

**Submission
No 245**

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

Name: Mr Robert Bertram

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Submission to the inquiry into koala populations and habitat in New South Wales

Thank you for the opportunity to comment on the Legislative Council's koala inquiry. I have been involved in forest and koala issues on the far south south coast since 1992. At that time State Forest compartments around where I live were scheduled for logging under the Timber Industry Interim Protection Act, on the basis they were the 'least sensitive areas'.

Consequently, a group of local residents engaged a soil chemist who found the sub-soils are dispersible. Soil dispersion is a limitation associated with reducing soil fertility, in particular soil water holding capacity. Subsequently, the concept of soil dispersion was included in the EPA's Environment Protection Licence (1996), although this inclusion was constrained to the impact of dispersion on surface soils.

Since that time there has been significant resistance to developing an understanding of soil dispersion and the reasons for its occurrence and the negative environmental impacts remain poorly understood, in the EPA and the NSW government generally.

Terms of reference

(a) the status of koala populations and koala habitat in New South Wales, including trends, key threats, resource availability, adequacy of protections and areas for further research,

I nominated what is now acknowledged to be the last koala population on the far south coast, in catchments between Dignams creek and Wapengo, as an endangered population in 2001. This nomination was eventually rejected (NSW Scientific Committee. 2007).

However, with regard to koala trends in the south east, in describing the nominated population. The NSW Scientific Committee suggested “. . . They are neither genetically, morphologically nor ecologically distinct, nor is the nominated population area of significant conservation value relative to other populations of the species in NSW.” This suggestion has proved to be largely if not totally incorrect.

The committee also suggested “. . . The quality of Koala habitat in this area is deteriorating because of multiple factors including extensive canopy dieback, clearing due to rural-residential development and commercial forest harvesting”

The major difference between these threats is that extensive canopy dieback can extend across the entire South East Corner Bioregion at the same time, whereas development and logging are constrained to particular land and the latter is said to be dispersed in space and time. The remaining koala population was greatly depleted as a consequence of extensive canopy dieback during the 2002-2004 drought, but appears to have recovered. There is no evidence to suggest any other forests can support koalas or that koalas are expanding beyond the original area nominated, apart from a few animals south of the Wapengo catchment.

In 2016 the remaining State forests occupied by koalas, Murrah, Mumbulla, Tanja and part of Bermagui State Forest were transferred to Flora reserves, for up to 10 years, with the suggestion that logging could resume then. The current date for logging appears to be after the first 3 year review of the rolled over RFA.

In the absence of development and logging, the major threat to koalas is dieback. Unfortunately, as indicated in the following confused and confusing quote from the management plan for the flora

reserves, extensive canopy dieback, that has occurred during dry weather and drought since 1998, is too complex to understand.

“ . . . Impacts on koalas and their habitat from clearing, other land-use and environmental changes (temperature increase and drought) have been significant contributors to the decline of koalas in the Eden region (Lunney et al. 2014). Within this context wildfire (and associated reactive management) and predation are probably the most immediate and major threats to the Murrah koala population. However, should the higher temperatures and more severe periods of drought predicted for the region (OEH 2016c) occur, additional declines are likely to occur, particularly due to wildfire, degradation of browse quality (Lawler et al. 1997) and defoliation (Jaggers 2004). Changes in other more complex threats such as dieback are less clear.” (State of NSW, Forestry Corporation of NSW and Office of Environment and Heritage. 2017)

More recently an ‘expert panel’ selected by the OE&H to ‘elicit knowledge gaps’ with regard to koalas, didn’t acknowledge dieback is a threat to the species or forests generally on the south coast. (Hemming et al. 2018)

Since assuming control of the flora reserves the OE&H has burnt over a thousand hectares of what some believe is critical koala habitat, apparently in the belief that burning will protect koalas. There is no publicly available information on the outcomes of these burns and requests for information are ignored.

The Forestry Corporation implemented 1080 baiting for dogs and foxes in 2004. The outcome has been the local extinction of dingos/dogs and significant increase in larger animals, particularly kangaroos and wallabies. Fox numbers appear to not to have changed. The OE&H ceased 1080 baiting in the flora reserves in 2017.

On February 19 2019 the OE&H held an invitation only koala workshop in Bega, which I attended. In an email from dated 1 May 2019, the OE&H indicated funding had been approved for an individual “to facilitate the initial phase of establishing a local Koala Strategy steering group”.

The email went on to suggest “In this initial design phase, options for the group’s structure, meeting and internal and external communication processes will be developed, with the aim to hold the first community-wide steering group meeting in mid-June.”

Now, three months since the workshop, there is still no information from or about this ‘community-wide steering group’. What has occurred is more broad acre burning in critical koala habitat, even though such management does not provide leverage against bushfire (Price et al. 2015). So it is difficult not to assume that the selection of this group is based on its members supporting current management.

(b) the impacts on koalas and koala habitat from:

(i) the Coastal Integrated Forestry Operations Approvals and Regional Forest Agreements,

The Regional Forest Agreements appear to be based on the Federal government’s trust that state governments are implementing sustainable forest management, based on the National Forest Policy Statement. Among other things the statement indicates “ . . . The Governments recognise the unique nature of Australia’s biota and that the natural inter-relationship between native flora and fauna is essential for the health of the forest ecosystem.”

Regrettably, all public forest management in NSW reduces biota, fauna and threatens most forest ecosystems, particularly those that historically or currently sustain koalas. Both the Forestry

corporation and the OE&H are opposed to reintroducing locally extinct native species essential for forest health, even when the federal government and the community are paying for it.

Twenty years after the RFA was implemented there is still no information on what grows back after logging, or at what rate in the Eden region, or apparently anywhere else in NSW. The optimism behind the Coastal Integrated Forestry Operations Approvals comes from a similar lack of information as the first RFA. However, on this occasion it is also necessary to continue to ignore Bell miner associated dieback and extensive canopy dieback, associated tree mortality and the very broad scale and long term associated negative environmental impacts.

(ii) the Private Native Forestry Code of Practice,

Since the Forestry Corporation has run out of sawlogs in the Eden RFA region and management is aimed at short term rotations for puplogs, private native forests are apparently being logged to sustain contractual arrangements to the current value adding sawmill. Should this supply not be sufficient, the mill is expected to close when the new RFA commences and a sawmill for low grade pallet timber will begin operation at the woodchip mill. By that stage there probably won't be many sawlogs on available on private land either and no prospect they will grow back. The flora reserves may provided a year or 18 months supply, based on the current sawlog quota.

(iii) the old growth forest remapping and rezoning program,

This program is more confirmation that timber removal exceeds tree growth rates and confirmation that the biodiversity required to sustain forest ecosystems is not considered necessary.

(iv) the 2016 land management reforms, including the Local Land Services Amendment Act 2016 and associated regulations and codes

The purpose of establishing Local Land Services was to eliminate catchment management. Neither catchments or their management are referred to in the principles of ecologically sustainable development (described in section 6 (2) of the *Protection of the Environment Administration Act 1991*). The basis for this approach would appear to be the notion that all public land management is sustainable.

(c) the effectiveness of State Environmental Planning Policy 44 - Koala Habitat Protection, the NSW Koala Strategy and the Biodiversity Conservation Act 2016, including the threatened species provisions and associated regulations, in protecting koala habitat and responding to key threats,

State Environmental Planning Policy 44 - Koala Habitat Protection has no effect on the south coast. None of the trees species listed in schedule 2 are known to be used by koalas and apart from a temporary cessation to logging, there is no real habitat protection while the key threat continues to be ignored.

The purpose of the Biodiversity Conservation Act 2016 is difficult, if not impossible to reconcile against current public forest management. Although one purpose is to “(b) to maintain the diversity and quality of ecosystems and enhance their capacity to adapt to change and provide for the needs of future generations,” The issue is that biodiversity has not been maintained and the quality of ecosystems has reduced. Without the words ‘ and improve’ after maintain and the management to back it up, the quality of ecosystems will continue to reduce. Consequently, a belief that ecosystems have the capacity to adapt to change and provide for the needs of future generations, is unrealistic.

(d) identification of key areas of koala habitat on private and public land that should be protected, including areas currently at risk of logging or clearing, and the likely impacts of climate change on koalas and koala distribution,

The minimum area that should be protected on the south coast are coastal catchments between Dignams creek and the Bega river. However, protection means both protection from current management and the implementation of adaptive management that acknowledges and is aimed at addressing the threats, across tenures.

(e) the environmental, social and economic impacts of establishing new protected areas to conserve koala habitat, including national parks, and

Conserving koala habitat in the Eden region failed to stop the species becoming extinct in the new National Park. Greater environmental, social and economic benefit is likely if current and new protected areas to conserve koala habitat, including national parks, are managed so koalas and the ecosystems that support them have a future.

(f) any other related matter.

The community has few opportunities to influence environmental management and one of these is through the NSW Scientific Committee. Please find attached to this submission an attempt to list dieback, associated with dry weather and drought, as a Key Threatening Process in NSW.

In addition details of proposed and rejected alternative management for south coast koalas is available at <https://bertramr.wordpress.com/forest-restoration/>

Robert Bertram
August 2019

References

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