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Dept of Agriculture, Water & the Environment
ACT 2601

Re: Draft National Recovery Plan for the Koala

Thank you for the opportunity to comment on the National Draft Koala Recovery Plan. This submission is written on behalf of the Clarence Environment Centre's (CEC)'s 85 members. The CEC has maintained a high profile presence in the Clarence Valley region of northern NSW for 35 years, in which time our various members have engaged in and contributed actively and pro-actively to koala research, care, rescue, rehabilitation, and lobbying and written submitted responses in efforts to encourage governments to help a remnant koala population increase and persist within NSW and the Clarence Valley local government area.

Most of the following observations are based on personal understanding of koalas, and largely on the way NSW legislation in particular operates, or fails to operate, for NSW koala protection.

Individual members have been encouraged to prepare their own responses to the Draft.



*Young female koala, found in a machine shed in cleared grazing land beside the Clarence River, Seelands. Healthy animal, relocated into suitable habitat
(P Edwards - WIRES koala coordinator 2006-2018)*

(*Note*: The Recovery Plan is referred to in this submission by acronyms DRP, in reference to this Draft document, and RP as the eventual finalised Plan. All referenced page numbers refer only to the downloadable pdf version, not the interactive online document).

STATEMENT

Developing a National Recovery Plan for Koalas was a requirement in determining to list the koala nationally as a vulnerable species (2012). The Labour Minister for the Environment at that time stated that the RP would follow release of the *National Koala Conservation and Management Strategy* (finalised in 2014). Ensuing federal governments have kept the RP on hold while koalas have continued their decline into obscurity. Its resurrection therefore brings with it considerably heightened expectations by the Australian people, and globally, of some serious commitment and strong leadership by Canberra to ensure Australia's most valuable asset remains a permanent central feature of our natural landscape, as well as our economy.

We recognise that the actual release of this DRP was triggered by an Expert Panel's finding that koalas were priority for urgent management intervention following the 2019-20 bushfires, and government's subsequent investment of \$18 million to support Koala conservation actions, which includes re-assessment of koala's listing status by the Threatened Species Scientific Committee and finalisation of the RP

For the last brief 250 years harmful progressive human activities have so depleted the once massive koala numbers that their survival status now must be viewed as endangered. Avoiding the appalling havoc wrought on the animals for the fur trade by introduced white human predators, the loss of food stocks for koalas, whether by fire, logging or clearing, is the absolute leading cause of their current dire situation.

In their work *A Review of Diet and Feeding Selection in Koalas* (CSIRO 2000) Benjamin Moore and William Foley summed up this point: "**As the koala (*Phascolarctus cinereus*) has few predators, does not have specialised requirements for shelter (eg hollows), and does not appear to be limited by competition, then food availability has to be the prime determinant of suitable koala habitat.**"

This is the simple equation around which all governments should now combine and focus their efforts for koala protection. Without strong and decisive positive actions now, to halt and repair the previous strong, decisive negative actions, then neither the goal of the RP (**p1: to reverse the trend of decline in population size of the listed Koala, by having resilient, connected, and genetically healthy metapopulations across its range, and to increase the extent, quality and connectivity of habitat occupied**), nor its purpose under the EPBC Act (**p12: to stop the decline of, and support the recovery of, the listed Koala, so that the chances of its long-term survival in nature are maximised**) can ever hope to be achieved.

We recommend the above quote also be kept front and foremost during the EPBC Act reassessment.

It seems that everything in the end will depend on the strength and will of the eventual Implementation Plan. **Section 11 Governance and structure (p35)** acknowledges that implementation will demand commitment and collaboration between state governments, landowners, forestry and mining interests etc etc, but assures us all that the Commonwealth will take a lead role in its coordination. The concern is that there is no shortcut to achieving this commitment and collaboration. We can only suspect that such negotiations (even to reach any sort of watered down agreements in the end) could very well take years. For the koalas' sakes we sincerely hope we are wrong.

Patricia Edwards

Clarence Environment Centre Vice President. Land for Wildlife Clarence Valley Regional Coordinator

SUMMARY:

The CEC is of the firm belief that unless the RP can be developed strongly and unassailably to eliminate political party opinions and to fully support koala health and growth ahead of, or at least in parallel to, the same for humans, then it will be destined to fail in its aims, as with all other plans, strategies, policies, regulations and wasted millions of taxpayer dollars before it.

Therefore the CEC submits the following recommendations: (supported by texts below)

- **State government laws.** The Federal government take over full responsibility for koalas, remove them entirely from the control of changing State ministers' whims and political party mindsets, and work only non-politically with local councils to protect their own community's koala populations.
- **National Koala Act** - To avoid koalas being used as a political football, as well as to help Commonwealth Government, present and future, avoid confrontation and conflict by State and commercial-interest groups, the koala be completely protected by its own Act - with no allowable exemptions (ie, loopholes/weasel-words) by or for varying state governments' regulations, and no avenue for amendments without consent by the general public and by the global community.
- **Biodiversity offsetting.** Destruction of koala habitat by offsets, or payments in absence of like-for-like vegetation, be eliminated from State policies and prohibited under the EPBC Act.
- **Clearing and logging of Koala habitat.** **A moratorium be immediately placed on all private native forestry operations, and on logging of koala habitat in native forests, regardless of whether occupied by koalas or not.** Also that private native forestry be prohibited across all States where the Recovery Plan applies, and if possible the management of Australia's native forests and harvesting operations become regulated by the Commonwealth Government under the Constitution.
- **Tree preservation Order** - Prime favoured koala food tree species *Eucalyptus tereticornis* across the NSW/Qld eastern coastal strip; *Eucalyptus camaldulensis* in the hinterland, and equivalent *Eucalyptus tereticornis ssp mediana* in Victoria be protected by a Federally legislated Tree Preservation Order.
- **Koalas a valuable asset** - Governments and all Australian landowners be encouraged to view koalas in the wild as a key financial asset, to be grown, developed, respected and protected as a prime source of revenue for government and landowners ahead of all other human activities
- **Crown land protection** - All Travelling Stock Routes and remaining Crown land be secured by permanent covenant under protection of the Commonwealth Government

RESPONSES TO THE DRAFT RECOVERY PLAN

We appreciate the absence of the previously overused and misunderstood term "core koala habitat", and its replacement use of the more readily understood description "priority habitat"

Note 1: The list of Strategies on (p2) needs a correction. Strategy 5 (p29) refers to habitat restoration; Strategy 6 (p30) refers to metapopulation management

Note 2 - The word 'strategic' is irritating and constantly overused in official documents today. It appears 18 times in this DRP. As an adjective it can be replaced by others more clearly understood and with the same meaning, or beneficially discarded altogether.

Note 3 - **Actions 1k (p23) Facilitate a network to establish and support an active Koala Recovery Team and Expert Technical Advisory Panel** appears to be out of place? The National Koala Recovery Team and Expert Technical Advisory Panel have been actively involved in all steps of Action 1 to this point.

State government laws:

Weak State protective actions and lack of restraints on human activities have been the sole cause for the rapid demise of koalas in Australia, including by bushfires, and have led to the now review of the species' status to Endangered.

Apart from its offsetting clause, we find **Strategy 4 (p28) Koala conservation is integrated into policy, and statutory and land-use plans** to be the one part of the DRP that offers hope for the RP possibly being successful. In particular **Action 4b (p28) "Review and revise statutory planning instruments, policies, and compliance controls at all levels of government, including local government, to avoid or minimise impacts of land use or land management on Koala conservation consistent with the recovery plan"**, by appearing to demand legislative changes for koala conservation projects an encouraging stance against commercial opposition, individual minister's preferences and presiding government's mindset. It also highlights that: *Management actions alone will not be sufficient to recover the Koala. Actions are needed to ensure harmonisation of existing and future planning and policy settings such that they collectively contribute appropriately to maximising the chances of long-term survival of Koalas in the wild.*

Disappointingly this hope of strong leadership, decisive actions and worthwhile changes fades again in the realisation that the RP will provide only **principles** for state and local governments to support koala recovery (**p1**). The DRP acknowledges the need for a national approach to "manage" (help?) koalas (**p1**), and the need to improve coordination of state and local-level actions, but then highlights its aim, **as a priority**, to complement and augment state-level strategies and actions.

It is evident by this that the Commonwealth Government's leadership role stops at actually demanding any State legislative changes. This provides an immediate weakening in the command chain and heralds yet more pussy-footing around aggressive State governments and political parties who are unwilling to adapt. Yet the plight of koalas calls for positive action, now

Test case - The updated NSW SEPP44 (Koala Habitat Protection) released March 2020, was to be the silver bullet that would save our declining koalas. Sadly the revised, 10-year overdue SEPP was hardly changed from its original version, yet this was watered down just a few weeks later in response to National Party outrage, led by Parliamentary Secretary for Agriculture and Forestry Mr Chris Gulaptis and supported by Deputy Premier Barilaro, in favour of logging and land clearing - the two most aggressive activities against koalas.

Clearly remembered is the 2016 NSW premiership of Mike Baird and his Minister Rob Stokes with their 'Equity Codes', which opened up c.2.2 million ha of private land identified as koala habitat for clearing; removed protection from endangered koala populations at Pittwater, Hawk's Nest, Tea Gardens and between the Tweed and Brunswick Rivers, and projected their Party intentions to remove requirements to protect high use koala habitat on public land, and the need for NSW Forest Corp to look for koalas before logging. It was also their intention to remove the need for Koala Plans of Management for individual sites, remove the need for Councils to zone identified koala habitat for protection by their LEPs, and to alter SEPP44 to simplify approvals for developers.

When the NSW Biodiversity Conservation Act was introduced, clearing of paddock trees more than doubled. Farmers using a new self-assessment code removed 21,716 paddock trees over the space of 18 months, or more than 50 a day, and 140% more than the average numbers cleared during the previous 7 years.

Our koalas are in no position to tolerate any further bias by an uncontrolled National Party, which does not represent the majority of the NSW people, not even all farmers, and are far removed from understanding the wishes of the general Australian public, never mind the needs of koalas.

The CEC unfortunately therefore retains grave concerns about the federal government's capacity, or will, to ensure each State participates positively in koala protection.

National Koala Act:

Strategy 4, and implementation of its actions, are critical to the success of the RP.

Koalas are 'recognised' as being protected in NSW through the planning system (p11). Yet the aims of the NSW EP&A Act (the Planning Act) are based entirely around human growth and progress, with the security of koala embedded into this massive piece of legislation as just one of numerous State Environment Planning Policies

NSW SEPP44 has failed to protect any koala habitat since its inception. Its updated version stands no better chance, simply by being triggered exclusively by relatively few and simple activities that require a development application (DA). This does not include State Forestry activities, and not even native forestry operations on private land

Koalas are not a political football. Our Commonwealth laws must ensure they can never again be treated as such by ensuring that amended legislations to protect them cannot be altered again at the whim of party politics.

The CEC firmly believes that unless the Commonwealth Government takes absolute control of koalas for the Australian people, and the RP can override unsympathetic State party leaders, the RP has small hope of succeeding in its goal.

We therefore recommend the Australian Government takes steps to have Koalas removed entirely from this NSW Planning Act, and develops new dedicated legislation for secure protection of koalas by combining all other parts of Strategy 4 into a single National Act, where they will no longer apply to individual States.

Biodiversity offsetting:

If the RP is to work, there can be no more net habitat loss. New and amended legislation must ensure this is the only way forward. **Action 4c (p28-Offsets)** is of deep concern. No matter how many hoops offsetting entails, in NSW without federal regulation it still means net habitat loss.

Allowance for offsets (and worse: payment in absence of like-for-like vegetation) is nothing short of awarding a licence to destroy, including koala habitat. It is a lazy 'cop-out', to help governments under pressure feel good about sacrificing koalas for commercial gain when approving otherwise unacceptable proposals.

The CEC therefore strongly urges that this practice (which is solely for monetary gain but never required to prove its success on private lands) be prohibited under the RP.

We also see this as applying to **Part 8, Strategies & Actions (p19), Point 2, Supporting strategies: "Increasing the area of priority Koala habitat that is protected is a key strategy to prevent further habitat loss and fragmentation and prevent further loss of Koala populations..."**

While increasing protected habitat is vital, this paragraph is ambiguous. Preventing further habitat loss by increasing protected habitat appears to be a way of juggling numbers while enabling destruction of already existing habitat. Only by protecting smaller links will koalas be able to expand their numbers and their territories into adjacent areas and fulfil the second part of this action plan - *Once identified, national areas of priority Koala habitat should include areas of large intact landscapes that have the greatest potential to retain viable populations and have the potential to also act as source populations to adjacent areas.*

Clearing and logging of Koala habitat:

State forests:

In Australia management of native forests and forestry harvesting is the responsibility of the States, (not delegated to the Commonwealth by the Australian Constitution). In NSW the regulator for forestry operations is the EPA, and the public have no 3rd-party legal rights in forestry matters.

On 18 October 2018 Austin William Evans, NSW Nationals MP for Murray, introduced a private member's bill in the NSW Legislative Assembly seeking to revert the Murray Valley National Park to State Forest. The bill lapsed in 2019, however it remains a fair representation of the timber industry's aim to move forestry operations into remnant protected areas, to augment their unsustainable practices.



19.2 Land use change (p44) goes into considerable detail about habitat clearing and the commercial forces driving this major cause of koalas' decline, including logging, and **19.3 Natural systems modification (p46)** mentions that under the Regional Forest Agreements each state has a set of compliance rules and minimum standards for conducting native forestry operations on public land to deliver ecologically sustainable forest management.

In NSW to date these rules have done nothing to protect koalas and their habitat, and consistently have not been complied with by logging contractors.



The DRP fails to mention the 2019 rollover approval of the NSW Forest Agreements (FA 1999, enacted through the Integrated Forestry Operations Approvals), so entrenching its inadequacies for a further 25 years without any consideration of changed and changing circumstances. This is now being questioned in court by the Environmental Defenders Office.



Above: *Aggressive logging in koala habitat, Clouds Crk SF*

Left: *Bell-miner associated dieback, Clouds Creek SF*

Below: *Weeds of every variety on logged land encroaching on creek exclusion riparian rainforest, Wedding Bells SF*

The NSW FAs (1999), which promised new biodiversity protection in State forests, began to fail just 4 years after its introduction when Forests NSW approved logging of old growth forests and parts of national parks in expectation of their protection being removed. By 2005 all state forests were being over logged with at least 40% of their basal volume being removed, with shortening periods between each operation, lantana invasion, and dangerous levels of related dieback.

Strategy 4(d) (p28) requests that impacts on koalas by forestry practices be incorporated into all (State) koala planning and actions. In light of previous experiences and State governments' continued strong support of the timber industry, which in NSW is well propped up by the NSW taxpayer, we feel sure such changes won't happen.

Currently Forests NSW are logging in koala habitat that was missed by the 2019/20 bushfires. We see this alone as a realistic example of the unsympathetic tenets that the RP will have to deal with.

In the absence of the Implementation Plan (pending), there are no suggestions as to how the worrying issue of logging might be resolved, which leaves our koalas still at risk during what we suspect will be an extremely difficult step to negotiate, and which, without strong directorship, will take several years to complete.

Also, as long as forests remain under State legislation, it will also remain all too easy for forestry logging of koala habitat and non-compliance to be glossed over as a State problem.

Certification of forestry logging: 16.2 Social & economic considerations (p39) suggests that certification could be an incentive to entice cooperation (ie, as proof of an environmentally sustainable operation, from a stubborn forestry industry that consistently flouts the rules).

In 2011 an international non-government organisation, the Forest Stewardship Council (FSC) was formed to support economic management of the world's forests, including Australia's. The industry saw certification as a good idea, as proof to consumers of their legal operations and ecologically friendly forest management.

The industry, however, developed its own certification system, the Australian Forest Standard (AFS) - which is non-independent, self-regulatory, makes certification non compulsory, and focuses on prescription standards, not actual performance. Its minimum requirements also come under the Integrated Forest Operation Agreement, which is loose, weak, and consistently proven to have been breached at every level.

Admitting to our ignorance about the process of altering a constitution, it nevertheless appears to the CEC that the legalities of forestry could be relatively easily overcome by transferring all forests with koala habitat to Commonwealth management by an amendment to the Constitution. Further, we suggest all national assets and interests should be managed by the Commonwealth government, including all wildlife as well as threatened species.

Private native forestry:

There is no requirement in NSW for a development application to carry out native forestry on private land. This potentially most harmful activity for koalas is not addressed separately by the DRP. Yet 16.3 Partners and affected interests (p40) notes that over half of koala habitat occurs on private land (Table2). For these reasons we believe that private forestry should be treated as a separate issue by the RP

The NSW Private Native Forestry Code of Practice (EPA 2013) Prescription for koalas (pt b) states: "*Any tree containing a koala, or any tree beneath which 20 or more koala faecal pellets are found must be retained, and an exclusion zone of 20 metres must be implemented around each retained tree. Where there is a record of a koala within an area of operations or a scat is found under a primary or secondary feed tree (ie, while logging is underway), then a minimum of 10 primary koala food trees and 5 secondary koala food trees must be retained per hectare of net harvesting area (not including other exclusion or buffer zones), where available.*"

And that is where the sum total of koala consideration starts and ends with private forestry. There is no requirement for either landowners or forestry workers to actually look for koalas or any threatened species before start of logging; nor to have qualifications to do that job; nor to employ a third party to do the searches for them. Should a landowner decide to do the work, he/she is highly unlikely to have the knowledge or experience to know what to look for.

The DRP suggests that communicating with freehold landowners might bring them on board as koala ambassadors (**Action 2i**). **Yet on the morning of Monday 16.8.21, while this submission was in preparation, the NSW Local Land Services sent out a call over national radio for private landowners to attend information sessions, to explain the benefits of selling trees off their properties. It included a mention of the vast acreage of untapped timber resources on private land, and also suggested a potential (though admitted unlikely) value of up to \$1,000 per tree.**

This call of course comes again in support of the failing timber industry, which has exploited our forests to a disgraceful degree where little is left but Lantana and 30-logs-to-a-jinker sized trees. NSW Forests have for some time had their eye on our National Parks as a future source of timber, and has already lobbied a favourable State government towards this end. It will obviously be easier and more popular to rape private land than national parks as a start. Sadly we suspect many property owners will take up this interesting offer to make some short-term income from their land.

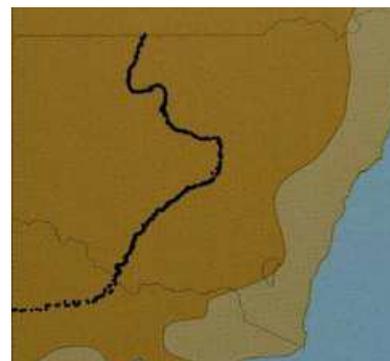
The CEC therefore urgently calls on national government to place an immediate interim injunction on all private native forestry activities, until the RP is finalised and Strategy 4 is enacted.

Strategy 3, Increase habitat protection (p27) - Although not referring to forestry practices, this strategy appears to apply to private native forestry operations. **We therefore also suggest that actions for Strategy 3 should be underway before any moratorium on logging can be lifted**

Tree preservation order

As with all wild animals koalas' food and location are so much one and the same that defining their habitat should not be nearly the complex issue it has become. *Eucalyptus tereticornis* (Forest red-gum) occurs uniformly in a constant band across every part of Eastern to South Eastern coast in the koalas' range, and is a species relied on to feed recovering koalas in care (*personal knowledge, koala carer*). It is a recognised prime food source across 4 OEH management zones - North Coast; Central Coast; South Coast and Northern Tablelands - and this preference is carried on up the Queensland coast where it becomes the Qld blue gum (*E tereticornis*), and down to Victoria where it becomes *E tereticornis* subsp *mediana*, which has shorter, fatter buds and starts flowering as soon as it ends in NSW.

It is notable by their range maps that where *E tereticornis* ends, another favoured feed tree *E camaludensis* (River red-gum) begins. Where Forest reds inhabit the coastal strip and Northern Tablelands, the River reds take over for Central & Southern Tablelands and the Western Slopes and Plains, both totally enclosing the koalas.



Above : Forest red-gum range (pale fawn);
River red-gum range (ochre).
Black line shows edge of koala range to Qld

As these two species are consistently eaten, and consistently available, it would seem reasonable to secure them for koalas, to help towards protecting isolated paddock trees, existing small koala ranges within State and private forests, and movement corridors along creeks and road reserves.

The CEC therefore urgently calls on the Commonwealth Government to consider an immediate interim protection order on these two tree species. This at least pending further scientific investigation if deemed necessary.

Koalas a valuable asset:

We appreciate the well thought out positive benefits of implementing the RP noted under Section 16 - **16.1 Broader biodiversity benefits** and **16.2 Social and economic consideration (p39)**. The last paragraph of the latter presents a refreshing new view of koalas as an asset, in that enabling the recovery of Australia's koala may attract tourist dollars into areas with koalas, as well as projecting a positive image of Australia as an environmentally sustainable manager.

These go along with **Objective 3. Communities and individuals have a greater role and capability in Koala conservation and management.**

The CEC asks that governing agencies, political leaders and Australian landowners, including farmers, be encouraged by the RP to see koalas not just as a drawcard for a few tourist dollars but as a key national asset, and a prime driver of revenue for government and landowners alike. Growing koalas to underpin the Australian economy should become a national aim, pastime, and pride, preferably outlined in the eventual RP.

OTHER REFERENCE COMMENTS

Action 1g (p22) Map habitat condition/loss to inform landscape management. The fact that habitat loss is mentioned as an ongoing possibility is a concern. The only hope for the RP being successful is to bring an end to any further habitat loss.

Strategy 3(p27) Increase habitat protection - These actions are well thought through and encouraging and have our full support. We recognise the difficulties in implementing and developing incentives to encourage fragmented protection across both public and private lands. Also that useful corridor creation by this method can take a long time. Nevertheless rather than seeing this just a support strategy we suggest it could become a major part of the action stream.

We make especial reference to **Part 3a Dedication of Crown land and purchase of identified koala habitat**, which we sincerely hope can be achieved.

Crown land protection:

As a rapid measure to ensure habitat protection, the CEC would particularly commend any determination to place all Travelling Stock Routes into permanent protection as already-delineated wildlife movement corridors, many of which have significant value to koalas. Since TSRs form corridors across all State borders, we would suggest these lands be moved into Commonwealth protection under the EPBC Act, not into dubious protection by the States.

Private land protection

Action 3(b) and 3(c) (p27) Establish or expand existing targeted private land incentive mechanisms, & Improve the condition of existing koala habitat on private and public land through altered land management practices:-

Hurdles (Legal matters) - In NSW many actions detrimental to koala conservation are legally acceptable. For instance purchasing and clearing bushland for profit; private native forestry; under-scrubbing for a parkland effect; clearing for undisclosed numbers of fences (RAMAS); bulldozing and burning pioneer native vegetation; fire hazard reduction clearing, and burnoffs that become uncontrolled and invade neighbouring properties destroy more habitat annually than development. A great proportion includes koala habitat, yet all regularly go ahead with no survey checks; no monitoring, few questions, and even fewer penalties for any found breaches.

Hurdles (Landowners) - The majority of landowners who carry out the above activities generally have little interest in or knowledge of native animals or biodiversity values when 'investing' in a portion of land. This is exacerbated by Real Estate agents, who automatically promote the values of uncleared rural land in terms of timber, grazing or agricultural potential, not as native wildlife sanctuaries and conservation reserves. We suggest this previously unexplored area of land purchases could perhaps beneficially be investigated at source, and included in negotiations and community education.

Possible amelioration avenues

1) Land for Wildlife is a highly useful program that is readily taken up and spreading nationally. Most landowners in the program gain a certain level of education by flora surveys and assessment reports, and many become eager to learn more. However, the status is non-binding, and landowners

are still able to do considerable harm through ignorance. Also government funding support for weed work, tree planting etc, while welcome, is sadly insufficient

We suggest that the Land for Wildlife management and regional deliverers of this program could assist in implementation of the RP, through on-ground identification of properties with koala habitat. Although not a requirement during the property assessment process, a number of regional assessors routinely undertake flora surveys as part of their registration assessment process, with learned values recorded in their assessment reports.

The Clarence Valley regional program, for example, includes comprehensive free of charge flora surveys by experienced botanists across each incoming property, and maintains a register of all properties with known koala feed trees identified on-site, including habitat quality and linkage values (Regional deliverers the Clarence Environment Centre, South Grafton).

2) Koala Conservation covenants - We suggest that a dedicated Koala Conservation covenant added to a land's title, with a gate sign and associated maintenance/stewardship support, could be a strong incentive to protect koala habitat, and a motivation for those many landowners who won't otherwise bother to save or improve their habitat. This we feel could also come with added benefits from other stakeholder authorities - eg, Local Land Services by lowering/elimination of annual rates, from local councils by annual rates reductions, and preferably by a familiar, recognisable connection with the National Parks & Wildlife Service, by on-ground involvement such as camera monitoring and feral animal control.

Implementation

11.1 The Recovery Team (p35)

Developing a recovery team is also going to take time, which koalas don't have. The fact that this is also to involve young inexperienced people just to give them opportunities for future jobs is another matter of concern. **While fully understanding that students should be able to join in the actions, we urge that these be on a volunteer basis, with experienced mature and highly knowledgeable people already active in their fields forming a stable, reliable and productive team to assist our koalas.**

12. Schedule and Cost (p35) - We believe that implementing the RP should not depend on State authorities and governments deciding on whether or not an action will suit their budgets.

We suggest the weasel-words, 'should, where possible', be deleted from paragraph 2 and replaced by decisive instruction 'must, as early as possible'. State governments have known for a while this has been coming, and should be prepared.

15(p38) Community and interests roles

15.2.(p38) Community koala conservation

Local communities are managed and influenced largely by their local councils, and decisions these authorities may choose to make. Yet apart from a mention of councils as major partners in the RP (Appendix 1), and their responsibility in NSW to develop Koala Plans of Management under SEPP44, there is no mention in the DRP of how local councils might be involved in koala conservation.

We suggest this needs to be addressed in the RP, with councils given a lead role in managing their own local koala populations. We even suggest this could go as far as overriding State legislation if necessary, where a council and community believes it will prove contrary to their plans for habitat protection or improvement

Councils are also very capable of knocking down koala habitat themselves when it comes to reaching a quota for human development and growth. Hence we suggest that a Commonwealth **Guardianship Benefit Scheme** could be set up, with rewards to councils who work

actively towards returning koalas to their jurisdictions and monitor their own success rate. Benefits could be in the form of advertising and promotion of councils where a koala migrates into newly protected/restored habitat, or recognition through grants to help those councils develop local and private tourist industries based around koalas.

Also we urge commonwealth support and encouragement of local councils looking to alter their Local Land Management Plans to include rezoning of any land with high ecological values and occupied koala habitat to Environment Protection, including private lands where landowners agree to such protection.

As suggested for 'Koalas a valuable asset' (p8 above), whatever the koala alone is to cost the taxpayer for its recovery and safekeeping, this could be balanced against an assessed likely return through domestic and international tourism, within a predicted time frame. We suggest this positive angle could beneficially be included in the RP, to bring a lot more commercial businesses, farmers and city dwellers on side with trying to save them.

Note: Regarding monitoring - Action 1a (p20) lists identification of nationally important koala populations by undertaking population modelling and analysis, including genetic diversity

The CEC wishes it to be known that we strongly oppose any human interference that involves close contact with wild koalas, especially by trapping. We support the monitoring program in principle, which has the expectation of reaping a sound (independent? trustworthy?) figure estimate of koala numbers nationally, and will, we hope, record their increase. We are, however, made nervous by the seen requirement to understand the genetic structure of the koala populations.

The obvious priorities are retaining koala habitat, providing and protecting connected movement corridors, and stopping any further habitat loss. In which case, if successful, the koalas will take care of themselves and remain genetically healthy. While we accept the usefulness of genetic testing as a foundation for any possible translocation programs, we nevertheless would like to see this proposed action put on hold for some years, at least until the success or failure of the RP is properly known.

Part VI Biology & Ecology - 29 Foraging Ecology (p69) - In discussing feed tree preferences, not considered is the fact that feed tree species themselves have similarly adapted over aeons to the constant browsing and pollination by millions of native animals. The shape of the trees with upward reaching branches, comfortable forks and flowers at the ends of their boughs for easy pollination by nightly incoming flying-foxes are perfectly adapted to host the marsupials that kept their leaves trimmed. In turn the trees rewarded the koalas by healthy replacement leaf growth and an abundance of flowers for the flying-foxes drawn in streams to their strongly scented nectar. Tragically, like koalas, now hardly seen, thanks to human arrogance and aggression.

Threats (Part 2/p14)

The wide range of threats to koalas by human activities are well defined and accurate, so appear well understood by federal government. Yet the DRP considers that addressing any individual driver, threat or threatening processes alone is unlikely to recover listed koala populations.

The CEC suggests this is incorrect, and this point could use a review. In fact we consider that by addressing any one of the threats individually, and some virtually immediately, then changes would soon become apparent. It could also start a gradual transition phase in small parts rather than in one large dose, so making any new regulations more acceptable to the people and industries they may negatively affect.

For example:-

- **Urbanisation** - Large areas of ready-cleared lands that are not prime farmlands should be the focus for future developments, not intact bushland. New suburbs or subdivisions can be

designed around standing koala feed trees, with attractive corridor verges and supplementary planting requirements incorporated into areas of known or historic koala use. In which case many development projects would become a good deal better and more useful for wildlife movements than the empty barren paddocks they currently are.

In the case of uncleared freehold title lands, purchase of land for the purpose of clearing and re-sale profit should be prohibited.

Cats and dogs should have already been long restrained by law under the various State Companion Animals Acts and local councils Keeping of Animals policies. We cannot understand why this hasn't yet been done. This now calls for Federal intervention.

- **Grazing** - All creeks, rivers and drainage lines should be required to be fenced against cattle using non-lethal wildlife safe materials, with a 10m buffer zone from either bank, including in state forests, and some financial assistance to established (permanent) farmers to install water tanks and troughs. This will enable our network of creeks to restore their natural moisture content as collection sites; allow for vegetation regrowth and weed suppression; assist with water retention in the eucalypt leaves along the water courses and health of habitat trees for koalas, and be an aid against climate change and bushfires for other migrating or static wildlife species.
- **Agriculture** - as above for creek lines. Also regenerative farming is becoming of interest to many farmers. This should be encouraged, with financial incentives including for habitat plantings, and for any dispersing incoming koala establishing a territory.
- **Transport infrastructure** - It is difficult to imagine an acreage figure for the amount of land taken up by roads, for the sole purpose of moving ourselves and our necessities around the country. There surely must be a limit to the number of roads we need without utilising those already in place. **The CEC would sincerely welcome at least a consideration of a national rail system, linking all cities around Australia, utilising already direct road corridors and providing an endless wealth of jobs**
- **Energy extraction** - Although still necessary in certain new fields of technology, it is hoped that one day this might not be the case. Meanwhile mining in all water catchments and koala territory needs to be prohibited nationally, not just to help koalas but for sound common-sense reasons to protect human health.
- **Forest harvesting** - Logging of native forests should be phased out entirely, with an immediate removal of forests known to be used by koalas from State Forest inventories. As per much earlier plans the industry should finally become self-supportive and reliant only on plantation forests. We suggest there should also be no allowance for creating fire-prone, dry sclerophyll hardwood plantations to replace moister type fire-resistant native forests, as well as a total ban on clear felling in catchments and on >25° slopes
- **Modification by fire, hydrology and soil erosion (as with droughts, heatwaves and bushfires)** - These can hardly be classed as natural processes. We believe wildfires would not be anywhere near such an issue if matches and smoking could be eliminated from vehicles, and all "burnoffs" overseen and carried out only by a professionally qualified fire brigade called in by landowners who want the work done.

Hydrology and erosion issues can largely be taken care of by controlling forestry and cattle as noted above. For the rest, the federal government has been aware of, and ignored, warnings about the pending catastrophe by global warming for >3 decades. Australia has become a shameful global pariah. For all our sakes now, this has to change.
- **Disease** - University research for chlamydia control is already well advanced and shown to be successful. This research needs to continue, with strong financial support by government until the program is completed. **However disease control will not eliminate stress. Whether or**

not koalas will continue to die in the future (with no signs of disease, therefore no one looking to rescue them) rests entirely on the success of the RP.

The costs of addressing all these threats are noted (p4), and appreciated. However it is also notable that the human race is remarkably adaptable. In time, addressing any one of these threats will be respected, and will go some way to helping koalas back to reasonable numbers.

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Part 1.1 Cultural significance (p7)

1. Cultural significance (Part 1/p7)

We believe that the late 1700s introduction of white males bearing metal axes and guns into the country, and the early start of the koala fur trade, would have been a very frightening time for the Aboriginal people.

We consider that where Aboriginals are to be included in the development of the RP, then some careful thought to [pre-European history](#) would be a sensible approach.

The work of Schlagloth, Cahir & Clark is referenced several times in the DRP - (*The Importance of Koala in Aboriginal Society in 19th Century Victoria. A Reconsideration of the Archival Record.. Schlagloth, Cahir & Clark, June 2018*). However this study discusses Aboriginal/koala interactions only in Victoria, and only from the late 1800s (ie 100 years after European arrival).

The above study finds that recorded early Aboriginal artworks, stories and legends from Victoria only scrappily touch on the koala, and while koalas ranged across much of Victoria, just 3 indigenous place names are derived from the local word for koala. This in itself suggests that the koala did not play a large part in Aboriginals' everyday lives or spiritual mythology.

Even a hundred years after European settlement with available killing equipment, while koalas apparently were used as food in some tribal regions this was not the case across all of Victoria, with restrictions and taboos still in place.

A personal précis of the Schlagloth study is that the koala was a revered animal, a type of sky hero, a little bit feared for its spiritual influence over the water supply, and esteemed as a knowledgeable councillor. Also where used as food by some, it was still generally taboo to skin a koala before cooking. So apart from occasional decorations of fluffy ears etc, they were not utilised as skins for clothing (Ethnographer James Dawson, 1881).

Dawson also comments that in the mid to late 1800s although koalas were eaten, other animals were definitely preferred. This is backed up by Strzelecki (*in Turner 1904 and Haydon 1846*) with the statement that koala flesh "... is tough and unpalatable," and also by other later reports by Europeans (and today online!) that koala flesh tastes like eucalypt leaves so is totally inedible. It can only be assumed that many Aboriginals would have reached the same conclusion.

"Regardless of stories, the question that always should be carefully considered is - just exactly how would a pre-European-arrival Aboriginal capture a koala to use as food?"

A story written by *The Vagabond*, published in *The Argus*, 27th March 1886, explains how an Aboriginal man hunting a koala chopped notches in the bark of a tree with a tomahawk, dug his toes into the holes, followed the koala up the tree in that way until it could go no higher, then hacked off the branch it was sitting on.

While feasible, and unquestioned, this again was 100 years after European settlement, using metal tools in an already altered landscape. There is no evidence from before the introduction of metals, axes, tomahawks, knives and the like, that hunting a koala for food was even possible. A simple sharpened stone axe could not have achieved the task described in *The Argus*, and a spear would rarely have reached an animal in a tree. Even where a koala might have been found lower down, then the nature of the early forests and limits of the weapons has to make it suspected that a meal of

koala meat would have been an opportunistic and uncommon event, even if approved by the tribe. Capturing a koala by chasing it up a tree would also have been unrealistic when the animal would easily jump from tree to tree through a conjoined canopy, or by the plain fact that human skin is not intended to withstand a koala with claws designed to pin it to a straight, smooth-barked tree.

The simple truth therefore suggests that pre-European Australian Aboriginals had neither the tools nor the capacity to put koala meat firmly on the regular menu, even if they had wanted to. I hope the present day tribal elders will agree with this theory, however it is open for interest and discussion." *(Personal comment, Patricia Edwards)*

We believe the Aboriginals' spiritual image of koalas as a revered symbol of great motherhood can be readily accepted and treasured by all.

There is also a fair weight of proof, given our present situation, that the early Aboriginal view of koalas holding some knowledge of the health of our water - above and below ground - should not have been ignored!

There appears to be no research or recorded knowledge from other states.

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End comment

We commend the DRP's focus on koala metapopulation health (**Goal p1**), and for the vision that all respective plans will mutually inform conservation effort at a national scale, including implementing across-state border cooperation and actions.

As we see it, the hope and expectations of finally producing a Plan that successfully returns the Australian Koala to at least sustainable and healthy levels has some correlation with the major task of coordinating cooperative responses and actions between a number of international countries to protect and return the Humpback Whale. The main difference, which makes saving our koalas even more problematic than the whales, is that human use of koalas' terrestrial habitat is far greater and more concentrated than on the oceanic habitat.

Nevertheless the cooperative actions between nations guided by the US Recovery Plan for the Humpback Whale (1991) are having a beneficial effect, and show every sign of working. This should encourage Australia's government to mirror this success for koalas.

We recommend that the beautifully-written, neatly laid out and uncluttered plan for the Humpback Whale should form a reference guide for the preparation of this National Recovery Plan for Koala, and in the interest of gaining human understanding, acceptance and cooperation its simple language should also be adopted.

Parallels exist in the HWRP to trying to save the koalas, shown by these précised extracts -

The intent of this Plan is to assist (koala) populations to grow and reoccupy areas where they were historically found... While some of us might like to encourage (koala) populations to reach the equilibrium carrying capacities that prevailed before (white settlement and) commercial hunting, such a goal may not be feasible. For better or worse, humans have claimed an increasing share of the habitat and resources once available to (koalas) and other species. (Koalas) have no alternative but to share the (land) with humans and exist in lower numbers. In contrast, it is only through force of law that humans must share the (land) with (koalas). The actions recommended in this Plan attempt to guarantee that we share enough resources that (koala) populations increase to levels specified... Human use of the (land) will not cease, so it is unlikely that the (koala) could, or should, return to its full abundance of previous millennia. On the other hand, recovery to the degree identified will still require some restraints on the part of humans. In seeking this balance, any interference with human activities that may be proposed in this Plan should be based on reasonable evidence that there will be some corresponding benefit to the (koalas).

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