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Koala Plan of Management
The General Manager
Tweed Shire Council
PO Box 816
MURWILLUMBAH NSW 2484

2nd December, 2014

Dear Sir

Re: Tweed Coast Comprehensive Koala Plan of Management

The Tweed Coast CKPoM purports to base its actions on two key precepts. As promoted in Part 1 (Introduction) and latterly in Part 3 (Koala Management Framework) the two precepts are as follows:

Sec 1.5 (The Challenge of Koala Recovery)

“(The CKPoM) ... moves beyond simply limiting the damage by controlling development to a more holistic approach that focuses on the full suite of actions that promote population recovery” and

Sec 3.2(b) (Science-based Management)

“(The guiding principles of the KPoM) ... are based on the best information available at the time of its preparation.”

Unfortunately, it is my view that neither of the above are true. The Tweed Coast koalas face some extraordinary challenges (amongst which is the terminal issue of localized extinction) over the envisaged 20 year life span of the plan. In order to assist the remaining population(s) to meet that challenge an extraordinarily bold and recovery orientated CKPoM was required. Instead, what has eventuated is – at best - a very ordinary, conforming and predictable planning document that is more focused on political acceptance and conforming to the Department of Planning’s dicta, than it is about the immensely more important task of recovering the Tweed Coast koalas. This of course is one of the entrenched problems with SEPP 44; hence while there can be an aspiration to a science-based management approach (and indeed solutions), such a thing can never be fully realized while there is an entrenched political hurdle of acceptability to overcome. It is sad that the Tweed Coast CKPoM now reflects this influence, instead of maintaining a strong and undiluted emphasis on the science, the recovery process and long-term population viability as the primary management objective.

In referring to issues identified by the Habitat Study (Part 1, Section 1.1.5 – Land use planning controls) the CKPoM additionally considers the prospect of substantial urban expansion on the Tweed Coast over the coming decades to be daunting. I can but agree that it is indeed a daunting prospect, the ultimate consequence of a protracted history of poor land use planning decisions that have taken place at both Local and State Government level. However, as daunting as this may be, it is certainly not as daunting as the challenge of recovering an increasingly endangered

koala population that – in my view – will now progressively succumb to apathy, complacency and ineptness now embedded in the CKPoM. Recovery is not affected by simply preparing a plan and/or stating within it that the process will be activated. Once identified, the processes that drive decline must be dealt with promptly and assertively (not just talked about or delegated to some future strategy). This is where the plan fails and why it will potentially preside over the continued and ongoing decline of the Tweed Coast koalas.

There is a lot I could say about the minutiae of the CKPoM, aspects of which go to matters such as a lack of familiarity with current literature and application of the best information concept. However, there is little point in such an undertaking when what must otherwise be the central platform of the CKPoM – koala recovery – can no longer be guaranteed. For that reason I have concentrated below on what I perceive to be the major shortcomings, doing so in decreasing order of priority.

Part 8 Reducing Koala Road Mortality

At this point in time, by far the biggest threat to long-term survivorship of the Tweed Coast koalas is the extent of ongoing road mortality. Based on knowledge regarding the number of koalas known to have been killed since completion of the habitat study in 2011, I would estimate that the mortality rate through road strike alone currently approximates 5% - 6% of total remaining population size annually. What has the draft CKPoM done to tackle this issue – nothing really, *inter alia* proposing a ‘strategy’ that will reaffirm what we already know, coupled with ‘*identification and investigation of opportunities for retro-fitting...*’ resulting in an envisaged 5 year program of works that can only be implemented if and when funding becomes available.

More dead koalas....

Part 7 Koala Habitat Restoration

Despite their increasing proximity to localized extinction arising from ongoing road-kill, the matter of restoring integrity to the remaining habitat patches within the Tweed Coast also remains unresolved by the CKPoM.

Trees take time to grow but the Tweed Coast Koalas do not have a lot of time left. There is a substantive body of literature on the ecological consequences of fragmentation and for this reason it must be afforded nearly the same priority as that of dealing with the road-kill issue (what use is the habitat if there are no koalas left to use it). While I applaud and commend the efforts of the Koala Connections project it is not of itself the long-term solution to habitat reconstruction and/or embellishment within the Tweed Coast. Actively committing and establishing a timeline for the rapid infilling of gaps in existing and critically important habitat areas such as Black Rocks is fundamental to assisting future survival prospects for this crucial koala population hub. To see this issue increasingly trivialized as not of a sufficiently high priority demonstrates a complete disregard for the severity of the challenges ahead of the Tweed Coast koalas. Instead the CKPoM proposes another strategy that will have its initial focus in the Round Mountain area. While I can acknowledge a Bradley-type principle in play here (working within large patches and from the inside out first), the situation for the Tweed Coast koalas is clearly beyond a first-principles approach such that all readily available areas should be afforded equal priority for habitat restoration purposes.

Part 5 Development Assessment

There are a number of aspects of this Part of the CKPoM that concern me, including such things as to what constitutes an actively used tree. Moreover, Council officers apparently have some discretionary powers as to whether trees remain or stay. This is also an unacceptable outcome in the absence of inclusion of a transparent assessment methodology by which Council officers can make such decisions.

Given the status of the Tweed Coast koala population, that the plan even considers the removal of preferred koala food trees from areas being used by koalas is concerning, more so – as I have alluded to above - when the parameters by which usage is supposedly determined remain nebulous. The concept of small development/large development as articulated in the CKPoM (and excluding such things as are identified in 2nd paragraph of Sec 5.6.1) is similarly poorly framed and has no ecological or scientific support. In instances where tree removal results the end result for koalas are the same - all that differs is the scale of the impact. Again, the dire situation of the Tweed Coast koalas warrants abandonment of such considerations as tree removal; the same applies to the 1 ha exclusion rule now required by Department of Planning, surely this cannot be allowed to be applied within Koala Management Precincts and the CKPoM is the poorer for not challenging it up front.

Part 13 Monitoring & Reporting

It is important that this part of the CKPoM does more than simply document the trajectory to localized extinction of the Tweed Coast koalas. Current thinking in terms of long-term koala monitoring programs are increasingly leaning towards 2 x 5 approach with monitoring of permanent sites every two years followed by a major review every 5 years. The intent of the biennial survey approach is to enable inter-generation trends to be quantified with (in the case of declining populations) intervention points identified in the event of (say) ongoing reduction in habitat occupancy rate over two successive monitoring events. As currently proposed, monitoring of the Tweed Coast Koala population every three years will enable only one inter-generational assessment and so reduces the chances of a successful intervention.

Concluding remarks.

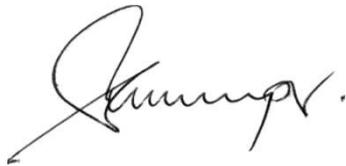
As stated earlier and despite misgivings about several other aspects of the draft CKPoM, I have deliberately kept this submission brief. Much of the history of what will potentially happen on the Tweed Coast has already been written elsewhere. I would invite Council staff and Committee members to familiarise themselves with the history of the decline to extinction of the Avalon koalas on the Barrenjoey peninsula on the northern beaches near Sydney. On the basis of what is currently contained in the Tweed Coast CKPoM, history is about to repeat itself and indeed, we are already a fair way down the track.

While some of the preceding comments may appear overly critical, that is not the intent of this submission. Rather I have attempted to highlight the underlying urgency of the need for assertive action by identifying inadequacies that – for the most part – can be readily rectified if the will is there. By way of example, how encouraging it would have been to read (in the context of Reducing Koala Road Mortality) that the CKPoM committed Council to actively funding/contributing to and/or participating in the trialing of new WID (Wireless Identification Device) technology in known koala road-kill black spots. How encouraging it would have been (in the context of Koala

Habitat Restoration) to look at an illustrated Figure detailing the extent of gap-filling across the remaining range of koalas across the entire Tweed Coast, along with a commitment to have localities such as Black Rocks planted out within the first 3 – 5 years of the plan. How encouraging it would have been (in the context of Reporting and Monitoring) to be reassured that a safety net was in place to enable more aggressive intervention measures to be put in place if ongoing, intra-generation decline was persisting.

In concluding I can only return to the beginning where on page 10 (Part 1, Sec 1.5, 2nd paragraph, last sentence) it is succinctly stated that the draft Tweed Coast CKPoM “...*meets the challenge*”. No it doesn't.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stephen Phillips', with a long horizontal stroke extending to the left.

Dr. Stephen Phillips
Managing Director.