



## AUSTRALIAN KOALA FOUNDATION

The international organisation dedicated to saving the koala and its habitat

Conservation of the wild koala and its habitat is of global significance

19 March 2009

Dear Mr. Peacock,

On behalf of the Australian Koala Foundation, please accept a draft "Threatened Species Nomination Form – for adding or changing the category of a native species in the list of threatened species under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)."

This draft is the result of your Government seeking an amended nomination form. You will note we have decided to seek the listing of the Koala Coast koala population as *Vulnerable* under the Federal Government's EPBC Act for the Koala Coast koala population in lieu of our previous nomination for *Critically Endangered*. This in no way accepts that the koala population is not endangered; rather it is an acceptance of the rigid bureaucratic and narrow guidelines of the IUCN criteria. In fact, the SEQ koala population is already listed as *Vulnerable* by the Queensland Government, under the *Nature Conservation Act 1992*, however Queensland Government actions to protect the koala in this region have been critically flawed, and have generally resulted in intensified declines in koala abundance.

The Koala Coast koala population is recognised as one of the most significant natural koala populations in Australia, due to the relatively large numbers of koalas and the high density of animals (Environmental Protection Agency 2007).

The AKF and others consider that anthropomorphic impacts have geographically isolated this population between Manly Road and Lota Creek to the north, the Gateway and Pacific Motorways to the west, Logan River to the south, and Morton Bay to the east. Recent (currently unpublished) genetic analysis has confirmed koalas from the Koala Coast region are genetically distinct from all other sampled regions in SE Queensland on Bayesian cluster analysis indicating a high degree of reproductive isolation. This is crucial evidence for the Minister to evaluate whether the koala population is distinct and therefore meeting the EPBC Act criteria.

Under the *International Union for Conservation of Nature* Red List criteria, a *vulnerable* listing requires evidence of 'an observed, estimated, inferred or suspected population size reduction of = 30% over any 10 year or three generation period, whichever is the longer, where the reduction or its causes may not have ceased.' Queensland Government data have shown a decline of 26% between surveys conducted in 1995-

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1999 and 2005-2006. Given the generation period of the koala as 6 years, the observed declines in abundance certainly fulfil the Red List criteria for listing the Koala Coast koala population as *vulnerable*.

The AKF is also aware of Queensland Government data that is currently unavailable due to the caretaker mode of the Parliament. Once the election is concluded, we would continue to urge you to obtain the results of the most recent surveys conducted by the Queensland Environmental Protection Agency; reports suggest that observed declines have intensified, and that the Koala Coast population now satisfies the criteria for listing as *Endangered*, or even *Critically Endangered*. If and when these documents come to light, we would be anxious to assist you in amending our nomination to reflect a more appropriate category.

We would appreciate any advice you can offer to ensure the nomination satisfies the regulations required under the EPBC Act. Can you please ensure any issues are raised prior to the close of business on the 24<sup>th</sup> March 2009, so that the final nomination document can be delivered to the minister prior to the closing date for nominations, the 26<sup>th</sup> of March 2009.

Yours sincerely,

Deborah Tabart OAM  
Chief Executive Officer