

Stakeholder group:

business

Are you of Aboriginal and/or Torres Strait Islander origin?

No

Do you consent to your submission being made public?

Yes

The current NSW Koala Strategy

1. Do you think the goal of doubling the number of koalas in New South Wales by 2050 provides a sound foundation for the NSW Government's approach to koala conservation into the future? If not, what do you think the goal should be?

- **No. This goal lacks scientific credibility.**
- **No. How can the NSW Government commit to doubling the number of koalas when it doesn't know how many there are to begin with and doesn't know the number which is sustainable?**
- **No. Doubling the number of koalas in New South Wales is a political folly.**
- **The goal should be about "Getting a proper handle on the koala's true conservation status".**

2. In your area of expertise, what gaps do you think there are in the Strategy?

- **The NSW Koala Strategy is an abject waste of money. It is a Strategy that lacks substance and credibility. It is full of small-scale feel-good initiatives that will have no tangible impact on koala conservation.**
- **There are no mechanisms in the Strategy to assess value for money. Transparency and accountability of expenditure allocated under the Strategy is completely lacking.**
- **In the absence of any commitment to broad-scale cross tenure forest monitoring the government will not know whether any of initiatives are working.**
- **The Strategy would be better described as an advertising brochure promoting Penny Sharp, DECCW, and the NSW National Parks and Wildlife Service.**
- **The government's Koala Strategy is exploiting the public's emotional attachment to a native animal.**
- **The recent Koala Summit was little more than a political stunt that fed on people's emotions.**
- **The Strategy is full of expensive inefficient initiatives**
- **The gaps in the Strategy are so large you could drive a log truck through them!**
- **The Strategy's design is being driven by emotion not science.**

- **The concept of Areas of Regional Koala Significance lacks scientific integrity and is not evidence based.**

- **There is no evidence that creating more National Parks for koalas is the answer but the NSW Government is charging on regardless?**

- **The Strategy does not give any attention to fundamental questions like:**

- o **The process for Listing koalas as endangered was based on very limited data and relied heavily on worse case scenario climate change modelling. How can the uncertainty around the koala's true conservation status be addressed in a timely and efficient manner?**

- o **In NSW where are koalas thriving and where are they not? What are forest management practices that are providing stability for koalas?**

- o **What can be done to reduce the threat of high intensity mega fires? Why isn't the National Parks and Wildlife Service employing policies and practices to mitigate them?**

Prioritising koala populations

3. Are the current categories of strongholds, populations for immediate investment and populations to fill knowledge gaps the right ones for koala conservation? Are there other important koala populations that should be identified for conservation management?

- **The government's understanding of koala populations across the animal's natural range may be best described as rudimentary.**

- **The government has insufficient information on the conservation status of koalas to start playing God.**

- **Categorising koala conservation into 'strongholds', 'populations for immediate investment' and 'populations to fill knowledge gaps' is populist nonsense.**

- **There are currently far more gaps than there is scientific knowledge.**

- **Why is it that State forests which are a known stronghold for koalas in NSW are the centrepiece of the government's koala conservation Strategy? I can only be concluded that the government's approach to koala conservation is being driven by politics not science.**

- **The concept of having important (and by default unimportant) koala populations is a nonsense.**

The importance of Aboriginal ecological knowledge to koala conservation

4. How could a revised Strategy further empower Aboriginal communities? What, if any, are barriers in the current framework?

- **If the government were genuine about Aboriginal engagement, it would be seeking advice on management of country not koalas. Having a statewide Koala Aboriginal Advisory Panel with more than 70 community members is little more than a political stunt.**

• Principles of Terra nullius remain embedded within NSW environmental law and policy. A revised Strategy will do nothing to address this. Until environmental law and policies explicitly recognise Aboriginal people the application of Aboriginal ecological knowledge will remain tokenistic.

Addressing the impacts of climate change

5. How do you think the NSW Government can more effectively identify and protect climate refuges in a revised Strategy?

A koala climate refuge is a nonsense. In a revised Strategy the NSW Government should be introducing policies and measures that help mitigate megafires.

The Strategy continues to promote a simplistic approach to conservation being the transfer of State forests and privately owned forests to passively managed reserves. This approach is exacerbating the threat of megafires.

In the 2019-20 bushfires National Parks performed worse than any other tenure. In 2019-20 most fires originated from lightning strikes in remote Park areas where they were allowed to burn for weeks before emerging on multiple fronts on blow-up days. An absence of mild burning and poor access meant little could be done to save koalas that were supposedly protected.

The NSW Government should be investing in ways to reduce the impacts of high intensity bushfires on koalas and other native animals, particularly in National Parks.

6. What support should the NSW Government provide to koala populations in areas we know will be subject to serious climate change impacts?

Active management of country where koalas reside is the solution.

In the dense tall forests on the eastern seaboard a key threat for koalas is high intensity wildfire. To address this threat the NSW Government should support broadscale cultural burning together with the creation of strategic low fuel zones with reduced tree density.

West of the Dividing Range in sparsely vegetated areas the NSW Government should support the planting of native trees for shade and shelter.

7. How could a revised strategy support better adaptive responses to climate change?

A revised strategy should acknowledge that passive reservation is not the solution.

An adaptive response to climate change requires a more holistic and flexible approach with the adoption of active and adaptive management practices applied at a whole of landscape scale.

A revised strategy should support active and adaptive forest management across all forested tenures. Some examples of active and adaptive management include ecological thinning and ecological burning.

Pillar 1: Protecting koala habitat

8. Do you think the combination of habitat acquisition, private land conservation, and habitat restoration is the right approach to protecting important koala habitat? What else should the NSW Government be doing to protect koala habitat?

No. There is too much emphasis on acquisition and reservation. Acquisition and reservation is tokenistic, expensive, and inefficient.

The Minister for the Environment states that koalas are facing extinction in the wild by the middle of this century unless we start to do things differently.

- **Under Pillar 1 the NSW government is planning to spend \$107.1 million over five years to 2026 to fund the protection, restoration, and improved management of 47,000 hectares of koala habitat. This spend equates to \$2,279 per hectare on an area that represents less than half of one percent (0.5%) of the habitat where koalas are known or likely to occur.**

- **If spending at the proposed rate continues by 2050 the NSW Government will have only protected an additional 2.6% of the habitat where koalas are known or likely to occur.**

- **If you add in the proposed Great Koala National Park, the Georges River Koala National Park, and the Woronora wildlife corridor in Sydney's south the percentage of protected habitat amounts to ~4.5% by 2050. By any measure this is tokenistic and an extraordinarily inefficient and ineffective use of public monies.**

While the Minister for the Environment misdirects large sums of public money on miniscule scale koala protection she is simultaneously planning to destroy the native hardwood timber industry by creating a Great Koala National Park in the middle of its north coast supply zone. The proposed park will consume up to 176,000 hectares of State forests where koala population are known to be stable.

East of the Dividing Range forested habitat is in plentiful supply and the existing reserve system is comprehensive, adequate, and representative. East of the Dividing Range the focus should be on improving forest management practices. In over cleared areas west of the Dividing Range habitat restoration is justified.

9. How can landholders be better supported to protect, restore and enhance koala habitat on their land? What are the barriers?

Landholders should be encouraged to become more actively involved in forest management. They should be encouraged to take a holistic approach and manage their forests for multiple values and benefits. Landholders should be incentivised to protect their forests from wildfires, pests, weeds, and diseases.

10. How can landholders be supported to participate in natural capital markets and other opportunities that drive improved outcomes for koalas?

Landholders can be supported to participate in natural capital markets by having methods which look beyond the traditional passive reservation model.

Developing methods that allow forests to be managed for multiple values is the answer as this aligns with how private landholders think and operate. This approach will have

the greatest likelihood of success when it comes to protecting koala habitat from common threats.

11. How can the NSW Government better support local councils to identify and protect koala habitat?

This is a loaded question and arguably not the right one to ask.

NSW koalas are very widespread being known or likely to occur over 11 million hectares of NSW forest. Effective koala conservation will never be achieved by identifying and protecting individual parcels of private forested land. Effective koala conservation requires a whole of landscape approach.

East of the Dividing Range koalas may be found in every LGA and in almost every forested catchment within each LGA. It is inappropriate and unreasonable to have local councils assess all the private forests within their LGA. Most local councils struggle with providing basic community services. Making them an authority on koala habitat identification and protection is well beyond their capability. Councils simply don't have the resources or expertise to do this job properly.

To undertake the task properly is a big undertaking that demands a State-based approach. If the task is to be done efficiently with consistency of method, it must be undertaken by the State government.

Pillar 2: Supporting local communities to conserve koalas

12. Do you think the regional partnership model is effective for delivering on-ground koala conservation actions? Do you know who the regional partnership is in your area?

- **No. It makes people feel better though as they think they're helping.**
- **Because koalas are very widespread, any talk about koala conservation actions also becomes a talk about general biodiversity conservation.**
- **A revised Koala Strategy should be careful not to overstep its mark.**
- **The Koala Strategy is already drawing upon a disproportionate share of the funding for biodiversity conservation with every dollar spent reducing the kitty for broader conservation initiatives.**

13. Are there any threats or issues specific to your region that should be given more attention to?

- **Prevention of megafires**

14. How can the NSW Government work better with philanthropic and business partners to leverage investment to deliver outcomes at the local level?

- **The NSW Government should focus on improving the knowledge base so money from well-meaning people can be directed to where it is needed.**

Pillar 3: Improving the safety and health of koalas

15. What else can the NSW Government do to better mitigate vehicle strike?

- **No comment**

16. What can the NSW Government do to better support the wildlife carer sector?

- **No comment**

17. What measures should the NSW Government be taking to address koala disease, including chlamydia?

- **Stressed koalas are believed to be more prone to the effects of chlamydia. High intensity wildfires that give rise to cycles of boom and bust are a likely cause of stress on koala populations. Implement mild fire regimes to stabilise koala populations and reduce stress.**

18. How could the NSW Government improve the koala translocation program to ensure conservation outcomes are met?

- **Stop doing it, it's a waste of money and it doesn't work.**

19. How can the NSW Government better protect koalas and their habitat in response to hazard reduction burning and bushfires?

- **The NSW Government should provide more support for:**
 - o **broadscale ecological burning**
 - o **the creation of strategic low fuel zones with reduced tree density.**
 - o **The maintenance of fire trails and control zones.**

20. How can the NSW Government improve emergency coordination with koala carers, vets and other partner organisations during a bushfire or extreme weather event?

- **No comment**

Pillar 4: Building our knowledge

21. What do you see as the most critical knowledge gaps in understanding the distribution and relative abundance of koalas across New South Wales?

- **Knowledge is the foundation of any sensible conservation strategy. You need to have it before you design and set the direction. In the political race to save the koala this principle has been ignored.**
- **You wouldn't build a house without a foundation. Why is the NSW Government implementing a Koala Strategy using a knowledge base that has more gaps than substance?**
- **Building knowledge should have been the sole priority of the original Koala Strategy and should be the primary focus of the Revised Strategy. Regrettably this is not the case.**
- **In the rush to save the koala the NSW Government has skipped over the need for scientific evidence.**
- **Major knowledge gaps enabled the use of dodgy modelling which was relied upon to have the koala's conservation status upgraded to Endangered.**
- **Models based on tiny unrepresentative samples were used to have the koala Listed as Endangered Listing. The same models were customised to ensure the Endangered Listing criteria were met. This would not have happened if development of the knowledge base had occurred first.**
- **Claims that the koala is on a trajectory to extinction by 2050 is based on opinion not scientific evidence.**
- **The NSW Government has compromised itself by making assumptions about the koala's conservation status in the absence of essential knowledge.**
- **The NSW Government's Koala Strategy puts the cart before the horse. The Revised**

Strategy looks like it is going to repeat the mistakes of the past by proceeding in the absence of essential knowledge.

- **Much of the NSW Government's Koala Strategy is flawed because it relies on models and opinions that are not evidence based.**
- **Absence of baseline data and dodgy modelling is misleading the community and misdirecting public funds.**

22. What changes should be made to the koala research plan to ensure it delivers research that directly benefits koala conservation?

- **The research plan should be testing the assumption that koalas are best protected in formal National Parks and Reserves.**
- **The irruptive traits of the koala need to be examined through well designed research. How koalas respond to mild fire versus high intensity fire should be a component of this research.**

23. What data do you need to effectively carry out koala conservation work? What changes would you recommend to how the NSW Government manages koala data?

- **Data needs to be adequate and representative. At present it is neither.**
- **Acoustic monitoring data is cost effective over large areas. Priority should be given to acoustic monitoring over the 11 million hectares of forest where koalas are known or likely to occur.**
- **The government should stop cherry picking koala data to suit its political narrative.**

Additional comments

Do you have any other comments or feedback?