a consequence of the 10/50 vegetation clearing rule. Furthermore, the construction of Sections 10 and 11 of the Woolgoolga to Ballina Pacific Highway upgrade, which intersects core Koala habitat, has had a significant impact on Ballina's koalas. All these mean that in many parts of the Region koalas are on the ground longer and therefore even more vulnerable to car hits, drowning in swimming pools, dog and cow attacks as well as stress-related disease. Climate change is exacerbating that vulnerability, which is reflected in the koalas we rescue. Over a three-week period during the recent drought, which was a 'brown' drought not experienced in many years in this Region, we rescued many koalas that were simply taken to the vets and euthanased as they were too emaciated to survive. Whilst there is no evidence apart from our direct experience, it seemed as though the koalas we rescued during this time were suffering from disease already and the drought was the last straw. The negative impact of this on our volunteers was substantial, as one of our volunteers is always with the koalas when they're euthanased.

There are, effectively, few regulatory protections for koala habitat, which I'll discuss in more depth later. However, the removal of so much of their habitat and the lack of government protection for it has created the parlous situation faced by koalas in the Region, with local koala groups having to seek grant funding to address tree removal by planting thousands of trees. Whilst this will be beneficial for koalas in the long-term, young trees have to survive and take years to reach the maturity that koalas require. Having to seek grants constantly and recruit volunteers to plant the trees place extra pressure on voluntary groups that are already over-worked. Whilst FOK is, as said above, the only koala rehabilitation group in the Region, groups such as *Bangalow Koalas* and *Team Koala* are focused strongly on tree planting, and FOK has also been involved directly in tree planting. Nevertheless, unless greater protection is provided for koala habitat the future for koalas in the Region is grim. Our position is that governments should not be relying on volunteers to address issues created by their ineffective legislation.

As indicated earlier, whilst our release rate for rescued koalas has been improving with the presence of a Vet Nurse checking our koalas consistently, it is still lower than we consider acceptable. However, what we know from our data base is that a reasonable proportion of the koalas we rescue then release to the wild is rescued again, sometimes several times. Many of the places where we release koalas are not in prime koala habitat, so unfortunately of the koalas released to the wild and then reported to us again, they are often either dead when we send out a rescuer, have been injured or are so diseased that they are euthanased.

Having the capacity to monitor koalas released into the wild would shed light on what happens to them post-release, and we could learn more about better release sites, but monitoring is expensive and only possible when research funds are available. We were involved in post-release monitoring several years ago and are involved in a Saving Our Species research project starting soon under which we will be able to monitor 12 koalas post-release for 3 months, but much more comprehensive monitoring programs are needed.

- (b) (ii)** The Private Native Forestry (PNF) Code of Practice impacts significantly on koalas in the Region, as many rural landowners took advantage of the opportunity to devote part of their land for PNF. The objective of the Code is to 'make timber a better money spinner for producers and provide a more reliable supply for harvesters and contractors (LLS Sustainable Land Management director Kristian Holz). PNF has been described by some as a unique form of agri-forestry, that it isn't a form of land-clearing; that it's a selective, smaller-scale, rotational farming practice that happens once every 20 to 30 years.

Whilst that may well have been the intention, the underlying problem for koalas is that, when trees are planted for PNF, koalas come. By the time harvesting occurs some 20 years later it is effectively a removal of koala habitat yet is not protected by the Code. Our experience is that in some parts of the Region harvesting of PNFs is clear-felling, and the fact that these PNFs are relatively small makes little difference to the impact on koalas – it's just more koala habitat being removed causing koalas stress. Furthermore, we have been contacted by residents who live near PNFs located next to National Parks in the Region where almost every tree was removed. Rather than commencing harvesting from the road boundary back towards the National Park the harvesters have worked from the boundary with the National Park out to the road boundary of the property, which had the effect of pushing koalas towards the road rather than working from the road boundary, which would have been more obvious to other residents, back to the National Park.

From our experience, when considered in the context of koalas, PNFs are just another form of habitat removal. Unless there is a requirement for identifying whether there are koalas in the PNFs, and sufficient trees are retained for koalas to browse on, preferably in corridors for them to move through, PNFs will continue to have a negative impact on koalas. Although the trees were planted for the benefit of rural landholders, harvesting should, in my opinion be assessed and approved with conditions that address the needs of koalas, and the harvesting should be monitored.

- (c) (i)** SEPP44 has been under review since 2016 and is listed by the Department of Planning as 'under consideration'. A question is why this review has not been concluded as submissions closed on 3 March 2017. Indeed, in 2010 we requested the Environmental Defenders Office (EDO) to write to the Government advising of our belief that SEPP44 was in urgent need of reform, particularly the fact that only 10 tree species were listed as koala habitat. Of major concern to us at the time - and currently - is that SEPP44 is limited to council-approved development and to sites below 1 hectare in size. That exclusion means that many koala feed trees have been removed across the Region in residential areas.

However, another major concern is that SEPP44 omits developments such as rural land-clearing and State Significant Development or Infrastructure that have a significant impact on koalas in this Region. For example, when macadamia plantations were first planted some 20-30 years ago, Tallowoods, a preferred koala food tree species, were established around the plantations as buffers to protect the young macadamia trees from winds. This effectively created corridors for koalas and of course they found them. Over the past 5 years many of these

'buffer' trees have been removed across the Region, sometimes with koalas in them that suffered shocking injuries or death. There is no protection of this substantial koala habitat as it is considered part and parcel of an agricultural pursuit. It is particularly galling that the trees are removed to supply cogeneration at the Broadwater Sugar mill – in other words burning it, which is bad for koalas as well as for climate change.

Also problematic is that SEPP44 distinguishes between 'potential' and 'core' habitat, leaving 'potential' habitat unprotected for future recovery including corridors that may be climate refugia. The definition of 'core' habitat is also problematic as it relies on identification of 'breeding females', which means those with joeys, and joeys are only visible on their backs during a small part of the koalas' breeding cycle after they have left their mothers' pouches.

Four of the Councils in our Region have Koala Plans of Management over parts of their LGAs that direct how developments with a potential impact on koala habitat are assessed. Unfortunately, the capacity to remove koala habitat provided there are offsets or compensatory planting of koala feed trees in other locations has seen the removal of huge numbers of koala feed trees across the Region. As said in (a), these trees, if they survive, take many years to grow to the maturity of the trees removed and are in locations often some distance from where the trees were removed. A frequent question to me from members of the public concerned about trees being removed is 'but it's covered by a KPoM isn't it'? I explain that the KPoMs are planning documents that **enable** development provided certain conditions are met, and that yes, the development is approved as is the removal of those trees. In their view - and ours - legislation should protect intact habitat and resident populations. SEPP44 does not in its current form, however the review needs to be completed and made public, hopefully with these and other important changes recommended by a variety of organisations adopted. It is our view that SEPP44 should, at the very least, apply to all forms of land tenure.

- (c) (ii) The NSW Koala Strategy is welcome as the first substantial NSW State Government initiative to address some of the causes of koalas – and other species – being on the path to extinction. The Strategy sets out a three-year plan to stabilise and increase koala populations across the state and has committed \$48 m for this purpose. This included \$20 m to acquire land to protect koala habitat and \$24.7 to implement various actions to achieve this. Whilst the Strategy has been criticised as addressing the symptoms of koala decline rather than the cause, which we know is habitat loss and fragmentation, aspects of the Strategy are certainly beneficial for koalas at least in the long-term.

Funds for research and training of Vets and Vet Nurses will go some of the way to addressing some of the threats to koalas, particularly the need for more Vets and Vet nurses to treat koalas that have been injured or are diseased. Whilst it might be considered that any Vet would be able to treat a koala, these animals are most complex and unfortunately few Vets have the required experience and skills to treat them. For example, in Lismore there is one Vet that we rely on and most of the koalas we rescue are seen by this Vet or are taken to Currumbin Wildlife Hospital in Queensland as there are no koala Hospitals between Port Macquarie and the northern border. WIRES bring koalas to us from the Clarence Valley, which is outside our licensed area as, apart from routine procedures, no Vet there has the necessary knowledge and experience. Under the Strategy Taronga Zoo is designing an online course, which is a good start, however it may well be that this needs to be supported by some face-to-face training, and the International Fund for Animal Welfare (IFAW) is funding a workshop for Vets and Vet Nurses in our Region later this year.

As a koala rehabilitation group, located in an *Area of Regional Koala Significance* (ARKS) or hub as identified by the Office of Environment & Heritage, we're involved in some of the actions being implemented under the Strategy and are particularly appreciative of that. It's a good start and many of the projects being funded should have beneficial outcomes for koalas in the long-term. As to whether the strategy is adequate, whether the land identified for future parks for koalas (which omitted the Great Koala National Park that we support) and whether the funds have been and are being allocated in the most effective way, is a matter that others will no doubt address. However, from our perspective, unless the Strategy is supported by legislative change to protect existing and future koala habitat, especially to the *Biodiversity Conservation Act 2016* and the *Local Land Services Amendment Act 2016* which effectively enables clear-felling, koalas in our Region and indeed across the State will continue to be compromised.

Finally, (e) in the Terms of Reference is concerned with the impacts of establishing new protected areas to conserve koala habitat. Perhaps the real question should be the impact on koalas and their habitat if new protected areas **aren't** established. I wish you well in your deliberations. A wonderful book by B. T. Greive (*Priceless: The vanishing beauty of a fragile planet*) points out that for wildlife we are their greatest enemy and their only hope: that their future is entirely in our hands - and in regard to this Inquiry, in your hands at present.

Yours sincerely,

Dr. Roslyn Irwin
President