



KOALA KOALITION
ECONETWORK PORT STEPHENS INC.

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4/5/2024

Dear Sir/Madam,

Re: MidCoast Draft Koala Strategy – on exhibition

Thank you for the opportunity to review the MidCoast Council's draft Koala Strategy. I would like to applaud your survey and consultation efforts to prepare a strategy. Preparing a strategy is a sensible strategy in itself, in lieu of the opportunity to prepare a CKPoM due to SEPP issues, which we understand only too well in Port Stephens having been unable to update ours from either a text or mapping perspective.

The 5 Key Actions being organised under headings relevant to the NSW Koala Strategy also seems advisable, even though that strategy is under review.

The Strategy Targets in section 3 and Strategy Actions in section 4 are excellent and comprehensive. I would like to make some suggestions for consideration of inclusion, as follows:

- Advising proponents of developments and advocating to government **against Offsets being located outside the local area** of any proposed MCC development because they are known not to be effective in conservation of local flora and fauna ref [Effectiveness of the Biodiversity Offsets Scheme | Audit Office of New South Wales \(nsw.gov.au\)](#).
- Assuming that Offsets will continue for some time until policy can be amended, MCC could be more active in identifying and recording **Offsets site opportunities in MCC LGA**.
- Your Strategy could further recommend standing against the **emerging number of large quarries within State Forests as an unsustainable Forestry Practice** eg Stone Ridge Quarry in Wallaroo State Forest [Stone-Ridge-quarry-KKEPS-submission-FINAL-July-2023.pdf \(econetworkps.org\)](#) and [Sutton-Forest-sand-quarry-SSD-Dec-2023.pdf \(econetworkps.org\)](#).

We have not researched how many other quarries are proposed, but excluding the Bago State Forest extraction estimates, the proposed extraction volume for Stone Ridge is over 140 times the average extraction volume of all the other quarries operating in NSW State Forests. This suggests an order of magnitude higher than other quarries in State Forests, with significantly higher environmental and community impacts coming from a single quarry. The prospect that native State Forests could become large-scale quarries instead of sustainably managed forests is out of balance with the Ecologically Sustainable Forest Management (ESFM) principles that underpin the NSW Forest Management Framework, including the objective to 'maintain or increase the full suite of forest values for present and future generations across the NSW native forest estate.'

- Would the draft koala strategy be able to support the [Lower Hunter Hard Rock Quarry Strategic & Conservation Planning Issue Paper FEB 2024 \(econetworkps.org\)](#)? One of the highest magnitude concerns in this paper is regarding cumulative and combined traffic impacts on local/regional roads and the seeming inability of TfNSW to respond to development proposals with suitable recommendations to address the dangerous situations that numerous proposals present to MidCoast and Port Stephens LGAs.
- Would the strategy be able to **not support using Biomass for energy** eg the Proposed restart of the Redbank Power Station near Singleton using waste wood residues (excluding native forestry residues from logging) for energy production. The exclusion for native forestry is subsequent to their previous proposal in 2021, but we argued that this could not be enforceable without auditable compliance procedures and biomass is not a green initiative.
- Port Stephens and other LGAs are seeing numerous proposals for **renewable energy such as Battery Energy Storage Systems (BESS) within koala habitat**. Proposals for wind farms and solar farms require large cleared areas. These projects are exempt from the usual biodiversity assessments. KKEPS sees the need to advocate against clearing for renewables in ecologically sensitive areas, and asks whether this might be mentioned in the strategy?
- In regard to climate change, which is mentioned already, could you consider **MCC mapping of corridors linking** in with the [Barrington - Hawkesbury Climate Corridors Alliance — HCEC](#) and the [Great Koala National Park](#). Port Stephens Council's mapping will soon be able to identify corridors and KKEPS is hopeful that mapping can identify meaningful locations for intervention allowing for **conservation of corridors extending across LGA boundaries**.
- Perhaps a stance **against koala translocations** would be advisable because translocation success is questionable. I believe this relates to how koala mothers passing gut flora is linked to the digestion of local tree species in their territory, and so makes it dangerous for koalas to be translocated. However, I notice this connection between pap and local species was not mentioned in the Koala Ecology section of the strategy.

Once again, thank you for exhibiting your strategy and allowing public comment. Please feel free to contact me to discuss any of these points further.

Yours faithfully,

Carmel Northwood

Convenor

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