



TIMBER NSW

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General Manager
Port Macquarie-Hastings Council
PO Box 84
PORT MACQUARIE NSW 2444

Email: council@pmhc.nsw.gov.au

Submission on Draft Koala Planning Documents

Thank you for the opportunity to comment on Port Macquarie-Hastings Council's Koala Recover Strategy, Coastal Koala Plan of Management and associated changes to planning rules.

Under Council's proposed planning arrangements set out in this document, it appears that developers wishing to permanently remove koala habitat will be afforded an opportunity to undertake further survey work and to put forward proposals that will mitigate their proposal's impacts. In contrast, private landowners wanting to conduct selective timber harvesting (the impacts of which are temporary and minimal) on the same lands will be denied any such opportunity. With think this proposed approach is illogical and inequitable.

It is the view of Timber NSW that using environmental planning instruments to remove private forests from primary production is a major land-use planning decision. From a timber industry's perspective, we are not satisfied that the magnitude of this decision and its associated socio-economic impacts have been fully considered or appropriately evidenced.

For more than 100 years, Timber NSW has represented the timber and forest products industry in this state. Our members work in collaboration with the state-owned Forestry Corporation of NSW and private forest owners to meet the growing demand for sustainable produced wood products. Around 80% of the State's hardwood timber needs are met from the NSW north coast. The forests in the Port Macquarie-Hastings LGA are among the State's best and play a critically important role in meeting the State's domestic timber needs as well providing direct employment for 289 local residents¹.

The Council's Koala Recovery Strategy report paints a dire picture of the conservation status of the koala with predictions of local extinction within 50 years. We are unconvinced that koalas are in general decline however we do share concern about the welfare of koala populations on the expanding peri-urban interface. For these populations we agree that their habitat is directly threatened by new development and that there is much higher risk of dog attack and vehicle collision. We also share Council's concerns about the threat that wildfire poses to koalas and recognise and support the adoption of more regular cool burning. For all of these reasons we support the Council's initiative to address these planning challenges.

We wish to bring to Council's attention the koala research being undertaken by Dr Brad Law from the NSW Department of Primary Industries (DPI). The research involves koala occupancy on the

¹ 2016 Census – employment by LGA and industry

NSW north coast across different land tenures. The research has occurred over three breeding seasons and involves the use of a novel acoustic recording technique using equipment known as a SongMeter.

We understand that Dr Law is due to shortly report and that his results will reveal that koalas are much more widespread than previously thought with much higher levels of occupancy across the north coast in areas that have been mapped as having moderate and high quality koala habitat. The research has revealed that koalas may be commonly found in large numbers within State forests that have had a long history of moderate and higher intensity timber harvesting.

The results of the work being undertaken by DPI are consistent with our general understanding that timber harvesting and koalas have successfully co-existed for over a century, and that the species has persisted with fire-stick forest management by indigenous people for thousands of years. Selective timber harvesting triggers regeneration and stimulates growth flushes on retained trees, the leaves of which are known to be favoured by koalas due to their higher digestibility and lower toxins.

We note that in Council's online submission it has prominently identified selective timber harvesting as a possible cause of koala habitat loss. We also note that in its Koala Recover Strategy it states that forestry can significantly impact on forests by selectively removing key food trees and degrading habitat quality. We are disappointed that Council has chosen to make these negative associations, particularly given the lack of credible scientific evidence to support such a view.

Under the current regulatory framework for private native forestry koalas are well protected (even in the absence of pre-harvest surveys). Harvesting must be selective and undertaken with care and in accordance with codes of practice. The codes include a suite of conditions that provide large scale general habitat protections as well as specific prescriptions for retention of koala browse trees. To support the code the NSW Forest Industries Taskforce has also developed a koala field guide for forestry operations that is available online –

<http://timbernsw.com.au/koala-code-practice-forest-harvesting-new-south-wales/>.

We note that private native regrowth forests with a long history of selective timber harvesting have been identified as koala habitat in the draft Coastal Koala Plan of Management. We also note that nearly 8,000 hectares of these forests have been classified as core koala habitat. The classification of such a large area as core koala habitat is of particular concern to the industry as it means that timber harvesting is automatically excluded.².

Under Council's proposed planning arrangements we understand that developers wishing to permanently remove koala habitat will be afforded an opportunity to undertake further survey work and to put forward proposals that will mitigate their proposal's impacts. In contrast, private landowners wanting to conduct selective timber harvesting (the impacts of which are temporary and minimal) on the same lands will be denied any such opportunity. We think this proposed approach is inequitable and unfair.

We accept that native forest east of the Pacific Highway within the LGA provide high quality koala habitat. However we would like to satisfy ourselves that the mapping of core koala habitat strictly meets the definition in SEPP 44. Information on the Council's website about the mapping methodology or how the maps were determined could not be found, so we propose to contact you directly about this. To the best of our knowledge at present, these maps were constructed with data on the location of koala droppings, or scats.

² Under the Private Native Forestry Code of Practice for Northern NSW, timber harvesting is excluded from core koala habitat that meets the definition of SEPP 44

If the current maps of koala habitat have been constructed using data from scat surveys and not on information gained from the location and behaviour of actual koalas, there are serious questions to be answered concerning their validity. This method is at best an indication of presence/absence of the species. Habitat quality maps that are based on the location of koala droppings, not koalas, can only be regarded as indicative, and may be misleading. This is discussed in detail in published literature, notably a series of papers by Dr. D. Lunney.

We are also concerned that the impacts on private landholders seeking to undertake private native forestry in these areas have not been explicitly acknowledged or addressed. For example, in the Council's Fact Sheet it states that 'If you are not doing any building or development, the Coastal Koala Plan of Management and associated changes will not affect you.' However under the Council's LEP, forestry is only permissible on rural land with development consent, so private native forestry operations that do not enjoy continuing use rights will in fact be captured under the CKPoM.

In summary, using environmental planning instruments to remove private forests from primary production is a major land-use planning decision. From a timber industry's perspective, we are not satisfied that the magnitude of this decision and its associated socio-economic impacts have been fully considered or appropriately evidenced.

Thank you again for the opportunity to provide feedback.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Maree McCaskill', written in a cursive style.

Maree McCaskill
General Manager