



Australian Koala Foundation

The international organisation dedicated to saving the koala and its habitat.

1st September 2011

Mr Stephen Palethorpe.
Secretary.
Senate Environment and Communications Legislation Committee.
PO Box 6100
Parliament House
CANBERRA ACT 2601

Senators,

On behalf of the Australian Koala Foundation (AKF), thank you for the opportunity of right of reply to the Australian Government's Threatened Species Scientific Committee (TSSC) comments after the Melbourne hearing.

It is clear the TSSC is convinced the koala should not be listed nor protected under the EPBC Act. In rejecting applications to list the koala on three separate occasions, the TSSC has repeatedly admonished the lack of any rigorous attempt to count the entire national population, which we reject wholeheartedly.

We are gratified the TSSC commends the AKF on our attempt to get koala numbers right but we have to then wonder why the Australian Government and its agencies have not done this work before over many decades, if this is such an impediment to listing (after all, protection of the koala is the responsibility of the Minister, not the AKF). The TSSC then proceeds to provide a critical appraisal of AKF estimates of koala abundance and our methods used to derive them and, all in all, they conclude that it is their belief we have failed to produce the necessary science to support our arguments.

Therefore, if the TSSC is correct that the AKF has no science to support our argument, then I suppose we should:

1. Return the Queensland University of Technology's Frank Oliver Fellowship Award citation for our contribution to science at that University and also ask them to return our funds so that they may be used for a more worthwhile purpose;
2. Ask the University of Queensland and University of Sydney to return all funds from the Australian Research Council when AKF acted as industry partner for millions of dollars worth of koala research, and
3. Admit that the 99 scientific peer reviewed papers (funded through AKF projects) which support our Potential Koala Habitat Atlas map don't exist.

The AKF would be very happy to have these funds returned because they were hard to raise, selling T-shirts and all.

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It is very patronizing of the TSSC to say that the AKF should be “commended” for our efforts. Even if it was meant in a well meaning fashion, then you would have to think that members of the TSSC would have ensured they spoke directly with Dr. Kerlin who conducted the modelling analyses, rather than engage in what appears to be a politically motivated attempt to undermine our work. We did suggest Dr. Kerlin appear before you and he would be happy to speak with you.

We could also argue that the TSSC may have a complete lack of understanding of modelling in ecology (in probability theory it is always the area under the curve that must equal one). If this is the case, and the TSSC has failed to grasp this fundamental principle, it may show them to be utterly ill-equipped to comment on a methodology that is, after all, based on probability theory.

It may also highlight a fundamental flaw in the listing process, the makeup of the TSSC and the incredibly rigid IUCN guidelines, which they admit makes it difficult to fit the koala into the listing box. Unless one can build a fence around a species, count every individual, and then return every 5-10 years to recount them, a listing seems certain to fail. Now I understand why the Tasmanian Tiger was listed when there was one left. Easy to fit into that box!

We also note and ask for an explanation of why the data provided by Victorian and South Australian Governments was not subjected to any similar examination for its credibility and scientific merit. Can it be that it was accepted as gospel? The AKF has been trying to ascertain the legitimacy of the Victorian and South Australian estimates for years. We still have no idea how these numbers are derived, and would be surprised if the TSSC knew. Unless the TSSC is privy to more information than was provided at the DEWHA Koala Expert Workshop (AKF scientists attended this workshop, with only one TSSC member present) then they are just numbers taken at face value from Government Departments (a courtesy not bestowed on the AKF).

The AKF has never denied (nor did the United States Government in its determination) that there are some pockets of problematic koala areas in Victoria and South Australia. These are, in our opinion, by and large a product of appalling population management, land clearing and maybe a long term lack of understanding of what koalas need as quality habitat at a release site. After reading Menkhorst’s “Hunted, marooned, re-introduced, contracepted: a history of Koala management in Victoria”, it is clear that translocation sites were chosen willy-nilly, not with a true understanding of the ecology and habitat requirements of koalas. Interestingly enough, this is where the AKF’s Koala Habitat Atlas could play a significant role for future planning of Victoria - if only the Victorian Government would not be so petulant in their attitude to work with our organization. As the United States Government clearly stated, koala isolates can confuse but should not cloud the conservation debate on a species.

One could, perhaps cynically, argue that TSSC has in effect ruled that they are comfortable with the loss of all koalas from Queensland and New South Wales because there are sufficient animals in Victoria to ensure the long-term survival of the species.

The public relations headline for this would be “Government prepared to sacrifice northern koalas for inbred southerners”. It also appears the TSSC has said “because the drought is over that all will be well as it was after the 1901 drought”. What a ridiculous notion! There is even a suggestion that if they didn’t take this position, all manner of species would be under threat and would need to be listed. Given that 1700 species are also listed as vulnerable, maybe this is a political imperative, but directed from where? The TSSC is supposed to be considering the Koala and the Koala alone, not throwing their hands up in the air because of an irrelevant and unsubstantiated “knock-on effect”.

The IUCN has clearly stated the koala will be one of the first species to be effected by climate change. Are the TSSC acting as a gatekeeper to control costs for Government rather than assessing on the merits alone? The AKF has argued to Minister Garrett on many occasions that 1000 species already on the Vulnerable list could be protected by koala forests, saving our country millions of dollars in recovery plans.

More importantly, the TSSC appears to be confused themselves about koala numbers. After 23 years in my job, I have seen many koala numbers bandied around and the TSSC did in the past endorse the figures of greater than 300,000 for Queensland and 180,000 for the Strathbogies (Victoria) in the early 1990s - more than 480,000 for those two areas alone. Now they claim that there were only 450,000 as at 1990. Similarly, their estimate of 200,000 in 2011 is largely based on estimates provided by southern Governments. There is no such methodology to underpin these numbers and if there is, it needs to be made public and compared and contrasted with AKF's. Will you ask them for that methodology?

The point is, the TSSC has endorsed figures of 480,000 for a fraction of the country in 1990; now, maybe to suit the political imperatives they have revised this down drastically to ensure that their current estimate is not a sufficiently large reduction to require listing. The AKF is accused of pulling numbers out of the air, but when the TSSC does exactly this, it appears to be accepted; the lack of scientific rigor and one rule for one and not for another is quite disturbing. For instance, the TSSC appears to take phone sightings seriously as acceptable survey methodology by Mr. Dan Lunney. Imagine if one koala was seen by 10 people. Surely the data is skewed.

It is easy for the TSSC to criticize AKF methodology, but they cannot produce one of their own. It appears the greatest threat to the koala is in fact the dissembled information that comes out of Government Departments rather than a genuine attempt to collaborate with AKF and others to find solutions.

Whatever the numbers, this is all "fiddling while Rome burns". All three Senate hearings have had witnesses identify the koala is in trouble and I have to have faith that you, the Senators, are listening. It is fundamental that the precautionary approach is taken. Our Board finds it shocking that instead of embracing our research and wanting to understand our thinking, our scientists are continually rebuked. You as Senators on this Committee have the power to recommend a listing. Both the Minister and the Shadow Minister may ignore it, but I have faith that you have heard what is being said in the hearings.

It is now 23 years that I have been writing letters like this to Government managers, Ministers, and now you, the Senators. I am truly tired of it. Our supporters worldwide write to me constantly and one said "if your strategy isn't working, change your strategy". I think she is right.

So, to end on a somewhat humorous note, it was fascinating for me to listen to one member of the TSSC say in Melbourne say that the United States Government legislation was "easy" and therefore the koala listing by that Government should not be taken seriously. It reminded me that the Chair of TSSC at the time (2000) said the AKF (in a Time Magazine piece) had achieved this listing because of a "seductive letter to President Clinton".

I am pretty sure the United States Government Scientific Authority is not that malleable, but I am starting to wonder whether our Government's may be.

The people of Australia and the world want the koala listed. That message has come through in nearly 100 submissions and endless hearings. We ask you to recommend the koala be listed as vulnerable under the EPBC Act and urgently.

Yours sincerely,

Deborah Tabart OAM
Chief Executive Officer