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Proposed logging in Yambulla State Forest koala habitat, Cpts 257, 258 and 259

I refer to your letter dated 4 April 2017 regarding proposed logging of koala habitat in Yambulla State Forest. Forestry Corporation is seeking information on koala activity within these forests.

1. Koalas have been recorded in this forest.

According to the Wildlife Atlas, there have been 4 koala sightings nearby in Yambulla State Forest.

The absence of very recent records in this area of Yambulla should not be taken as evidence that the forest has no value as koala habitat or that koalas are not still present. Has anyone actually looked for koalas there?

According to Forestry Corporation research “extensive surveys are not able to identify localities from which koalas are absent [and] the assumption that a single survey can establish the absence of koalas from a particular locality appears to be inappropriate.”

It said: “koalas were scattered through the [Eden] region on various land tenures. The results suggest that conclusions regarding the distribution of koalas, based on previous records, may reflect uneven survey effort.”

The authors of this research were Forestry Officers who were instrumental in determining policy and practice towards koalas for many years. They also noted that significant clusters of koalas were found since 1988, at Tantawangalo–Yurammie and the Murrah area where the koala was previously believed to be extinct. It is therefore, they argued, dangerous to make any assumptions about the presence or absence of koalas on the basis of minimal, if any surveys and very little other knowledge.

2. Tanja State Forest precedent.

May I remind you that when Tanja State Forest (now Murrah Flora Reserve) was originally proposed for logging 5 years ago surveys initially showed no koala presence. It was only after protests and the sighting of a koala that further, more intensive surveys were undertaken. Numerous other koalas have been sighted there since. And the more serious surveys resulted in the discovery of a significant new

¹ “A playback survey of the koala, *Phascolarctos cinereus*, and a review of its distribution in the Eden Region of south-eastern New South Wales” Vic Jurskis, Alan Douch, Ken McCray and Jim Shields, State Forests of NSW, South East Region, PO Box 273, Eden NSW 2551, Australia. Revised manuscript received 18 September 2001

koala population. The same could well be the case with other forests such as Yambulla, if further, more serious surveys were undertaken.

3. Both Commonwealth and NSW protection measures are in the process of being developed and/ or updated.

a. IFOAs. I understand that IFOA prescriptions for the koala on the South Coast are currently under review and are likely to be changed. In these circumstances it would be quite inappropriate to log any forests where koalas have historically been recorded.

The current prescriptions are useless and unworkable. For example, it is a general requirement in logging koala habitat that the logger must check a tree before he cuts it down. Leaving aside the general difficulty of seeing koalas in tall trees, that rule is not practical. It may have had some chance of being effective in the days of the chainsaw, but at the present time, when all logging is done by a mechanical harvester, there is no chance of the operator being able to see through the heavy steel plate roof of his machine to check whether there is a koala in the tree or not. Other workers on the site (usually 2) are also in no position to check on what animals are in the tree. For occupational health and safety reasons, they cannot stand close enough to the tree to have any chance of seeing a koala or anything else in the tree.

b. Environment Protection and Biodiversity Conservation Act 1999

(EPBC) Act listing. In 2012 the koala was listed federally as a threatened species (vulnerable). The EPBC Act does not apply in RFA areas provided that RFAs provide at least equivalent protection. Federal measures under the EPBC Act are still some way off being finalized and we do not know yet whether State measures will, in fact, provide equivalent protection.

Inquiries suggest that neither the State nor the Commonwealth have any interest in finding out whether equivalent protection is, in fact, provided.

However, the 'Interim koala referral advice for proponents'² has been released by the government for use while the guidelines are being developed. It contains this passage:

"If your action is likely to have a significant impact on the koala, referral is recommended. If you are uncertain whether your action is likely to have a significant impact, the department recommends that you refer or contact the department. Examples of actions, where uncertainty about the significance of the resulting impact on the koala may arise, are those that: "result in the loss, fragmentation or permanent degradation of quality habitat that is identified during surveys as not currently supporting a koala population." Logging would certainly fit that description.

Recommendation:

The proposed logging should not proceed. At the very least, no further consideration of logging in the area should take place at least until:

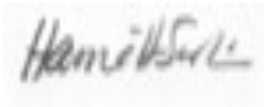
1. Revised IFOAs for the koala are concluded;
2. The Commonwealth provisions following the threatened species listing of the koala (as vulnerable) are finalized.

In the mean time, because the area is historically koala habitat, I am requesting that Forestry Corporation does not proceed with this operation, particularly since it

² <http://www.environment.gov.au/epbc/publications/interim-koala-referral-advice.html>

may not comply with the EPBC Act Koala Guidelines, once they are developed. Moreover, because it is relatively remote and away from the public eye, the Forestry Corporation has got away with little or no public scrutiny of logging in Yambulla State Forest. Consequently, it is one of the most intensively logged areas of forest in the region and we cannot afford to lose any more of it, with or without koalas. The standard response by the Forestry Corporation for all logging is that the organization has “contractual obligations to fulfill.” This is not valid. The Wood Supply Agreement with the Eden chipmill (SEFE) makes it is clear that there are numerous circumstances in which the contract can be varied or cancelled. There is nothing in it which compels the logging of Yambulla Forest, especially when there is a very small and declining market for the resulting woodchips.

Yours sincerely

A handwritten signature in black ink, appearing to read "Harriett Swift". The signature is written in a cursive style and is contained within a light grey rectangular box.

Harriett Swift
10 April 2017