NSW KOALA STRATEGY REVIEW SUBMISSION GUIDE FOR THE SYDNEY BASIN

CURRENT STRATEGY IS NOT WORKING

- The strategy is not the primary instrument to protect koalas.
- Fundamental weakness is the strategy does not prevent land clearing.
- No evidence of strategy improving outcomes for koalas.
- Measurables of strategy are action based not outcome based.
- Research themes are productivity focused not conservation focused.
- Koala Strategy Review must support the aims of BCA, LLS & EBPCA reforms in line with recommendations from the 2020 NSW Koala inquiry. Offsets need to be stopped. They are not like for like and lead to loss in habitat.
- NSW Planning Review must also consider koala habitat connectivity on private land on the peri-urban edge (ie lot sizes)

KEY RECOMMENDATIONS

The koala strategy should include supporting and funding the implementation of policy & regulations including:

- Finalising the Koala SEPP Guideline - applying a full list of koala habitat trees to rural and urban land.
- Adding all LGAs in the Sydney Basin with koala sightings to the Koala SEPP i.e. Sutherland Shire, Penrith, and Hills Shire.
- Funding councils to map habitat and develop Comprehensive Koala Plans of Management (CKPoMs) ensuring all councils with koala sightings have a CKPoM in place.
- Giving recognised koala corridors legal protection e.g. via relevant SEPP changes, by following Chief Scientist recommendations to protect, restore, and zone appropriately sized corridors as conservation land (C2).
- Reforming the Cumberland Plain Conservation Plan to protect all koala habitat classified as urban capable.
- Scrapping the Rural Boundary Clearing Code (RBCC) to prevent further fragmentation of koala habitat.
- Urgently adopting interim controls on koala habitat in Areas of Regional Koala Significance (ARKS) to prevent clearing of koala habitat across public, and private land.
- Reforming the Local Land Services (LLS) Act to end code based clearing and strictly limit allowable activities on koala habitat.
- Reforming the Biodiversity Conservation Act (BCA) and Biodiversity Offsets Scheme (BOS) to strengthen protection for koalas (and other species).
- Increased funding and support for koala rescue and rehabilitation and to enable timely entry of koala rescue records into Bionet.
- Incorporating wildlife mitigation measures such as overpasses and underpasses into plans for all new roads and upgrades and lowering speed limits in known roadkill hotspots.
- Undertaking a strategic supply plan to reduce ad-hoc quarry development on koala habitat.

Pillar 1: Habitat Conservation

Connectivity of Koala Habitat is key.

- Protect existing habitat immediately before (further) fragmentation
- Protect and Restore corridors
- Connectivity needs to be holistic (e.g. protection of all East-West corridors in Campbelltown/Appin to connect the Nepean Corridor to the Georges River Koala Reserve)
- Create a Blue/Green Grid
- Fund councils via NSW Koala Strategy to develop Comprehensive Koala Plans of Management (CKPoM) ensuring all councils have a CKPoM in place.
- Chief Scientist advice for Campbelltown needs to be applied across the state particularly in peri-urban areas.
- Connectivity should replace translocation as a principle

Additionality of habitat is contested.

- What is the baseline of 'existing habitat' for calculating additionality from?
    - 25,000 ha of the 47,000 ha of additional koala habitat comes from 'protecting' existing habitat.
- When is land defined as already protected for koalas? If it's owned by the government it shouldn't be able to be used as an offset.
- Issues of biobanking (e.g. Noorumba Reserve) - 'protecting' council reserves is double dipping.
- Net losses. (ie clearing one third of existing habitat and 'protecting' the two thirds is still a net loss of a third of existing habitat)

Pillar 2: Support Local Conservation

- Fund councils via NSW Koala Strategy to develop Comprehensive Koala Plans of Management (CKPoM) ensuring all councils have a CKPoM in place.
- Increased funding and support for koala rescue and rehabilitation and to enable timely entry of koala rescue records into Bionet.
- Focus on corridor restoration (eg Mallaty and Elladale Creeks)
- Hawkesbury should be added as a priority population for immediate investment.

Pillar 3: Reduce Threats

Vehicle Strike Hotspots:

- Picton Road - Koala Strategy Claims to have "fixed" yet 10 deaths this year. What are measures of success?
- Fencing alone does not improve outcomes for connectivity. Target outcome needs to be safe connectivity.
- Incorporate wildlife mitigation measures such as overpasses and underpasses into plans for all new roads and upgrades.
- In hotspot areas with no fencing or wildlife crossings, speed limit reductions must be implemented immediately to prevent further unnecessary losses.

Disease
- Stress should be recognised as a driver of disease. The increased stress from habitat loss, development, and vehicle strikes should be considered a key threat.

Bushfires
- Strategy needs to include bush fire risk management.
- Key koala corridors should be recognised as environmental assets and protected from bushfires.

Pillar 4: Improve our Knowledge

Data & Research:
- Existing strategy research themes are not conservation focused, rather economy driven.
- Need transparency on how money is being spent
- Biodiversity Assessment Method (BAM) is an issue. Bionet is an input into the calculations for the BAM which is used to calculate offsets and species distribution among other things. If Bionet is wrong, then all those calculations are wrong.
- Concern with ongoing delays in data entry.
- LLS code based clearing is not measured - loss of koala habitat not quantified.
- Surveys: Money should not be wasted on a process of elimination. If it's koala habitat that can be linked to existing occupied habitat it should be protected.

Submissions to the Koala Strategy Review are due **APRIL 26th 2024** and can be submitted via email, online form, or by post here.