



## CLARENCE ENVIRONMENT CENTRE Inc

29-31 Skinner Street

South Grafton 2460

Phone/ Fax: 02 6643 1863

Web site: [www.cec.org.au](http://www.cec.org.au)

E-mail: [admin@cec.org.au](mailto:admin@cec.org.au)

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### Save Our Species, Iconic Koala Project

[koala.strategy@environment.nsw.gov.au](mailto:koala.strategy@environment.nsw.gov.au)

The Clarence Environment Centre has welcomed the chance to provide what we see as relevant and important comments and input into the proposed NSW Koala Strategy through the review of SEPP44; the eventual content of the Strategy, and the recommended actions resulting from the review of the Priority Action Statement under the Saving our Species Iconic Koala Project

#### Summary

12 years of close work with koalas by the author of these submissions in wildlife rescue, care and rehabilitation brings a view that we are losing these most iconic of all Australia's animals.

As arboreal creatures koalas' habitat is treetops, and in only a few select species. Without trees they cannot survive. Yet for too long we have been forcing them to try to do this across their entire natural range.

Humans have a seen need to remove trees for their own survival, governed by a system based solely on growth - growth in wealth, growth in housing; growth in living standards, growth in jobs, growth in services and infrastructure, and more and more growth in people to cover the costs of these ever-increasing requirements. Quite clearly sustainable growth is a myth. It is a contradiction in terms.

All this growth in NSW is controlled by the EPA Act, with a strong emphasis on human good. Koalas are managed under this Act, with their main protective instrument, SEPP44, triggered only when a development application is involved. Neither the Act nor the SEPP have served to help koalas in the past, nor will do in future in their current format

Loss of habitat is the sole main cause of koalas' decline, and this occurs in a number of ways other than by physical clearing. High temperatures, falling water tables; exclusion of creeks and watercourses; destruction of swamplands, and specifically fire, are all components of habitat loss, and all remove koalas' main source of survival - moisture in the eucalypt leaves. The trees might still be standing, seen by the human eye as plentiful, but when the leaves have no moisture, they are useless to koalas.

Along the coastal strip, today's more secure koala populations are found around townships, where communities watch out for them, retain some trees for them, supply them with water, and above all keep them safe from fire. However this habitat is limited, restricted, and isolated.

The massive proposed injection of funds into protecting and restoring koala habitat in NSW is an encouraging step by state government that we applaud. However the time necessary to achieve outcomes by some of the actions will likely prove untenable. Also the expectation is that much of the funding will go towards further studies, research, watching and talking, when it needs to go directly and urgently into increasing food and habitat across koalas' range.

In response to the PAS review recommendations, we agree with the amendments and inclusions, and offer our added comments in blue below:

Table 1

## 1) Loss, modification and fragmentation of habitat

- *In areas where a koala population is present, undertake planting to restore and increase the area of koala habitat. Restoration and augmentation planting and/or direct seeding should use appropriate feed and shelter tree species in areas of degraded and/or potentially suitable habitat. Revegetation should focus on expanding existing smaller areas of known occupied habitat, including private land, and connecting areas of suitable habitat to create corridors for movement. Resources for long-term monitoring and management of revegetated areas should be included.*

**Revegetation and habitat expansions must include habitat within State Forests. SFs are responsible for the most extensive loss of koala habitat across NSW. Focus for this initial funding should be habitat creation - monitoring and management can come later.**

- *In areas where a koala population is present, negotiate agreements with landholders, particularly in-perpetuity covenants or stewardship agreements that promote the protection and retention of high quality koala habitat or habitat that contributes significantly to connectivity in the landscape.*

**Koala habitat also needs in-perpetuity protection from fires. For this the Rural Fires Act 1997 will need to be amended to exclude burning and bulldozing containment lines through koala habitat, and treat koala habitat as an asset requiring protection.**

**SEPP44 should also apply to State Forests, with SF logging requiring a DA, or otherwise koala habitat currently within SFs should be transferred to the National Parks estate. Preferably both**

- *In areas where a koala population is present, undertake koala habitat studies and mapping using standardised methods and terminology to identify key koala populations and rank and map koala habitat. Centralised mapping and database to include details of works, methods, costs, sources of funding and outcomes of monitoring.*

**We suggest mapping is costly and will take too long when funding needs to be spent on koalas themselves. See Appendix I & II in response to the Koala Strategy for a simple method of koala habitat mapping. Citizen scientists will tell us where the koalas already exist.**

## 2) Vehicle strike

- *Identify blackspots where koala road mortalities are greatest and target proven mitigation techniques such as fencing and wildlife crossings, in discussion with council and Roads and Maritime Services. Mitigation may also involve the development, testing and deployment of new technologies that can reduce vehicle strike.*

**Anything to reduce koala deaths and injuries on roads of course is supported. However mitigation should also include not putting roads through established koala habitat. Koalas establish home territories against roadways. then don't often try to cross. The main problems occur when juvenile koalas are dispersing in search of their own home territory, or disturbance happens by developing and road construction**

- *Liaise with Roads and Maritime Services and local councils in the development of new/existing roads to plan koala barrier fencing and crossings as part of road construction projects*

**See CEC's submission to the Koala Strategy, Action 44 and Action 45, as our response to this suggestion -**

*... Without a reining in of developers and enforcing future local subdivisions to be developed solely within already cleared lands, this action cannot successfully be applied to local councils under State Government Planning laws to avoid koala habitat. Presumably therefore this clause refers to public roads, and again to the RMS. The CEC would like to suggest that today we have quite enough roads already, to take everyone with a vehicle wherever they want to go. The enormity of land acreage currently taken up by tar and dirt to accommodate people wanting to move from A to B is inestimable. The future can only be for downsizing -*

*... Again, SEPP44 does not apply to the EPA Act Part 5, Critical Infrastructure*

*... The Pacific Highway upgrade is one good example. The new route is no shorter than the old, is costing the Australian taxpayer many millions of dollars more than a simple upgrade of the existing highway would have done, and has now destroyed koala habitat in a number of places.*

### **3) Predation by roaming or domestic dogs**

- *Conduct local community awareness campaigns in areas where attacks by domestic dogs on koalas are prevalent to raise awareness of the impacts and the importance of responsible dog ownership, including keeping dogs restrained on leads and in properly fenced enclosures.*

*See CEC's submission to the Koala Strategy, Action 5 and Action 50, as our response to this recommendation*

*... The Animals Act 1998 needs amending to safely restrain dogs in developed areas in koala habitat, or ban them altogether. Colourbond metal fencing should be enforced - ▪ to prevent koalas from climbing and entering dog pens, ▪ to deter dogs from terrorising a koala while on the ground, and ▪ to prevent attack on a koala through an unsubstantial, inappropriate mesh fence. Councils also need to mandate trimming of any trees and shrubs that can enable access to a dog pen by a koala. Alternatively, where a dog run includes large forest red gum trees (preferred koala food trees), the owner needs to be approached to see if the pen might be reduced or altered, to give koalas access to the trees*

*... without legislation, information will not be taken in by anyone who doesn't care. The Companion Animals Act needs to stipulate required fencing materials for dog pens in known koala habitat, and enable its enforcement under local council's Keeping of Domestic Animals policies. Otherwise local councils need to be free to, and encouraged to, enforce dog-free developments.*

### **4) Intense prescribed burns or wildfires that scorch or burn the tree canopy**

- *Liaise with relevant authorities or land managers to ensure that identified koala habitat areas are defined as assets for protection in fire planning tools when managing wildfires and prior to any hazard reduction burns. Promote best practice fire management protocols in areas of significant koala populations*

*See CEC's submission to the Koala Strategy, Action 46, as our response to this and the following suggestion*

*.... As with the RMS, the RFS is another authority that can demolish a significant tract of koala habitat - and any wildlife habitat - as easily as can the RMS, with full authority to do so ... Although burning is legally listed as clearing under the Native Vegetation Act, so purportedly is in breach of the law, any landowner can light a fire at inappropriate times without need for a permit, then suffer no consequences if that fire sparks up and gets out of control. The RFS's main response to this situation is to bulldoze containment lines and back-burn into yet more bushland, regardless of koala habitat, to protect human assets. Without changing the laws, to put a total ban on all fire lighting by anyone other than qualified RFS personnel, and then on a case-by case basis, the CEC suggests this action (46) will be pointless.*

*We also suggest that, with fire being such a lethal element in a heating climate, matches and*

**other firefighting equipment, including cigarette lighters, should be banned from all motor vehicles. No one should smoke while driving - or should need to.**

- *Liaise with authorities or land managers to ensure that any unavoidable prescribed burns within koala habitat are conducted in a way that minimises impacts on koala habitat and individual koalas, based on best practice guidelines*

#### **5) Koala disease**

- *Improve understanding of the role of chlamydia in koala population dynamics and mortality, including baseline genetic information and links between habitat disturbance and disease-related morbidity, by conducting research in collaboration with universities, vets and ecologists.*

#### **6) Heat stress through drought and heatwaves**

- *Support carer and vet networks in their response to the management of koala health and welfare during extreme weather conditions*
- *Research and trial adaptation management actions such as installation of artificial water sources and the establishment of refuge habitat and promote connectivity through habitat restoration*

**In general koalas need natural healthy water courses for collection and transfer of rainfall and a constant percentage of moisture to the leaves of the trees they eat from. Any artificial water source plan, while a nice idea, we feel would only result in the eyes of authorities being cast again on these already demolished, previous vital sources of water for koalas. Instead, restoration of all creek and water course habitat and protection in perpetuity from all clearing, burning, water extraction, grazing etc, should be a priority. Please see the CEC's submission to the Koala Strategy, Appendix I (The need for water) as our response to this suggestion**

#### **7) Human-induced climate change**

- *Use predicted climate change data and modelling techniques to predict the possible impacts on koalas from climate change. This should include how koala habitat is likely to change under different climate changes scenarios, such as temperature rise impacts on habitat, drought and wildfires. Use this information to prioritise adaptation actions and investment in habitat and corridor protection and restoration.*

#### **8) Inadequate support for fauna rehabilitation**

- *Support koala rehabilitation groups and vets to rehabilitate sick and injured koalas through training, provision of materials, and promotion of state-wide protocols including for rehabilitation, genetic profiling, record-keeping and release to the wild*

**Please see CEC's submission to the Koala Strategy, and comprehensive comments in reply to Action 15, as our response to this recommendation**

#### **9) Lack of knowledge (poor understanding of sources of trauma and mortality)**

- *Engage with koala rehabilitation groups and other information sources to better understand the causes of koala trauma and mortality. Collate and map the results.*

**Please see CEC's submission to the Koala Strategy, and reply to Action 16, as our response to the recommendation**

## 10) Lack of knowledge (poor understanding of population distribution and trend)

- *Develop standardised method and reporting for monitoring change in koala populations and distribution through time and contribute survey data to centralised database. Include genetic information where possible.*

Most of this data can come from koala care groups and wildlife rescue organisations and their vets whose work includes koalas. The Koala Health Hub attached to the Sydney University is already a very good collection point for genetic data.

Monitoring change in populations distribution may already be too late. It seems today the best-recorded koala populations occur around suburbs and other areas of human population. Quite likely this is happening in response to fire in previous outlying forested habitat. Also it seems highly likely that these best known populations could well be already isolated, and in decline themselves.

- *Support the collation of koala survey records and monitoring information through a centralised database for state-wide reporting and analysis, contributing sighting records to NSW BioNet.*

Please see CEC's submission to the Koala Strategy, Action 16, as our response to this suggestion - *Communities need a single, set, recognisable, user-friendly contact for reporting koala sightings and exchanging information (ie not Sydney-based, with electronic instructions; numbers to enter and waiting times). We suggest that local councils may, with funding support, employ a wildlife officer, whose duties would include lodging koala records on an in-house datasheet and also on the NSW Wildlife Atlas (BioNet).*

## 11) Lack of knowledge (poor understanding of animal movements and use of habitat)

- *Improve understanding of koala movements and use of their habitat in the landscape by conducting targeted research on individuals using GPS collars and mark-recapture techniques.*

The CEC will strongly oppose any further funding spent on capture and tracking programs. Innumerable similar surveys have already been undertaken. Koalas are known to be killed by radio-tracking collars and to die through stress brought on by capture and release. We feel there is not further need to risk more koala deaths. The data must already be available by now, needing only gathering up and collating. This should also include numerous records produced by dedicated koala care groups and wildlife care and rehabilitation organisations over many years of effort. (Please see CEC's submission to the Koala Strategy, Appendix I & II, in response to this suggestion)

## 12) Getting the community engaged in koala conservation

- *Use multiple channels to engage the community in koala conservation and recovery actions across the state. This includes communication strategies, citizen science, volunteers, on-ground conservation actions, awareness programs, and landholder engagement.*

We again thank the NSW government for the opportunity to have our say

Yours sincerely

Patricia Edwards - Clarence Environment Centre, President