

COFFS HARBOUR CITY COUNCIL



Our ref: 2712414

8 February 2011

Committee Secretary
Senate Standing Committee on Environment and Communications
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Sir/Madam

Concerns over the status, health and sustainability of Australia's koala population, and conservation issues associated with Koala Habitat in the Coffs Harbour LGA.

Between 1996 and 2000, Coffs Harbour City Council (CHCC) undertook the preparation of a comprehensive Koala Plan of Management (KPoM) according to NSW State Government guidelines: *"Procedures for Preparing Comprehensive Koala Plans of Management under State Environmental Planning Policy 1995 (SEPP) No.44 - Koala Habitat Protection"*. The plan was given conditional approval in May 2000 by the Director General of the Department of Planning and Urban Affairs (DUAP). The plan was subsequently incorporated into Coffs Harbour City Council Local Environment Plan 2000 (LEP2000).

The principle aim of the KPoM is to provide a strategic framework for the conservation and management of koala habitat, and the management of threats to koalas. The mapping undertaken as part of this plan forms the basis for the identification of areas meriting protection through the planning provisions of the CHCC LEP 2000.

The KPoM identifies and ranks core koala habitat into primary, secondary and tertiary zones on private land in the LGA. In many cases, Council is the principle consent authority for development activities. However, almost half the land in the LGA is State Forests or National Parks, and as such, is not under council's jurisdiction. An even greater and ongoing concern has been the granting of logging approvals by the Private Native Forestry (PNF) a division of the Department of Environment, Climate Change and Water (DECCW). Currently DECCW has issued approvals in over 2,277 ha of the 19,000 ha of core koala habitat in the Coffs LGA.

'Core koala habitat' is a valid classification under the KPoM, and the significance of this type of habitat is formally recognised in the Private Native Forestry Code for Northern NSW under the listed species' ecological prescriptions. Based on this, Council considers the PNF approvals to be issued illegally and contrary to KPoM and PNF Code.

The logging approvals also contravene Clause 12 of the LEP that requires that the consent authority (Council) shall not grant consent to any development on lands mapped as primary, secondary or tertiary koala habitat, or on lands adjoining primary koala habitat, unless the development is in accordance with the KPoM. CHCC are in no way involved the PNF decision making, and thus are constrained in bringing a halt to the process.

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Whilst there are strong commitments and actions in a number of DECCW planning documents including the Recovery plan for the koala (2008) and the Northern Rivers Regional Biodiversity Management Plan (2010), Council feels that the approvals granted by DECCW under PNF are highly contradictory to their conservation objectives and actions. Council considers the resulting loss of koala habitat occurring under PNF approvals a serious management issue with the potential to contribute to ongoing declines in the local koala population as a result of habitat simplification and degradation.

Extracts from relevant DECCW documents.

The following extracts are from DECCW strategic documents and serve to illustrate the discrepancies between DECCW conservation policies on koalas, and the PNF approval process.

- Action 1.8
DECC will identify important koala populations in NSW for active management, monitoring and conservation.

For example, Coffs Harbour and Bellingen koala populations have been identified as two of approximately 12 important populations within NSW

Source – state Recovery plan for the koala 2008

- 3.1.4
Encourage local councils to prepare shire-wide or part shire-wide comprehensive Koala plans of management under the provisions of State Environmental Planning Policy No.44 – Koala Habitat Protection, to provide for the protection and management of Koalas and their habitat in the Region.

Source - *Northern Rivers Regional Biodiversity Management Plan 2010

(*document approved by state and federal government),

Extent of the PNF problem in the Coffs Harbour LGA.

The following statistics presented in Table 1 provide an indication of the extent of koala habitat that is affected by the DECCW Private Native Forestry Approvals.

Table 1. PNF approvals in core koala habitat

Total number of PNF approvals in the Coffs Harbour LGA	90
Number of properties with 'core koala habitat'	75
Total area of 'core koala habitat' affected	2277 ha
Primary habitat	58 ha
Secondary habitat	492 ha
Tertiary habitat	1726 ha

To protect koalas in the region the DECCW needs to consider the following options:

- Exclude all 'core koala habitat' from existing Forest Operation Plans;
- Integrate the KPoM spatial layers under the PNF system;
- Write to all private landholders with an existing PNF approval, and stipulate a mandatory requirement to undertake an independent and comprehensive flora and fauna assessment if they wish to challenge the boundaries of 'core koala habitat' mapping (using the principles in field verification of old-growth and rainforest protocols in the PNF code). The results of that study will inform a revised Forest Operation Plan by excluding 'core koala habitat';
- Refer proposed changes to the KPoM mapping to Council and be assessed assessment under the performance based criteria listed in the KPoM.
- Exclude all 'core koala habitat' from future Forest Operation Plans. The boundaries (only) can be modified if there is justification provided through an independent comprehensive flora and fauna assessment.

Council commends the Senate for undertaking this inquiry. The terms of reference are all very relevant and require great scrutiny if we are to see better outcomes for the conservation of koala habitat and populations in Australia. However, before embarking on any of the preferred outcomes on the above list, Council strongly urges the Senate to secure an improved commitment from state governments to agree to meaningful conservation initiatives that protect koala habitat. Further, that the Senate demand that the NSW state government immediately cease the practice of issuing PNF logging approvals in 'core koala habitat' and adjoining Endangered Ecological Communities (EEC's).

Yours faithfully

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