

Make a submission for **saving Koala homes** to: Reviewing the NSW Koala Strategy Discussion paper

NEFA, March 2024

<https://legislation.nsw.gov.au/view/html/inforce/current/epi-2021-0722#>

The NSW Government is reviewing its 2021 Koala Strategy, the thrust of which is to do nothing about protecting Koala homes on State Forests, and only protecting Koala homes on private land where the landowners want to sell or enter voluntarily conservation agreements. It's open slather for those wanting to destroy Koala habitat. If you care about Koalas, please take a few minutes to make a submission to help save Koala's homes.

As part of a \$71 million project, the NSW Government has so far purchased 10,069 hectares for addition to the national park estate and entered conservation agreements over 7,697 hectares. These include cleared lands, with only a small part high quality Koala habitat occupied by Koalas. By comparison there are 230,000 ha of high quality Koala habitat and Nationally Important Koala Areas identified on State Forests in north east NSW, from which tens of thousands of mature Koala feed trees are being logged every year. If the Government really wanted to save Koalas from extinction in the wild by 2050 the most effective and immediate action would be to save Koala's homes from logging on State forests.

We are still living with the consequences of the National Party's declared war on Koalas, when National Party leader John Barilaro forced the NSW Government to abandon their new State Environment Planning Policy (SEPP 2019) aimed at protecting core Koala habitat on private lands, resulting in rural lands being covered by SEPP 2020 (basically the superseded 1995 SEPP) and urban areas covered by a revised SEPP 2021 (basically a revised SEPP 2019) (for background scroll down under <https://www.nefa.org.au/koalas>) These have now been incorporated into Chapters 3 and 4 (respectively) of [State Environment Planning Policy \(Biodiversity and Conservation\) 2021](#).

The good aspect of the SEPPs is they allow Councils to prepare comprehensive Koala Plans of Management (KPoMs) to identify core Koala habitat across the whole or part of a Local Government Area, though few have been prepared. Having different criteria for comprehensive KPoMs in rural and urban areas, and onerous criteria for identifying core Koala habitat, has achieved the intent of making the whole process unworkable. When core Koala habitat was identified in a KPoM it used to have to be excluded from logging, until Barilaro removed this in 2020. SEPPs do require site specific KPoMs to be prepared when a Development Application (DA) is submitted to Council. KPoMs are not required for any other form of land-use change, such as rezonings, State Government approved development plans, Private Native Forestry or land clearing. Governments can rezone land for residential development, then approve a masterplan carving it up into small lots, and only then the developer needs to submit a KPoM with a DA to Council – too late for Koalas.

Glossary

ARKS: Area of Regional Koala Significance

Core koala habitat: an area of land which has been assessed as being highly suitable koala habitat and where koalas are present or have been recorded in the past 18 years

KHSM; Koala Habitat Suitability Model. Ranks the landscape in terms of likely use by Koalas. The problem with such modelling is that the vegetation mapping is inadequate to identify the patchy distribution of preferred Koala feed trees and does not account for the degraded structure of many forests.

Koala Hubs: Identified by EOH in 2017 as "spatially defined areas ... primarily to delineate highly significant local scale areas of koala occupancy currently known for protection". Governments have

continued to log them indiscriminately, only protecting them within the proposed Great Koala National Park in September 2023. They are also dated with other qualifying areas since identified but not assessed.

KPoM: Koala Plan of Management

State Environmental Planning Policy (Biodiversity Conservation) 2021; incorporates both **Koala SEPP 2020** and **2021**.

Submissions can be made:

Please personalise your submissions so that they will be treated as individual submissions.

Online

Respond to the consultation questions ([see suggested responses below](#)) online at:

<https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/programs-legislation-and-framework/nsw-koala-strategy/reviewing-the-nsw-koala-strategy/consultation-form>

By email

Email your submission to koalasummit@environment.nsw.gov.au

Here's some suggested points to make:

Prioritising koala populations

*The Strategy identifies 50 priority koala populations based on Areas of Regional Koala Significance, or ARKS. ARKS identify koala populations where koalas have the potential to persist over the long term. 19 are identified as **populations for immediate investment**.*

*The Strategy uses '**strongholds**' to further prioritise key populations. These stronghold areas represent koala populations that are significant in some respect, such as being very large populations or representing areas that will be climate refuges in coming decades.*

The 19 priority populations include

Banyabba (Whiporie-Rappville) ARKS.

Coffs Harbour-Nambucca

Port Macquarie-Comboyne

The Coffs Harbour-Nambucca ARKS are within the proposed Great Koala National Park, though logging of Koala homes continues while it is being assessed, except in Koala Hubs since September.

Identified Koala strongholds, including Koala Hubs, continue to be logged in the *Banyabba* and *Port Macquarie-Comboyne* ARKS. NEFA have been appealing to the Government to stop logging of Koala Hubs in Yarratt SF (Port Macquarie ARKS) and in 2023 we took the Forestry Corporation to court in a failed attempt to stop logging of Koala strongholds in Braemar and Myrtle State Forests (Banyabba (Whiporie-Rappville) ARKS).

Focus questions

3. Are the current categories of strongholds, populations for immediate investment and populations to fill knowledge gaps the right ones for koala conservation? Are there other important koala populations that should be identified for conservation management?

- **There needs to be independent surveys for Koalas undertaken in all high quality KHSM habitat proposed for logging or clearing.**

- **There should be no logging where koalas are demonstrated to be living in pre-logging surveys, or of Koala Hubs on public lands within all ARKS.**
- **On private lands there should be no logging or clearing where koalas are demonstrated to be living in pre-logging/clearing surveys, or of Koala Hubs within all ARKS. Such areas should be prioritised for KPOMs.**
- **Koala Hubs still have not been released publicly, or been granted any status (except in the proposed GKNP). Koala Hubs were last derived in 2017, they need updating in light of new records over the last 6-7 years.**

Addressing the impacts of climate change

The impacts of climate change are already affecting koalas. These impacts are likely to increase in frequency and severity in the coming decades.

Under the Koala Strategy we have:

- *identified, protected and expanded habitat that serves as refuge from heat, drought and fire*
- *identified stronghold areas that support healthy, stable and genetically viable populations that are expected to persist in the long term*

The modelled Koala climate refugia (ie until 2070 and 2100) have not been sighted. There is a particular need to identify and stop further degradation of local landscape refuges from drought, wildfires and heatwaves – these are areas near creeks or on floodplains with high water tables, topographically protected by cliff-lines or on southern slopes. There are numerous strongholds for Koalas that have not been identified – identification of a few strongholds does not make up for this deficiency. Koala hubs are one example of this, and they are still being logged indiscriminately, other identified strongholds have been identified in Royal Camp-Carwong-Braemar and part of Myrtle State Forest, and yet are currently being logged.

Focus questions

5. How do you think the NSW Government can more effectively identify and protect climate refuges in a revised Strategy?

- **Regional climate refuges (to the years 2070 and 2120) need to be urgently identified throughout NSW and prioritized for protection, particularly on public lands.**

6. What support should the NSW Government be providing to koala populations in areas that we know will be subject to serious climate change impacts?

- **Local scale climate refuges (i.e. riparian habitat, topographically protected valleys) need to be identified and prioritized for protection, particularly on public lands.**

Pillar 1 Koala habitat conservation

The Strategy aims to conserve koala habitat in a number of ways, including purchasing land with koala habitat to add to the national parks estate, and funding the Biodiversity Conservation Trust to partner with private landholders who have koala habitat on their property. The Strategy also supports the restoration of koala habitat across different land tenures, including working with private landholders to restore and protect koala habitat on private land.

Protection of Koala habitat is the most important action for Koalas. It is irresponsible to the NSW Government not to protect Koala habitat across the board on State Forests. Protection of the 2 populations within the proposed Great Koala Nation Park will benefit those populations, though it will not assist other populations which continue to be indiscriminately logged and cleared.

Focus questions

8. Do you think the combination of habitat acquisition, private land conservation and habitat restoration is the right approach to protecting important koala habitat? What else should the NSW Government be doing to protect koala habitat?

On the north coast 230,000 ha of high quality Koala habitat and Nationally Important Koala Areas occur on State Forests. It is in public ownership, so large areas can be easily and immediately protected. It is largely free of urban fragmentation impacts (ie domestic dogs and traffic). It is better to protect existing Koala homes than plant new ones.

- **The most urgent necessity to save Koalas from extinction has to be to protect all Koala habitat on State Forests, as this is the quickest and cheapest way to improve the survival prospects of Koalas.**
- **Require independent pre-logging surveys to identify highly suitable koala habitat where koalas are present or have been recorded in the past 18 years, and exclude identified habitat from logging.**

11. How can the NSW Government better support local councils to identify and protect koala habitat?

The NSW Government should identify Koala habitat across all tenures, in accordance with the requirements of State Environmental Planning Policies, so that the mapping can be used as the basis for developing Local Councils' Koala Plans of Management. It is time to remove Barilaro's SEPP 2020 and the exemptions for logging and landclearing. An initial focus should be KHSM modelling to identify Koala habitat, which could be periodically updated with data from the searches. A particular focus needs to be identifying female breeding colonies and corridors.

The NSW Government needs to:

- **Repeal Chapter 3 of State Environment Planning Policy (Biodiversity and Conservation) 2021. and expand Chapter 4 to cover rural lands.**
- **Take on the role of accurately mapping core Koala habitat across all Local Government Areas within ARKS for preparation of comprehensive KPoMs, prioritising area identified as high quality habitat in KHSMs, climate refugia, areas with high development pressures, extensive areas of habitat and isolated populations.**
- **Until comprehensive KPoMs are prepared, require site specific KPoMs to be prepared for any activity proposing significant removal of vegetation within areas mapped as high quality Koala habitat, Koala Hubs and/or Nationally Important Koala Areas. This should apply to all forms of development from the initial stage, including when undertaken by the state Government.**