



TIMBER NSW

4 December 2015

Ms Suzanne Acret
Sustainability Programs Co-ordinator
Ballina Shire Council
PO Box 450
BALLINA NSW 2478

council@ballina.nsw.gov.au

Dear Ms Acret,

Re: Submission on Draft Comprehensive Koala Plan of Management

Thank you for the opportunity for Timber NSW to comment on the draft Comprehensive Koala Plan of Management (CKPoM).

Koalas are one of Australia's most widespread native animals occupying a diverse range of forested habitats which include the east coast and western slopes of New South Wales. Over the vast majority of their range koalas occur naturally in low population densities. The nature of their distribution means that they are unable to be effectively protected simply by forming refuges. A broad and holistic approach is required.

We support a CKPoM that is focused on the management of the koala's key threats (as identified in section 1.7 of the draft CKPoM). We suggest consideration be given to the inclusion of weeds (e.g. camphor laurel and lantana) as a key threat as they restrict koala movement and can affect fire behaviour and food availability.

Timber NSW does not accept that Private Native Forestry (PNF) should be included on the list of threats. Further, the inclusion of the following unsupported statement from page 11 is unscientific and unwarranted.

One of the most significant threats to koala habitat in Ballina Shire is the potential loss of native forests and feed trees through private native forestry. In addition to direct habitat loss, private native forestry activities may also increase the stress on koalas impacted by forestry operations raising the potential for the emergence of disease.

We are unaware of any research or evidence to suggest that PNF is a threat to koala habitat. We note that the Office of Environment & Heritage does not identify PNF as a threat to koalas.

<http://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10616>.

In fact, Council's own data presented in Table 2 on page 9 does not contain any evidence to indicate that PNF may be having an adverse impact on koalas.

We are aware that a few years ago a PNF operation occurred where the operator did not comply with all of their licence conditions and where the outcome was less than satisfactory. We understand that this operator was subsequently fined. The industry would support action taken against any operator who does not comply with their licence conditions. However this should not be seen as indicative or representative of the broader industry and caution any judgement taken by Council on the basis of this incident.

Timber NSW understands that not everyone is comfortable with PNF operations. However there is no supporting evidence that PNF operations are a threat to koalas. Some of the most well recognised koala habitats around Coffs Harbour have been routinely subject to selective timber harvesting for over 100 years. Recently published research by Lunney et al (2015) <http://www.publish.csiro.au/?paper=AM15019> has found that the koala populations in these forests are stable.

Regrowth forests are an essential food source for koalas and it is through the practice of timber harvesting that regrowth is created. Wildfire is an alternative mechanism for creating regeneration and regrowth however it is far less sympathetic to the needs of individual koalas.

From a planning perspective it is important that Council clearly differentiate between selective timber harvesting and the land clearing that occurs with urban development and road works.

We note that Ballina LEP Environmental Zoning provides for environmental protection at a strategic level and consider that this could be more clearly communicated.

At an operational planning level the draft CKPoM acknowledges the role of the *Native Vegetation Act* in regulating PNF operations however it does not recognise the comprehensive nature of this regulation nor the extensive environmental protection that it provides (refer PNF Code of Practice for Northern NSW <https://www.epa.nsw.gov.au/pnf/CoPNthnNSW.htm>).

Reference should also be made to the Koala Code of Practice that was developed by the NSW Forest Industries Taskforce in 2014. <http://timbernsw.com.au/koala-code-practice-forest-harvesting-new-south-wales>. The Code provides an additional layer of protection and compliance with it ensures that koalas and their habitat are effectively protected.

We are concerned and confused by the way the draft CKPoM has defined core koala habitat for the purposes of triggering SEPP 44.

The definition of Core Koala Habitat within SEPP 44 means 'an area of land with a resident population of koalas, evidenced by attributes such as breeding females (that is, females with young) and recent sightings of and historical records of a population'.

It would appear that Council is basing its definition of core habitat on undisclosed data and a series of linking logic that is not transparent. Based on the widely accepted understanding of core habitat it would appear that Council is utilising an overly liberal interpretation of the definition (refer extract from page 26 below). We note that without access to the survey records it makes it difficult to form a clear view on the Council's approach.

koala population throughout the Southern KMP area. It is therefore considered that all Preferred Koala Habitat within the full geographic extent of the Important Population Boundary (Figure 1 and Figure 6 – Southern Koala Management Area) meets the *Core Koala Habitat* descriptor given that it currently supports a permanent resident free living population.

To ensure that the method used by Council to define core koala habitat is scientifically robust and consistent with state wide practice, we strongly recommend that it be subject to independent expert assessment. Further we would suggest that the findings of this assessment be made publicly available.

We note that Ballina Shire Council did not consult with the NSW Department of Primary Industries (DPI). NSW DPI are charged with the sustainable use of the State's natural resources and employ scientists with expertise in the ecologically sustainable management of forests for koalas and other threatened species. See <http://www.dpi.nsw.gov.au/research/areas/nsw-forest-science/hardwood-leaves/distribution-of-koalas-north-east-nsw> . Timber NSW respectfully suggests that Ballina Council access this rich source of knowledge and expertise.

In summary, the technical aspects of the draft CKPoM and the unsupported claims made about PNF warrant review and Ballina Shire Council may be attempting to regulate or restrict activities that are already appropriately regulated.

Timber NSW is genuinely concerned for the welfare of koalas and is committed to their conservation. We very much appreciate the opportunity to convey our views and look forward to having a constructive and open dialogue.

Yours sincerely,

Yours sincerely,

A handwritten signature in black ink that reads "Maree McCaskill". The signature is written in a cursive, flowing style.

Maree McCaskill
General Manager