



The international organisation dedicated  
to saving the Koala and its habitat

The Hon Jacklyn Trad MP  
Minister for Infrastructure, Local Government and Planning  
PO Box 15009  
City East QLD 4002

6<sup>th</sup> Feb 2017

Dear Minister,

On behalf of the Australian Koala Foundation (AKF), I am writing to comment - and raise our concerns - about the released draft of the new Southeast Queensland Regional Plan (SEQRP). I wish to register my concerns about the failure of your Department to offer an opportunity to comment on Koala-specific aspects of the Plan.

Koalas have not been addressed by the draft SEQRP currently on display. The public have instead been left with a short statement that Koala issues will be dealt with in the final draft:

"The Queensland Government has established an expert panel to improve koala conservation in SEQ. The panel is currently reviewing the existing policy and regulatory framework that relates to koala protection and management. Once available, the expert panel's recommendations are expected to inform the final version of Shaping SEQ."

This new Regional Plan will establish the planning framework for the next 50 years, a critical time period for the Koala if it is to be saved and your Government will have to get it right if you want Koalas to stay in the landscape over that time.

We appreciate that Minister Miles may be taking the lead on Koalas, but the AKF has for many years watched the Queensland Government abrogate its responsibilities to protect Koala habitat. So, we worry that there will be no strong Koala input into the plan and that it will as usual, be sprung onto the public at the last minute. It would be good to get a greater understanding of what you expect

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of the public's input into this process as time is marching on; because we understand the final plan is due to be released mid-2017.

I have written to the Premier (14<sup>th</sup> October, 2016) asking her to enforce a moratorium on the removal of all Koala habitat and that no development approvals are given in Koala habitat until the future of the SEQ plan is decided. My team and I have offered assistance to the Premier and also to two members of the Expert Panel. To date we have not received any request for assistance. Interestingly the AKF funded the PhD's of two of the expert panel, so they are well known to our Board.

I am sure you agree that if the SEQRP does not work to properly protect habitat, Australia and Queensland will have made a grave mistake when they have lost the Koala in the region. Minister Miles has already announced publicly that the Koala is now functionally extinct in the Southeast, and of course the AKF will not accept that this new Committee or his Department will be able to change the course of history in this regard unless strong legislation is put in place to protect important habitats.

In the absence of any meaningful proposals for Koala management, let me take this opportunity to provide you with recommendations from the AKF:

***1) Changes to the Urban Footprint and Rural Living Areas to protect Preferred Koala Habitat from development***

An analysis of changes to the Urban Footprint in the draft SEQRP show that an additional 5,900 hectares of preferred Koala habitat will be made available for development, while an additional 1,500 hectares will be reclassified as Rural Living Area. This is only a cursory look and in coming days we will provide you with a better assessment. It would be helpful for you to offer an officer in your Department to work with the AKF so we can compare and contrast the impact on both our mapping systems. Would that be possible?

This is quite shocking, given the plight of the Koala.



***2) Strong legislation with clear compliance and enforcement mechanisms that will protect Koalas and Koala habitat.***

The AKF has, as you know, drafted the Koala Protection Act. Nothing short of this legislation will save the Koala.

AKF and I first became embroiled in Koala politics in the famous “koala road” debate when Premier Goss lost his Government. Since 1995 there have been 16 ineffective policies trying to protect the Koala, but they have never stopped industry gaining power to develop land. Some of these policies include:

- State Planning Policy 1/97 Conservation of Koalas in the Koala Coast,
- State Planning Policy 1/05 Conservation of Koalas in Southeast Queensland,
- South East Queensland Regional Plan,
- Nature Conservation (Koala) Plan and Management Program 2006-2016,
- State Planning Policy 2/10 Koala Conservation in Southeast Queensland, and
- South East Queensland Koala Conservation State Planning Regulatory Provisions.

These instruments have one thing in common – they didn’t/don’t work. Two key Koala populations in Southeast Queensland, the Koala Coast (Redlands, Logan and Brisbane) and Pine Rivers/Moreton Bay Koala populations, have undergone an 80% decline and a 54% decline since 1996 respectively. That is not a sign of effective legislation and the declines are probably worse, given the difficulty in gaining statistics from Minister Miles’ Department.

We can agree on one thing however; that despite all this legislation, both Minister Miles and the AKF now firmly believe the Southeast Queensland Koala population is close to extinction and should be listed as ‘*critically endangered*.’ History will show that the AKF nominated this important population with the necessary criteria including genetics data to show the Koalas in this region were “distinct” (as required under the EPBC Act). At the time Minister Garrett, Federal Minister of the day, refused to even look at the documents. Premier Bligh took the same position when a nomination was lodged under the Nature Conservation Act (NCA).



In practice, all of these instruments boil down to two things: i) a Koala spotter, who has *"the primary responsibility of locating Koalas in the trees for people undertaking clearing,"* is required to be on-site when any clearing is conducted, and ii) clearing must be conducted in a sequential fashion (i.e. start one side and move to the other, presumably so that Koalas can move ahead of the bulldozers). That's it. AKF has watched each year as the Spotter/Catchers have become a growth industry, and the industries which employ them can go home at night and not think of the Koalas (and other wildlife) that simply are expected to just move on. AKF can point to many projects where sequential clearing has occurred and large number of animals were found dead weeks afterwards. Carers are asked to clear up the mess; it is truly shocking.

It is on public record that AKF does not endorse either of these practices - protection of trees is the only way to halt the decline of Koalas in Southeast Queensland not to mention the ridiculous concept of Offsets.

It is possible for Koalas and development to co-exist in a way that makes suburbs sustainable for Koalas and importantly more liveable for human residents as well.

Koala Beach was established in 1994 as a Koala-friendly urban development. It is located in Pottsville on the Tweed Coast. A 20 year review conducted in 2014 found that Koalas are still present at the site (now subdivided into 500 residential lots), and that biodiversity values at the site match those observed at the nearby Pottsville Environment Park. In the 2009 Federal Senate Inquiry into the status, health and sustainability of Australia's koala population, Koala Beach was recognised by the Property Council of Australia as a model for successful restoration of Koala habitat, and the 'coexistence of wildlife and humans.'

Key to Koala Beach's success have been a number of Koala-friendly principles:

- 1) All existing Koala Habitat protected from development
- 2) Prohibition on dogs and cats within the estate
- 3) Traffic calming and speed limit restrictions
- 4) Fencing restrictions (all fences must provide 30cm clearance at the base of the face to facilitate movement of animals across the site)
- 5) One new Koala tree planted in front of every dwelling
- 6) Residents contribute to a levy, which supports an environmental management committee which undertakes restoration and management activities.



Koala Beach provides a model for urban development in sensitive Koala areas.

**3) *Ranked Mapping is regarded by AKF as the precursor for any successful Koala protection.***

Without good mapping, any planning decision is a bad decision and it is impossible for the AKF to believe that the Queensland Government is serious about protecting Koalas until decent maps are in place.

The Southeast Queensland Koala Habitat Assessment and Mapping Project (May 2009) was flawed from the outset, most obviously because it was based on Koala sightings. The problem is that sightings are notoriously biased; sightings do not actually represent the true distribution of Koalas. A person has to be present to record the sighting, so a map based on Koala sightings would actually predict that Koalas most commonly occur along roads or in open parks, not in large patches of Eucalypt forests where there are fewer people to spot Koalas, and Koalas are harder to see.

More importantly it has been acknowledged by the Queensland Government that this industry mapping is simply wrong. It fails to identify key areas of important Koala habitat, for instance waterways dominated by *Eucalyptus tereticornis*. To use the vernacular, Koala habitat mapping that forgets to highlight the importance of areas of *E. tereticornis* is like leaving the lamb out of a lamb roast.

The recent Koala habitat mapping completed by UQ (Southeast Queensland Koala Population Modelling Study 2015) was a slight improvement. It was at least based on more formalised method for creating sightings. However, it is still based on sightings. Sightings only provide a snapshot of Koala habitat utilisation. They do not provide a long-term picture of how Koalas are using the landscape. By stressing visual sightings of Koalas, there is a significant risk that areas of Koala habitat will be declared empty, because the Koalas-in-residence happened to choose the survey day to occupy parts of their range outside the selected search area.

The Koala Habitat Atlas is a flag-ship project of the AKF – a 25 year project aimed at identifying, mapping and ranking all remaining Koala habitat in Australia. The AKF



uses a faecal pellet survey based methodology, because Koala scat does persist in the environment, and can demonstrate Koala habitat utilisation even if the Koala is not present at the survey site on the day of the survey.

Minister, this letter is just a precursor to a more formal letter once I have taken more advice from our Landscape Ecologist David Mitchell. He is currently evaluating the maps so we can see the full extent of the changes coming and as you know from my appearance on Steve Austin's programme, I am confident more land has been identified by the Department and the draft maps are still not truly showing the extent of land necessary for your development plans and developer colleagues. I am confident also that the final maps will be sprung on the community later this year, with little or no opportunity to speak out for the Koala habitat due to be destroyed by inappropriate development.

My letters to your NSW colleague the Hon. Gabrielle Upton and Federal Environment Minister Josh Frydenberg are also attached. These letters outline the grave concerns I hold for the piecemeal approach being taken by the Federal and State Governments to circumvent the need for a national Recovery Plan and a federally-based Koala Protection Act.

Yours sincerely,

A handwritten signature in black ink that reads "Deborah Tabart". The script is cursive and fluid.

Deborah Tabart OAM

Chief Executive Officer

Australian Koala Foundation