# **New Hope Group**

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Our Ref: New Acland Coal Mine - Senate Inquiry into Australia's Koala Population

Your Ref: E-mails dated 18 May 2011 & 7 June 2011

14 June 2011

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

Attention: Mr Christopher Lawley (Senior Research Officer)

Dear Sir

Re: Senate inquiry into the status, health and sustainability of Australia's koala population

Thank you for providing the New Hope Group (NHG) with the opportunity to make this submission to the Senate inquiry into the status, health and sustainability of Australia's koala population (Senate inquiry). We make the submission on behalf of our subsidiary company, New Acland Coal Pty Ltd (NAC), which operates New Acland Coal Mine within the Darling Downs region of Queensland.

As you are aware, the NHG was granted approval by the Senate Standing Committee to make a formal submission. An initial submission date of 9 June 2011 was set with an extension granted to 14 June 2011.

The NHG's submission provides a general background on New Acland Coal Mine's operations and addresses relevant matters involving New Acland Coal Mine's operations that are related to the formal Terms of Reference for the Senate Inquiry.

#### Summary

NAC's area of operations on the Darling Downs has a long history of coal mining and agriculture, underground coal mining having begun in the Acland area in 1913. Most of the original native vegetation within New Acland Coal Mine's current Stage 1 and 2 and proposed Stage 3 mining lease areas ("the Mine") was previously cleared by past agriculture and grazing activities.

NAC has engaged in a rigorous environmental impact assessment process, involving an Environmental Impact Statement (EIS) to address the requirements of the *Environmental Protection Act 1994* and *Environmental Protection and Biodiversity Conservation Act 1999* (i.e. under a bi-lateral agreement). The EIS represents the highest level of environmental impact assessment in Queensland, is thoroughly assessed by a range of State departments/agencies and the Commonwealth, and provides the greatest amount of public consultation and opportunity for comment/input.











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The Mine's environmental management is facilitated by two on-site environmental officers and is also further supported by senior environmental staff based at the NHG's Head Office (Brookwater, Queensland). To date, NAC's mining operations have <u>not</u> been required to address any major issues of non-compliance in relation to its EA or EPBC Approvals.

Queensland's *Nature Conservation (Koala) Conservation Plan 2006* (Koala Plan) provides for the conservation of the Koala (*Phascolarctos cinereus*) in Queensland. The Mine is situated in 'Koala District C' of the Koala Plan. While there is evidence of population decline in 'Koala District C', the species is classified in this area as 'least concern' wildlife under Queensland's *Nature Conservation Act 1992* due to a generally lower perceived threat to their survival (EPA QPWS, 2006).

NAC makes the following points concerning the effect of its operations on the local koala population.

- There will be no impacts on koala habitat in northern parts of the Mine (Stage 1), which supports koalas. Vegetation in the northern parts of the Mine is improving through natural regeneration, particularly in those areas where agricultural activities have been excluded or kept to a sustainable level (e.g. grazing).
- NAC has prepared a Conservation Management Plan to protect, rehabilitate and manage vegetation and habitat within the Mine's Stage 2 area. This conservation zone is intended to link, in the future, with the rehabilitated riparian zone of the Mine's proposed Stage 3 area.
- Rehabilitation of the conservation zone has already commenced with the promotion of natural regeneration and re-vegetation with native plant species that currently occur along the creek. NAC has long-term plans to significantly increase the extent and quality of koala habitat within the overall Mine and Project areas.
- In the conclusion to our submission, we note that lands under mining lease areas present an opportunity to enhance discrete managed habitats and secure koala populations. The sustainability of populations can also be increased by planned habitat connectivity within localities, or even larger regions, and through planned and resourced environmental management, which would otherwise not be available under normal circumstances.

# **Background**

### **History**

- Coal mining began in the Acland area in 1913 and has been a mainstay of the community since that date. The township of Acland was established primarily around the development and life of several underground coal mines in the area, with agribusiness and mining coexisting successfully.
- NAC has been involved in exploration in the area since 1999. NAC began operating Stage 1 of the Mine in 2002 and Stage 2 in 2008. A third stage of the Mine is proposed and is currently the subject of an EIS process.
- NAC has maintained a high standard of environmental management, undertaken regular community consultation, and maintained a good working relationship with the relevant regulatory authorities throughout its operations.

#### **Operations**

- The Mine is located 14 kilometres north-northwest of Oakey, about 40 kilometres northwest of Toowoomba and 177 kilometres west of Brisbane, Queensland's capital city.
- The Mine comprises two mining leases (MLs) ML 50170 (1,103 hectares) granted during late 2001 as Stage 1 and ML 50216 (1,175 hectares) granted during late 2006 as Stage 2. New Acland Coal Pty Ltd (NAC) also possesses a new mining lease application (MLA) that is the subject of a new approvals process MLA 50232 (5,069 hectares), which is designated as the Stage 3 Project (the "Project"). If approved, the total lease areas for the Mine's operations would be:

Tenure	Stage	Area (Hectare)
ML 50170	One (Current)	1,103
ML 50216	Two (Current)	1,175
	Current Total	2,278
MLA 50232	Three (Proposed)	5,069
	Future Total	7,347

- At the Mine, the coal is mined, processed and dispatched to both export and domestic thermal coal customers.
- The Mine, including the Project area, will progressively operate over 5,941 hectares of its lease areas over its life, until cessation of mining operations around 2045. Importantly, the Mine will continue to undertake progressive rehabilitation to ensure that disturbance areas are kept to an operational minimum each year.
- In general, NAC expects to be operating in the Acland district for at least another 50 years based on current resource calculations, long-term mine plans and expected rehabilitation requirements.

#### **Environmental Approvals**

### NAC's Current Environmental Approvals

- NAC's mining operations are currently governed by the legal conditions of its main environmental approvals:
  - Environmental Authority No. MIM800317705 (EA), which is administered under Queensland's *Environmental Protection Act 1994* (EP Act) by the Department of Environment and Resource Management (DERM); and
  - EPBC Approval 2004/1885 (EPBC Approval), which is administered under the Commonwealth's *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) by the Department of Sustainability, Environment, Water, Population and Communities (DSEWPC).
- NAC's EA possesses an extensive range of conditions specific to the protection and management of air quality, land resources, water resources (surface water and groundwater), nature conservation, noise and vibration and light.

- NAC's EPBC approval possesses a series of conditions for the protection and management of the specific issue of 'threatened species and communities' (i.e. as a matter of National Environmental Significance under the EPBC Act).
- To date, NAC's mining operations have <u>not</u> been required to address any major issues of non-compliance in relation to its EA or EPBC Approval.
- NAC's current environmental approvals were developed from a rigorous environmental impact
  assessment process, involving an EIS to address the requirements of the EP and EPBC Acts
  (i.e. under a bi-lateral agreement). The EIS represents the highest level of environmental
  impact assessment in Queensland, is thoroughly assessed by a range of State
  departments/agencies and the Commonwealth, and provides the greatest amount of public
  consultation and opportunity for comment/input.

## Future Environmental Approvals

- NAC is currently involved in an environmental approvals process for the Project, which was granted 'State Significance' in early 2007 by the then Department of Infrastructure and Planning (DIP), under Queensland's State Development and Public Works Organisation Act 1971. The Project was also deemed a 'controlled action' in early 2007 by DSEWPC under the EPBC Act (EPBC 2007/3423). An EIS and Supplementary EIS (SEIS) for the Project has been lodged with the Office of the Coordinator General (formerly DIP) for assessment by the State and Commonwealth under a bi-lateral agreement.
- NAC expects the EIS and SEIS for the Project will receive a similar level of comprehensive assessment from the State and Commonwealth governments. The current EIS process has allowed the public to provide their comments to government for consideration. NAC has undertaken considerable consultation in relation to the Project and continues to provide further information via a dedicated website (<a href="www.aclandproject.com.au">www.aclandproject.com.au</a>), continued public consultation meetings and regular newsletters.

#### **Environmental Management**

- The statutory requirements of NAC's EA are administered at the Mine by a Plan of Operations (PoOps). This document is assessed by DERM and is subject to compliance inspections by DERM. NAC possesses a range of management plans, which are administered as supporting documents to the PoOps. These management plans address issues, such as general waste, water, tailings, rehabilitation, weeds, nature conservation and monitoring. The majority of these documents required approval from DERM before they were implemented at the Mine and are subject to regular review to ensure their adequacy as mining operations progress.
- NAC employs an extensive environmental monitoring regime to assess the potential impacts of its mining operations in relation to air quality, noise and vibration, water management (surface water and groundwater) and land management. NAC's environmental monitoring regime is specified in an active management plan, and where applicable, is conducted in compliance with regulatory guidelines, Australian Standards, etc. NAC's environmental monitoring data is always available for audit purposes by DERM, and on an as required basis, is made available on request for individual community members with issues or concerns.
- The Mine's environmental management is facilitated by two on-site environmental officers and is also further supported by senior environmental staff based at the NHG's Head Office (Brookwater, Queensland).

# Inquiry Terms of Reference - The status of the koala population

# Planning instruments

- Queensland's Nature Conservation (Koala) Conservation Plan 2006 (Koala Plan) provides for the conservation of the Koala (Phascolarctos cinereus) in Queensland and includes provisions for the assessment and management of Koalas during a project's development approval process and implementation. The Mine is situated in 'Koala District C' of the Koala Plan. While there is evidence of population decline in 'Koala District C', the species is classified in this area as 'least concern' wildlife under Queensland's Nature Conservation Act 1992 due to a generally lower perceived threat to their survival (EPA QPWS, 2006).
- The Koala Plan has recently been replaced by the following new State planning instruments South East Queensland Koala Conservation State Planning Regulatory Provision and State Planning Policy 2/10: Koala Conservation in South East Queensland. These new State planning instruments only apply to local government areas in South East Queensland, and therefore, do not apply to the Mine area.

# Fauna surveys - Mine/Project summary

- A number of fauna surveys have been conducted over the years within the Mine area in 1998 and 1999, in 2005 and in 2007.
- The fauna surveys aimed at targeting the presence and distribution of fauna across the Project area. Survey methodologies were performed in accordance with best practice guidelines for vertebrate fauna groups and the Terms of Reference requirements for the Project. As the Koala is classified as a 'least concern' species in the Project area, no targeted population surveys were undertaken.
- This approach is considered acceptable given the 'least concern' listing of the Koala, and is consistent with other EISs undertaken for mining and infrastructure projects in Queensland.
- While an exact population estimate was not established for each survey, general interpretation
  of all baseline surveys suggest that Koalas are present, but in low abundance, within the Mine
  and Project areas.

#### Surveys - 1998 & 1999

• Fauna field surveys were initially completed for the Acland coal deposit area in 1998 and 1999 by Ison Environmental Planners and were previously reported in the Acland Project Feasibility Study (Woodward Clyde, 1998) and the Acland Mine Environmental Impact Statement (EIS) (Ison Environmental Planners, 1999) (SKM, 2007). Shell Coal Australia originally commissioned these studies.

#### <u>Surveys - 2005</u>

• A targeted fauna field survey was completed for the New Acland Stage 2 Expansion Project area in 2005 and reported in the New Acland Stage 2 Expansion EIS (SKM, 2007). Fauna survey techniques included Elliott trapping, ANABAT II ultrasonic bat call recording, spotlighting, habitat searches, dip nets for aquatic life, and bird surveys at dusk and dawn. Opportunistic surveys were also made for fauna species. Sampling targeted all habitat types in the New Acland Stage 2 Expansion Project area and involved a combination of systematic and opportunistic survey methods over a number of days and nights.

### Surveys - 2007

- Fauna surveys undertaken across the Project area in 2007, found Koalas in Poplar Box woodland present within the Project area, particularly to the northwest and southwest of Acland and along portions of Lagoon Creek (SKM, 2008). Local residents have also anecdotally reported Koalas in forested areas of the Acland district. A detailed fauna field survey was completed for the Project area by SKM from 26 February 2007 to 2 March 2007. A combination of sampling techniques were employed including diurnal and nocturnal census and opportunistic observations. Survey methods included Elliott and pit fall trapping, ultrasonic call recording of microchiropteran bats, spotlighting, frog and reptile searches, nocturnal owl call broadcast and diurnal bird census. At least one sampling site was surveyed per habitat type with greater effort applied to the larger dominant habitats, such as Poplar Box woodland. The fauna survey effort and location of sample sites were aimed at supplementing the previous fauna survey work rather than replicating effort. Where possible, the location of fauna trap sites were selected to sample new locations not previously surveyed (SKM, 2007).
- Spotlighting and dusk census for arboreal mammals (including Koalas) was conducted at each
  of the trap sites, in addition to other forest fragments. Spotlighting was conducted by two
  observers for a minimum period of two hours per night over four nights culminating in a total
  survey effort by spotlight of 16 hours. Notes were taken on the location and relative
  abundance of observed fauna.
- Searches for evidence of Koalas were conducted at all trap sites by undertaking random meanders and stopping to search for Koala droppings (scats) around the base of trees greater than 20cm diameter at breast height, until a total of 20 trees were searched. Preference was given to known Koala browse species, including Poplar Box (Eucalyptus populnea) and Queensland Blue Gum (E. tereticornis).

# Fauna surveys – adjacent areas

- Koalas are also regularly recorded outside of the Mine and Project areas, at the Army Aviation Centre Oakey (AACO), located approximately 14 kilometres to the south-southeast, within patches of Poplar Box woodland, which provide primary habitat for the species (SKM, 1996; cited SKM, 2009a). It should be noted that due to the lack of native tree vegetation in the Oakey district, any stand of suitable native trees is valuable Koala habitat, particularly individual trees in open areas (SKM, 1995; cited SKM, 2009a)
- In spite of the isolation of Poplar Box woodland at the AACO, the high number of Koala sightings indicates that the site is important for this species. A Koala Habitat Survey undertaken in 1995 classifies the area as prime Koala habitat and proposes re-vegetation of parts of the site to enhance this habitat's value (SKM, 1995; cited SKM, 2009a).
- Remnant vegetation along Oakey Creek to the south of the AACO is mapped as 'State significant' under the Queensland Biodiversity Planning Assessment, and is likely to provide a wildlife corridor for Koalas.

# Inquiry Terms of Reference - The health of the koala population

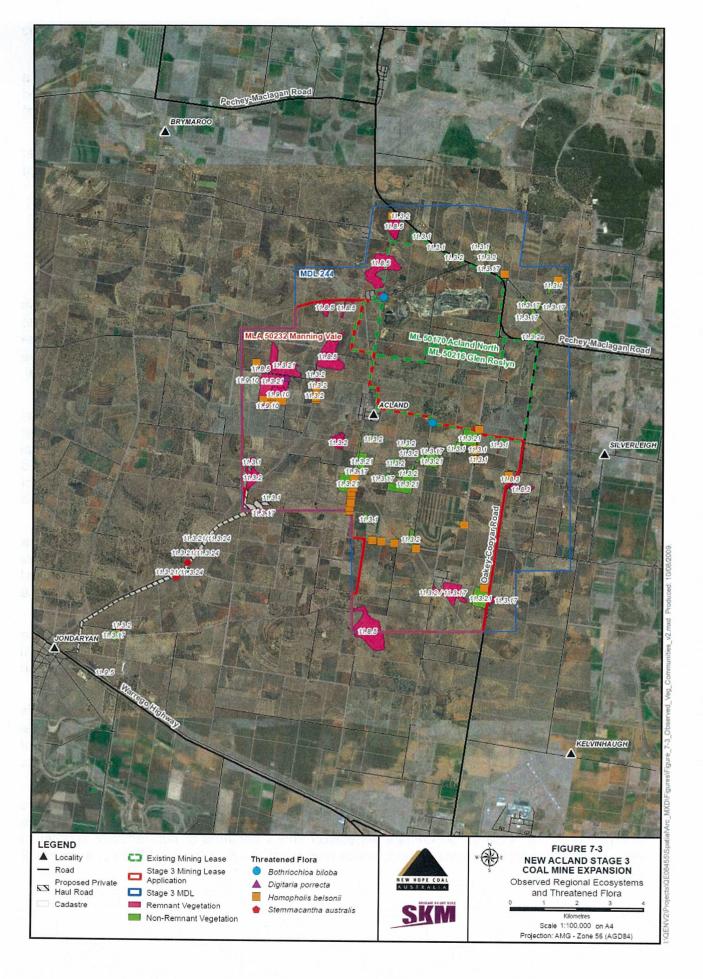
 Koala studies undertaken within the Oakey region of the Darling Downs (former Jondaryan Shire) recorded significant population density declines between 1971 and 1997, with one study group (the Berwick population) almost reaching extinction during the study period (Gordon et al 1990, Penn et al. 2000).

- From surveys conducted in the Oakey area it also appears that koala population possesses a high percentage of females with disease and fertility problems. Brown et al. (1987) showed that 53% of the Koalas at Oakey were serologically-positive for Chlamydia. It is also likely that Koalas in the Acland region are threatened by Chlamydia causing fertility problems.
- It is expected that Koalas in the Acland and Oakey areas are also exposed to other anthropogenic threats, such as road trauma and adverse interactions with certain feral and domestic animals (e.g. dogs).

# Inquiry Terms of Reference - The sustainability of the koala population

# Koala habitat

- A number of flora surveys have also been conducted over the Mine area. Initial flora surveys were undertaken in 1998 and 1999 by Ison Environmental Planners (SKM, 2007). The Queensland Herbarium undertook regional ecosystem (RE) mapping of the New Acland Stage 2 Expansion Project area in 2005. Further detailed flora surveys were undertaken within the Project area in 2007. Vegetation communities were mapped in accordance with Neldner et al. (2005). See EIS Figure 7.3 (SKM, 2009).
- Most of the original native vegetation within the Stage 3 Project area has been cleared by past agriculture and grazing activities. Approximately 10% (or ~507ha) of the Project area contains vegetation communities that can be classified as remnant or regrowth examples of regional ecosystem types. The balance consists of improved pasture, scattered clumps of trees and individual paddock trees. Extant remnants currently comprise small isolated patches of woodland amongst grazing and cropping lands and narrow strips remaining within road reserves.
- The general topography of the area comprises low, undulating hills and alluvial plains with a small number of rocky hillocks. Lagoon Creek is the main ephemeral stream that flows generally in a southerly direction to the east of the Mine's Stage 2 area and then in a southwest direction through the centre of the Project area. The riparian zone of Lagoon Creek supports a patchy distribution of remnant vegetation.
- Eight regional ecosystems were observed within the Project area. However, only two of these provide habitat for Koalas RE 11.3.2 Poplar Box (*Eucalyptus populnea*) woodland on alluvial plains and RE 11.3.17 Poplar Box woodland with Brigalow (*Acacia harpophylla*) and/or Belah (*Casuarina cristata*) on alluvial plains. See EIS Figure 7.3 (SKM, 2009).
- RE 11.3.2 is found in the southern, western and northern parts of the Project area. This community mainly occurs as isolated clumps along Lagoon Creek amongst cleared agricultural land. This community within the Project area covers an area of approximately 40 hectares of remnant vegetation and a further 27 hectares of non-remnant vegetation providing 67 hectares of Koala habitat, which represents 1.3% of the total Project area (5069 hectares).
- RE 11.3.17 is found in the southern and northern parts of the Project area and occurs as isolated clumps amongst agricultural land. This community within the Project area comprises approximately 18 hectares of remnant vegetation and 1 hectares of non-remnant vegetation providing 19 hectares of Koala habitat, which represents 0.4% of the total Project area (5069 hectares).



SENATE KOALA INQUIRY SUBMISSION (JUNE 2011) VERSION 6\_FINAL.DOC

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Koalas were typically associated with Poplar Box woodland (REs 11.3.2 and 11.3.17). Koala
presence was most prevalent in the northern parts of the Project area. Koala presence was
also noted in lower abundance in the southern part of the Project area along Lagoon Creek
where Poplar Box was common (SKM, 2007).

## NAC habitat protection and rehabilitation

- In general, there has been a lack of woody vegetation within the Mine's Stage 1 area as a consequence of past agricultural activities. The Mine's Stage 2 area will eventually result in the clearance of 36 hectares of remnant woody vegetation on the lower margins of Bottle Tree Hill, comprising REs 11.8.3, 11.8.5 and 11.9.10, which possess no value as Koala habitat. A conservation zone has been established along Lagoon Creek within the Mine's Stage 2 area to ensure no disturbance to Koala habitat. NAC's conservation zone is designed to increase the ecological value of the Poplar Box woodland and improve its conservation status from non-remnant to remnant.
- The Project will result in the clearing of 43 hectares of remnant and 36 hectares of non-remnant habitat for the Koala, comprising REs 11.3.2 and 11.3.17, within the proposed mine pit and infrastructure areas. The clearance of this vegetation will occur over a 15-20 year period and will result in the gradual loss and fragmentation of remnant Koala habitat in the Project area (e.g. along Lagoon Creek).
- Lagoon Creek will be temporarily diverted to allow extraction of the coal beneath the creek's channel. There will be no impacts on koala habitat in northern parts of the Mine, which supports Koalas. Vegetation in the northern parts of the Mine is improving through natural regeneration, particularly in those areas where agricultural activities have been excluded or kept to a sustainable level (e.g. grazing).
- The Mine currently has areas of remnant vegetation within the active Stage 1 and 2 areas that are protected from clearance, and it is anticipated that similar areas of vegetation will be identified and protected within the Project area.
- NAC does not allow uncontrolled clearance outside its defined mining and infrastructure areas and has a strict protocol in place for clearance in these areas that must be approved by the Mine's General Manager.
- NAC possesses an approved Final Land Use and Rehabilitation Strategy (FLURP) for the Mine that sets out the procedures for the rehabilitation of the Stage 1 and 2 mining areas. NAC intends to update the FLURP for the Project to incorporate the proposed range of final land uses. NAC intends to employ a holistic landscape management approach to the plan and will focus on broad scale flora and fauna management to achieve the best possible long term environmental outcomes. This requirement will be incorporated into the Project's new EA and will also require regulatory approval. NAC understands that the Project's size, scale, complexity and timeframe necessitate an advanced level of environmental planning to achieve a long term sustainable result for the Acland district.

#### NAC Conservation Management Plan

NAC has prepared a Conservation Management Plan (SKM, 2008) to protect, rehabilitate and manage vegetation and habitat along the riparian zone of Lagoon Creek and existing stands of REs 11.8.5 and 11.8.3 located on Bottle Tree Hill. NAC's Conservation Management Plan defines a conservation zone along the riparian zone of Lagoon Creek and around Bottle Tree Hill within the Mine's Stage 2 area. The conservation zone is intended to link in the future with the rehabilitated riparian zone of Lagoon Creek within the Project area to improve connectivity of habitat along the creek system (i.e. as a long term objective).





- Rehabilitation of the conservation zone has commenced with the promotion of natural regeneration and re-vegetation with native plant species that currently occur along the creek. This approach will re-establish and enhance Koala habitat along Lagoon Creek. The management of the conservation zone is detailed in the Conservation Management Plan (SKM, 2008) and has been approved by the DERM as a condition of the current EA.
- Proposed future clearing of native vegetation within the Project area will occur in the presence of a wildlife spotter/catcher(s) accredited by Queensland Parks and Wildlife Service for safe handling and possible relocation of animals unable to safely move away from the disturbance. NAC is currently in the process of developing a Standard Operating Procedure (SOP) for vegetation clearing and fauna relocation, which will be in accordance with the Koala Plan procedures. This SOP will be administered as part of the Mine's current Environmental Management System (EMS). To date, there has been little need for this SOP due to the lack of wooded native vegetation within the Mine's Stage 1 and 2 mine areas (i.e. as a consequence of past agricultural activities). Employees, contractors and visitors to the Mine are made aware of relevant SOPs and environmental matters as part of NAC's mine site induction process.
- During the Project's operation, it is proposed to progressively reconstruct Lagoon Creek's channel and riparian zone back along its original location as sections become available behind the active mine path. Pre-clearing vegetation types will be re-established along the reconstructed length of Lagoon Creek within the Project area. This approach will progressively re-establish Koala habitat along Lagoon Creek.
- It is important to note that the staged diversion of Lagoon Creek will take approximately 15-20 years. During this period NAC will progressively re-establish the creek, including the riparian zone. Therefore, at the end of the diversion process the establishment of Koala habitat will be relatively advanced in the initial areas of the mined creek system with a progressive decrease in maturity along the re-established creek system to an area of immature growth adjacent the proposed Final Permanent Diversion. In summary, the combined rehabilitation of the Lagoon Creek's riparian zone (Stages 2 and 3) will significantly increase in the long term the extent and quality of Koala habitat within the overall Mine and Project areas.
- The existing vegetation along Lagoon Creek is patchy, disjunctive and of varying quality. It is believed that without further intervention (e.g. restoration works) this vegetation would have declined over time, particularly under an agricultural regime. NAC's long term goal for Lagoon Creek will create a riparian zone of 50-100 metres either side of the main channel over a 10 kilometre section of the creek. This outcome is far superior to the existing status of Lagoon Creek, which has been classified by the State government as being in a poor to very poor condition (SKM, 2009).
- To meet its EPBC Act requirements, NAC is proposing the development of a Queensland Bluegrass Ecological Community Offset to the south of the Project area. This offset links to a State recognised corridor that has also been identified as Koala habitat. NAC intends to incorporate this portion of the corridor into the proposed offset to enhance the overall ecological values of the proposal. The application of a suitable legal mechanism for the long term protection and management of the offset is currently under investigation by NAC.

### **Other Matters**

- The Mine possesses two professional environmental staff on site that assist with fauna related matters as they are raised (e.g. Koala issues)
- NAC believes its employees possess a positive attitude to towards koalas and other wildlife.
   This attitude has been promoted at the Mine by the EMS's environmental awareness training.

#### **Submission – Conclusion**

The NHG trusts this submission is useful to the Senate Inquiry. The NHG has focussed on addressing those matters that relate to the Senate Inquiry's Terms of Reference.

As detailed in this submission, the NHG has:

- demonstrated compliance with and adherence to EIS processes;
- engaged in surveys and analysis in relation to flora and fauna within its mining lease areas, including surveys and studies of the koala population; and
- utilised this information to devise an effective Conservation Management Plan which includes mechanisms to protect and rehabilitate Koala habitat.

The NHG respectfully makes the following observations concerning the ongoing management of the Koala population in its mining lease areas.

- Mining lease areas create a principle that areas brought under environmental management through new economic development activity create opportunities to positively contribute to the health and sustainability of Australia's Koala population.
- The essential prerequisite EIS studies are an opportunity to complete fine-grained identification of the status and health of Koala populations and habitat. These studies may not otherwise be undertaken by existing landowners, land users or within the funding capacity of government agencies. The studies cumulatively add to habitat and population knowledge.
- Benchmarks for future management are established on a locality by locality basis. Although
  government auspiced environmental planning overlays provide a broad-brush framework to
  inform environmental planning, the fine-grained interrogation of the habitat health, potential
  connectivity of isolated habitats and sustainability capacity of habitats is only undertaken
  within the EIS process of new projects.
- New economic activities' regulatory approval processes create an opportunity for negotiation of conditions of approval which may include practical restoration of habitats previously reduced by clearing for agriculture and continuing degradation through agricultural impacts and other land uses. Conditions of approval can include continuing environmental management over a period and include clearly defined benchmarks and performance measures, which guarantee a higher level of environmental outcome than reliance on unplanned habitat regeneration.
- Lands under mining lease areas present an opportunity to enhance discrete managed habitats and secure Koala populations. The sustainability of populations can also increase by planned habitat connectivity within localities, or even larger regions, through planned and resourced environmental management, which would otherwise not be available.

The NHG looks forward to the recommendations of the Senate Inquiry process and trusts the Senate Committee in the future will provide positive advice and guidance on the status, health and sustainability of Australia's Koala population.

Yours faithfully **NEW HOPE GROUP** 

Bruce Denney Chief Operating Officer

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