



## AUSTRALIAN KOALA FOUNDATION

The international organisation dedicated to saving the koala and its habitat.

Peter Wright  
The Director, Species Information and Policy Section  
Department of the Environment  
GPO Box 787  
Canberra ACT 2601

28<sup>th</sup> January 2014

Dear Mr. Wright,

### Re: Draft EPBC Act referral guidelines for the vulnerable Koala

On behalf of the Australian Koala Foundation (AKF), I would like to make the following comments with respect to the draft referral guidelines:

1. These guidelines are clearly more about reducing the workload for government and development proponents rather than protecting Koalas. As Port Stephens Council has also pointed out in its submission, many sites of importance to securing the long-term survival of Koalas, in particular populations in urban and semi-urban areas, will be excluded from referral (see points 2 and 3 for more detail). Clearing under 2ha doesn't even need approval, even to protect critically important Koala populations (cumulative impacts have been totally ignored) and Koala habitat has to score a ridiculously high 8+ on the equally ridiculous habitat assessment tool to warrant referral.

The Government clearly needs to be reminded that referral is simply the first step on the road to approvals; referral does not imply that an action will be halted, or even declared a *controlled action*. Rather than attempting to cut down on work for the Department, these guidelines should be about ensuring anything that deserves assessment is referred. We would therefore recommend that, at minimum, the definition of *habitat critical to the survival of the Koala* should be broadened to include any areas that record a score of 2 for any attribute contained in Table 3.

2. In our opinion, there has been a general lack of care and attention (and indeed, basic knowledge of how Koalas use some habitats) in the preparation of these guidelines.

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Consider these examples:

- a) The *Vegetation Composition* component of the assessment tool was clearly written without any real thought. QLD Regional Ecosystem 12.3.6 (*Melaleuca quinquenervia*, *Eucalyptus tereticornis*) is a highly significant vegetation community for the Koala in Southeast Queensland and Northern New South Wales. Yet it would only score 1 in these guidelines. It's a critical mistake – one also made by the Queensland Government in their ridiculous Koala habitat mapping.

To list a few more:

- 12.3.4      *M. quinquenervia*, *Eucalyptus robusta*, *Lophostemon suaveolens*,
- 12.3.7      *Casuarina cunninghamiana* ssp. *cunninghamiana*, *E. tereticornis*,
- 12.12.15b   *Lophostemon confertus*, *Eucalyptus microcorys*...

They are all primary Koala habitat, and yet they only feature one known Koala food tree, and so are undervalued by the guidelines.

- b) Scientists consulted by the Government have plenty of evidence that Koalas will travel up to 20 kilometres over land with limited vegetation, and yet the guidelines use a figure of 1 kilometre. This greatly impacts on the definition of a *contiguous landscape* and undermines the *Habitat Connectivity* component of the assessment tool.
  - c) A great deal of research conducted into habitat planning (summarised in McAlpine *et al*, 2006 - *Planning Guidelines for Koala Conservation and Recovery*) has been forgotten in the preparation of these guidelines. *Habitat Size* criteria, included in earlier drafts of these guidelines, have been removed, while figures corresponding to the minimum size of an area of Koala habitat (500-1000ha in inland areas, 300-500ha in coastal areas) appear to be based on the random whim of the author rather than the established research.
3. A key weakness of the assessment process under the *Environmental Protection and Biodiversity Conservation Act 1999* has long been that environmental assessments are conducted by consultants directly employed by the proponent. These guidelines equally fall into that trap by employing a number of totally undefined and/or highly subjective criteria:
    - what is a contiguous area?
    - how frequently and/or regularly do Koalas have to die from dog attack/vehicle strike to be significant?
    - what is the recovery value of a site?
    - how significant is a *significant impact*?

These guidelines need to be a lot more proscriptive. Subjectivity simply provides an avenue for the proponent to shirk their responsibilities to the environment. I've been in my job for 25 years, and I have seen this time and again; It is a brave consultant who, at this risk of their future job prospects, makes this kind of judgement call against the interests of their client.

4. The AKF remains totally opposed to environmental offsets.

To re-iterate my first point, these guidelines are clearly more about reducing the workload for government and development proponents rather than protecting Koalas. The AKF is firmly of the opinion that these guidelines will not stop the continuing decline of the Koala.

We have little faith that the *EPBC Act* or these guidelines will achieve much for the Koala; indeed we have only made this submission to ensure our position is on the record. Instead we remain committed to protecting the trees, and feel now more than ever that the only way to achieve true protection for the Koala will be to get the *Koala Protection Act* passed in Federal Parliament.

Finally, let me again register my disappointment that AKF scientists were not invited to participate in the expert workshop in September last year; had the AKF been invited, I have no doubt we could have helped the Department produce a document that would have worked for, rather than against the Koala.

Yours sincerely,

A handwritten signature in black ink that reads "Deborah Tabart OAM". The signature is fluid and cursive, with the first name "Deborah" being the most prominent part.

Deborah Tabart OAM  
Chief Executive Officer  
Australian Koala Foundation