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Committee Secretary

Senate Standing Committee on Environment, Communications and the Arts

[via email: eca.sen@aph.gov.au](mailto:eca.sen@aph.gov.au)

THE INQUIRY INTO THE STATUS, HEALTH AND SUSTAINABILITY OF AUSTRALIA'S KOALA

Dear Secretary and members of the Senate Inquiry Committee

The Sunshine Coast Environment Council welcomes the opportunity to contribute to the Federal Inquiry into the status, health and sustainability of Australia's koala population being undertaken by the Senate Standing Committee on Environment, Communications and the Arts. Your consideration to extend the submission period due to unavoidable circumstances is greatly appreciated.

INTRODUCTION

The Sunshine Coast Environment Council (SCEC) Inc. is the peak environment body for the region covering from Cooloola to Caboolture and west to the Hinterlands. As a not-for-profit organisation with 50 member groups and over 400 individual, family and business supporters, SCEC has a collective representation of some 7000 people. SCEC is the regional affiliate of the Queensland Conservation Council and is apolitical.

Formed in 1980, SCEC continues to be instrumental in achieving many positive environmental outcomes for the Sunshine Coast region. We proactively engage with all levels of government and work with business for optimal environmental outcomes. A fundamental part of our mission sees us undertake extensive community education and events. SCEC actively works with the Regional Councils as well as State and Federal government departments, industry stakeholders, academic institutions such as the University of the Sunshine Coast, Sunshine Coast TAFE, other community groups and the general public.

SCEC is the publisher of the independent publication, 'ECO' which focuses on environmental and sustainability issues. ECO is published quarterly with a distribution of 15,000 copies from the Gold Coast to Gympie. SCEC also provides a widely accessed online version – www.econews.org.au

SCOPE OF SUBMISSION

This submission endeavours to address a number of the following Terms of Reference in detail or in part

Preserving the Quality of Life

1. The iconic status of the koala and the history of its management;
2. estimates of koala populations and the adequacy of current counting methods;
3. knowledge of koala habitat;
4. Threats to koala habitat such as logging, land clearing, poor management, attacks from feral and domestic animals, disease, roads and urban development;
5. the listing of the koala under the *Environment Protection and Biodiversity Conservation Act 1999*;
6. the adequacy of the National Koala Conservation and Management Strategy;
7. appropriate future regulation for the protection of koala habitat;
8. interaction of state and federal laws and regulations; and
9. any other related matters.

EXECUTIVE SUMMARY

SCEC commends Senator Bob Brown for initiating this long overdue Inquiry and the subsequent support it has garnered. This submission endeavors to communicate a range of issues taking an increasingly significant and shameful toll on this iconic native species and the urgency with which these issues need to be addressed. It is sincerely hoped this Inquiry is a catalyst in triggering a robust response to this crisis in Australia's biodiversity.

1. The iconic status of the koala and the history of its management

1.1 The koala is synonymous with Australia and is symbolic to all Australians, particularly Queenslanders, being the fauna emblem on Queensland's coat of arms. When the then Federal Minister for the Environment, the Honourable Peter Garrett, proclaimed the Koala as a priority species for the Government Priority Assessment List, Minister Garrett recognised the Koala as *"one of our greatest and most loved national icons and that the government must be committed to its ongoing conservation"*.

This undeniable link with Australia also represents a significant contributor to the tourism economy of this country¹. Responsible for an estimated \$1.1 billion annually to the industry based on 1996 figures, the koala consistently rates as a great attractor for international tourists. Whether in photo, film, characterized image or personal interaction, the koala evokes a sense of wonder of Australia's unique wildlife.

The indictment on Australia should the global community become aware of the shocking state of this iconic species and the lack of protection it is afforded would be shameful and politically embarrassing. The general public in Australia is largely unaware of the extent of threats facing 'our koala' as the prospect of losing this iconic and much loved animal is beyond comprehension.

1.2 SYSTEMIC FAILURE TO PROTECT THE KOALA

¹ Hundloe, T.J & Hamilton, C, 1997 *Koalas and Tourism: an economic evaluation*, Discussion Paper, Australia Institute, Lyneham, ACT

Despite 16 pieces of legislation, koala populations, particularly in South-east Queensland are in serious and accelerating decline.

Why? The Sunshine Coast Environment Council suggests that an unhealthy relationship tends to pervade between the State government and the development industry. This has seen legislative regulations weakened and skewed in favour of the development industry in Queensland at a tragic cost to this iconic species. There has been consistent facilitation of development in ever diminishing sensitive and core koala habitat areas, particularly in the urban footprint

Queensland legislation context

In 2006 the Queensland Nature Conservation (Koala) Conservation Plan and Management Program 2006-2016 (The Koala Plan) which afforded protection for koala habitat within the urban footprint came into effect. However, on the 12 December, 2008, the Draft South East Queensland Koala State Planning Regulatory Provisions (Draft SEQ Koala SPRP) and the habitat regulatory maps, which altered the protection for koala habitat within the urban footprint, came into effect. A review of the Draft SEQ Koala SPRP and the subsequent final version resulted in broad reaching concerns that the policy:

- Lessens the effectiveness of the Nature Conservation (Koala) Conservation Plan and Management Program 2006-2016, by removing these provisions from the Urban Footprint where Koala habitat exists;
- Will cause negative environmental impacts by diminishing provisions within parts of the SEQ Regional Plan Urban Footprint on the Sunshine Coast;
- Contains insufficient planning intent to protect, maintain and enhance existing habitat, including urban habitat; and
- Nominates Department of Infrastructure and Planning as concurrence agency for ecological based referrals rather than the Department of Environment and Resource Management.

Specifically, the South East Queensland Koala State Planning Regulatory Provisions (released in July 2009) provides exemptions that appear to allow developers to avoid the implementation of Koala Conservation provisions. Five (5) exemptions have now been included for developers. In particular, the limited protection previously extended to populations within the urban footprint has been removed or severely hamstrung. The ability to prevent further loss of viable habitat within the urban footprint has been all but removed. The effect of changes between the Draft version of the State Planning Regulatory Provisions of 2008 which provided a level of protection and recognised the need to manage development to avoid impacts on habitat values to the final version released in July 2009 was dramatic. Just when there finally appeared to be practical and legislative controls underpinned by justifiable 'no exemptions' against certain criteria, they all but disappeared out of the final version now in effect. The development industry bristled at perceived potential obstructions to being able to build with impunity.

Concern deepened when the Department of Infrastructure and Planning became the concurrence agency rather than DERM (formerly EPA) who has been reduced to an advice agency in relation to Koala Conservation in the Urban Footprint.

Since the introduction of this last iteration of legislative framework, koala numbers and habitat extent have continued the trend of decline evidenced in the Queensland Governments report on the *Decline of the Koala Coast Koala Population: Population Status in 2008, Department of Environment and Resources Management, April 2009*. The study found the decline in Koala population between 2005–2006 to be 51%. A decline similar to this is unacceptable on the Sunshine Coast and maintaining existing populations is paramount. Any lessening of provision to protect Koalas will correlate to the potential for local extinctions on the Sunshine Coast, which have significant koala habitat in the urban footprint.

Further detail is provided in Appendix 2 “Koala Fact Sheet” prepared by the Environmental Defenders Office January 2011

2 & 3. Estimates of koala populations and the adequacy of current counting methods; and knowledge of koala habitat;

Inadequate Mapping

The current Regulatory Maps used in the *SEQ Regional Plan 2009 – 2031* (SEQRP) for so called planning purposes, fail to provide accurate information or sufficient scale and detail on the existence of koala populations, habitat and corridors.

For example, Koala mapping was undertaken by the then, Caloundra City Council several years ago for the Caloundra environs using approved methodology. This mapping was subsequently endorsed by the newly amalgamated Sunshine Coast Regional Council and forwarded to the appropriate state government departments. However, these more accurate maps are not reflected in these SEQRP regulatory maps, particularly concerning the Urban Footprint.

There is concern that not all areas of known koala habitat have been included in the current designated Koala Habitat Areas. Regional councils were in the process of undertaking koala population assessments; however, long awaited State resources were terminated. The Sunshine Coast Regional Council was poised to undertake local mapping and data exercises when the state government cut funding and removed the opportunity to further these vital studies.

The SEQ Koala Habitat Mapping Project 2009 forms the basis of the mapping in the *South-East Queensland Regional Plan 2009-2031*. It has always been a concern that the above project did not follow the standard tendering process and was commissioned to one oft selected provider. The project commenced in January 2009 and the mapping presented to State Cabinet in May of that year. This was a woefully inadequate

timeframe to effectively assess the extent and value of Koala habitat in SEQ and reliance on it for regulatory planning triggers is unacceptable.

Consultants tend to have crossover contracts between government and the development industry. Perceived conflict of interest is a well recognised concept, however, it is understandably difficult to prove actual conflict of interest.

Unless the government enacts protective legislation, koalas and their habitat continues to be irrevocably lost. Developments are being approved in koala habitat areas; however there is not sufficient detail on the current maps to show this or to trigger any level of necessary protection. Thus koala habitat and hence the koala population is at increasing risk due to insufficient knowledge of the remaining SEQ Koala population.

SCEC urges the recognition of the Australian Koala Foundation's Koala Habitat Atlas, together with the implementation of a scientifically robust mapping exercise to inform regionally specific land use and ensure the necessary on-ground protection.

Fundamentally, a species can't be conserved without habitat. Notably, the habitat that supports koalas also supports over 700 other listed species and thousands more native animals. Koalas continue to be at escalating risk as they are subjected to significant loss of primary habitat and fragmentation of remnant habitat, particularly in south-east Queensland.

When we are counting individual trees and animals it will be far too late.

4. Threats to koala habitat such as logging, land clearing, poor management, attacks from feral and domestic animals, disease, roads and urban development;

4.1 Unsustainable population growth

The current level of Australia's unsustainable population growth is wreaking havoc on our biodiversity and quality of life. The Australian Conservation Foundation recognised the root of environmental declines, amongst others, is unchecked population growth and took the step of listing "human population" as a key threatening process under the *EPBC Act*

http://www.acfonline.org.au/articles/news.asp?news_id=2749&eid... (Appendix 3)

The Queensland State government has long been championing the "growth is good" mantra at the expense of the ecological and liveability values of the state. This mentality is perpetuating compounding consequences, particularly in the south-east corner and no doubt duplicated across Australia. Obvious signs of stress across a range of indicators are consistently ignored.

4.2 Urban Development

The unrelenting push of development has seen little regard for conservation imperatives. It is appalling that any native species, let alone an iconic one such as the koala, is victim to this disregard.

Fuelled by exponential population growth and lack of sustainability principles, urban sprawl is decimating wildlife through high rates of habitat loss, fragmentation and conflicting land uses. Associated infrastructure to service more and more growth, such as power lines and roads and the introduction of domestic and industrial behaviours exert great pressure on the ability of the koala to adapt and ultimately, survive. Due to the aforementioned failures in the planning regime and a lack of commitment to “sustainable communities” which are underpinned by principles of ecologically sustainable development, the conflicts are going largely unaddressed while vegetation clearing continues. With an inter-relationship between koalas in urban and peri-urban areas and those in the wild, the capacity to maintain populations across ranges is diminishing. Urban biodiversity is crucial to overall ecological integrity and the genetic diversity of the koala.

There is no explanation as to how developers working in koala habitat areas in Queensland are being policed to ensure compliance with the latest round of planning legislation that came into effect in 2010.

Notably, Queensland’s Department of Environment and Resource Management (DERM) has no code of practice for contract koala spotters (of varying experience and capabilities) working on development sites.

Relying on “sequential clearing” of development sites, as a means to protect koalas, underscores a fundamental lack of understanding of the natural instincts of koalas and the impact of displacement.

4.3 The effect of Offset policies

The concept of vegetation and biodiversity offsets is becoming an increasingly convenient tool of the State and the development industry. Rather than being a ‘last choice if mitigation of impacts is not possible’, this practice is gaining prominence to actually facilitate development in areas otherwise unsuitable for development such as those with conservation values.

Offset requirements offer little in the way of habitat values with the abrupt loss of mature trees and reinstatement taking decades. In the interim, the resilience of native fauna such as the koala is sorely tested. Displacement, forced behavioural change and the ability to manage within disturbed and highly modified landscapes puts the koala under incredible stress. As ecosystems and vegetation communities are increasingly impacted within regions such as the Sunshine Coast, the opportunity for ‘like for like or better’ offset parcels or compensatory habitat decreases. This creates a progressive stripping of biodiversity values from region and renders species locally extinct. The koala is falling into this bracket within the Sunshine Coast.

4.4 Failure of the Vegetation Management Act 1999 (Queensland)

A clear deficiency in the *Queensland Vegetation Management Act 1999 (VMA)* is that regionally significant vegetation communities of key habitat for koalas within the Sunshine Coast region are listed as ‘not of concern’ due to the methodology used for determining remnant vegetation status across extremely large bioregions. The VMA is a fundamental piece of Queensland legislation in the context of habitat protection. Yet its structure is based on the mapped extent of regional ecosystem types with no mechanism to

consider the impacts of clearing, particularly over the longer term. It also fails to take account of habitat degradation due to fragmentation or the management of species such as the koala.

4.5 Fragmentation of habitat and loss of connectivity

Fragmentation occurs when areas of continuous habitat are reduced to a set of isolated smaller remnants.

It is common knowledge that the 'Theory of Island Biogeography' is a fundamental principle of natural system management. This theory explains the changes in the rate of extinction and migration of species due to fragmentation of vegetation. Important variables include the size of the fragments, distance from species pools and connectivity. This theory is directly related to biodiversity and highlights the importance protecting areas of vegetation that are larger, closer to species pools and/or preferably connected via corridors. Hence, this theory and its associated concepts (i.e. edge effects) justifies that fragmentation and disturbance of corridors has a direct impact on biodiversity

We resile from images of Amazonian rainforest and Borneo highlands being razed and burned displacing orang-utans and diverse wildlife from their habitats and demand their protection. And rightly so. However, Australia is as just as much a culprit with the long term effects yet to be fully realised. The growing list of threatened species is testament to Australia's poor conservation track record and the koala is set to become the 'pin-up' species. I do not say this lightly or in jest.

4.6 Vulnerability to road trauma and attacks by feral and domestic animals

The countless admissions to wildlife hospitals, specialised veterinary facilities and carers demonstrates the huge toll urban pressures are taking on koala populations. Attacks from domestic animals such as dogs and vehicle strikes account for an alarming percentage of injuries and death. Population numbers have been crashing in the last decade as noted in the DERM report - *Decline of the Koala Coast Koala Population: Population Status in 2008, Department of Environment and Resources Management, April 2009.*

<http://www.derm.qld.gov.au/register/p02966aa.pdf>

Increasing fragmentation of the landscape and home ranges with road infrastructure (again, a symptom of unsustainable population growth, continued urban sprawl and a lack of integrated public and active transport networks) is subjecting the koala to insurmountable physical barriers. Road design has ignored the need to identify and be sympathetic to koala movement requirements and habitat. The advent of fauna crossings, the oxymoron of 'koala friendly fencing' and appropriate speed and signage has lagged what the data is showing. The compounding presence of urbanised influences stressing the koala is demonstrated by the high injury and mortality rates. There is little capacity for resilience with these increasing threats and recovery opportunities must be urgently investigated

Case Study Paper: <http://www.publish.csiro.au/paper/WR02029.htm>

4.7 Native Forestry Harvesting

The practice of native forestry harvesting on generally freehold land on the Sunshine Coast is widespread and contributing to habitat loss and a reduction in broader biodiversity values. This practice is poorly regulated and often used as a precursor to submitting development applications. Areas that have been identified to support regionally important conservation values are progressively logged. This tends to result in the diminishment of these values giving rise to a perceived justification for development rights that would otherwise not apply. Clearing is currently permitted in 'endangered' ecosystems and in locations of important corridor linkage.

Recommendations:

1. Tighten the Code of Practice for Native Forestry Harvesting
2. Increased monitoring and compliance
3. Exclude harvesting in 'of concern' and endangered ecosystems
4. Prohibit harvesting of koala trees
5. Requirement for fauna spotter qualified in best practice koala spotting and management
6. Prohibit harvesting in core habitat areas and regionally significant corridors

4.8 Disease

SCEC refers the Inquiry to the submission by Dr Jon Hanger (#34) in relation to the effects of disease on koala populations.

We strongly support the need for a significant and urgent injection of funding for research commensurate with the extent of the koala disease epidemic

Recommendation:

1. Significant, urgent and enduring funding for research into koala disease

Recommendations:

1. A moratorium on the clearing of the tree species listed in the submission of the Australian Koala Foundation (#25-page 17 of 22) on which koalas rely for roosting, breeding, feeding and movement leading to systematic protection.
2. Protection of regionally significant vegetation communities and linkages
3. The observance of the 'Theory of Island Biogeography'
4. Regulatory status of local planning scheme mapping such as that being prepared by the Sunshine Coast Regional Council
5. Review of state koala legislation to remove perverse outcomes and strengthen its protective capacity, especially within the urban footprint
6. Restore, enhance and protect landscape scale corridors and connectivity
7. Conservation values and positive environmental outcomes to direct development intent
8. Offsets are not supported in lieu of prudent environmental imperatives and the support of koala viability

9. The removal of 'Injurious Affection' from Queensland legislation to allow 'back zoning' by local government without fear of compensation claims of areas unsuitable for development, such as those with conservation and connectivity values
10. The retention of sufficient and viable habitat and maintaining permeability to facilitate safe koala movement through urban areas. It is extremely important to have connectivity between bushland areas to support areas of re-colonisation and movement. Elements, such as woody vegetation along creeks, can provide linkages between larger bush areas for example.
11. If development is to occur, the development footprint and adjacent areas incorporate 'koala friendly' design principles
12. Reconsideration of need and scale of road and utility infrastructure. Incorporation of conservation principles and robust management plans in the planning, construction, implementation and operation of infrastructure

5. The listing of the koala under the Environment Protection and Biodiversity Conservation Act 1999;

5.1 The Sunshine Coast Environment Council (SCEC) requests that the Australian Federal Government list the koala as "vulnerable" under the EPBC Act.

The Queensland Government's own report has estimated a 51% decline in the koala population of the Koala Coast and a 64% decline in the last 10 years

http://www.epa.qld.gov.au/nature_conservation/wildlife/koalas/koala_plan/decline_of_the_koala_coast_koala_population_population_status_in_2008.html).

Despite State Planning Guidelines dating back to 1995, including the recent release of the SEQ Koala State Planning Regulatory Provisions (over 12 pieces of legislation in all) the Queensland State Government has allowed urban expansion and development to occur in koala habitat, resulting in the death of over 25000 koalas in the past decade. There is absolutely no guarantee that the States can provide adequate protection for this iconic species. In fact we have seen the continuing decline in koala numbers through loss of habitat, disease, predatory attacks and road fatalities.

We defer to the Australian Koala Foundation (AKF) data on the koala populations. Through extensive robust scientific fieldwork and literature reviews over twenty four years, the AKF has produced the Koala Habitat Atlas and estimated koala populations. This data has shown the extensive decline in koala numbers. The AKF estimates that there are no more than 100,000 koalas - a decline of 75% which more than meets the criteria to list this species as vulnerable – it would even meet endangered.

The recent review of the National Koala Conservation and Management Strategy 2009-2014 recognised that the time to act is now if we are to avoid extinction of our iconic species. It further reinforced the speed of action which must match the urgency to halt the critical decline in the Koala population.

To address this urgency, the koala must be listed as "vulnerable" under the EPBC Act. Listing the Koala as "conservation dependent" relies on the states or local governments to ensure the survival of the koala and

through poor planning and laws that favour urban development over iconic koalas and despite over 16 pieces of legislation alone in SEQ that approach has seen thousands of koalas die. The precautionary approach enshrined in the legislation must be utilised to protect the koala. The exemptions under the State Development Act

5.2 State Projects and Mining Exemptions

Queensland's State Development and Public Works Organisation Act provides the person holding the office of the [Coordinator-General](#) with significant powers to manage major projects, coordinate environmental impact assessments and direct programs of works on a whole-of-government basis.

The original Act was first passed in 1938 by William Forgan Smith's Labor government as a post-depression measure to create employment and to develop the state through a system of coordinated public works. The Act was substantially revised and updated in 1971 with the central role of the Coordinator-General in planned development preserved. In 1971, specific powers relating to supervision of the environment were incorporated into the Act. More recent amendments have strengthened the Coordinator-General's powers to ensure timely decisions are made on state and regionally significant projects and to ensure the timely provision of critical public infrastructure.

<http://www.dip.qld.gov.au/infrastructure/state-development-and-public-works-organisation-act.html>

The impartiality of the Coordinator-General is comprised by his/her dual role in both assessing the environmental impacts of a project and the intent of project delivery.

Huge areas containing complex ecosystems are being lost to mining operations and ill-conceived infrastructure projects, often over protracted period of time rendering the areas biologically sterile.

Mining and state significant projects, which are increasingly being applied to residential and commercial development, are largely exempt from State law. The environmental costs of a project and the impact on native fauna are only really tested against Federal law. Hence, another reason to list the Koala as vulnerable under the EPBC Act

Recommendations:

1. The Sunshine Coast Environment Council strongly reiterates the urgent need to list the koala as vulnerable under the EPBC Act.

Reliance on IUCN guidelines to trigger changes in conservation classification does not allow effective regulation and conservation of the koala. The inevitable outcome is a reactive response to the koala crises and a crisis management approach.

2. A review of the reactive approach to the koala crises and the implementation of proactive koala management strategies.

6. The adequacy of the National Koala Conservation and Management Strategy;

Whilst a welcome initiative in identifying the threats the koala is experiencing and the related trends in its mortality, the lack of implementation mechanisms and the integration of local, state and federal policy renders its success problematic. The commendable objective to conserve the koala is jeopardised by the lack of actions to achieve this.

Recommendations:

- Protect individual trees - instigate an immediate moratorium on all koala trees (refer AKF species list)
- Address the major threats facing the species.
- Implement a recovery plan at a Federal level, duly funded.
- Implement funded, standardized, high resolution vegetation and koala habitat mapping protocols
- Ensure policy instruments recognise the presence of koalas/koala habitat

7. Appropriate future regulation for the protection of koala habitat;

7.1 Robust and unassailable planning regulation that protects habitat

7.2 Improved and more accurate habitat mapping reflective of on-ground circumstances and opportunities

7.3 Statutory powers for local government planning schemes to protect and re-connect habitat/vegetation patches without the spectre of injurious affection claims

7.4 Listing of the koala as vulnerable under the EPBC Act 1999 with a commensurate recovery plan

7.5 Repeal of exemptions currently enjoyed by the development industry and the state which are contributing to koala declines

7.6 The enactment of specific high level and integrated protective legislation specific to vegetation types required for koala viability and conservation

7.7 Robust control of offsets to ensure *in situ* habitat values are preserved

7.8 Community Infrastructure Designations

An example of the lack of protective measures and a tokenistic consultation process lies at Eerwah Vale/Ridgewood/West Cooroy in the Sunshine Coast Hinterland. This area is home to a hinterland koala population under immediate threat due to a major infrastructure project to be undertaken by Powerlink (a State government entity). This project will test the intent of the State Government's planning instruments employed in 2010 (in the words of Stirling Hinchcliffe MP) to "ensure that future land use and infrastructure projects, protect and enhance koala conservation values."

While the need for such infrastructure remains questionable, the local community is frustrated by the consultant and Powerlink's chosen path through pristine forest and rural properties with scientifically tested (under the former Maroochy Shire) high ecological value. Alternative route options are possible via the shorter infrastructure corridor of the Bruce Highway. These properties hold the headwaters of the North Maroochy River and were the subject of waterways rehabilitation works under the former Maroochy Shire Council (now amalgated into the Sunshine Coast Regional Council) because of their importance to the region's biodiversity and water quality.

Eerwah Vale residents are especially concerned in respect to the protection of koala habitat, as a section of the Cooroy West State Forest (koala habitat) was logged in late 2008. This also resulted in significant community protest.

SCEC refers the Inquiry to the submission provided by community group P.A.G.E (Powerlines Action Group Eumundi) for specific issues arising from this proposal

Recommendations:

1. Reconsider the need and scale of the Powerlink project at Eerwah Vale and the analysis of the most environmentally sensitive route should the project proceed on any scale
2. Introduce penalties under Queensland legislation for providing misleading, erroneous Environmental Impact Statements and related documents

8. Interaction of state and federal laws and regulations

8.1 Currently the Bi-lateral Agreement between the State and Federal governments is not only ineffective, but abused

8.2 Essential, independent and broader ranging assessments are not being applied particularly in the case of state development projects and the declaration of Urban Development Areas or Master Planned Areas by the State Government.

The Queensland government takes a fast-track approach to planning, usually under questionable circumstances and flawed justification. The required oversight and robust scientifically based assessments of impacts is generally not given the opportunity to be effective.

Recommendations:

8.3 Despite a raft of regulatory provisions at State level and pointedly to no extent at the Federal level, the koala population in south-east Queensland is crashing

This cannot be allowed to continue

8.4 The EPBC Act needs to be strengthened and updated beyond the current Matters of National Environmental Significance – this includes listing the koala as vulnerable under the EPBC Act

8.5 Specifically, the use of Strategic Environmental Impact Assessments (SEIA's) are becoming increasingly warranted to address the cumulative impacts of developments.

The advantages of undertaking a strategic assessment include:

- early consideration of national environmental matters in planning processes
- greater certainty to the local communities and developers over future development
- reduced administrative burden for proponents and government
- capacity to achieve better environmental outcomes and address cumulative impacts at the landscape level, and
- flexible timeframes to better meet planning processes.

8.5 Strategic assessment can help to address issues such as:

- region-wide development pressures
- high growth areas with a large number of projects requiring assessment and approval
- multiple stakeholders
- complex, large-scale actions, and
- cumulative impacts on matters of national environmental significance (NES) protected by the EPBC Act.

SCEC is currently seeking an SEIA of the Pumicestone Passage and its catchments due to the increasing development and human activity pressures being exerted on an internationally significant wetland, its association to the Moreton Bay Marine Park and its inherent ecological values. These pressures are set to increase with the Caloundra South development with a projected population of 50,000 people – a city the size of Gladstone in a floodplain on the shores of this environmentally sensitive area. To demonstrate the roughshod approach by the State government, this proposal is now the subject of Supreme Court action by the Sunshine Coast Regional Council against the State for a breach of natural justice relating to the State's objectionable takeover of planning powers.

8.6 This approach to consider the cumulative impacts on the koala has validity and should be elevated in the assessment process. If it had been applied cross-jurisdictional then the true impact on the koala would have been realized.

8.7 The present practice of assessing projects in isolation does not reflect the compounding effects on species and their habitats. The plight of the koala, particularly in South-East Queensland is a result of this piece-meal approach

8.8 Empower Federal instruments with overarching actions to effect conservation outcomes

8.9 Scrutinise the effectiveness of Queensland State laws and regulations for their adherence to Federal requirements with frequent on-ground auditing

8.10 Close the exemptions in legislation leading to detrimental impacts on koalas and associated vegetation communities and individual trees

9. Other comments:

9.1 Climate Change

Climate change must be recognised as a threat to koalas. Currently, baseline data is not taking sufficient account of climate trends and the resultant impacts on the koala. Temperature change may influence flowering and the ability to produce viable seed. This may lead to koalas needing to adapt to different fodder trees. As the abundance of food trees is already declining through clearing, the choice in fodder trees is greatly reduced thereby exacerbating the impacts of climate change. A cornerstone of climate change adaptation is habitat protection and the enhancement of corridors to facilitate movement and build resilience.

9.2 Political expediency and continued 'business as usual' in a time of climate change are driving species to extinction at accelerating rates and destroying the fabric of ecological integrity.

9.3 The underlying threat to the koala is habitat loss both on a small and large scale and must be recognised and addressed as a matter of urgency

9.4 The preventable causes of death of koalas during land-clearing operations can easily be mitigated by appropriate regulation, policy and enforcement, but are currently not addressed.

9.5 Koalas that are likely to be displaced or impacted by land-clearing or other development processes should be managed in a scientifically considered manner that is humane and maximises the benefit for conservation of the species.

9.6 Personnel engaged to manage wildlife on development sites must be appropriately skilled and accredited. Management plans for koalas must be prepared by an experienced, independent consultant. Approved and robust fauna management plans must be in place prior to approval of development applications by the assessment manager.

9.7 It is important that the respective responsibilities of local and state governments in the protection and conservation of species and ecosystems is well defined. Some local governments seem to take the view that koala conservation is exclusively a State responsibility while others take their local stewardship seriously by are denied the resources necessary to implement management actions and recovery plans.

9.8 Only 98 of the 576 parks and protected areas under the care of Queensland's DERM have a management strategy. Some of the last koala footholds, like Noosa National Park, do not have a management plan. One might read into this that DERM only produces plans for areas where they consider they have the resources to implement them. The result is neglect in key areas where intensive management could otherwise resurrect koala populations in decline.

Preserving the Quality of Life

- 9.9** Research conducted by Deidre DeVilliers in Queensland has demonstrated that, under present policy constraints, approximately 60% of hand-released koalas die in their first year after release.
- 9.10** In particular, the current koala plan expressly forbids the translocation of koalas from development sites. This paradigm is flawed because it results in an unacceptably high level of mortality (loss of individuals) and therefore loss of genetic diversity.
- 9.11** To date the Queensland Government has commissioned scientific research in respect to koalas in the Pine Rivers and Redlands areas only. With the benefit of this trend data, which showed significant declines in koala numbers, DERM has deemed these areas to be “Priority Koala Management Areas”. The many other declining populations in the state, including the Noosa population and others in the South East corner, are not afforded any special protection measures nor receive any level of management or monitoring unless it is privately funded.
- 9.12** The consultants responsible for the delivery of the koala mapping project to the Department of Environment and Resource Management (DERM), which was designed to provide regulatory triggers, claims it recommended comprehensive ground truthing (field verification of koala habitation), and that this was not conducted to the extent required (only randomly).
- 9.13** It is not clear whether the koala mapping project was compromised due to budget or time constraints, or simply a poor brief.
- 9.14** There needs to be an increase in protected areas to shore up koala populations with effective management plans implemented
- 9.15** The urgency and level of measures needed to arrest the decline of the sustainability of the koala populations and its associated habitat should not be circumvented due to perceived economic imperatives. While the recent natural disaster events in Queensland are regrettable and will draw on the economic capacity of the State, this should be no excuse to delay protective management measures. Queensland has experienced three decades of ‘growth’ and ‘boom times’ yet it was in economic trouble and lost its triple A rating long before recent events. The GFC notwithstanding, where did it all go and where are the espoused benefits?
- 9.16** This situation is another example of the myth that population growth equals economic growth. Australia must slow its unsustainable population rate and stabilize the population to a level that recognizes the limits to growth and reverses the declines in liveability and environmental indicators

- 9.17** Australia cannot continue to “sell the farm” in the short-sighted exploitation of its natural resources at the expense of its biological integrity.
- 9.18** The South-east Queensland Regional Plan 2009-2031 and any subsequent reviews must remove mandatory population figures for regions. Population projections should be based on the sustainable carrying capacity of regions which recognize the biophysical features, the natural limits to growth and the desired look and feel articulated by the community. In the case of the Sunshine Coast, innumerable surveys and submissions continue to convey that the protection of the natural environment is paramount and that its integrity underpins their lifestyle values. Yet, the State government in concert with the development industry, continue to ignore the sentiment of the community and the scientific imperatives.
- 9.19** A Royal Commission should be held into the relationship between the development industry and the State government
- 9.20** The impending loss of an iconic species such as the koala in south-east Queensland should sound loudly as the ‘canary’ of a much larger and systemic crisis.

Senators, this submission is by no means exhaustive. I would therefore be happy to elaborate on any aspect raised and make myself available to provide evidence to the Inquiry if required.

My appreciation once again for the opportunity to contribute to this important Inquiry.

Yours sincerely

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Campaigns Manager