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The Hon Robyn Parker MP
NSW Minister for the Environment

Dear Minister

Koala Protection from logging

Your highly publicised remark that logging in State Forests protects Koalas, has undoubtedly attracted a lot of unwelcome criticism.

We would like to believe that your comments were intended to focus on the fact that there are prescriptions in place under the Integrated Forests Operations Approval that are supposed to protect Koalas, and perhaps some of their habitat, from the more extreme levels of logging that are currently being undertaken.

However, the reality is that those prescriptions are not working, in many cases are not even being applied, and your compliance enforcement team is failing dismally in their responsibility.

Two weeks ago, we forwarded a complaint to the EPA showing the devastation that has occurred within one of the rare areas that Forests NSW have actually identified as a Koala high use area (see attached PDF), which is hopefully under investigation.

This past weekend we spent assisting with an audit of the Royal Camp State Forest southwest of Casino where we found evidence of widespread high use areas, some of which are being logged even as I write. The harvest plan (No. 3727) admits that *“Evidence of Koalas was found in the compartments, but pre-logging surveys did not detect high use areas, Compartment mark-up 5.2.2 must be completed.*

Compartment Ca_15 is an intermediate use area. Ten primary browse trees must be retained per two hectares where available. These trees must be marked for retention, No AGS permitted in preferred forest types.”

Prescription 5.2.2 spells out the procedure required if a compartment contains preferred forest types. Marking-up must be conducted at least 300 metres in advance of harvesting operations by an adequately trained person who must inspect trees at ten metres intervals. This entails thoroughly searching the ground for scats within at least one metre of the base of trees greater than 30 centimetres dbhob (diameter at breast height).

Prescription 5.2.2. c) spells out the triggers for a Koala Star Search, which coincidentally are the same conditions that determine what constitutes a *“Koala high use area”* defined as *“an area where any of the following features are located:*

- i. *Three out of any ten consecutive trees inspected are found to have Koala scats beneath them; OR*
- ii. *a sighting of Koala; OR*
- iii. *a tree with more than 20 Koala scats beneath; OR*
- iv. *any trees with Koala scats of two distinctly different sizes beneath.”*

In all, within a three hour survey based on the methodology spelled out in Forests NSW's Threatened Species Licence, the audit team identified 3 high use areas, mostly in yet to be logged areas, but one within an area currently being logged in which, had the prescription been carried out as stipulated, could easily have been identified. The failure to mark any browse trees for retention in the logged area indicates to us that no survey has taken place. At one point, we identified a high use tree (more than 20 scats collected within 1 metre of the tree base) standing less than 5 metres from logged trees.

Because of the high degree of soil disturbance around the logged stumps, no attempt was made to count scats around them. However, we believe it is fair to assume that high use browse trees have already been logged during the current operation.

In another area where logging had already occurred, we found that there had been a pre harvest burn which would have conveniently destroyed all evidence of Koala presence. Therefore we believe it should be mandatory that no burning be undertaken within at least six months prior to logging.

For a species that is now listed nationally as threatened, these systemic failures are unacceptable.

We were recently asked by your EPA for input into the development of Koala protection measures for the Private Native Forestry Code of Practice. The circulated Discussion Paper has highlighted the problems associated with definitions of Koala habitat.

Currently we have State planning laws describing “core” and “potential” habitat, while some management plans refer to “primary, secondary and tertiary” koala habitat. State Forests NSW on the other hand refer to high and intermediate use areas, all very confusing, and open to manipulation and interpretation by stakeholders wishing to exploit those forests.

The Paper makes the point that: *“The Recovery plan for the koala identifies a range of current threats to koalas. The most critical of these are habitat loss, fragmentation and degradation. Other threats are dog attack, fire, logging, disease and being struck by cars.”*

By placing logging among “other threats”, we are led to believe it is only a secondary threat to Koalas. However, we sincerely believe the passage could, indeed should, be rewritten to read:

“The most critical threat to koalas is logging. It destroys, fragments and degrades koala habitat, it removes forest canopy connectivity, forcing the animals to the ground in order to move from tree to tree, making them vulnerable to dog attack, attacks by cattle, and vehicle strike. Logging debris increases fuel loads that contribute to dangerous fires, another major threat to koalas, and it is well established that physical disturbance and habitat loss through logging causes stress that leads to deadly diseases such as chlamydia”.

We must recognise that koala habitat does not need to have high conservation values in terms of old-growth or hollow-bearing trees, or even high levels of biodiversity. In fact much of the remaining koala habitat occurs in highly degraded and modified landscapes. It also has to be recognised that many koala feed trees are targeted timber species.

Because of the dire circumstances in which koalas now find themselves, with numbers in serious decline, the mere existence of koalas in an area confirms that it is koala habitat. Whether it be good quality or poor, or simply a corridor of forested land that allows koalas to move safely across the landscape, it is all critical habitat for these threatened animals, and Koalas must be granted a greater degree of protection if they are to survive in the long term.

Wherever Koalas occur the forest canopy connectivity must be retained and not broken or fragmented. This would also provide greatly improved protection for other threatened species, not just Koalas, and have the additional benefits of reducing the ravages of Bell Miner Associated Dieback, will reduce the rapid decline in carbon sequestration, reduce erosion and waterway pollution, and significantly increase biodiversity levels and ecoservices that these forests provide for us absolutely free of charge.

We ask that you request your departmental heads to give serious consideration to the matters raised above, and act in the best interests of the forests, and the Koalas and other fauna that depend on healthy ecosystems to survive.

Yours sincerely

John Edwards
Honorary Secretary.

Copies to - Premier's office
- The Hon Katrina Hodgkinson MP