

Submission  
No 266

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

**Name:** Mrs Lorraine Vass

**Date Received:** 2 August 2019

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Ms Cate Faehrmann MLC  
Chair  
Portfolio Committee No.7 –  
Planning & Environment  
NSW Legislative Council

Dear Ms Faehrmann

***Re: Inquiry into koala populations and habitat in New South Wales – inquire into and report on actions, policies and funding by government to ensure healthy, sustainable koala populations and habitat in New South Wales***

First, thank you to the NSW Legislative Council for agreeing to hold this Inquiry, thereby giving we interested parties another opportunity to express our views to government on the status of NSW's koalas and their habitat and to offer suggestions for stabilising and hopefully increasing healthy koala populations within their natural range across the State.

By way of introduction I write as a koala conservationist of nearly 20 years and as a citizen who is passionately confident that koala recovery is still possible despite the prevailing disregard for the koala's right to its place in the natural ecosystem.

I am not a scientist but I have been observing koalas, attempts to manage them and 'koala politics' in the Northern Rivers region for a long time, mostly in the capacity of President of Friends of the Koala. This organisation, formed in 1986, is licensed by the NSW government to rescue, rehabilitate and release koalas. Other core business encompasses koala habitat protection and enhancement, advocacy, community education and research. My attempt to address the Inquiry's very broad terms of reference will be from what I have learned from this experience.

**(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.**

The Northern Rivers region which loosely matches the local government areas of Tweed, Kyogle, Byron, Ballina, Lismore and Richmond Valley is an acknowledged koala stronghold. It is also one of the State's most densely populated rural communities and is part of the nation's fastest growing locality. In 2011 the human population was 283,500, expected to rise to 380,500 by 2036. Mega developments such as Kings Forest in Tweed Shire and the West Byron [Bay] Urban Area in Byron Shire will seriously impact koala survival along the coast. Over the border, South East Queensland's population is projected to grow by well over 1 million people in the same period. About a third will be residing in the Gold Coast. Recreational use of our region by Queenslanders is already high and will rise dramatically – to the detriment of our koalas and other threatened species.

Over the past decade several councils in the Northern Rivers have released koala habitat and population studies to underpin State Environmental Planning Policy No 44 – Koala Habitat Protection (SEPP 44) compliant comprehensive koala plans of management (CKPOMs) or koala management strategies for parts or, in the case of Ballina, their entire jurisdiction.

Koala populations persisting across the Northern Rivers may number between 3,500 – 6,500 animals (my estimate). Their circumstances vary enormously, from areas of relatively high density to low; from urban and peri-urban locations through landscapes (which include colonised planted windbreaks) fragmented by agricultural pursuits, to public and private forests and the protected national parks

estate. The population between the Tweed and Brunswick Rivers east of the Pacific Highway was declared endangered by the NSW Scientific Committee in April 2016. Most of the Northern Rivers is an Area of Regional Koala Significance (ARKS) in the New South Wales Koala Prioritisation Project.

### **Key Threats**

The key threats to koalas in the Northern Rivers region are loss and fragmentation (leading to loss of landscape connectivity) of habitat due to urbanisation and associated infrastructure, agriculture and logging, a very high incidence of disease, and road mortality and injury. Predation by dogs and cow attack are also significant threats but probably less reliably documented, as is wildfire (whether or not associated with the climate crisis). Wildfire is a sporadic threat that has likely shaped present distribution and densities. While some wildfire occurs in settled areas and can be closely managed and the impacts reasonably assessed, other wildfires occur in more remote bush and the impacts are only coarsely documented. Other climate change induced elements are also present. Habitat loss, fragmentation and degradation is undoubtedly the over-arching threat, being a determining factor in disease, road kill and predation.

### **Trends**

Population trends vary across the region but it needs to be said that there is not a close, uniform knowledge of koala populations. Where studies have been carried out modelling suggests that areas of occupancy generally and in coastal areas in particular have diminished. In Lismore however, the area of occupancy expanded by 600% between 1993 and 2010 (three consecutive koala generations) in the northern part of the local government area as koalas colonised planted windbreaks to extend their range across the landscape.

### **Resource availability**

Koala stewardship has a reasonably long history in parts of the Northern Rivers (e.g. the Tucki Tuckurimba Koala Preservation Committee in the Lismore area was formed in 1958) as well as scientific engagement - the Tucki Tucki Fauna Reserve gazetted in 1963 was the State's first koala reserve which became the Tucki Tucki Nature Reserve in 1967 and its koalas studied as part of a State-wide conservation program. There is presently a high level of willingness to take action to protect koalas (90% of people). This figure comes from the NSW North Coast Koala Study conducted during 2018 as part of the Australian Research Council (ARC) Linkage project, *Conserving and recovering the koala populations on NSW Far North Coast*.

The partners in this 3-year project which concludes later this year are the University of Queensland, Southern Cross University and the University of Sydney in conjunction with Friends of the Koala and the councils of Lismore, Byron, Ballina and Tweed. These four councils and Friends of the Koala have built a successful collaborative working relationship over the years. Their *North-east Hinterland Regional Koala Conservation and Recovery Project*, just getting off the ground now, is funded under the Saving our Species Iconic Koala Project over three years (2019-2021), the Far North-east Hinterland being identified as a priority management site.

Grant opportunities are primarily associated with habitat protection and enhancement and to a lesser degree, community education. Councils, community groups and individual land-holders in the Northern Rivers are adept at seizing them.

Having said that the capacity of Northern Rivers councils to engage in koala conservation varies enormously, being dependent on policy priorities and financial position. Richmond Valley for example accepted OEH funding (\$40,000 I think) several years ago to prepare a CKPOM and got as far as a Koala Habitat & Population Assessment in mid-2015. Kyogle Shire Council as recently as 8 July 2019 resolved to *investigate the best way to implement a Koala Plan of Management which protects and supports the local koala populations*.

All our councils struggle with what is expected of them by the State government. A current example is their involvement in the NSW Koala Monitoring Plan being finalised for approval by the Chief Scientist and which is likely to involve 10 survey sites across the Far North-east Hinterland ARK

A crucial gap in resource availability is specialist veterinarian and hospital facilities for treating koala disease and injury. While Friends of the Koala admits around half the koalas taken into care in NSW

each year, and is developing its veterinarian capacity, it still needs to triage animals to Currumbin Wildlife Hospital and to a lesser extent the Australia Zoo Wildlife Hospital, both in Queensland.

### **Adequacy of protections**

In the first instance koala protection relies on land tenure. I cannot provide precise figures for the Northern Rivers, so I will use figures from WWF-Australia's report *Koala habitat conservation plan* published in March 2019 (p.28): 73% of the region's koalas are located on private land; around 13% on the Parks Estate, 3% in State Forests and 11% on other Crown Land.

With only an estimated 13% of the region's koalas protected on-Park, land-use, environmental, and logging laws and instruments aimed at protecting koalas become extremely important. Regrettably no existing legislation, Federal, State or Local, actually does the job as the on-going attempts by the developer of Kings Forest to weaken the Koala Plan of Management, the approval of Section 10 of the Pacific Highway Upgrade and the Northern Rivers E-Zone fiasco (i.e. the restrictive criteria imposed on Northern Rivers councils by the State Government for applying E2 and E3 Zones and environmental overlays in their Local Environment Plans), to name a few examples, demonstrate.

Even the koalas protected on-Park may not be entirely threat-free. Little is known about the distribution of koalas in the reserve system and with further cuts to the National Parks & Wildlife Service, it may be some time yet before their situation is fully understood.

### **Areas for further research**

Northern Rivers koalas should do quite well out of the recently announced research proposals to be funded by the NSW Koala Strategy's Research Plan given the focus on understanding and management of chlamydial disease and genetic management as well as Brad Law's work on koala occupancy in private native forests, Jonathan Rhodes' investigation of private land conservation investment and Jon Hanger's review of and recommendations for koala translocation.

I'd like to see more effort in:

1. systematic local koala surveys. How can we effectively protect and manage what is so imperfectly located and quantified? Expert elicitation and modelling can only go so far; drone technology may be a helpful part of the solution?
2. investigating the place of disease in koala conservation and management; the Lismore situation does suggest that koala populations are capable of growth/recovery despite the welfare issue of a high and chronic disease burden; e.g it would be helpful to get an idea of the percentage of infertile (or otherwise unfit to contribute to the population) koalas, perhaps through necropsy results in the first instance.
3. developing a more holistic approach to koala management that considers cumulative impacts and synergistic interactions among threats.
4. understanding and planning climate refugia options in the Northern Rivers.

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

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

I do not have the first-hand experience to make meaningful comment. I tend to agree with the Chief Scientist that there is little data to assess the effectiveness of protections such as exclusion zones for areas where there is active and high use by koalas, and retention of a defined number per hectare of preferred koala food trees in intermediate use, even if they were properly applied. The North East Forest Alliance (NEFA), whose work I respect has repeatedly found Forestry Corporation pre-logging surveys to be poorly executed. We have to conclude therefore that the loss of habitat to harvesting will result in loss of individuals which can be expected to lead to sub-population fragility, etc.

In regard to the current Coastal Integrated Forestry Operations Approval (IFOA) adopted in 2018, relying as it does on the OEH likelihood map and the DPI habitat model used together to set protections, I cannot but think that it is little more than an experiment providing no certainty that koalas and their habitat will be adequately conserved and managed, nor that individual koalas and their preferred habitat will be protected. Monitoring and adaptive management, even if they are done well, (and it is a big 'if'), will not *prevent* impacts. The monitoring reveals a problem, triggering a review to determine the appropriate adaptive

management strategy to solve it, but it is too late for the koala(s) at the heart of the problem.

**(ii) the Private Native Forestry Code of Practice**

Private Native Forestry (PNF) is the Sword of Damocles hanging over the heads of koalas in many parts of the Northern Rivers. 993 approvals were granted between 2007 and 2015 over 152,806 ha., the mean approval being 154 ha. Goodness knows how many PNF Licences there are today. Some approvals may never be activated, some have already run their course, some may not directly impact on koalas but their sheer number is a risk that has led one OEH staffer to opine that PNF is potentially the biggest threat to koalas in our region.

The current PNF Code of Practice for Northern NSW and its application is inconsistent with the aim of both SEPP 44 and the Commonwealth Environment Protection and Biodiversity Conservation Act (EPBC Act) and actively circumvents assessment processes detailed in CKPOMs and required by the EPBC Act.

Identification of koala food tree species and areas of significant koala habitat for the purposes of informing PNF Property Vegetation Plan assessments should be made with reference to contemporary data including CKPOMs, koala management strategies and other available research or literature.

The effect of tree clearing for PNF has been recorded in Ballina Shire, where an area of high koala activity was subsequently thinned. The site was first surveyed by Dr Steve Phillips, who conducted a Koala Habitat & Population Assessment for Ballina Shire Council during 2013. He again surveyed the site during 2015 when undertaking the Ballina Koala Population Study for the Roads and Maritime Service.

On the latter occasion Dr Phillips found the site to be an area of low activity with far fewer koalas. The numbers for the study area suggest some or all of the displaced koalas did not survive. It is possible that they died as a result of the tree clearing itself (injuries), stress, starvation seeking new trees, or were vulnerable to dog attack searching for new habitat. Even as I write, a PNF operation at Coolgardie in Ballina is causing concern.

The Codes of Practice are being revised. The most important requirements for Northern NSW are pre-logging surveys for koalas (and other threatened species), implementation of the SEPP44 intent to exclude logging from core koala habitat and correct identification of local food trees and areas of significant koala habitat.

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

I am aware of the Natural Resource Commission's Supplementary Advice report on the Coastal IFOA and that two of the 13 pilot sites, Ewingar and Girard State Forests, are in the Northern Rivers. Potentially then, if the government goes ahead with the program, the misgivings I have already expressed in regard to the impacts of the Coastal IFOA and RFA will increase.

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

See remarks made in regard to (c) 3 – Biodiversity Conservation Act 2016.

**(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.**

**1. State Environmental Planning Policy 44 – Koala Habitat Protection (SEPP 44)**

A well-intentioned outcome of NSW's 1988 Koala Summit, the SEPP operates within the legislative frame-work of the *Environmental Planning & Assessment Act 1979*. There has been no published evaluation of the SEPP's effectiveness or of SEPP-compliant CKPOMs, most of which are of relatively recent origin.

Gazetted in 1995 SEPP 44's flaws soon became apparent, namely an emphasis on encouragement at the expense of requirement, the inability of its definitions of koala habitat to identify all habitat of importance to koalas, the very limited list of koala food trees used to identify potential koala habitat, a one-hectare trigger for requiring a site-specific koala plan of management, no clear monitoring, review, reporting or compliance requirements and local government's incapacity to deal with applying it as part of the development application process. This latter point being illustrated by the mere handful of individual koala plans of management in place across the Northern Rivers during the first 15 years of the SEPP's life and the refusal of any council in the Northern Rivers to prepare, much less adopt a CKPOM during that time.

The 2008 *Approved Recovery Plan for the Koala* achieved some recognition of regional preferred koala tree species and incentives to local government for preparing CKPOMs but things got sticky in 2015 when the Department of Planning & Environment appeared to become unsettled about elements of the SEPP's operation. Moving the goal-posts necessitated terse consultation with a rather confused local government. Predictably Northern Rivers councils whose CKPOMs were still in preparation or had yet to be approved, responded in different ways and to this day neither Tweed's nor Byron's plans has State government approval.

The NSW Chief Scientist & Engineer in her 2016 *Report of the Independent Review into the Decline of Koala Populations in Key Areas of NSW* noted that the Department of Planning & Environment was "currently reviewing SEPP 44 to identify ways to improve the existing protections and to modernise them. This includes how koala habitats are defined, as well as the tree species ..." (p.2). She also recommended a second review stage in which the effectiveness of SEPP 44 and CKPOMs and their role in the planning system would be assessed.

Towards the end of 2016 I wrote quite a detailed submission for Friends of the Koala in response to the Department's Explanation of Intended Effect, the focus of which, in our view (as well as the Chief Scientist apparently), was extremely narrow. We have received no further advice on progress (if any), of the review process.

Until NSW's planning system ensures absolute protection of koalas and their habitat by (a) demanding and (b) supporting in law the identification and protection of development 'no go' zones in Local Environment Plans that carry over into CKPOMs the laws which purport to be protecting legislation will remain enabling legislation.

## 2. **The NSW Koala Strategy**

Although the Chief Scientist's recommendations fell short of addressing in a holistic way the overarching cause of koala declines which is anthropogenically-induced changes to habitat, they did, as discussed, propose improved outcomes for koalas through changes to the planning system (4) which is largely ignored in the Strategy as is the recommendation to improve outcomes through the Biodiversity Conservation Bill and associated Regulations (5) and the investigation of models for guiding and incentivising collaborative best practice for new development and ongoing land use occurring in areas of known koala populations... (6)

These are major disappointments; the NSW Koala Strategy is by no means a silver bullet for koala survival – no government initiative has been.

Having said that the NSW Government should be congratulated on first acknowledging the general decline of koala populations across the State and for requesting the Chief Scientist & Engineer to make recommendations which would inform development of a 'whole-of-government', funded, if flawed, NSW Koala Strategy. This is more than any other NSW government has done for koala conservation.

In December 2018 WWF- Australia published a critique of the Strategy, *The NSW Koala Strategy: ineffective, inadequate and expensive. An Assessment of the NSW Koala Strategy against Recommendations made in the Independent Review into decline of koalas in NSW*. It is a well-argued criticism as far as it goes and I commend it to you with the proviso that it is not entirely balanced as it does not, in my view, deal knowledgeably with the progress made on the Chief Scientist & Engineer's recommendations regarding the contribution of the scientific and broader community (8 to 11).

Some 14 months since the Strategy's release it is still too early to assess its effectiveness in regard to these recommendations. Unquestionably there has been a lot of activity: e.g. symposia, workshops, local project funding, launch of the NSW Koala Country website, release of the NSW Koala Research Plan 2019-28, development of three 3-year funded regional projects – Southern Highlands, Port-Macquarie-Hastings, North-east Hinterland, data and sample management protocols related to koala disease management, development of training for veterinarians and veterinary nurses, a State-wide citizen science koala/wildlife survey as well as awarding koala habitat conservation tenders to 10 private landholders in the Port Macquarie and Lismore/Ballina areas and creating new koala reserves and parks. Keeping up is a challenge and the summaries of NSW Koala Strategy Inter-Agency Committee meetings (two have been made public), do not give a lot away.

Progress is not without a bit of smoke and mirrors due primarily to a certain overlap and interchangeability between funding sources for actions in the Strategy and actions associated with the reform of the volunteer wildlife rehabilitation sector which is part of the broader biodiversity reforms (see also 3 below).

The Strategy's investment of \$7.5m in koala care is a subject very close to my heart. I have been advocating establishment of a state-wide network of koala and wildlife hospitals and wildlife veterinary services for nearly 20 years. Koalas taken from the wild to address disease or injury deserve the best treatment possible and the voluntary rescuers and rehabilitators who have been toiling for forty years and more deserve the encouragement and acknowledgement of their work given by both the Chief Scientist and the Strategy.

Clearly \$7.5m will not go far in establishing a veterinary service and hospital network. Indeed, the two projects specifically mentioned in the Strategy at Port Stephens and Gunnedah have been funded through the NSW Restart program with grants of \$3m and \$6.5m respectively to Port Stephens and Gunnedah councils.

In early 2018 Friends of the Koala commenced up-grading its Koala Care Centre to a Triage, Treatment and Pathology Clinic. \$15,000 was promised by the National Party should the government be returned. No doubt the commitment will be honoured at some point. The group also supports the separate enterprise of Northern Rivers Wildlife Ltd which has been formed to establish and operate a wildlife hospital specialising in koala treatment to service the Northern Rivers region. This is a long-term project so in the meantime the organisation that is admitting around half of the koalas brought into care across NSW must continue relying on wildlife hospitals in Queensland.

The action about which I do have misgivings is the proposed single wildlife rescue number. I understand that the number's purpose is to pick up those areas of the State not covered by licensed rehabilitators, or by groups unable to deliver a 24/7 telephone rescue service. It is not to compete with established 24/7 services which are operating efficiently. The Northern Rivers is covered by five groups, including Friends of the Koala which does all the region's koala work. Promoting a new rescue number runs the risk of confusion, delay, and even burdening the group with irrelevant telephone calls. Unless the new system can direct callers reporting a koala incident in our region straight to Friends of the Koala (by utilising word recognition technology perhaps), it may simply introduce another delay in the rescue process. The proposal will need very careful consultation to ensure that it does in fact ensure timely availability of the right assistance.

### **3. Biodiversity Conservation Act 2016**

I have written countless submissions over these past few years pointing out the serious shortcomings of the so-called biodiversity law reforms in relation to the habitat-specific koala. It would be pointless to regurgitate all my evidence-based observations here.

Suffice to say that in my view nothing less than exempting koala habitat in its broadest sense (i.e. including the re-growth, paddock trees and small remnants which are critical to the persistence of koala populations in the Richmond River flood plain, not to mention the planted windbreaks,

garden [koala feed] trees, weeds such as Camphor Laurel and macadamia orchards that are all essential to koala survival in the more disturbed landscapes of the Northern Rivers) from the Act's code-based clearing and the offsets scheme will deliver adequate outcomes for koalas.

At the very least the Sensitive Regulated Land sub-category of Category 2 of the Native Vegetation Regulatory Map which covers some koala habitat, i.e. 'core koala habitat' as defined by SEPP 44 (keeping in mind the inadequacy of the existing definitions and that there are only six approved CKPOMs across the State) must be extended to include the millions of hectares of vegetation on which koalas are known to rely. It is truly shameful that less than 1% of identified koala habitat in NSW is protected from clearing under the disastrous Land Management (Native Vegetation) Code which sets the controls.

In regard to the reforming of biodiversity conservation licences under which the providers of wildlife rehabilitation services fit, I have to say that the attention paid to the sector has been gratifying and useful. Implementation of the 3-year plan to support and improve wildlife rehabilitation set out in the NSW Volunteer Wildlife Rehabilitation Sector Strategy is a partnership between OEH and the sector supported by the Foundation for National Parks and Wildlife and the Environmental Trust and funded by \$4.05m from the Koala Strategy and \$1.2m from the Foundation (via the Environmental Trust).

**(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.**

As previously mentioned, most of the Northern Rivers is one of 48 Areas of Regional Koala Significance (ARKS) in the New South Wales Koala Prioritisation Project. Work is in progress using koala records to map local-scale resident koala populations or activity 'hubs' referred to as Koala Hubs. Initially 567 Koala Hubs were identified across the State. The problem is that reported records do not necessarily represent all the important koala areas. Quite recently, for example, I have learned of a group of residents in the Dungay/Urliup area in the Tweed who have been collecting koala sighting data which may prove to be a Hub. Hence the urgency for systematic local surveys to identify all areas of resident populations which need to be protected.

But there is no absolute protection even for identified Koala Hubs. In 2017 a re-zoning application for a 165ha parcel of land at Monaltrie, on the south-east outskirts of Lismore was received by Lismore City Council. The land, which is subject to the Comprehensive Koala Plan of Management for South-east Lismore, is known to support koalas which are part of the Monaltrie-Tregeagle-Wyrallah Hub. The Council rejected the application but it is only a matter of time before the proponents try again. It should be of interest that the koala population for the CKPOM study area is estimated at 1,800 animals.

Properties in this area, together with the part of the Ballina Local Government Area identified as the 'Important Koala Population' in Ballina Shire's Koala Management Strategy and which has a koala population of approximately 285-380 animals (the two areas being connected through the Tuckean Nature Reserve at Green Forest) have been open to a recent Biodiversity Conservation Trust (BCT) Priority Koala Habitat Conservation Tender process. The BCT is entering into five in-perpetuity agreements with landholders covering 82 ha, investing \$1.6m to fund annual conservation management payments. I do not have first-hand knowledge of interest, the assessment process or all of the five properties, three of which are in Ballina and two in Lismore apparently, to cast judgement on effectiveness other than to say it appears to be a very small step.

Nor do I have first-hand knowledge of the situation in our public forests; I rely on the activity of NEFA to keep informed. Just last Sunday (28 July) NEFA inspected compartments 23 and 24 of Braemar State Forest, south of Casino. Braemar is already marked-up for logging during August. According to NEFA's initial audit report the Harvesting Plan identifies one Koala High Use Area (HUA) of 0.9ha, 3 koala records from 1998 and 2 records from 2016. During the inspection NEFA identified 42 records

and an additional HUA over 3 ha in size. Previous NEFA audits have identified significant koala populations remaining in nearby Carwong, Royal Camp and Gibberagee State Forests.

Under the new Coastal IFOA pre-logging koala surveys have been abandoned in favour of koala habitat modelling where 10 koala food trees over 20cm in diameter per hectare are retained in modelled high-quality habitat, and five koala food trees per hectare in areas of modelled medium-quality habitat. These rates are less than half of what had been originally proposed and in my view are totally inadequate.

In regard to Carwong and Royal Camp State Forests, the abundance of HUAs has prevented the Forestry Corporation from logging them since 2012 however the new IFOA's reliance on modelled habitat over HUA protection will make them available for logging.

NEFA makes the very valid point "that these remnant forests on and around the Richmond River floodplain are particularly important for the future of Koalas (and many other species) as drought refuges in an era of global heating." We already know from the report for the Saving our Species Iconic Koala Project, *Framework for the spatial prioritisation of koala conservation actions in NSW* (2018) that the Far North-east Hinterland is at only moderate risk of Climate Change, Heat Stress and Wildfire and that it is an area of interest for climate refugia for koalas. What better reason than to give serious consideration to these forests being added to the Parks estate?

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

I have already mentioned the five landholders in the southern part of the Northern Rivers who will be assisted financially in managing their properties for koalas. I understand that a few others across the region will or have benefited economically from selling their properties for strengthening koala protection by the NSW reserve system.

If the planning system ever gets to the point of providing absolute protection for koalas and areas are declared development-free, some landholders will surely feel disadvantaged.

The most divisive issue in the Northern Rivers appears to be in regard to proposals for transferring state forests to create new koala reserves and national parks. What is left of the tax-payer subsidised, unsustainable timber industry and its workers are clearly threatened by such proposals but what exactly is on the table and what does the Northern Rivers community think is the best use of our publicly owned forests?

I have already mentioned the low level of protection for koalas by the reserve system. There is considerable support among environmental groups in the Northern Rivers for the local proposals contained in the National Parks Association of NSW's *Blueprint for a comprehensive reserve system for koalas (Phascolarctos cinereus) on the North Coast of New South Wales* (2015), namely:

- *Western Border Ranges, subject to the agreement of the Native Title holders, covering 32,234ha over thirteen state forests including Beaury, Richmond Range, Mt Lindesay, Unumgar and Yabbra which is estimated to support over 1,000 koalas. This proposal will help to link seven existing World Heritage properties and a recognised biodiversity hotspot;*
- *Sandy Creek National Park comprising Carwong and part of Royal Camp State Forests near Casino to protect 2,100ha of logged forest estimated to contain 50-200 koalas*
- *Tweed Coastal Range National Park covering 2,550ha of habitat for the endangered Tweed-Brunswick Rivers koala population of approximately 140 animals.*

The only Koala Reserve announced for the region under the Koala Strategy was Mount Lindesay, west of Kyogle. The reserve comprises parts of the Mount Lindesay, Donaldson and Unumgar State Forests, a total of 5,620 ha; just 17% of the community's proposal. Significant areas of the forests

which will become a Flora Reserve owned by the Forestry Corporation and managed by the National Parks & Wildlife Service, had been abandoned for timber production due to Bell Miner-Associated Dieback. Never the less, it is located in an ARK and contains modelled high and moderate quality koala habitat. As far as I am aware there has been no funding allocated to undertake the rehabilitation necessary for restoring the health of these forests.

As to what people think is the best use of our native forests - in a poll commissioned by the North Coast Environment Council in the electorates of Lismore and Ballina in early 2018, **88.5% of Ballina** respondents thought protection of forest wildlife, nature and trees (48.6%), the protection of water supplies (23.4%), safely storing carbon in trees (7.9%) and recreation activities (8.5%), was the best use.

In the **Lismore electorate 90.7%** of respondents favoured protection of forest wildlife, nature and trees (47.9), the protection of water supplies (23.4%), safely storing carbon in trees (10.9%) and recreation activities (8.5%), as the best use.

A mere **9% of Ballina** respondents and **7% of Lismore** respondents thought logging for timber and woodchips was the best use and a further 2% thought logging to get wood to burn for power generation in place of coal was the best use.

While I might not have the economic studies to hand, I feel confident in asserting that tourism is a significant component of the Northern Rivers economy. I can also vouch for the joy and excitement of a visitor, Aussie or foreigner, seeing a koala in the wild for the first time.

## Conclusion

Clearly there is a long way to go to secure a healthy future for koalas in the Northern Rivers region. Community groups, scientists, conservation and land trust organisations, governments and their agencies and the folk who are privileged to live with wild koalas all have parts to play.

For the purposes of this Inquiry, the key priorities for the Northern Rivers are:

- Address the Chief Scientist's Recommendation 4 to improve outcomes for koalas through changes to the planning system – extend and strengthen SEPP 44 to ensure absolute protection of koala habitat.
- Address the Chief Scientist's Recommendation 5 to improve outcomes for koalas through the Biodiversity Conservation Bill and associated regulations – ideally exempt koala habitat from code-based clearing.
- Address the Chief Scientist's Recommendation 6 to investigate models for guiding and incentivising collaborative best practice for new development and ongoing land use occurring in areas of known koala populations across tenures, industries and land users – certainly needed where developments are already approved, however new developments should not be allowed in areas of known koala populations, nor in areas identified as preferred (although unoccupied) koala habitat.
- Support systematic local koala surveys as a matter of urgency.
- Ensure absolute protection of Koala Hubs on all land tenures.
- Identify climate refugia options
- Support expediting the establishment of a wildlife hospital
- Create the proposed Sandy Creek National Park extended to include Gibberagee and Braemar State Forests
- Extend the Mount Lindesay Koala Reserve into the *Western Border Ranges* proposal
- Support local government's capacity to deliver effective landscape-scale koala protection and management
- Support the National Parks & Wildlife Service to manage recent extensions to the reserve system
- Support development of a transition plan to end native forest logging on public and private land.

Thank you for the opportunity to make these comments. If you need further information on anything I have raised, please contact me.

I wish your deliberations well. The conservation and good management of our koalas is the responsibility of all of us.

Yours sincerely

Lorraine Vass  
2 August 2019