



7 April 2020

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

Via email: ec.sen@aph.gov.au

Dear Secretariat

Re: Environment Protection and Biodiversity Conservation Amendment (Save the Koala) Bill 2021

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the *Environment Protection and Biodiversity Conservation Amendment (Save the Koala) Bill 2021*.

Farmers have an abiding care for their environmental surroundings and enjoy the rich biodiversity it provides. Koalas are important and unique to Australia; they pose no threat to agriculture.

The NFF is strongly opposed to the championing of charismatic *taxa* as a means of environmental protection, reflecting a narrow-minded view which ignores the inherent complexities of healthy ecosystems and what supports them.

More appropriate and effective solutions would seek to involve, and be led by, local communities and landholders who have expert understanding of the landscape they live in.

The Bill seeks to:

1. Prevent the Minister from approving an action under the EPBC Act where that action consists of or involves the clearing of koala habitat; and
2. Remove the exemption of Regional Forest Agreements from requirements of the EPBC Act where there is, may, or is likely to be a significant impact on koalas.

The NFF rejects the Bill in its entirety for the following reasons:

- Existing processes under the EPBC Act allow for koalas to be listed as a threatened species, and thus protected, should they be found eligible against a set of criteria. The Threatened Species Scientific Committee is responsible for assessments and providing advice to the Minister under the

listing process, and there is no apparent reason why an entirely separate process should be created for one particular species.

- Koala populations significantly vary across Australia. While populations were affected in NSW following the 2020 bushfires, especially on public land, koala populations in both Victoria and South Australia are robust and would be unnecessarily captured under the scope of this legislation. There is no reason why these landholders should be unfairly targeted due to declining populations in other states. Farmers who maintain koala populations on their property, of their volition, would be equally impacted and further disincentivised to take action to protect the environment — a clear, perverse outcome.
- The NFF suggests that the Bill should clearly define koala habitat, and that any presence record of koala populations be highly verifiable.
- The Bill is a disproportionate and blunt tool that creates significant uncertainty for industry, effectively stopping productive land management, including regrowth, across eastern Australia for an undisclosed amount of time. Furthermore, the Australian Greens offer no evidence to suggest why this may be an appropriate tool to protect koalas, how it would practically operate and associated costs.
- Further, there is no mechanism nor incentive for farmers to maintain koala populations which many do at their own cost. Proposals for protection such as market-based instruments for biophysical assets are one mechanism recommended in the 2009 Hawke review, the Craik review as well as the recent Samuel review.

The farming community is actively working to improve biodiversity in partnership with the government, including protecting habitats of native species on their land as much as their resources will allow. While Koalas and other native species are important, further regulation and restrictions on property rights are ineffectual to improve environmental outcomes. Farmers require support, resources, recognition and incentives to continue to deliver environmental outcomes that are valued by society, not the imposition of poorly targeted legislative solutions.

Until such time as the Senator offers an evidence-based justification of the need for such a blunt instrument, the NFF cannot realistically contemplate such a Bill, and thus should be rejected.

Should you require any further information, please contact [REDACTED]

Yours sincerely

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TONY MAHAR
Chief Executive Officer