

North East Forest Alliance

NORTH EAST FOREST ALLIANCE

Dailan Pugh OAM
President
North East Forest Alliance

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The Hon Kevin Hogan MP
Member for Page.
63 Molesworth Street
Lismore, NSW, 2480
kevin.hogan.mp@aph.gov.au

Dear Mr. Hogan,

Within the Page electorate it is evident the Spotted Gum forests of the Richmond River lowlands, with their extensive stands of Koala feed trees (particularly Grey Gum, Grey Box, and various Red Gums), are a priority area for Koala conservation with the capacity to support a viable population of Koalas, with great potential for population-level recovery from the wildfires and logging.

Unfortunately, the 2019 fires left this Koala population in a highly vulnerable state, which is currently being aggravated by logging of priority koala habitat on State Forests in accordance with North East NSW Regional Forest Agreement signed by Prime Minister Scott Morrison in 2018.

In light of the Commonwealth's listing of Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) as Endangered, and the identification in the Conservation Advice as urgent (a) increasing the total area of protected, connected quality koala habitat in priority areas, and (b) reviewing statutory planning instruments to avoid or minimise impacts of land management on koalas, NEFA are writing to request that you:

1. Make urgent representations to Environment Minister Susan Ley to engage independent experts to review NEFA's proposed Sandy Creek Koala Park and identify other priority koala habitat within the Northern Rivers for incorporation into state protected areas.
2. Make urgent representations to Prime Minister Scott Morrison to modify the North East NSW Regional Forest Agreement to require:
 - a. pre-logging surveys by independent experts to identify koala habitat prior to logging commencing, and
 - b. protection of identified Koala habitat to retain the quality food and shelter trees needed to meet their daily energetic requirements

Given the urgent need to mitigate threats to Koala's survival, NEFA requests that you please inform us what action you take in response these requests, and what the outcome is.

Commonwealth responsibilities for Endangered Koalas:

I note that until the Recovery Plan is released, guidance is provided by the '**Conservation Advice for *Phascolarctos cinereus* (Koala) combined populations of Queensland, New**

South Wales and the Australian Capital Territory', which came into effect on 12 February. It notes:

Biophysical habitat attributes for the koala include places that contain the resources necessary for individual foraging, survival (including predator avoidance), growth, reproduction and movement. The total amount of resources (including habitat attributes) and how they are arranged in the landscape influence the viability of metapopulations and processes.

For an individual koala, these resources include access to sufficient quality food and shelter trees to meet their daily energetic requirements and reproductive needs, and a place to avoid predators.

An identified major threat to Koala's survival is "Clearing and degradation of koala habitat", including by "timber harvesting".

I wish to bring your attention to two identified actions in particular; 3a and 4b. These are both recognised as Priority 1 actions, being of the utmost urgency:

Strategy 3: Increase habitat protection

Land-use change is the most significant threat to the koala through habitat loss, fragmentation and degradation. Increasing the total area of protected, connected quality koala habitat in priority areas will be important to protect and recover koala populations.

3a. 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.

Strategy 4: koala conservation is integrated into policy, and statutory and land-use plans.

Management actions alone will not be sufficient to recover the koala. Actions are needed to ensure harmonisation of existing and future planning and policy settings such that they collectively contribute appropriately to maximising the chances of long-term survival of koalas in the wild. ...

4b. Review, revise, and strengthen where appropriate, statutory planning instruments, policies, and compliance controls at all levels of government, including local government, to avoid or minimise impacts of land use or land management on koala conservation.

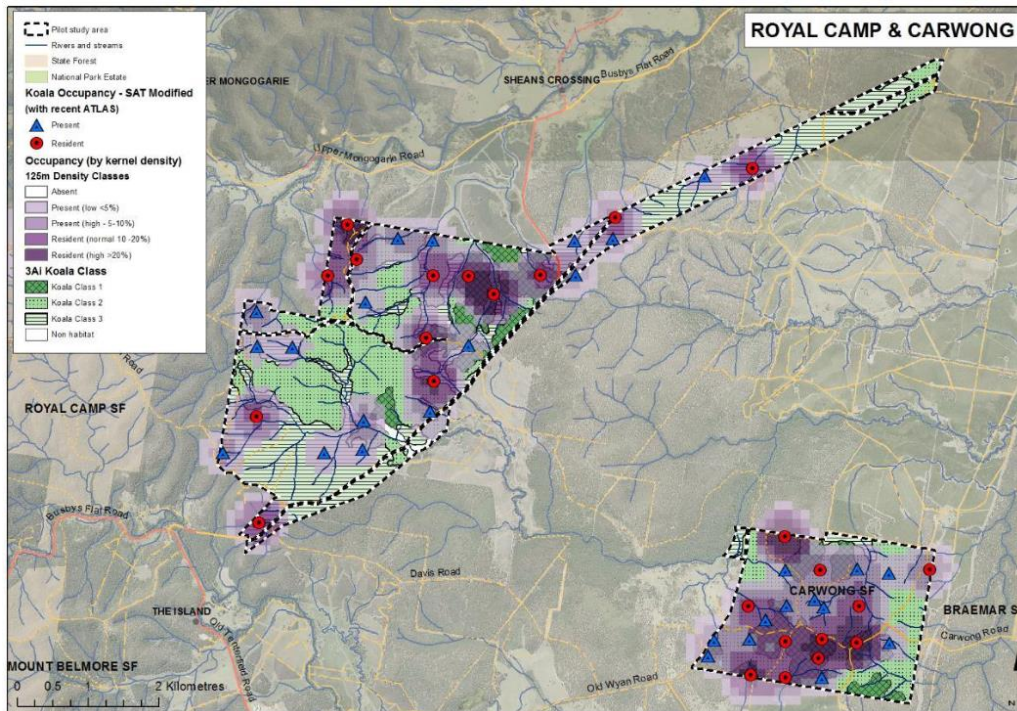
The importance of the Richmond River lowlands for Koalas.

Since 2012 myself and a variety of ecologists and community volunteers have been undertaking surveys focussing on Koalas on State forests across the Richmond River lowlands.

These surveys have revealed Koalas to be widespread, with populations concentrated where there are high numbers of larger (>30 cm diameter) Small-fruited Grey Gum, Coastal Grey Box and red gums.

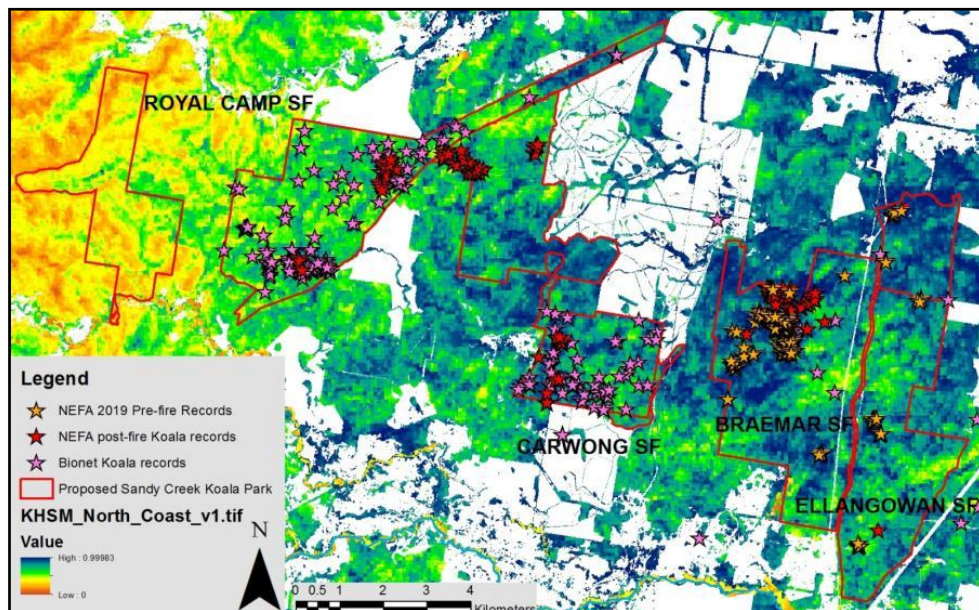
Back in 2013 we first recommended that Royal Camp and Carwong State Forests be protected as the Sandy Creek Koala Park, primarily because of the high densities of Koalas

we found. At the behest of the then NSW Environment Minister, the EPA commissioned 2 studies, including EPA (2016) '[Koala Habitat Mapping Pilot: NSW State Forest](#)', which confirmed NEFA's findings of widespread resident Koalas. This proved the accuracy of our findings.



Map 19 from EPA 2017: Potential habitat utilisation by 3Ai koala class – Royal Camp and Carwong state forests. Note that the red circles represent resident Koalas.

More recently in 2019 we found even higher densities of Koalas in Braemar State Forest, and subsequently began undertaking surveys in adjoining forests, also finding Koalas widespread in Ellangowan State Forest. We thus began preparing a proposal for an enlarged 7,000 ha [Sandy Creek Koala Park](#).



Proposed Sandy Creek Koala Park: All Koala records overlaid on DPIE model of likely Koala habitat (blue is highest quality habitat).

The situation changed on the night of 8 October 2019 when the Busby's Flat fire burnt out 93% of the proposal overnight - killing most of the Koalas. There was an apparent loss of 78-89% of Koalas. While Koalas were eliminated from the most intensively burnt stands, they did survive in the less intensively burnt areas, and will recover over time. While the most intensively burnt Koala habitat may not currently be occupied, it is still required to accommodate future population increase and recolonisation.

Since the fires we have also located surviving Koalas in pockets amongst burnt forest in [Myrtle](#) and [Camira State Forests](#). Most recently we have found widespread Koala occupancy in unburnt stands in [Cherry Tree State Forest](#). These results show that Koalas are widespread across the Spotted Gum forests of the Richmond Rivere valley.

It is evident from the extensive areas of suitable Koala habitat identified across the Richmond River lowlands, and the widespread distribution of Koalas, that this area is a priority area for Koala conservation with the capacity to support a viable population of Koalas, and amongst the greatest potential for population-level recovery from the wildfires and logging.

Given the demonstrated importance of these forests for Koalas, in accordance with the Conservation Advice's urgent priority to increase the overall area of protected koala habitat by dedication of Crown land as priority koala habitat for incorporation into the state protected areas, NEFA requests that you make urgent representations to Environment Minister Susan Ley to:

- 1. Engage independent experts to review NEFA's proposed Sandy Creek Koala Park and identify other priority koala habitat within the Northern Rivers for incorporation into state protected areas.**

Logging rules for Koalas:

Along with Gladys Berejiklian, Prime Minister Scott Morrison signed the North East NSW Regional Forest Agreement on 28 November 2018. In doing so he accredited the logging rules detailed in the 2018 Coastal Integrated Forestry Operations Approval (CIFOA), which the Commonwealth had previously approved.

These rules replaced those that had been in operation since 1998. The new rules removed the need for the Forestry Corporation to thoroughly search for Koalas ahead of logging and identify Koala High Use Areas for protection. The intent of this rule had been to identify and protect the highest quality Koala habitat, though poor implementation had resulted in only 200 ha being protected over 15 years. NEFA often found Koala High Use Areas on the Richmond lowlands where the Forestry Corporation failed to identify them. Rather than requiring an independent body or deploying scat-detection dogs to look for them, the requirement was deleted.

Because of the deficient modelling relied upon, at most 5 small (20cm diameter) Koala feed trees per hectare need to be retained across State forests in the Richmond catchment in modelled 'medium' quality Koala habitat (Prescription 2), with no feed trees required in the extensive areas not identified as medium habitat. Aside from this, the only other requirement is that if they see a Koala in a tree, they need to wait for it to leave before cutting it down.

From our plots across the proposed [Sandy Creek Koala Park](#) NEFA identified there are on average 56.9 potential Koala feed trees >20cm dbh per hectare. This means that at best only 8.8% of existing Koala feed trees need to be retained. Of the trees 20-29.9 cm dbh, 17.7 are Koala feed species, meaning that only 28% of these small trees are required to be

retained to satisfy tree retention requirements. There are effectively no requirements to retain the larger trees (>30cm diameter) preferred by Koalas.

As there are no requirements to search for Koalas ahead of logging or select retained feed trees based on actual Koala usage (i.e. presence of scats or scratches), none of the identified 5 potential Koala feed trees per hectare may actually be used by Koalas.

Because Koala High Use Areas no longer require identification or protection, the retention of just 5 arbitrarily chosen small potential feed trees per hectare in core Koala habitat will do little, if anything, to mitigate impacts.

In their submission (obtained by GIPA) 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.

It is evident that the North East NSW RFA and CIFOA do not provide any meaningful protection for Koala habitat on State Forests in the Richmond River catchment. In recognition of the Koala's status as Endangered, and in accordance with the Conservation Advice's urgent priority to revise and strengthen statutory planning instruments to avoid or minimise impacts of land management on koala conservation, NEFA requests that you make urgent representations to Prime Minister Scott Morrison to modify the North East NSW Regional Forest Agreement to require:

- a. pre-logging surveys by independent experts to identify koala habitat prior to logging commencing, and**
- b. protection of identified Koala habitat to retain the quality food and shelter trees needed to meet their daily energetic requirements**

Yours sincerely,

Dailan Pugh OAM, President, North East Forest Alliance.