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Dear Jonathan

**Re protection of the koala in southeast Queensland and review of current koala interventions**

Thank you for the opportunity to make this submission to the Southeast Queensland Koala Expert Panel. The Queensland Conservation Council is the state's peak conservation organisation). We are deeply concerned about the plight of the koala in the southeast part of Queensland, recognising the species has experienced a dramatic collapse in population in recent years, and likely faces eventual extinction in the wild in the region.

The need for projection measures for the local and subregional populations of koalas in southeast Queensland, and the risks of extinction in this region have previously been acknowledged by government (Qld Department of Environment 2008<sup>1</sup>) and by conservation specialists (such as Professor Frank Carrick 2009<sup>2</sup>). More recent research by yourself and colleagues has confirmed many of the earlier identified trends.

We acknowledge that the Queensland Government has established the Koala Expert Panel, of which you are Chair, to provide advice on "the protection of the vulnerable koala in southeast Queensland". Whilst we would much rather see the emphasis placed on positive action and addressing the fundamental underlying issues with the decline of koalas, rather than yet more research, we do recognise the importance of proper evaluation of existing interventions and of further highlighting what should be done to better protect the koala in southeast Queensland. Not that we see these as being hard to pinpoint: loss of habitat, loss of safe space in which to move, and the stress this places on the species.

We have studied the final Terms of Reference. The Queensland Conservation Council wishes to see the Expert Panel provide strong, clear scientific analysis and decisive conservation policy advice on

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<sup>1</sup> 'Decline of the koala coast koala population: population status in 2008', Department of Environment and Resource Management, April 2009

<sup>2</sup> Whither the SEQ Koala? Professor Frank N Carrick AM, 2009.

the protection of the koala in southeast Queensland, and to offer an honest and frank assessment of current interventions.

The Queensland Conservation Council believes there are some fundamental reforms and actions necessary to help protect the koala in southeast Queensland, including:

1. Mapping remaining koala habitat and updating koala statistics.
2. Stopping the clearing of koala habitat under the Vegetation Management Act.
3. Fixing current legislation which acts to facilitate destructive development in koala habitat areas (eg roads and transport laws, planning law, state development laws, offsets laws).
4. Stopping road kill with 'Green Fauna Infrastructure', changing road speeds, and so on.
5. Reducing the escalation of koala euthanasia rates, and releasing official statistics on this.
6. Managing dogs in koala habitat areas.
7. Implementing Bushland Buyback and joining up wildlife and nature corridors.
8. Creating/expanding specific koala reserves and protection zones.
9. The Queensland government adopting a transparent, strong policy statement about prioritising koala and koala habitat protection.

The remainder of this submission seeks to expand on these reforms and actions.

### **1. Mapping remaining koala habitat and updating koala statistics.**

It is essential that remaining koala habitat – both outside the urban footprint, and within it - is comprehensively mapped. The re-evaluation of the Statutory Protection Mapping to include High Value Regrowth and secondary habitat is warranted as most primary habitat has been lost. Where available, detailed essential koala habitat mapping can be good, but we are concerned that these can be avoided when developers use consultants and single day koala studies to challenge it.

The lack of mapping is compounded by the lack of koala statistics post 2012. We are concerned that it is now difficult to determine the precise picture of division of harm because of the lack of four years' worth of complex koala statistics indicating populations, demographics, observations, injuries and mortality

***Recommendation: properly map remaining koala habitat in southeast Queensland, including primary and secondary habitat areas***

***Recommendation: Address gaps of contemporary knowledge on koala populations, land use change and koala mortality***

### **2. Stopping the clearing of koala habitat under the Vegetation Management Act.**

Queensland Conservation Council is extremely concerned about the ongoing loss of koala habitat in Southeast Queensland. Habitat trees are being cleared for agriculture, housing and commercial development, transport and other purposes. Thanks to changes to the Vegetation Management Act in 2013, legislation no longer protects High Conservation Value Regrowth vegetation, which can be just as important as remnant woodland for koalas.

Each of these factors is leading to the direct destruction of the places where koalas live, feed and breed. Land clearing is the largest single threat to biodiversity in Queensland, and koalas are suffering from remnant woodland and specific tree clearing. Koala habitat needs strong protection, and land clearing is a huge threat to koalas.

It is acknowledged that the Palaszczuk government has attempted to strengthen the VMA as far as High Conservation Value Regrowth is concerned, as well as the clearing of remnant woodland for so-called high value agriculture, but this was thwarted in the Parliament. We also recognise that Labor has recommitted to passing stronger laws when it has the numbers in Parliament.

However, it is now imperative that such law reform be extended to protecting koala habitat from all types of clearing.

***Recommendation: the Vegetation Management Act be amended as soon as possible to provide maximum protection of koala habitat in Southeast Queensland. Remnant woodlands and trees and High Conservation Value Regrowth in koala areas need urgent and comprehensive protection.***

**3. Fixing other legislation and policies which acts to facilitate destructive development in koala habitat areas (eg roads and transport laws, planning law, state development laws, offsets laws).**

Tree clearing under the Vegetation Management Act is one part of the threats to koala habitat and koalas. A range of other legislation also acts to allow or facilitate threats to the koala. Most of these legislative provisions are not adequately tied to Ecologically Sustainable Development outcomes, or the Precautionary Principle in particular. They are routinely overridden by planning schemes and Council and State Government Decisions.

The Department of Environment and Heritage Protection is not empowered to effect environmental vetos or to necessarily provide advice and use referral powers to the State Assessment and Referral Agency in the Department of Infrastructure, Local Government and Planning.

Offsets allowing for the destruction of primary koala habitat appear to be a foregone conclusion, but most clearing is not in the State Offsets Register, indicating Local Authority or as of right or other Offset /Exemption clearing has unacceptably occurred.

Overall, it appears that state and Federal legislation is failing the koala in southeast Queensland, through a combination of overriding legislation, poor planning or planning mechanisms which prioritise development over koala protection, a lack of basic habitat protection and a lack of enforcement, the operations of Offsets Act 2014 and lack of instruments to prioritise koala protection.

***Recommendation: Planning, transport and urban living legislation and policies as they operate in or affect Southeast Queensland should be required to deliver proper protection for the koala, and avoid destruction of koala habitat.***

#### **4. Stopping road kill with 'Green Fauna Infrastructure', changing road speeds, and so on.**

Road-related injuries and deaths continue to be a key problem for koalas in Southeast Queensland. This includes main roads and carriageways, as well as neighbourhood streets. We believe that many of these injuries and deaths could be avoided through the application of suitable infrastructure and road traffic management.

In the first instance, the state government and local governments should resist the construction of new major roadways through koala habitats or known movement areas.

For existing roads and streets, Green Fauna Infrastructure should be employed– which includes appropriate protection fencing, wildlife tunnels, wildlife corridor bridges and other mechanisms – to create safer opportunities for koala movement. These need to be closely monitored and managed for predation by wild dogs.

It is understood that the Department of Main Roads has previously researched these mechanisms and has the necessary policy knowledge to create stronger regulation of traffic, but does not currently use it. We also recognise that there would appear to be some successful instances of Green Fauna Infrastructure (Karawatha, Kuraby), and examples of poor outcomes and recent policy failure (Moreton Bay Road, Moreton Bay rail line).

We also believe that much more could be done to better manage local neighbourhood traffic, to create safer movement for koalas. Options here include reduced speed limits, increased warning signs and illuminations, painted zones, traffic calming, and community awareness, education and acceptance of these approaches.

***Recommendation: A clear evidence base of Green Fauna Infrastructure and traffic management options and experiences should be developed and used to massively increase the use of mechanisms to allow safe movement of koalas in traffic areas.***

#### **5. Reducing the escalation of koala euthanasia rates, and releasing official statistics on this.**

The Queensland Conservation Council is deeply concerned about apparent escalating euthanasia rates of koalas, although with a lack of formal statistics it is hard to know precisely how big a problem this is. At the very least, we have reasons to fear that the combination of injuries, stretched resources and adverse veterinary assessments of Chlamydia is resulting in many koalas being euthanised, some potentially unnecessarily so.

***Recommendation: Compile and release formal statistics on koala euthanasia rates and seek to avoid unnecessary euthanizing of koalas in Southeast Queensland.***

#### **6. Managing dogs in koala habitat areas.**

Dogs, both wild dogs and domestic dogs, can pose a major threat to koalas. This is particularly so during koala movement at night. Wild dogs in rural areas out to be managed through suitable fencing and necessary and humane pest management approaches.

Domestic dogs could be better managed through a combination of dog owner education and support for responsible dog management, suitable garden fencing, better management of strays and street roaming domestic dogs, and night curfews (at least for unleashed dogs) in known koala habitat areas. We understand that a similar cat curfew has operated in Victoria as a wildlife protection instrument.

***Recommendation: Better management of wild and domestic dogs in koala habitat areas.***

## **7. Implementing Bushland Buyback and joining up wildlife and nature corridors.**

While the better protection of koalas and their habitats, and the better management of threats to the koala, all need to be applied comprehensively across Southeast Queensland, it is also recognised that the region needs additional, formally protected areas for the koala. These include expanded National Parks, additional conservation areas, further Bushland Buybacks, and also the joining up of wildlife and nature corridors between these and other areas of known koala habitat.

More broadly, the state could adopt a formal 'koala first' policy when looking at uses of crown land.

***Recommendation: further acquisitions under the 'Bushland Buyback' scheme, and the joining up wildlife and nature corridors, should be supported.***

## **8. Creating/expanding specific koala reserves and protection zones.**

On the issue of specific koala reserves, we are very anxious to ensure this does not become the default policy approach. Comprehensive strategies need to be applied across the board. But this does not mean there is no place for reserves: the current Daisy Hill koala reserve could and should be massively expanded and kept as a conservation area (not a mountain bike trail area or a training ground for sporting events).

We would also like the government to explore the option of using the Powerlink site at Diana's Bath, Somerset, as a koala reserve. This has 3,000ha available we believe, and may be a suitable site for a northside koala reserve.

We would also like the Queensland government to recognise the opportunity that exists on Minjerribah (North Stradbroke Island) for koala protection. Minjerribah has a naturally occurring population of koalas that are healthy and apparently breeding well and as such are of high conservation value. However, no-one knows how many koalas are on the island and how they are trending. There has never been a whole of island population census.

Threats to koalas on Minjerribah include, car strike, dog attack, fire, habitat loss, potential disease introduction. Not damaging the island hydrology is important because koalas prefer trees associated with island's wetlands and other areas that get adequate moisture. There is a risk of introducing pathogens that the island koalas are not adapted to via koalas returning to the island after treatment on the mainland. Sick and injured koala should be treated on the island and could be if some basic support was provided to compliment expertise

There is an opportunity to support the Quandamooka Yoolooburrabee Aboriginal Corporation (QYAC) and the local community in their desire to ensure the island's koala population remains viable for the long term. The island's koalas are of significant cultural value to the Quandamooka People. They are also an important and valuable tourist attraction particularly as the island builds itself as an eco-cultural tourist and education destination.

***Recommendation: specific koala reserves and protection zones should be created and expanded. The opportunity that exists on Minjerribah (North Stradbroke Island) for koala protection should also be pursued.***

## 9. Current state government policy towards koala protection.

The Queensland Conservation Council remains unclear about what exactly the current state government policy is towards koala protection. There does appear to be an overall lack of government commitment and action to reverse the plight of the koala in southeast Queensland. In part this may be because of the loss of koala expertise (scientists and other staff) to monitor and implement responses over recent years. But it is mostly about a lack of prioritisation of the koala's protection as an environment and social policy issue.

***Recommendation: Expert Panel work with EHP to ensure that the draft report includes a clear statement of current policy intent, and current policy actions, as well as an assessment of their efficacy.***

Given the lack of certainty about koala numbers, locations, and the certainty about threats and pressures, we believe it is necessary and appropriate to now declare the koala in Southeast Queensland as 'Endangered'.

In Queensland threatened species are listed under the *Nature Conservation Act 1992*. Under that Act,

"A threatened species is any plant or animal species that is at risk of extinction. Different categories are allocated to threatened species depending on the degree of risk. These categories are based on a number of criteria including, trends in population size, health and distribution."

The criteria for declaring a species as 'endangered' are:

- there have not been thorough searches conducted for the wildlife and the wildlife has not been seen in the wild over a period that is appropriate for the life cycle or form of the wildlife; or
- the habitat or distribution of the wildlife has been reduced to an extent that the wildlife may be in danger of extinction; or
- **the population size of the wildlife has declined, or is likely to decline, to an extent that the wildlife may be in danger of extinction; or**
- **the survival of the wildlife in the wild is unlikely if a threatening process continues.**

Available koala data points to several instances where koalas have probably already become extinct locally or are close to this. Research by the University of Queensland indicates a collapse in koala population over the last twenty years in Southeast Queensland's. 80 percent of the koala population has disappeared from the Koala Coast area over this time, and more than half of the koalas have disappeared across Pine Rivers region during the same period.

It would therefore appear that these last two *Nature Conservation Act* criteria certainly apply in the case of the koala in Southeast Queensland. While the first does not at this stage, the second criterion does arguably apply as well. While declaring the koala in Southeast Queensland as 'Endangered' would represent a major policy step, it would also appropriately signal the seriousness of its situation, and would also be a catalyst for many other recommendations in this submission.

***Recommendation: the koala in Southeast Queensland be declared Endangered under the Queensland Nature Conservation Act 1992.***

By way of conclusion, something significant and radical needs to happen if we are to avoid complete extinction of the koala from Southeast Queensland. In reality, this 'something' is actually a suite of actions and interventions...no one single measure has worked to date and nor will it into the future. A number of actions and interventions need to be implemented simultaneously, and these need to be bound together through clear, strong policy delivers koala protection.

Understanding current approaches and where they are failing is important. While there are knowledge gaps, these are not an excuse for immediate responses, and we know those responses need to be more effective than our current ones because *prima facie* if government only does more of what it has tried already, on the evidence we do have...it will fail.

We urge the Southeast Queensland Koala Expert Panel to be bold, brave and forthright in its advice and recommendations to government. This could be the last real chance to offer proper protection for the koala in Southeast Queensland, and to avoid its effective extinction in the wild within the region. We hope that the above comments and recommendations are of some use and help in your work and deliberations.

Thank you once again for the opportunity to make this submission. Please do not hesitate to contact me should you require any additional information or wish to discuss anything we have raised.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Tim Seelig', with a long horizontal flourish extending to the right.

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