

Dr Vanessa Standing MVSc.

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10/11/10

RE: Integrated Forestry Operations Agreements Review

**Attention: The Director
Forest Agreement Review
59- 61 Goulburn Street
P.O. Box A290
Sydney South
NSW 1232**

Dear Director,

My comments for this review are based on my observations of koalas and their habitat on the mid north coast over the last twenty years as well as information from articles published in the scientific literature. Whilst my main interest is the koala, my comments are also relevant for other forest- dwelling animals, particularly the other threatened arboreal species such as the Yellow-bellied glider and the Squirrel glider.

I have been compelled to write this submission because of the harvesting operation which occurred in Compartment 31, Maria River State Forest earlier this year. I had seen a koala in this forest and scats in several locations and the pre-harvesting survey also found signs of koala activity. A harvesting operation had just been completed in this compartment when I moved to this area in 2001 resulting in the death of at least one female koala from Chlamydial disease. I wrote to the Minister to try and stop the latest operation and I enclose the correspondence which I received in reply. There have been similar operations in other forests in the Kempsey area e.g. the eastern part of Maria River SF, Tambarlopa SF and Ballengarra SF.

I have come to the conclusion that koalas are being deliberately and systematically exterminated from SF along the east coast of NSW. Forests on private land containing core koala habitat are also being harvested with little regard for the conservation of the koalas.

I do not say this lightly or to sound extremist. The problem is clearly with the threatened species licensing conditions and their implementation.

- The threatened species licence required that ten trees per two hectares had to be retained for koalas. A qualified ecologist carried out the pre-harvesting survey but a forestry officer obviously with no ecological knowledge, selected which trees which were to be retained. More than half the trees selected for retention (they were marked with a K) were**

close to the road, which being a ridge road, the soil is poor with limited water retention and totally unsuitable as koala food trees. The total annihilation of the understorey means these trees will be exposed to the weather and predators for at least five years.

All the retained koala food trees were of the one species (*E. microcorys*) and most of the good koala food trees were harvested.

- The trees selected for retention are only retained for this harvesting operation. When this compartment is harvested again in 5-10 years, another pre- harvesting survey will be done which will probably find no koala activity (no tree- no koala) and the retained trees will be harvested. The part of Compartment 31 which was not harvested this time probably will be at some time and then there will complete loss of koala habitat. This is a formula for koala extinction.

These licensing conditions are farcical, illogical and unscientific. Current scientific knowledge of the ecology and nutrition of the koala is not being considered and they are not consistent with the objectives of the NSW Recovery Plan for the Koala and certainly not conducive to the recovery of the koala population in the Kempsey Shire.

Milestone 5.4 of the IFOA review is definitely not completed or achievable under these conditions. Timber harvesting is a key threatening process and the IFOA threatened species licences are a formula for koala extinctions.

Koalas in the Kempsey Shire.

In 2008 the Kempsey Shire Council commissioned Biolink Ecological Consultants to do a koala study and prepare a Comprehensive Koala Plan of Management for the eastern part of the Kempsey Shire. (Lack of funding did not permit a Shire-wide study). This study produced some interesting results including:

- Most of the koala activity was associated with Secondary (class B) habitat category which comprise the bulk of potential koala habitat supporting *E.microcorys*, *E. proprinqua*, *E.globoidea* and /or *E.tindaliae* growing on erosional and residual soil landscapes.
- Whilst *E.microcorys* was the most preferred koala food tree across the study area, its utilisation by koalas differed between soil landscapes, its pattern of use on erosional and residual soil landscapes being both significantly lower and strongly size dependent.
- The estimated density of the koala population within the study area was less than 0.02 koalas /ha and the estimated population number was 250 - 400 animals.
- The authors state "Management therefore needs to be sensitive to the heightened threatening processes associated with small and declining populations and provide for population expansion."

Reserves.

I was told twice (see attached correspondence) that NSW has a world class reserve system. As koalas do not occur in the wild anywhere else in the world, I found this comment irrelevant and rather hollow. I welcomed the addition of several SF or parts of SF to the reserve system at the commencement of the IFOAs.

However their koala habitat potential was limited partly because they were logged prior to being handed over and partly because of their topography. The eastern part of Maria SF which became Maria NP was logged just prior to the commencement of my study in 1989-1990. It was logged again before being transferred in 1995.

Koala habitat is not adequately protected in reserves in NSW. Koalas need large areas of contiguous undisturbed forest, particularly now, because most of their primary habitat has been cleared for agriculture, and more recently for rural residential subdivisions.

Many reserves are becoming increasingly isolated and fragmented because of the intensity and frequency of timber harvesting in surrounding areas making it very hard for young animals to disperse safely.

Recommendations

- A change in the threatened species licensing conditions to reflect the urgency of protecting koalas and their habitat and to address the continuing decline of koala populations in eastern NSW.
- A qualified accredited ecologist must select the trees to be retained and these trees should provide optimal conditions for koala use such as high leaf moisture, low toxicity and shelter from extreme weather. This should be happening on freehold land as well if the PNF Code of Practice is to have any credibility. It is ridiculous to expect landowners or logging contractors to do proper flora and fauna assessments.
- Selected trees must be retained in perpetuity
- A reduction in the number of scats under a tree to trigger activity levels. Even one scat is meaningful in the present landscape.
- An increase in the number of trees/ hectare to be retained.
- A suite of koala food trees should be selected if available.
- An increase in the number of special management zones to allow koalas to recover from harvesting operations in their forest.
- The part of Compartment 31 Maria River State Forest which was not affected by the harvesting operation this year should be reserved in a special management zone or transferred to NP.
- Key corridor areas should be protected from harvesting.

Or/

- A moratorium on the harvesting of all koala food trees where there is koala activity or where there is a history of koalas in a SF, Crown land or in adjacent areas.

Thank you for the opportunity to comment on the review of the Integrated Forestry Operations.

Yours faithfully,

Vanessa Standing

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