

# **LOGGING KOALAS TO EXTINCTION**

**How the NSW and Commonwealth Governments are allowing the most important Koala habitat to be logged**

**Dailan Pugh, North East Forest Alliance, May 2023**

**The Commonwealth and State governments have identified Nationally Important Koala Areas and Koala Hubs as being of exceptional importance for the survival of Koalas. Despite both Governments having undertaken processes to identify the most important Koala habitat, they continue to allow it to be logged indiscriminately, even after the 2019/20 wildfires decimated many populations. If we want to save Koalas from extinction, there needs to be an immediate cessation to logging in these identified important Koala areas.**

This report assesses the conservation of Koalas on the North Coast of NSW based on the Commonwealth's identified Nationally Important Koala Areas and the NSW Government's identified Koala Hubs. To assess the current extent of the problem, these are overlaid with the Forestry Corporation's May 2023 12 months Plan of Operations for logging to quantify how much of this most important mapped Koala habitat is now being logged.



## In summary:

- There are almost one million hectares of Nationally Important Koala Areas on the North Coast, of this 24% is on State forests managed for timber production and 22% on National Parks protected for conservation
- State forest compartments encompassing 41,000 ha of Nationally Important Koala Areas are identified by the Forestry Corporation on their 12 months Plan of Operations for logging, with 9,600 ha actively being logged right now
- Over a third of Nationally Important Koala Areas on the North Coast were burnt in the 2019/20 wildfires, with the loss of the majority of Koalas
- Of the 41,000 ha of Nationally Important Koala Areas identified for logging, 41% was burnt in the 2019/20 wildfires, with logging jeopardising the survival of already severely depleted Koala populations
- There are almost 63,000 hectares of Koala Hubs (*highly significant Koala habitat*) on the North Coast, of this 24% is on State forests managed for timber production and 12% on National Parks protected for conservation.
- 2,716 ha of Koala Hubs are identified within compartments shown by the Forestry Corporation on their 12 months Plan of Operations for logging, with 528 ha in compartments actively being logged right now.
- The 5.6 million hectare North Coast currently has 21.6% of its area reserved, which is significantly below the target of 30% by 2030
- Protection of all native forest on State forests would increase reservation to 33.4 %, which is the minimum required for one of the world's biodiversity hotspots

*Please note that this report is based upon the whole compartments identified on the Plan of Operations, in practice about 40% of compartments will be excluded from logging (i.e. steep slopes, rainforest, oldgrowth forest, wetlands, stream buffers etc.), with additional areas excluded as Wildlife and Habitat Tree Clumps. As a guide it can be expected that half the identified compartments will be logged in practice, though this will represent more than half the Koala habitat.*

The North Coast, as described herein, is comprised of the IBRA bioregion of NSW North Coast along with the New South Wales section of the South East Queensland IBRA bioregion. A [2012 study](#) estimated the North Coast supported 8,367 Koalas, having undergone a 50% population decline in the past 20 years. Since then logging of Koala habitat has continued unabated, landclearing has escalated, the 2019/20 wildfires have decimated populations, and Koalas are being increasingly stressed by rising temperatures, heatwaves and droughts due to climate heating ([DAWE 2022](#)).

As a result of the 2019/20 wildfires, *Phascolarctos cinereus* (Koala) combined populations of Queensland, New South Wales and the Australian Capital Territory, was up-listed from Vulnerable to Endangered under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), effective from 12 February 2022.

The North Coast is situated within the North East NSW Regional Forest Agreement area, and thus exempted from the EPBC Act, with logging and clearing of Koala habitat regulated by New South Wales' inept rules that allow most mature Koala feed trees to be logged and rampant "unexplained" clearing within identified Nationally Important Koala Areas and Koala Hubs.

For logging of Koala habitat on State forests there are no requirements for pre-logging Koala surveys, at best 5-10 small potential Koala feed trees per hectare are protected in modelled habitat, and if a Koala is sighted they have to wait for it to leave the tree before they can cut it down. [My assessments](#) have shown that logging plans can allow over 75% of potential mature Koala feed trees to be removed within the logged area.

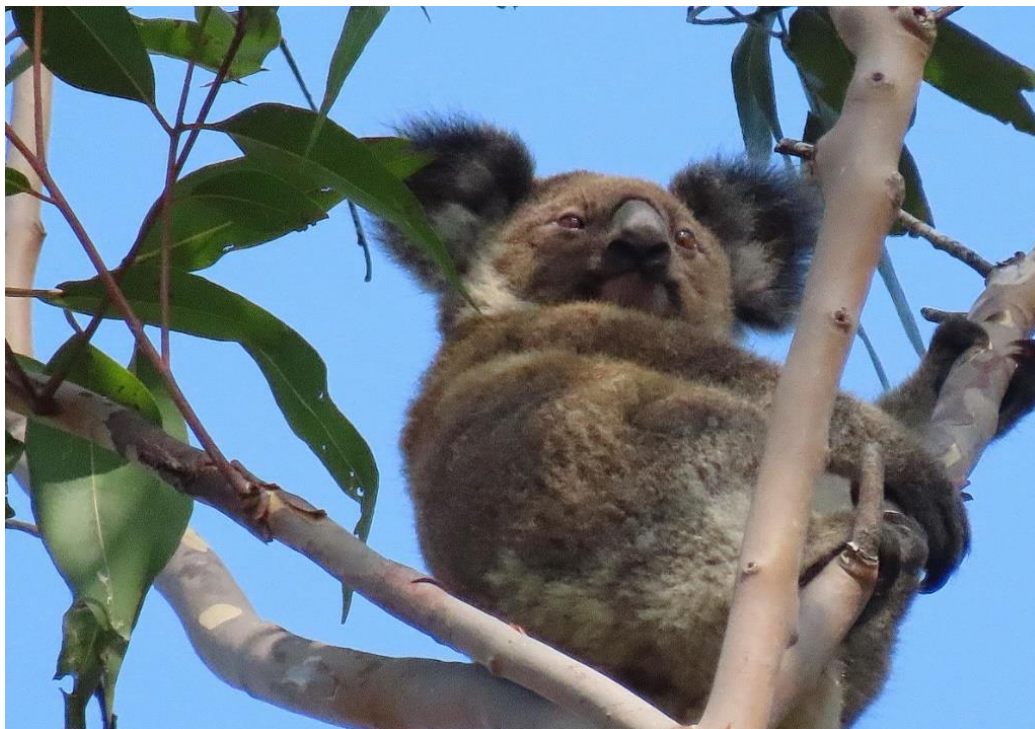
Despite the 2019/20 bushfires decimating Koalas their up-listing to Endangered, and clear recognition that the Regional Forest Agreements do not provide adequate protection, logging of Nationally Important Koala Areas and Koala Hubs continues unabated.

The [2020 Samuel's Review](#) of Regional Forest Agreements, in relation to Matters of National Environmental Significance (MNES) found *“that the environmental considerations under the RFA Act are weaker than those imposed elsewhere for MNES and do not align with the assessment of significant impacts on MNES required by the EPBC Act. ... There is also great concern that the controls on logging within forests have not adequately adapted to pressures on the ecosystem such as climate change or bushfire impacts. ... The Review considers that Commonwealth oversight of environmental protections under RFAs is insufficient and immediate reform is needed. The National Environmental Standard for MNES should be immediately applied and RFAs should be subject to robust Commonwealth oversight.”*

This report focusses on the Forestry Corporation's [Coastal IFOA Native Forest Plan of Operations Map \(12 Months\)](#) (accessed on 22 May 2023) to assess the extent of Nationally Important Koala Areas and Koala Hubs identified for logging in 2023 on public lands.

## Contents

1. Nationally Important Koala Areas .....	3
2. Koala Hubs .....	7
3. Reserve Status of the North Coast Region .....	8



In August 2019 Compartment 6 of Braemar State Forest was found to support an [exceptional density of Koalas](#). On one night in October 2019 the Busby's Flat fire burnt through the forest killing most of the Koalas, this is one of the few survivors. Despite being identified as a Nationally Important Koala Area, logging operations recently commenced with the intent of removing over 75% of mature Koala feed trees. Koala populations have still not recovered, so this logging could be their death sentence.

# 1. Nationally Important Koala Areas

In accordance with the National Recovery Plan, the Commonwealth undertook a project to identify Nationally Important Koala Areas in 2021, though they have since done nothing to protect it on public lands.

Priority actions identified in the [National Recovery Plan for the Koala \*Phascolarctos cinereus\* \(combined populations of Queensland, New South Wales and the Australian Capital Territory\)](#) (DAWE 2022), include:

- *Identify nationally important populations and habitat across the listed koala range under current conditions, and considering future impacts of climate change such as drought, heatwave, and fire, assessed by undertaking habitat distribution, population modelling and analysis (including abundance/density and genetic diversity), allowing for iterative updates using a robust scenario-based approach.*
- *Increase the overall area of protected koala habitat by dedication of Crown land and purchasing land identified as priority koala habitat for incorporation into the state protected areas. Priority areas include those that support viable populations and those that have the greatest potential for population-level recovery.*

DAWE (2022) includes as action 1a '*Identify nationally important populations and habitat for recovery across the listed koala range under current and future conditions*'. To implement this action the NESP Threatened Species Recovery Hub (Runge et. al. 2021) has mapped **Nationally Important Koala Areas** (NIKAs).

Runge, C.A., Rhodes, J.R., Latch, P. 2021. [A national approach to the integration of koala spatial data to inform conservation planning report](#). NESP Threatened Species Recovery Hub Project 4.4.12 report, Brisbane.

The report notes

*The purpose of such areas is to delineate broad regions within which Commonwealth conservation activities and funding for koala recovery could be prioritised, and to provide guidance for states, local government authorities and non-government organisations for regions which are important for long-term koala persistence.*

...

*Recovery requires increasing birth rates and/or lowering mortality rates to increase koala numbers and/or increasing carrying capacity. This research takes a landscape-scale approach to conservation that seeks to maintain healthy habitat and stable koala numbers ...*

...

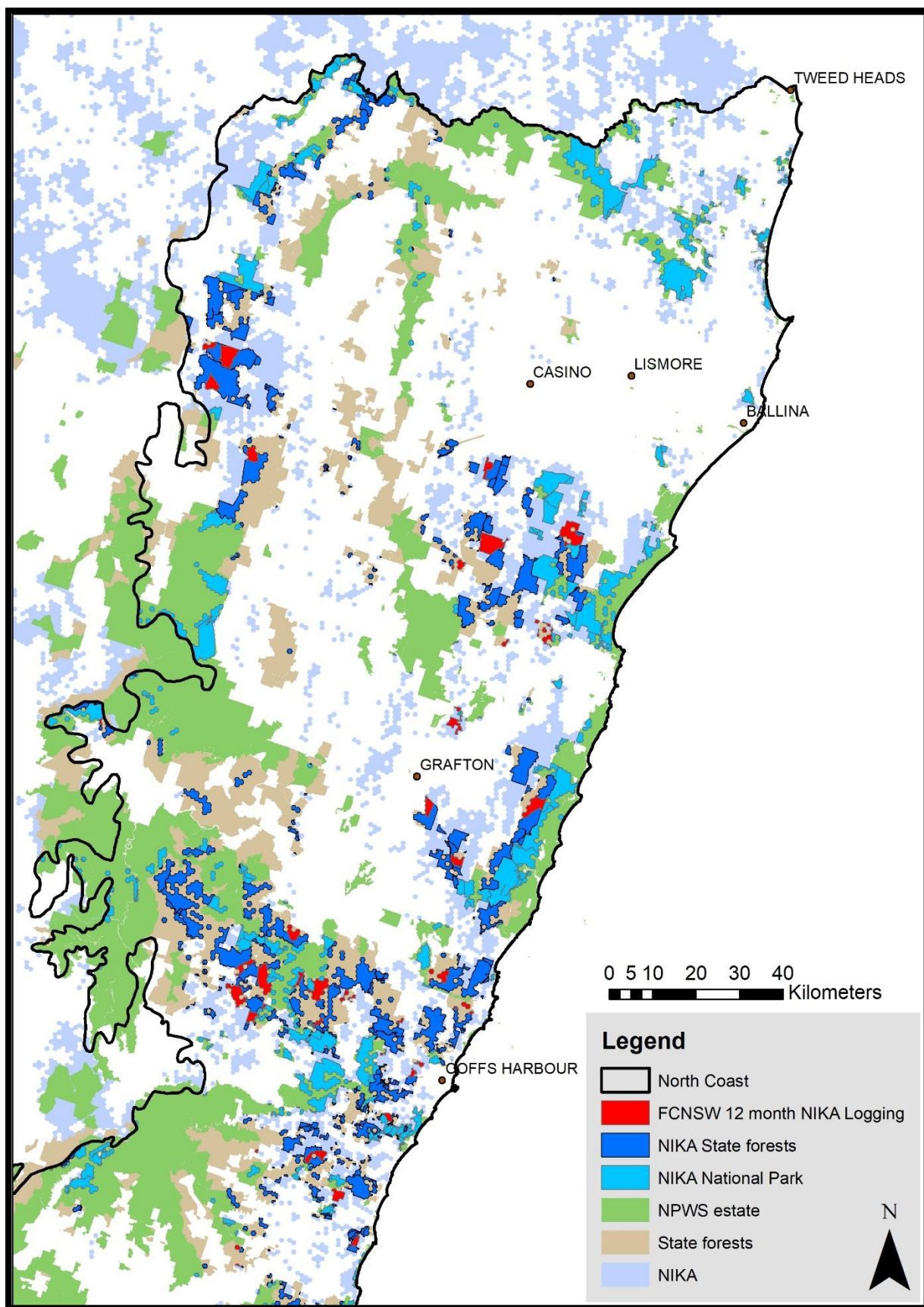
*The technical criteria for NIKA proposed here prioritises large, connected areas of high-quality and relatively intact koala habitat and areas likely to remain climatically suitable for koalas*

There are 992,690 ha identified as Nationally Important Koala Areas within the North Coast region, comprised of:

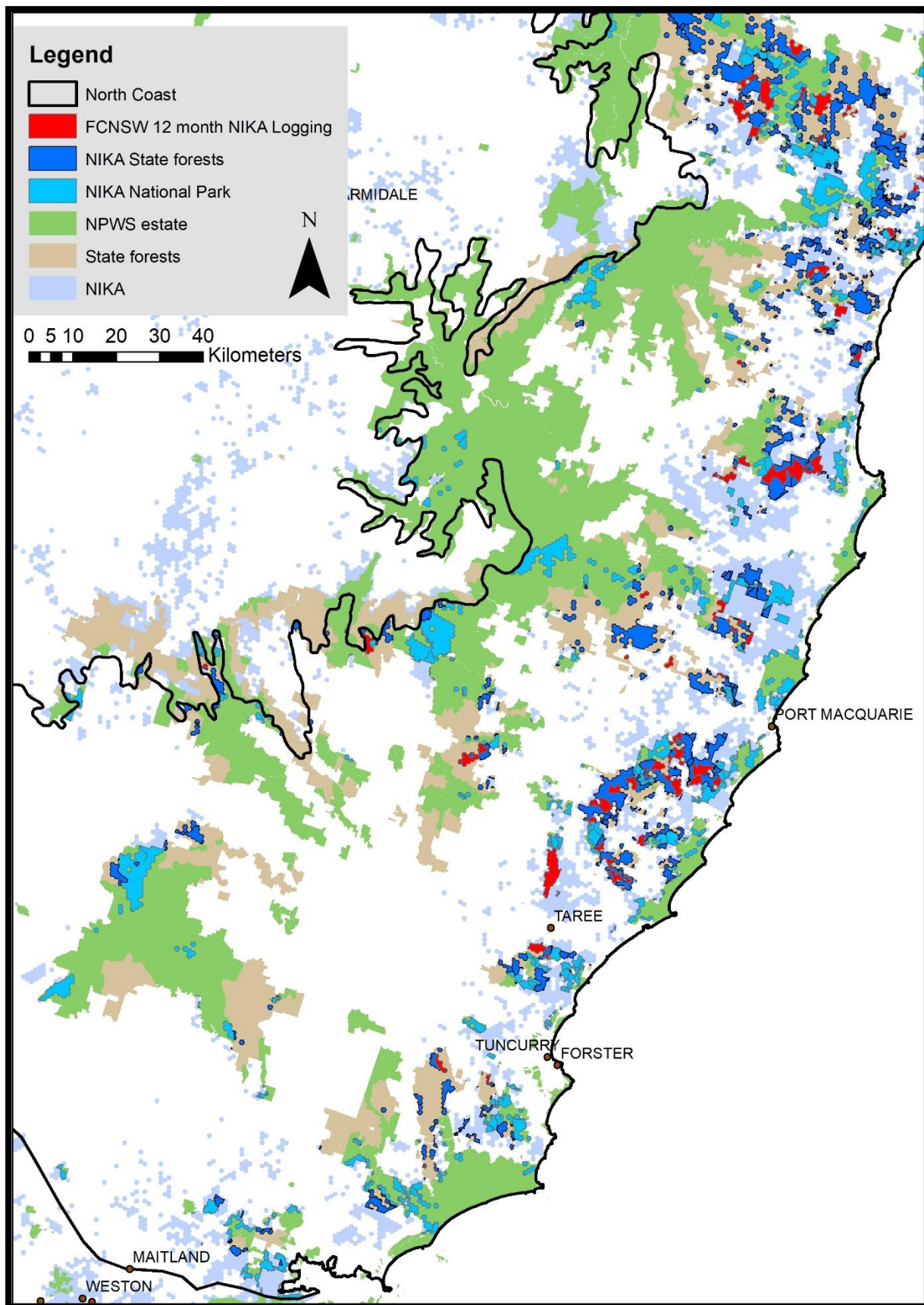
- National Parks and reserves: 222,477 ha (22.4%)
- State Forests 233,945 ha (23.6%)
- Other tenures 536,268 ha (54%)

Forestry Corporation's [Coastal IFOA Native Forest Plan of Operations Map \(12 Months\)](#) accessed on 22 May 2023 identifies 81,404 ha of native forests within the North Coast region at various stages of planning for logging; 16,311 ha of compartments are identified as actively being logged at this time, with some have been recently logged, and others identified as being planned for logging.





Upper North East: Nationally Important Koala Areas (NIKA) by tenure, showing NIKA (red) within compartments identified for logging on FCNSW 12 month Plan of Operations.



Lower North East: Nationally Important Koala Areas (NIKA) by tenure, showing NIKA (red) within compartments identified for logging on FCNSW 12 month Plan of Operations.



Of this, 40,803 ha is identified Nationally Important Koala Areas within compartments identified for logging, with 9,634 ha shown as actively being logged.

Of the 992,690 ha identified as Nationally Important Koala Areas, 335,900 ha (33.8%) was burnt in the 2019/20 wildfires. Of the 40,803 ha of the Nationally Important Koala Areas identified for logging in 2023, 16,855 ha was burnt in the 2019/20 wildfires.

The Conservation Advice ([DAWE 2022](#)) for Koala states:

*Koala monitoring records from north-east New South Wales following the 2019/2020 bushfires, indicate that sites characterised by high-severity fire (e.g., canopy scorch) had zero koala occupancy (i.e., zero return/recovery) immediately post fire. At sites where koalas have been detected following fire, refuge areas were present in the surrounding landscape, or fire severity was lower (NSW Government 2021b). While koala's have returned to bushfire impacted locations it is likely to take many years before populations are fully re-established.*

From their comparisons of Koalas scats at pre and post 2019/20 wildfire plots, [Phillips et al \(2021\)](#) found “the median reduction in naïve occupancy levels was approximately 71%”. It is evident that within the firegrounds Koala populations have been severely reduced, and thus made highly vulnerable to extinction. As surviving Koalas struggle to recover, logging is now being undertaken with the same pre-fire Koala prescriptions, including of refuge areas. The compounding impacts of logging threatens their survival.

## 2. Koala Hubs

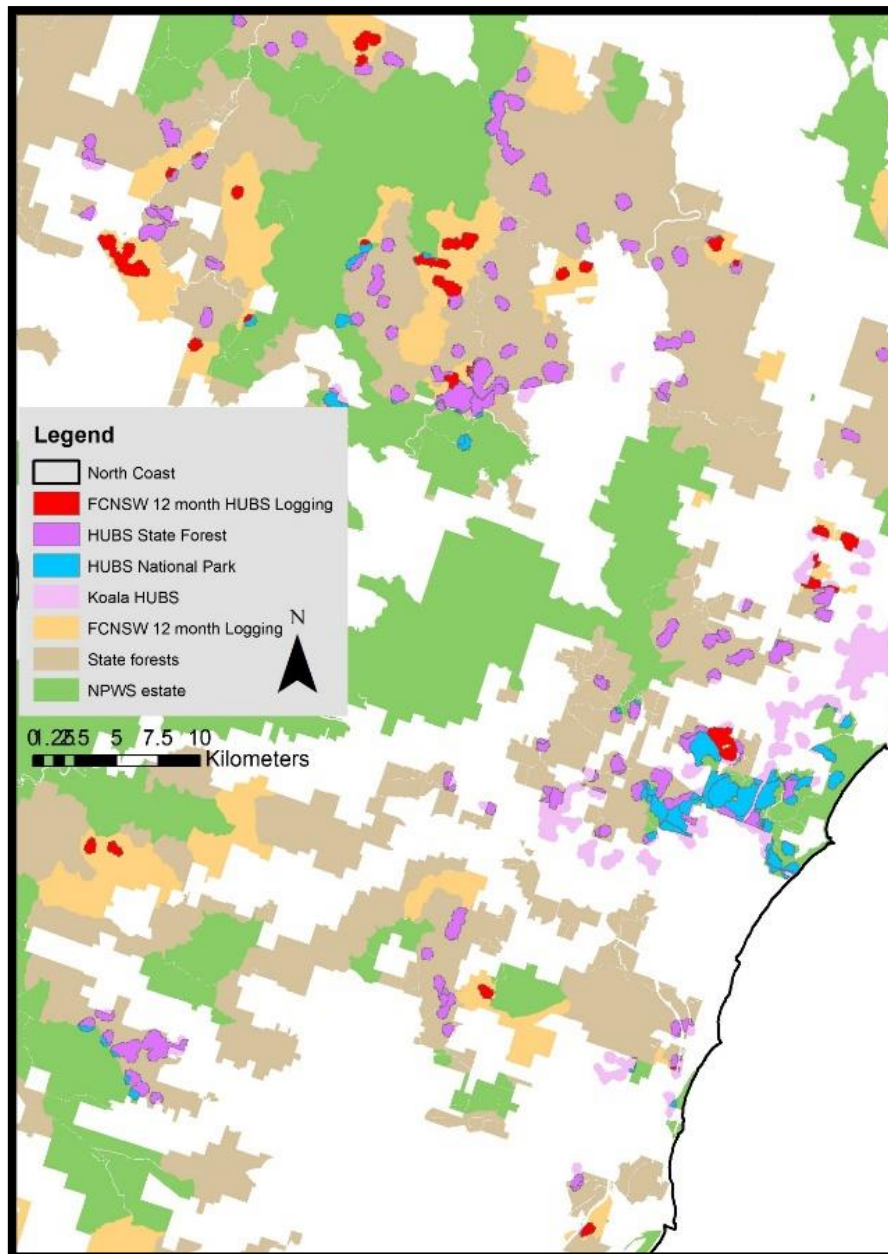
Koala Hubs were identified in 2017. At the request of the Chief Scientist, the Office of Environment and Heritage analysed Koala records “to delineate highly significant local scale areas of koala occupancy currently known for protection”, identifying “areas of currently known significant koala occupancy that indicate clusters of resident populations known as Koala Hubs”. They are based on pre-2017 records, and in part depend on whether there have been repeat surveys to identify long-term residency, they therefore only show a minority of areas of exceptional importance for Koalas.

The previous State Government refused to release this report, so it was obtained under a GI(PA) application. Since 2017 the Forestry Corporation and EPA have ignored Koala Hubs and [continued to log them without modification](#).

There are 62,745 ha identified a Koala Hubs within the North Coast region, comprised of:

- National Parks and reserves: 7,507 ha (12%)
- State Forests 15,318 ha (24.4%)
- Other tenures 39,920 ha (63.6%)

Forestry Corporation's [Coastal IFOA Native Forest Plan of Operations Map \(12 Months\)](#) accessed on 22 May 2023 identifies 81,404 ha of native forest compartments within the North Coast IBRA region at various stages of planning for logging; 16,311 ha is actively being logged at this time, some have been recently logged, and others are being planned for logging. Within this area there are 2,716 ha of identified Koala Hubs, with 528 ha in compartments actively being logged at this time.



Part of the proposed Great Koala National Park, showing FCNSW 12 month Plan of Operations, overlaid with Koala Hubs. Red hubs are within compartments identified for logging.

### 3. Reserve Status of the North Coast Region

The national and regional planning framework for the systematic development of a comprehensive, adequate and representative '[CAR](#)' National Reserve System is provided by the [Interim Biogeographic Regionalisation for Australia](#) (IBRA). The latest version, [IBRA7](#), classifies Australia's landscapes into 89 large geographically distinct bioregions based on common climate, geology, landform, native vegetation and species information.

For simplicity, in this report the IBRA bioregion of NSW North Coast has been incorporated with the New South Wales section of the South East Queensland IBRA bioregion, and is herein termed the North Coast Region. The total area covered is 5.6 million hectares, from the Hunter River north to the Queensland border, and west to the Great Escarpment, where it adjoins the New England Tablelands bioregion. Currently the tenure is comprised of:



- National Parks and Reserves 1,219,977 ha (21.6%)
- State Forests 710,212 ha (12.6%)

Claimed hardwood plantations and pine plantations comprise 42,571 ha of State forests, indicating the area of native vegetation on State forests as around 667,641 ha (11.8 % of the bioregion).

For the NSW North Coast IBRA bioregion, 25.3% is currently reserved, with 8 of the 19 sub-regions below 20% reserved:

Cataract 4.8%, Ellerston 1.7%, Karuah Manning 16.1%, Macleay Hastings 14.2%, Mummel Escarpment 19%, Rocky River Gorge 15.2%, Tomalla 5.6%, Upper Hunter 1.4%,

For the NSW section of the South Eastern Queensland IBRA region incorporated in this assessment, 14% is currently reserved, with all 6 IBRA subregions having under 20% in existing reserves:

Burringbar-Conondale Ranges 6.3%, Clarence Lowlands 11.2%, Clarence Sandstones 14.8%, Scenic Rim 18.9%, Sunshine Coast-Gold Coast Lowlands 6.3% and Woodenbong 14.4%.

For one of the world's 36 [Biodiversity Hotspots](#), it is clear that we need to protect all native vegetation on State forests to progress the State and Federal Government's goal to protect [30% of our land area by 2030](#).