

# Braemar State Forest Supplementary Audit 1

Dailan Pugh, North East Forest Alliance, August 2019

On 28 July NEFA located part of a nationally significant Koala population in part of Braemar State Forest scheduled for logging this month. It is part of a larger population that NEFA had previously identified in Royal Camp and Carwong State Forests in 2012 and 2013, which, at the then Environment Minister's request, had been verified by the EPA as being of national significance.

NEFA identified part of an extensive Koala High Use Area (HUA) marked-up for logging. The harvesting plan, and marking-up, showed it was going to be logged under the old IFOA logging rules which required the identification and protection of Koala HUAs. Our appeal to Premier Gladys Berejiklian to intervene to protect Braemar's Koalas was in vain.

Far from identifying and protecting Koala HUAs the Government now intends to log it under Premier Berejiklian's new Coastal IFOA logging rules, which remove the protection for Koala HUAs and require that nothing specifically be done to mitigate impacts on Koalas in this area.

NEFA returned on 8 August to further assess the distribution of Koalas in the proposed logging area, identifying that the Koala HUA likely extends over 24 hectares, that other Koala HUAs are likely to be present, and that outside Koala HUAs Koalas are widespread but limited by the low numbers and diversity of feed trees due to previous logging.

It is not acceptable for the Forestry Corporation to be allowed to rampage through a nationally significant Koala population. As his predecessor did, the Environment Minister Matt Kean must intervene to ensure Braemar's Koalas are fully assessed and adequately protected.

## Findings

NEFA's audit of compartments 23 and 24 of Braemar State Forest on Sunday 28 July located an extensive Koala High Use Area in an area marked up for imminent logging by the Forestry Corporation. NEFA wrote to the Premier Gladys Berejiklian on 30 July 2019 asking her urgently intervene to ensure that independent surveys are undertaken to identify all important Koala habitat in Braemar State Forest before logging starts, and to ensure that a full assessment is undertaken of Koala habitat on the Richmond River lowlands given their demonstrated importance as Koala habitat. She passed our request onto the Environment Minister Matt Kean, who in turn passed it onto the EPA who don't intend to do anything to protect this very important Koala habitat.

NEFA were subsequently told that despite having prepared a harvesting plan and marked up the forest for logging under the old IFOA logging rules, the Forestry Corporation were now renumbering the compartments as 6 and 7 and were preparing a new harvesting plan to log the area under the new logging rules which no longer require pre-logging searches for, and protection of, Koala High Use Areas.

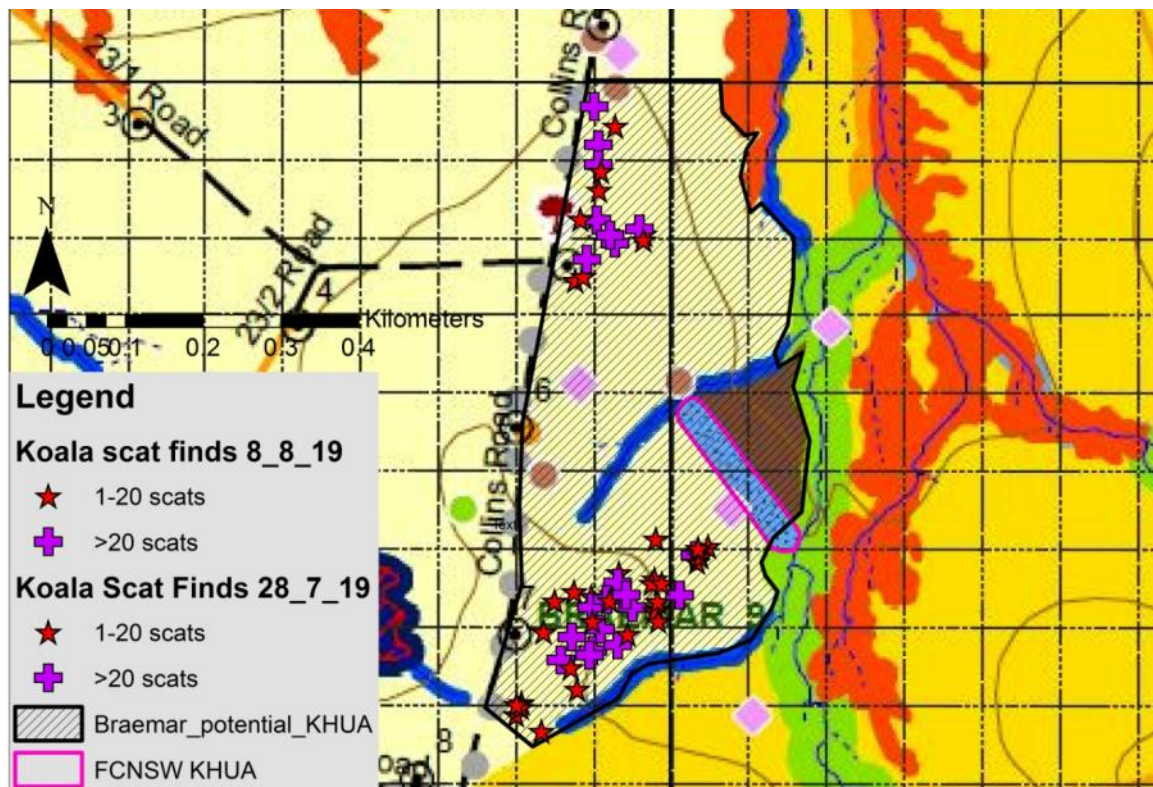
On the 8 August 2019 NEFA returned to Braemar to obtain a better understanding of the distribution of Koalas and habitat in the logging area. Three areas were briefly assessed.

The first was about 500m to the north of the 3 ha Koala High Use Area (HUA) previously identified.

In an area of about 2ha 16 trees were identified with Koala scats beneath them, 8 with 1-20 scats and 8 with 21-50 scats. Note that this area was not comprehensively searched, meaning more feed

trees are present. Once again the whole area was considered to comprise a Koala HUA, and the high use area extended outside the area searched.

Based on our findings of 2 Koala HUAs totalling 5ha, as well as the Forestry Corporation's identified 0.9ha HUA in the same vicinity, it appears that the intervening habitat would also constitute part of an extensive Koala High Use Area encompassing at least 24 ha of the net logging area, and likely extending outside this area.

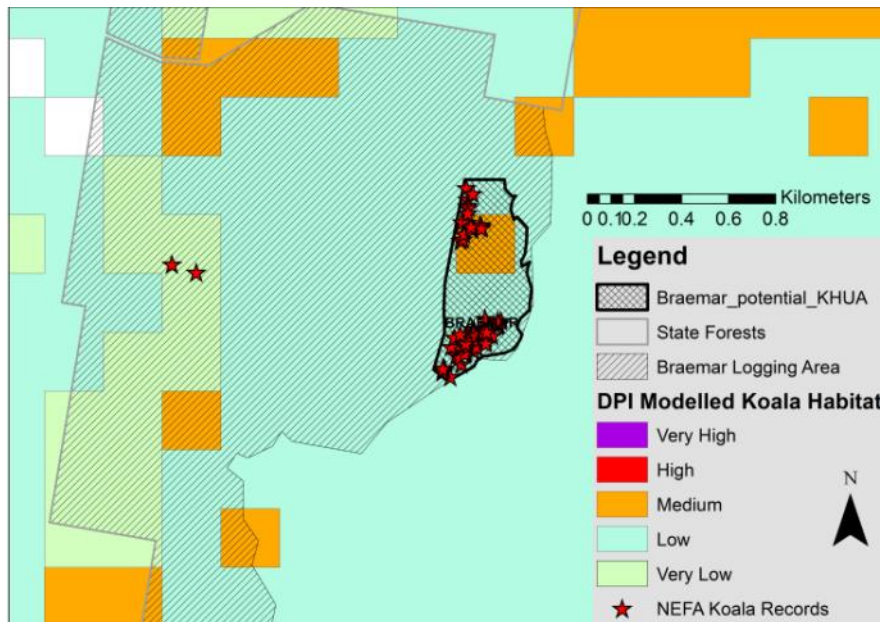


Different sized scats show the presence of males, females and joeys. It appears that the relatively high abundance of red gums, grey gum and grey box all contribute to the exceptional Koala values of this area.

Our brief assessments on 8 August of other parts of the forest identified relatively low densities of these feed trees. The two additional areas (<1 ha) briefly searched reflected this. A single tree was found with one scat at the second site. At the third all Grey Gums inspected had distinctive Koala scratch marks, with one having 21 scats and another 1 scat. Scats were not found under most trees with abundant Koala scratches.

These results indicate a widespread population of Koalas utilising most of the forest, with extensive Koala HUAs limited to parts of the forest with high densities and diversities of feed trees. Outside these areas Koala densities appear limited by the availability and diversity of feed trees due to past logging.

Under the new Koala rules only 10 small (20cm) feed trees per hectare need to be retained in modelled high quality habitat and 5 feed trees in compartments with more than 25% modelled medium quality habitat. There is no modelled high quality Koala habitat, and because less than 25% of these compartments have been identified as medium quality habitat there are no requirements to protect any Koala feed trees.



**Comparison of NEFAs Koala records with DPI-Forestry's model of Koala habitat that is being relied upon for prescriptions. Note that most of the potential Koala HUA identified by NEFA is modelled as low quality Koala habitat, and that the high use tree found further to the west in an area where numerous Grey Gums had Koala scratches is modelled as very low quality Koala habitat. The model is a farce and not a suitable replacement for pre-logging surveys.**

It is ironic, given there are no requirements to retain feed trees, that in its media response to NEFA the EPA now claim "*The Coastal IFOA uses new koala habitat maps to predict where koala habitat occurs and requires specific koala feed tree protections regardless of the presence of a koala*".

The EPA also claims that "*The Coastal IFOA requires FCNSW to consider permanently protecting important koala habitat in new exclusion zones called wildlife habitat clumps and tree retention clumps*". The new requirements for wildlife habitat clumps and tree retention clumps over 10% of the logging area will mostly encompass existing exclusions and do not require the inclusion of Koala habitat - it is only one of many considerations. Protecting just small fragments of high use areas is not good enough.

In their media response to NEFA the Forestry Corporation state that:

*The new Coastal IFOA contains new, improved conditions for koala protection that were developed by experts drawing on the newest research into koala habitat. Because koalas themselves are difficult to find in the field, the new conditions focus on identifying and protecting koala habitat and feed trees. We will continue to look for koalas and their habitat throughout the mark-up of the area and have already identified a number of patches of koala habitat for permanent protection. We will also ensure that preferred koala browse trees are kept right across the harvest area. Overall more browse trees and preferred habitat for koalas will get protected under the new rules.*

These claims are patently false. In 2016 the EPA undertook a project overseen by an expert panel to review various approaches to map potential Koala habitat, with extensive groundwork to test the mapping. The project found that neither modelling nor ecosystem mapping were accurate enough to identify the "*occurrence of feed trees and therefore habitat class at the level of detail required for management in state forests*", with the panel unanimously agreeing that "*the primary intent and*

focus should be to identify the location, distribution and extent of areas that are supporting extant/resident koala populations".

In his review for the EPA's (2016) Pilot Mapping Project, Phillips (2015) stated:

*... note that the question of what is being protected has also been raised. I would have thought that this was a question that should not have required an answer when surely the most important thing to protect are remaining areas of habitat that are currently supporting resident koala populations. This consideration remains independent of the issue of habitat quality and so should be the primary objective of management.*

DPI Forestry's model of Koala habitat is so shonky that it identifies most of the exceptional Koala High Use Area we have identified as low quality habitat not requiring any Koala feed tree retention.

The agency experts advising on prescriptions recommended the retention of 25 Koala feed trees over 25cm diameter in modelled high quality habitat and 15 in medium quality habitat, though because of the Forestry Corporation's claims of timber impacts the Government reduced retention rates down to 10 and 5 trees respectively, and tree size down to 20 cm diameter. Even where they are applied these small trees will do very little to mitigate impacts.

In their submission to the new logging rules, the Office of Environment and Heritage (2018) complained that the new Koala feed tree retention rates are less than half the number and of a smaller size than proposed by the Expert Fauna Panel, concluding that the increased logging intensity proposed under the new rules is expected to impact Koalas through diminished feed and shelter tree resources:

*Koalas are selective both in their choice of food tree species and in their choice of individual trees. The scientific basis for proposed tree retention rates in the Draft Coastal IFOA is not clear, and the rates are less than half those originally proposed by the Expert Fauna Panel.*

*While Koalas will use small trees, research has shown that they selectively prefer larger trees. In our experience, the proposed minimum tree retention size of 20cm dbh will be inadequate to support koala populations and should be increased to a minimum of 30cm dbh. Many Koala food trees are also desired timber species, so there is a high likelihood that larger trees will be favoured for harvesting, leaving small retained trees subject to the elevated mortality rates experienced in exposed, intensively-logged coupes.*

*Koalas require large areas of connected habitat for long-term viability. The increased logging intensity proposed under the draft Coastal IFOA is expected to impact Koalas through diminished feed and shelter tree resources. Animals will need to spend more time traversing the ground as they move between suitable trees that remain, which is likely to increase koala mortality.*

This case proves how grossly inadequate Premier Berejiklian's new rules for Koalas are. If we are to give Koalas a future it is essential that we identify and fully protect remnant populations, particularly those of outstanding significance on public lands, as in Braemar.



# Appendix 1: Koala Scat Records

y_proj	x_proj	Koala scats
6787746	498876	1
6787751	498886	2
6787773	498891	50
6787794	498927	30
6787805	498964	10
6787823	498903	23
6787825	498882	3
6787812	498958	23
6787798	498963	4
6787804	498920	24
6787969	498900	22
6787920	498906	22
6787944	498927	9
6787895	498905	25
6787886	498909	1
6787645	497648	21
6787610	497752	1
6787862	498906	2



6787610 497752



6787645 497648



Not recorded.



6787886 498909



6787895 498905



6787944 498927





6787920 498906



6787969 498900



6787804 498920



6787798 498963



6787825 498882



6787823 498903



6787794 498927



6787805 498964



6787773 498891



6787751 498886 .....



6787746 498876