

The Inquiry into the status, health and sustainability of Australia's koala

Submission by David Keogh, President, Wildlife Logan

Introduction

Wildlife Preservation Society of Queensland Logan Branch Inc (Wildlife Logan) was established in 1989 with the goal of attempting to protect wildlife habitat in the East Logan region and subsequently we extended our area of focus to the entire Logan City Council local authority area. Much of our concern has been the steady decline of koala numbers in the Koala Coast, and elsewhere.

Purpose of this Submission

The purpose of this submission is to provide further information, evidence and observations in relation to the following terms of reference (tick as appropriate):

- The iconic status of the koala and the history of its management;
- Estimates of koala populations and the adequacy of current counting methods;
- Knowledge of koala habitat;
- X Threats to koala habitat such as logging, land clearing, poor management, attacks from feral and domestic animals, disease and roads, and urban development;
- X The listing of the koala under the EPBC Act;
- X The adequacy of the National Koala Conservation and Management Strategy;
- X Appropriate future regulation for the protection of koala habitat;
- X Interaction of state and federal laws and regulations; and
- Any other related matters.

Evidence and Observations

- 1. Threats to koala habitat such as logging, land clearing, poor management, attacks from feral and domestic animals, disease and roads, and urban development and covering the other ToR as marked X above**

Koalas are at risk because the Queensland Government fails to implement strong enough measures to protect koala habitat with too many exceptions given to developers, quarry owners and its own agencies to continually clear and fragment koala habitat as well as failure to implement dog control measures within the Koala Coast region.

- The exemptions provided by the State Government Statutory Regulatory provisions are so broad that it makes the protection of koala habitat within the urban footprint impossible unless within a conservation zone identified in a Local Planning scheme. It effectively makes any community response to the State Planning Policy (SPP) fruitless. Effectively the SPP is worthless and statutory changes, as highlighted in this submission are required to protect the koala.

- There is now ample evidence that shows there has been a long history of broken promises by the Queensland State Government that they would protect the koala and implement effective koala conservation policies (see Appendix A). The proposed SPP and Regulatory provisions only add to this evidence.
- The State Government to date has favoured the developer's needs in preference to koala conservation. A Commission of inquiry is required to examine the preferential treatment given to developers, examining the close links to political donations and approved development within koala habitat.
- The SPPs of the past and present fail to protect koala habitat and in particular fail to protect the urban koala and its habitat. The SPP and Statutory Provisions provide this evidence. Effectively the SPP and Statutory Regulatory Provisions suggest urbanisation can provide koala conservation outcomes, which in scientific terms is totally inaccurate.
- The Premier's Koala Taskforce recommendations are relevant to consider and be adopted within the SPP.
- The State Government's scientific reports show that the protection of the urban koala is critical to the overall survival of the SEQ koala. See: <http://www.epa.qld.gov.au/register/p02966aa.pdf>
- The survival of the koala depends on the protection of its current habitat; therefore, the **SPP must STOP** habitat loss and further must ensure there is an enhancement and re-establishment of koala habitat and that linkages are maintained and or established between koala habitat. The proposed SPP does not achieve these goals.
- The North Stradbroke Island koala population is very important and deserving of strong protection. In fact it is the only viable population within the Koala Coast, so an all out effort needs to be undertaken to protect this population from the sand-mining and wind up the quarrying/mining activities well before 2028 as currently proposed.
- Public infrastructure while important must not result in a net loss of koala habitat.
- The scope of the mapping has gaps within coastal cities (80,000 ha of unprotected remnant vegetation in the Urban Footprint) and Western Councils. The Southern and Western Councils and rural areas are unmapped and could contain 50% or more of the remaining koala population. The areas affected and to be affected by infill and broad hectare clearing and Major Development Areas do contain Koala populations and much of this habitat is unmapped.
- The Koala population crash in SEQ is past the tipping point (EPA 2009) and escalating threats warrant more targeted and drastic planning changes.

- Genetic diversity is not understood by decision-makers (Appendix B)

Issues which have contributed to this risk include the uncontrolled population explosion in SE Queensland and a lack of a whole of government response to koala protection.

Evidence or Observations that I have to support this position includes I have lived in the same residence since December 1985 at Cornubia, which is now within the Koala Coast boundary. My property is in a conservation area and although there has been some new properties developed over the last 25 years in the main there is a wide selection of koala food trees and linkages for koalas to occupy the area as habitat. Every mating season up to 1996 my wife and I would hear koalas calling on numerous occasions each year. They are cryptic species and not easy to visually spot so their vocal antics are a good indicator of their presence. Since 1996 or thereabouts the mating calls have diminished to a point by the mid-2000s and thereafter we have not heard koalas at all, despite the so called State Planning Policies progressively implemented by the Queensland Government.

Other contributors to the risk have been:-

- Inadequate and / or absence of mapping
- Lack of research into genetic diversity.

Recommendation for Consideration by the Committee

List what could be done to improve this situation for the future.

- Changes need to be made to the *Sustainable Planning Act* framing new spatial extents, precautionary principle and koala and other triggers in an EIS process. Interim temporary planning orders should be put in place to protect remnant vegetation and regrowth as most of the Major Development Areas (eg failure to stop clearing at Flagstone,) and major state legislation (i.e. *State Development and Public Works Organisation Act 1971*) do not have/support investigation studies or koala surveys (No DIP Guideline for mandatory studies).
- The *Sustainable Planning Act* must be amended to provide clarity and protection to councils when adopting Regional Plan changes. While these changes are designed to protect koala habitat and the state from compensation claims the same must filter down so Councils are likewise protected. *Achieving the Policy outcome through a planning instrument (S. 3.5 – 3.7)* are unachievable until Local councils are offered protection from compensation claims. Land use designations made prior to the commencement of the SPP fail to achieve the support of S. 3.10.

- In a recent study conducted by the IUCN, it was reported that koalas are extremely vulnerable to climate change. The increase in Carbon Dioxide is causing koala food trees to produce leaves that are not as nutritious. Hence, koalas will suffer malnutrition. The report goes on to state that koalas will respond by either eating more or narrow their selection of foods trees. Both responses indicate the importance of retaining as much koala habitat as possible if this species are to survive. The current SPP and SEQ Koala State Planning Regulatory Provisions does not allow this to happen and allows development in protected koala bushland and does not provide an adequate system for offsets
- SEQ Koalas to be declared critically endangered with support sought from the Federal Government to have the Koala Coast koala population listed under the *EPBC Act*.
- The no more clearing of koala habitat. All koala habitat protected and a buyback plan needs to be clearly articulated.
- A moratorium on clearing of ERE regrowth, also of 'Of Concern' /not Of Concern regrowth (Koala Habitat) is warranted.
- Funding package for buyback, leasing/planting of food quality agricultural land in Redlands/Logan River/ Brisbane Valley/ Moreton Bay/ Sunshine Regional Councils for koala habitat.
- Protection is needed for the 80,000+ ha of remnant vegetation (largely Koala Habitat) in the Urban Footprint, including MDAs and future urban growth areas all largely supporting unprotected koala habitat.
- Existing and proposed Infill / MDAs / roads/ road widening in koala habitat is set to eliminate perhaps a thousand koalas on and off site. Areas of concern are Ebenezer, Jimboomba, Redlands, Ripley Valley, Bahrs Scrub, North Maclean, Park Ridge, Round Mountain, Flagstone and New Beith. This is a matter requiring close attention and re-assessment.
- Koala habitat outside the SEQ Regional Plan's Urban Footprint is largely not protected (Woolloomin Creek and areas covered by PMAVs). This must be reviewed.
- A suite of legislation requires changes to ensure koala habitat is protected within the same. i.e. *State Development and Public Works Organisation Act 1971*.
- Designation of koala habitat both future and unprotected as Regional Open Space. This helps the State Government meet Q2 obligations.

- Infrastructure charging for fauna infrastructure and Greenspace should form part of the requirements set within Priority Infrastructure Plans (PIP) and other infrastructure charging mechanisms.
- The bushland areas to be affected by certain infill, broad hectare clearing (VM Act permits) new roads, infrastructure corridors, Structure Plans and Major Development Areas do contain Koala populations, these areas must be mapped and the koala populations protected. Essential Habitat and ERE Ecosystems needs to be reviewed so koala habitat is included.
- Assess development and infrastructure in koala habitat areas against the Koala Task Force actions and recommendations, *Wildnet* observations, AKF mapping and koala habitat mapping 2009 and derived University of Qld recommendations (Rhodes, McAlpine and Possingham et al) and EPA 2007/2009, Carrick (2008) and other strategies.
- Existing development approvals in koala habitat warrant review and require renegotiation, offsetting and buyback. (Task Force limits development commitments to development approvals only)
- The 'needs case' for the exceptions of extractive industry or community facilities warrants calibration against superior thresholds for core areas, roads, existing and future koala corridors.
- Local Authorities should be required to implement koala conservation and undertake the identification and protection of koala habitat areas in planning schemes, structure Plans and Pip's without fear of compensation claims.
- A State Koala Conservation Committee is required to address koala conservation as a whole of government process.
- The monitoring and tracking of "Urban Koalas" as described by Carrick (2008) in peri-urban areas, urban perimeters and urban bushland matrix is necessary.
- There is a need to designate broad fauna infrastructure crossing points and fauna proof fencing on all major arterials, Flinders peak Greenbank Karawatha Corridor (FGK), in Noosa and proposed D'Aguilar Range Biosphere Reserves and many 4 lane upgrade roads proposed in local authorities and by Main Roads.
- The Offsets Policy needs priority review as it is not working.
- The listing of the koala under the EPBC Act; (and see below).

In summary, the koala although Queensland's fauna symbol is fast disappearing particularly in the Koala Coast. The only viable population seems to be on North Stradbroke Island, so an all out effort needs to be undertaken to protect this population from the sand-mining and wind up the quarrying/mining activities well before 2028.

Thank you for the opportunity to present this submission to you for consideration by the Committee. We would be pleased to discuss these matters with the Committee further.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'David Keogh', with a long horizontal flourish extending to the right.

David Keogh
President
Wildlife Logan

Appendix A

In **1995** the koala was listed as a common species under the *Nature Conservation Act 1992 (NCA)*.

The **1995** *Planning Guidelines for the Conservation of Koalas in the Koala Coast* (SPP 1/95) stated, urban residential, industrial and commercial estates and major Community developments were considered to be generally incompatible with the maintenance of koala habitat values.

However, the State Government allowed urban development to occur in koala habitat.

The **1997** *Planning Guidelines for the Conservation of Koalas in the Koala Coast* (SPP 1/97) stated, urban residential, industrial and commercial estates and major Community developments were considered to be generally incompatible with the maintenance of koala habitat values.

However, the State Government allowed urban development to occur in koala habitat.

In March **2004** the koala was re-listed as a common species to 'vulnerable to extinction' in the South East Queensland Bioregion, under the *Nature Conservation Act 1992 (NCA)*.

However, the State Government allowed urban development to occur in koala habitat.

In **2005** the *SEQ Regional Plan* stated, Koala populations are declining or becoming locally extinct in many areas primarily due to habitat loss. The SEQ Regional Plan Regulatory provisions stated, subdivision of land in the *Regional Landscape Area* could not be subdivided below 100 ha.

However, the State Government allowed urban, commercial development and quarries to occur in koala habitat and allowed subdivision of koala habitat in the *Regional Landscape Area*. The lots were smaller than 100ha.

In **2006** the *Nature Conservation (Koala) Conservation Plan 2006 and Management Program 2006-2016* stated, koalas are suffering from the impacts of urban development and habitat clearing. The greatest threats to their survival are the destruction and fragmentation of their habitat, car strikes, dog attacks and disease. However, the State Government allowed urban expansion and development to occur in koala habitat.

In **2006** *Nature Conservation (Koala) Conservation Plan 2006* stated:

koala habitat means—

- (a) a woodland where koalas currently live; or
- (b) a partially or completely cleared area that is used by koalas to cross from (1) one woodland where koalas currently live to another woodland where koalas currently live; or
- (c) a woodland where koalas do not currently live, if the woodland—
 - (i) primarily consists of koala habitat trees; and
 - (ii) is reasonably suitable to sustain koalas

However, the State Government allowed urban expansion and development to occur in koala habitat.

In **2007** the *Report on Koala Coast Koala Surveys 2005-2006* (EPA) stated, http://www.epa.qld.gov.au/publications/p02181aa.pdf/Report_on_Koala_Coast_koala_surveys_20052006.pdf

The koala population in the Koala Coast from the 2005-06 survey is estimated at 4611 animals. Based on the estimate of 6246 koalas (Dique et al. 2004) from the 1996-99 surveys, this represents a 26% decline in abundance of the regional koala population. The estimated population declined in the Redlands Shire by 27%, Logan City by 26% and Brisbane City by 21%

Studies have suggested that conservation programs for wild populations need to be designed to conserve habitat capable of supporting approximately 5000 - 7000 animals in order to ensure long term persistence (Begon et al. 1996; Smith 1996; Reed 2003). To conserve this number of koalas in the Koala Coast, the area of RL/RP would need to be increased by between 12% (24 550 ha) and 57% (34 440 ha) based on habitat composition in 1997. Improving the landscape composition through bush rehabilitation to fully vegetate the RL/RP would not provide sufficient habitat by itself to maintain a viable koala population of 5000 - 7000 animals. Consequently, functional habitat must also be conserved on the Urban Footprint to secure sufficient resources to sustain a viable koala population in the long term.

However, the State Government allowed urban expansion and development to occur in koala habitat.

In **2008** the survey by consultants GHD for the Environmental Protection Agency and *Moreton Bay Regional Council* showed the urban koala population in that area had declined 46 per cent over the past six years. The loss of koala habitat was recognized as the biggest killer of koalas.

However, the State Government allowed urban expansion and development to occur in koala habitat.

2008 Saturday, August 09, 2008

Unfortunately, the State Government has already suggested major koala habitat south of Boundary Road, Thornlands (Woodlands Drive) ^[1] be opened to greenfield development and has forced the community to go to court to stop quarries destroying koala habitat in Mt Cotton. The State Government appears to have written off hundreds of hectares of core koala habitat and koalas in the Coomera area.

April 2009

State Government allows the clearing of state land supporting koala habitat in Thornlands.

May 2009

The results of the 2008 Koala Coast koala survey estimates a population of 2279 animals. Based on the population estimate of 4611 koalas in 2005-2006, this represents a 51% decline in less than three years and a 64% decline in the 10 years since the original 1996-1999 estimate of 6246 koalas.

See:

http://www.epa.qld.gov.au/publications/p02966aa.pdf/Decline_of_the_Koala_Coast_koala_population_population_status_in_2008.pdf

The State Government still allows urban expansion and development to occur in koala habitat.

July 2009

<http://www.dip.qld.gov.au/resources/plan/koala/final-aprp-01-07-09.pdf>

The *Draft South East Queensland Koala State Planning Regulatory Provisions* (see attached) came out for public comment in December 2008 and it included NO exemptions, under this draft plan koalas had some kind of chance of survival even in the urban environment. The final version, the *South East Queensland Koala State Planning Regulatory Provisions* (see attached) was released in July 2009 and it provides exemptions that appear to allow developers to avoid the implementation of Koala Conservation provisions. **Five (5) exemptions have now been included for developers. Exemption 1.3(d) in particular appears to have removed any protection once provided to koalas within the urban footprint and in effect this new State Government Koala Plan will allow the destruction of most if not all urban koala habitat not situated within some form of land designated for conservation.**

1.3 (d) development that is generally in accordance with a rezoning approval where the development entitlements from the rezoning approval are conferred by the following □

^[1] Greenfield land supply in South East Queensland. DIP

- (i) *the resulting zone in a transitional planning scheme;*
 - (ii) *a development permit or acknowledgement notice mentioned in section 3.2.5(1)(a) of the Integrated Planning Act 1997 for a development application (superseded planning scheme) for the resulting zone in a transitional planning scheme which is a superseded planning scheme;*
 - (iii) **a planning scheme (other than a transitional planning scheme);**
- or

The State Government still allows urban expansion and development to occur in koala habitat.

August 2009

The Koala Coast koala population is close to effective extinction and the regional population is not much better off and the State Government has allowed the destruction of koala habitat across the region in very recent times at Brendale, Fitzgibbon, Manly, Thornlands, Mt Cotton, Wellington Point, Petrie, Logan, Gap Creek Road and the list goes on and grows longer every day.

The State Government still allows urban expansion and development to occur in koala habitat.

January 2010

State Government Statutory Regulatory provisions (1.4. *When this state planning regulatory provision does not apply*) clearly highlights the exemptions clauses favors developers over koala conservation. The clauses are significant that it ensures little koala habitat located in the urban footprint will be protected.

Appendix B

Genetic Variation and Structuring in the Threatened Koala Populations of Southeast Queensland

Kristen E. Lee Æ Jennifer M. Seddon Æ Sean W. Corley Æ William A. H. Ellis Æ, Stephen D. Johnston Æ Deidre´ L. de Villiers Æ Harriet J. Preece Æ, Frank N. Carrick
Research article 2009 Springer Science+Business Media B.V. 2009

NB: I could attach to my submission, but please contact me for the research paper on: dpkeogh@bigpond.com