



Australian  
Koala  
Foundation

A.C.N. 010 922 102

## Senate Inquiry into Australia's Environment

**Submission from the Australian Koala Foundation (AKF) 10 November 2014**  
**Deborah Tabart OAM, Chief Executive Officer**

On behalf of the Australian Koala Foundation (AKF), I am grateful for the opportunity to air our concerns regarding the current state of Federal Protection of the Environment in Australia. I wish to make the following submission and wish to appear in person to the committee.

The Australian Koala Foundation in its 28-year history has committed approximately \$10 million dollars in research and mapping of the Australian landscape. This research in part gave the former Minister for the Environment, Mr. Tony Burke the necessary information to list the Koala as vulnerable in Queensland, New South Wales and the ACT under the Environmental Protection and Biodiversity Conservation (EPBC) Act. This determination was made in May 2012.

In 2011 there was a "Koala" Senate Inquiry which had 3 hearings: in Brisbane, Melbourne and Canberra. There were 101 submissions and Senator Doug Cameron made the comment that he had never seen such interest in a senate hearing in his whole senate career. The Report that resulted from this committee was unanimously accepted by all Senators and it was deemed that federal oversight was needed for a national icon, such as the Koala.

Since that time, the AKF has watched with dismay a resurgence of the "good old days", where it seems that political donations and industry favours are the order of the day.

Since the 2012 listing, the AKF has been watching the referrals process, looking to see whether the Federal listing was going to have a positive impact on Koala conservation. It has been shocking and it is hard to describe in a few words. In essence what we are seeing is a clear message, coming down from Queensland and New South Wales Ministers, telling bureaucrats that the federal listing is not to be observed and that "the environment cannot be given priority over development". Indeed Mr. Wolf Sievers, Manager of Threatened Species in the Queensland Department of Environment and Heritage Protection has said this in person to our chief ecologist, Dr. Douglas Kerlin. We would encourage the committee to call Mr. Sievers to confirm this for themselves.

We are seeing Councils being encouraged to take matters into their own hands; case studies below will show this as a fact. We are seeing the "self-referral process" (a major flaw of the EPBC Act) being flaunted by those that wish to destroy Koala habitat. We are seeing "fudging" of environmental standards so that the needs of the EPBC Act are not met. Worse still we have watched environmental guidelines at the Federal level being watered down, to make it easier for the development industry. This is clearly coming from a directive and the Senate Inquiry needs to really ask who and where from?

We are also becoming aware that while former Ministers Garrett and Burke delayed the listing of the Koala, that they gave a number of significant projects in QLD and NSW '*controlled action*' status, relieving them of obligations under the EPBC Act. Interestingly one of the bureaucrats formerly called in the Koala Inquiry, Ms. Deb Callister has now been delegated the responsibility for determining referrals under the EPBC Act, and approved the Tallowood Cemetery expansion discussed below.

Below are specific case studies we believe are relevant to the Terms of Reference for this Inquiry; our list of suggested witnesses came as a result of these blatant disregard for the law:



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**With regards to (a) Attacks on carbon pricing, the Clean Energy Finance Corporation, the Australian Renewable Energy Agency and the renewable energy target, the Climate Change Authority and the Climate Commission.**

The Australian Koala Foundation has a particular interest in the Federal Government's proposed '20 million trees' policy.

In the lead-up to the 2009 COP 15 Climate Change talks in Copenhagen, the Australian Koala Foundation (AKF) established a research project to assess the growth rates and carbon storage potential of Eucalyptus trees. One aspect of this work involved planting tube stock Eucalyptus trees to monitor survival and growth. Five years later, across three field sites, 30-60% of the initial stock has survived, and not one of the remaining trees has grown to a size sufficient to support koalas.

We would argue that, of the 20 million trees to be planted, only 10 million may survive; given the current drought, the survival rate could be as low as 5 million. More importantly, it is going to take 20, 50, maybe even 100 years for these new trees to provide habitat for species such as the Koala. It will take just as long for a new tree to offset the carbon lost in a mature tree removed for development. We calculate that 20 million saplings is roughly the equivalent of 10,000 mature trees, and let me assure you that **20 million new trees won't make the slightest difference if we don't start to seriously protect our existing mature trees as well.**

So, what processes are in place to ensure the proposed number of trees are planted? Who will replace any tree losses? What happens if drought or fire sweeps through and kills them all? Who is watching? How long are they going to be watching? Will the Department of the Environment (DoE) be auditing the projects? What safeguards are in place to ensure these new trees are nurtured and protected?

'20 million trees' is truly just a political statement with very little basis in reality. Perhaps someone from the Department can shed some light...

**With regard to (b) Attacks on Federal environmental protection through handing approval powers over to State Governments, which have poor track records and recent environment staff cuts."**

During the Senate Inquiry into the Status, Health and Sustainability of Australia's Koala Population, there was general agreement amongst all involved in that enquiry that the States are incapable of protecting the Koala. In my 27 years with the AKF I have seen State and Local Governments across the country prove this time and again. They were unwilling and incapable of protecting Koalas and their Habitat. It has just been an endless procession... game after game after game... and for the Koala it has been the classic 'death by a thousand cuts.'

It is clear that each level of Government fears the "cost" of environmental assessment and enforcement. As AKF has repeatedly said, the cost of this should be clearly on the proponent, but it is also clear that Government doesn't want to upset industry. So what we are seeing is a shambles. No-one wants responsibility for assessment and each level of Government wants to look like they have "it under control." They do not.

**It is just shocking to see projects assessed by the Federal Government at the concept stage (and given the green light), before any of the details have been worked out.** Projects which for instance claim that retaining walls will keep Koalas and dogs separate, even though it is obvious that those



same retaining walls will not be approved by Council. Just a complete shambles – there is no other word for it.

We would ask that the Committee in its determination gives consideration to the following specific case-studies:

1. When a supporter informed us of a proposal to raise the speed limit along Ford Rd in Burbank and Avalon Rd in Sheldon (Queensland), the AKF sought advice from the Federal Environment Department; these roads run through the heart of the 'Koala Coast' and would greatly increase threats to a Nationally Significant population of Koalas (mortality associated with vehicle strike is a significant cause of Koala declines in urban areas). The supporter who raised this matter with the AKF was a local resident who had raised concerns with local councillors and the State Member, and has been told this change was a *fait accompli*.

The Federal Department of the Environment Senior Compliance Officer assisting with this enquiry, Ms. Claire Kimmings, stated that "*the Department's position is that the proposal to increase the speed limit on Ford Road and Avalon Road is not an action under national environmental law and referral is not required,*" and concluded "*the Department is not able to take further action on this matter.*"

**How can the Federal Government be in the position where officers feel they have no power to intervene when State Government decisions put Koalas at risk?** Given the State Government position, increasing the speed limit on roads through some of the most important Koala habitat in Australia, **how can the Federal Government be satisfied with handing all power to the QLD State Government?** Why has the Federal Government taken this position given the listing of the Koala? Did "someone" tell them to take this position? We would argue this may be the case. The question is "who".

2. The AKF was approached in regards to clearing for private forestry purposes on two separate parcels of land within Southeast Queensland. These activities were being conducted under the *Native Forestry Practice Code*, a self-assessable code. In each instance, the supporter who contacted us was concerned because they believed Koalas were present on the sites being cleared. Desktop investigations suggested both sites constituted *habitat critical to the survival of the Koala* as defined by the Federal Department of the Environment Draft Referral Guidelines for the Vulnerable Koala.

The AKF approached the Queensland Department of Natural Resources and Mines for advice in these matters.

In the first instance, we have, even now, been unable to trace the officer in the QLD Department of Natural Resources and Mines responsible for monitoring compliance with the self-assessable code (some ten months after the clearing occurred). We made a number of representations to the QLD Department of Environment and Heritage Protection, who had suggested they would investigate compliance with the Nature Conservation (Koala) Plan, but we have yet to hear of a satisfactory conclusion to their investigation.

In the second instance, the Queensland Department of Natural Resources and Mines Compliance Officer who responded to the query, Mr. Andrew Coulsell, was based in Roma (5 hours from Brisbane and the clearing site), yet claimed to be responsible for all of Southern QLD. When asked whether the department had been notified about these actions (a requirement of the code), the officer replied that he did not have access to the database which recorded notifications, and he subsequently needed two weeks just to check whether



notification had been received. Apparently this was because the Brisbane office which received the notifications online, did not subsequently pass them on to the relevant district offices unless requested. He further stated that any compliance issues he was alerted to had to be raised with the Brisbane office prior to any investigation, and the matter was first assessed in Brisbane to see whether further investigation was warranted. If so, Brisbane then sent a request back to Roma for the officer to take a look. Sometime later Mr. Coulsell informed the AKF that clearing had not been registered in this second instance, but there was no penalty for failing to comply with the code; the current procedure was simply to write to ask them to notify. **We hope you agree it is farcical, pointless and will lead to environmental destruction.** I would encourage the committee to call Mr. Coulsell to ask about Queensland Government processes for investigating compliance.

**We are not at all confident that the Queensland Government has the desire, the systems in place, or the resources, to properly manage their current workload.** I am surprised that Canberra does not share this view; it certainly appears the Federal Government is confident about the capacity for the Queensland Government to handle this workload. Perhaps the committee can ask the Department why they are confident that Queensland can manage the assessment and approval workload. Maybe that question should be put to Minister Hunt.

The AKF has certainly raised concerns about these operations with the DotE in Canberra, with troubling results. Assistant Director of the EPBC Compliance Section with the Federal Department of the Environment, Ms. Trish Randall, concluded:

*“As you may already be aware, in the late 1990s the Australian and Queensland Governments engaged in negotiations in relation to entering into a Regional Forest Agreement (RFA) in South East Queensland. The area that was the subject of these negotiations was the South East Queensland RFA Region as described under section 41(1)(h) of the EPBC Act.*

*The Australian and Queensland Governments did not sign an RFA. Despite this, Section 40(1) of the EPBC Act provides that forestry operations undertaken in RFA regions are exempt from the approval requirements under Part 9 of the EPBC Act for the purposes of Part 3 even if an RFA has yet to come into force.*

*The Department considers this exemption is likely to apply to forestry operations in the South East Queensland RFA Region, including private native forestry operations.”*

So we have a ludicrous situation where **forestry activities in Southeast Queensland (see Figure 1) are exempt from any obligations under the EPBC Act, because of an agreement that was never actually signed.** Queensland got singled out with a sweetheart deal – all the benefits of a RFA (no EPBC Act oversight), with none of the costs. The proposed RFA would have limited forestry to certain areas (see Figure 1) within Southeast Queensland; under the current arrangements the whole area is open for business. Was this the precursor to the ‘one-stop shop?’

We would ask the committee to call Ms. Randall to ask what steps have been taken to address this loophole.

3. In July this year we wrote to Minister Hunt to express our alarm with regards to a developing situation at Lawnton Pocket Road in Queensland. A developer had recently cleared a significant area of land and found a sizeable population of Koalas on the development site



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(after the event). Moreton Bay Regional Council and the Queensland Department of Environment and Heritage Protection declared the animals to be in danger (despite the fact that animals did not require supplementary food – suggesting they were not starving - and were freely moving into and out of the site), and released a tender asking for contractors to capture the animals, move them from the site, and monitor post release for a period of 12 months. It appears however that, when the estimates were received, a decision was made that it would all be too costly, so these animals were instead captured by the little old ladies from the local Koala care groups (fabulous and dedicated little old ladies by the way, but I'm not sure they should have been placed in this invidious position), sent for the cheapest possible health check, and deposited into new habitats (mostly urban parks in heavily urbanised areas) without any monitoring.

We asked the question of Council – does this project require Federal Approval under the EPBC Act? Their first response was that the development was approved under the EPBC Act back in 2004. True, but approval was granted for the development - not for the translocation of animals. The proposed translocation program was certainly not authorised by the prior approval for development. When that fact was pointed out, the subsequent response was that they have 'not received any advice from the State Government regarding any obligations under the EPBC Act.' **Why is Council taking direction from the State Government about Federal Government matters?**

These Koalas have now been removed from the development site and released; when we asked Mr. Sievers (Manager of Threatened Species at the QLD Department of Environment and Heritage Protection) about the fate of those animals, he suggested the translocation had been a success. When pressed about how they could know the project had worked when no monitoring had been undertaken, he stated that officers had returned to the release sites and "everything looked fine." **It's pathetic and totally unacceptable.** I would encourage the committee to ask Mr. Sievers about this exercise. Why was this translocation not referred under the EPBC Act? How can the Queensland Government be assured these translocations have been a success?

We asked the Federal Department of the Environment to investigate whether this should have been a controlled action. The response, from Shane Gaddes, Assistant Secretary in the Compliance and Enforcement Branch, similarly suggested that, given the proponent had received approval for the development in 2004, a subsequent, all but completely unrelated translocation exercise, taken out some 10 years later by Council and State Government, also somehow managed to get approval. We queried this on July 24 2014, writing:

*"Thank you for your reply but with the greatest respect, you are missing the point. We are not talking about the development of this site that was approved prior to the Koala listing, we are talking about the translocation exercise which we believe needs EPBC Act approval. This is not about the developer, this is about action taken by Local Council and the State Government.*

*It would be good to have your views on those matters."*

**We have yet to receive a response.** We would ask the committee to call Mr. Gaddes to ask whether it is indeed the official position of the DoE that **a prior approval for an action will, in future, cover not just that action but all other actions taken in relation to that land, by any party.** If that is indeed the position of the Department than that is a sad indictment on the system.





4. We wrote to the Department in October 2014 to raise concerns with regards to the application of the Spot Assessment Technique (SAT) with Assessment Officers. A proposal to clear vegetation for an expansion to the Tallowood Cemetery in Deception Bay QLD had been referred to the Department, supported by an Ecological Assessment report that had used the SAT to assess the site for its significance for Koalas. In our opinion, the application of the SAT in this assessment was poor, and the interpretation of the results was even worse (I should point out that the SAT was developed by AKF researchers, and we therefore have a vested interest in ensuring that the methodology is not diminished in its substandard application by consultants and the Department of the Environment), and yet the application was granted *'not a controlled action'* status without any further investigations required. Ms. Deb Callister, Assistant Secretary in the Queensland and Sea Dumping Assessment Division of the Federal Department of the Environment was the delegate making this decision. Ms. Callister was called as a witness in the previous Koala Inquiry.

We are very concerned that the officers assessing these referrals do not have a sufficiently developed understanding of the SAT and the interpretation of SAT results to allow for the appropriate assessments of referrals that deal with Koalas and Koala Habitat. We would ask the committee to call the Delegate in this case, Ms. Callister, to determine whether or not we are correct? What processes are in place to ensure that Department Officers have sufficient training to interpret the reports they receive during the course of their work, and what processes are in place to remove the biases inherent in a system where the developer is the one who pays for the environmental work (a consultant who said 'no' to a developer is unlikely to have a long and happy career!)?

5. After contacting the Department in regards to clearing on Marsden Road, Kallangur QLD, we were surprised at the response from the Federal Department of the Environment. In an email on 16 June 2014, Compliance Officer Annica Schoo stated that:

*"The Draft Referral Guidelines identified that the clearing would not be likely to have a significant impact on the koala. This is primarily due to the area not being part of a contiguous landscape of more than 300ha."*

The Draft Referral Guidelines for the Vulnerable Koala define a contiguous landscape as *"an area of koala habitat bounded by barriers."* That same document defines *"barriers"* as:

*"A feature (natural or artificial) that is likely to prevent the movement of koalas. Natural barriers may include steep mountain ranges, unsuitable habitats or treeless areas more than 1 kilometer wide. Artificial barriers may include infrastructure (such as roads, rail, mines etc.) that have ineffective mitigation to facilitate movement or high traffic volumes or other developments that create treeless areas more than 1km wide."*

In a reply to the Department, the AKF stated that:

*"Now the site is:*

- i) less than 1 kilometre away from significant areas of habitat that would constitute a contiguous landscape of more than 300ha,*
- ii) only separated from these areas of habitat by: Thompson Road to the West, Alma Road to the North and Marsden Road to the East,*  
*and*



- iii) *I would consider that each of these roads to be either minor in character (with low traffic volumes) or fitted with infrastructure to facilitate animal movements.*

*Given the above, can you confirm that the department considers such roads (Thompson, Alma and Marsden) to be 'barriers' to Koala movement?"*

We have yet to receive a reply to this question. In this particular instance, it appears that Department officers declined to take action because of a ruling that these three roads constituted '*barriers*' to Koala movement. The AKF has argued that none of these roads fit the definition of barrier under the Draft Referral Guidelines, and the Government has yet to explain the reasons for their difference of opinion. **It simply seems the Department is making it up as they go along. No clear vision, no clear leadership.** We request that the committee call Ms. Schoo to explain the DoT position.

6. When the EPBC Act was initially brought into being, I remember the grand statements about how the Act would allow for a large-scale, landscape wide approach to conservation. **It was a tremendous goal, but one that I think has been largely forgotten.**

When the AKF was contacted by a number of supporters concerned about clearing at the former Alma Park Zoo site at Dakabin north of Brisbane, we were particularly interested in the Department's policy on cumulative impacts; the Alma Park zoo site is one of a number of new developments proposed for the area.

The Department response suggests that not only do they not have a policy on cumulative impacts, but that a previous decision to allow clearing strengthens the argument to allow further clearing. In this instance, the Acting Director of the EPBC Compliance Section at the Federal Department of the Environment, Mr. Daniel Curtin, referred to an earlier referral for the site across the street; clearing was allowed at this site, so there was no reason to not allow clearing across the road. **Everything I hear from the Department again suggests to me they are making it all up as they go along.** We would ask the committee calls Mr. Curtis, to ask whether indeed the Department of the Environment has a policy on cumulative impacts, and whether the Department stills believes they have a role to play in landscape scale conservation.

7. We are, I am sure, all aware of the recent tragedy at Croppa Creek in New South Wales. **An environment officer was killed as a result of the inefficiency of the system.** What is less well known is that a Federal environment officer was in Croppa Creek in late 2012 to look into the Turnbull case. Contacts have suggested to us that a former NSW compliance officer and other colleagues at a state level were lobbying to get the Turnbull's charged under the Commonwealth act because it carried a possible jail term (unlike the NSW Native Vegetation Act) and they felt this would send an important signal. However, the lobbying was unsuccessful.
8. The AKF also wishes the Victorian Government to be called in this inquiry. In recent months, it has come to light that the listing of the Koala did not occur by and large because of statistics.

To gain a National listing, the Koala would need to demonstrate declines of greater than 30% over a twenty year period; the then Threatened Species Scientific Committee found that Koalas across Australia had *only* declined by 29%, and therefore recommended the species



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not be listed – a recommendation the then Minister for the Environment was only too happy to endorse. There was no margin of error here, no precautionary approach. But the sad truth is that that 29% figure is largely based on back-of-the-envelope, pick-a-number-out-of-a-hat estimates of Koala numbers in Victoria. I think the Australian public would also be shattered to know that **the decision not to list the Koala in Victoria was based on a contrived and malevolent figure that was off by only one percent.** And the AKF would argue that the logging industry in Victoria played a vital part in that decision.

The Senators should call the Hon. Ryan Smith, Victorian Minister for Environment and Climate Change to provide the scientific calculations for this near miss.

The AKF is supportive of efforts to streamline the assessments process. Indeed that is one reason why we believe there is a need for a Federal Koala Protection Act - to simplify the process. The Senate Inquiry into the Status of the Koala insisted the Koala was listed federally, and concluded that the States are incapable of protecting the species.

Similarly, the AKF does not have any faith in the States to protect the environment, and we have concerns that the 'one-stop shop' will have a significant negative impact on our National Icon, the Koala. Other case studies abound. **Why did we go to all the trouble of getting the Koala listed federally, to see it all overturned on the whim of a new government?**

We must however, also make it clear that the AKF does not have any faith in the Federal Government and the Environmental Protection and Biodiversity Conservation Act to protect the Koala either. In all of our dealing with the Federal Government, a clear and decisive pattern has been established: **if there is any possible loophole that can be used to allow the Department to excuse itself from a role in protecting the Koalas, that loophole has been exploited. We have yet to see the Federal Government make any decisive use of its newly acquired powers to protect Koalas and Koala habitat, at all.**

**To be frank, however, we also lack faith in the Senate Inquiry process. During the Senate Inquiry into the status, health and sustainability of Australia's koala population we saw Government bureaucrats and industry treat the process with impunity.**

For instance, it was clear in the Canberra hearing that the then CEO of the Property Council, Ms. Caryn Kakas, was opposed to the protection of the Koala and was put on notice by Senator Cameron in part due to her belligerent answers. My conclusion was that for the first time the development industry was faced with a potential barrier that might slow the usual open-slatheer assault on the Australian landscape. The Koala could have become the "one-stop shop", but certainly not the shop that the developers wanted to see.

In her response on notice to a question, asking the Property Council to identify "*one [offset] area that has been successfully planted and become koala habitat anywhere in Australia,*" Ms. Kakas could only produce one example. With great irony, she identified Koala Beach (I say identified; in truth it appears Ms. Kakas simply plagiarised the Koala Beach page on our website). Koala Beach is a Koala friendly sustainable urban development in Northern New South Wales, created by The Ray Group in collaboration with the AKF. The Property Council had no role in the development of Koala Beach, and areas of Koala Beach certainly were not '*planted*' as offsets; rather the habitat areas of Koala Beach were excluded from development at the earliest stage. Her response to a second question on notice was equally dismissive.

Since that disingenuous response I have often wondered why Ms. Kakas has not been brought to account by that Senate Committee and I request that she be questioned in this new Inquiry. It is





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obvious that that the property development industry and its Council are those that would be likely to gain the most by reduction “in green tape”. **The Senators should call the CEO of the Property Council.**

We would also draw the Inquiry’s attention to evidence provided by Hancock Victorian Plantations (HVP). When Ms. Sewell, the then CEO of HVP was asked by Senator Cameron whether HVP had employed Peter Menkhorst she replied “no”. Further questioning elucidated information that he had provided training to HVP staff. Senator Cameron requested further information on notice, to our knowledge this was never provided to the Committee. AKF takes particular interest in Mr. Menkhorst’s activities, he is DEPI’s Koala expert and should be providing independent advice to the Victorian Government, and should have been providing independent advice to the Senate Inquiry. However, the financial relationship between HVP and Mr. Menkhorst was not disclosed, and yet he told the Committee that “I think HVP deserve to be commended for the work they have done. They are leading the way.”

Although Ms. Sewell no longer works at HVP, the AKF wants HVP managers called again to see whether they have played any role in preventing greater protection of the Koala in Victoria.

We also have concerns about the evidence supplied by Ms. Deb Callister, then acting Assistant Secretary in the Wildlife Branch of DSEWHA. Ms. Callister consistently deflected questions asked about Koalas in Victoria back to the Victorian State Government. Similarly, Ms. Callister deflects questions back to the Threatened Species Scientific Committee (TSSC), without providing clear answers. For example, when asked if the Department was aware of estimates of only 52 Koalas in Mumbulla Forest, the Committee members were met with the reply that the TSSC had considered the report as part of its Population Abundance Workshop. Two AKF scientists were at that workshop and can confirm that those numbers were not discussed, and that in fact, rather than look at the numbers, the Department instead focused on the claim that “faecal pellet surveys are showing their presence in significant areas such as Mumbulla State Forest.”

So again let me voice our concerns; the Koala, a national icon of our country, is being failed by flawed legislation and flawed process. We agree with the findings of the Inquiry into the status, health and sustainability of Australia’s Koala populations – the States are incapable of protecting the Koala. However we also do not feel the Federal Government is doing enough either. As I said before, it seems that, if there is a way out of taking responsibility for the Koala, the Federal Government will take it.

**The AKF insists that the Federal listing of the Koala under the EPBC Act is maintained and a national Recovery Plan instigated immediately. The ‘one-stop shop’ will not save the koala.**

In making this submission, I would also suggest the following people are called to be held accountable for the protection of the Koala:

Ms. Deb Callister, Assistant Secretary, Queensland and Sea Dumping Assessment Division, Department of the Environment;

Mr. Daniel Curtin, Acting Director of the EPBC Compliance Section, Compliance and Enforcement Branch, Department of the Environment;

Mr. Shane Gaddes, Assistant Secretary, EPBC Compliance Section, Compliance and Enforcement Branch, Department of the Environment;

Ms. Trish Randall, Assistant Director, EPBC Compliance Section, Compliance and Enforcement Branch, Department of the Environment;

Ms Annica Schoo, Compliance Officer, EPBC Compliance Section, Compliance and Enforcement Branch, Department of the Environment;

Mr. Andrew Coulsell, Compliance Officer, QLD Department of Natural Resources and Mines;



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Mr. Wolf Sievers, Director, Threatened Species Unit, QLD Department of Environment and Heritage Protection;  
Mr. Peter Menkhorst, Ecologist, Arthur Rylah Institute, Victorian Department of Environment and Primary Industries;  
The Hon. Ryan Smith, Victorian Minister for Environment and Climate Change;  
The Property Council of Australia;  
Hancock Victorian Plantations.

Thank you for your consideration,

Deborah Tabart OAM  
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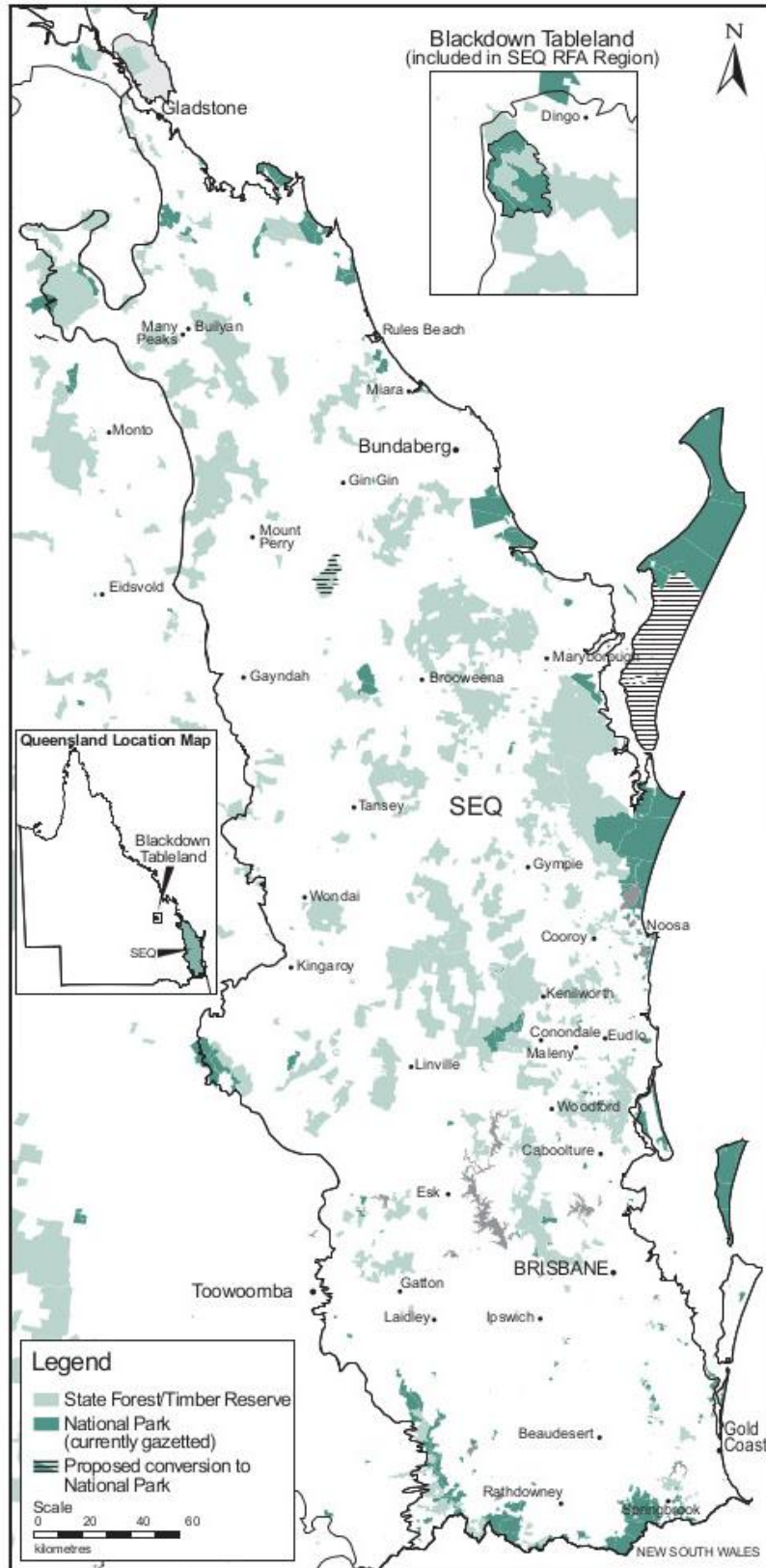


Figure 1. Southeast Queensland Regional Forestry Area. Source: South-East Queensland Comprehensive Regional Assessment 1999.