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31 January 2020

Hon Leeanne Enoch  
Minister for Science, for Environment and the Great Barrier Reef  
Ministerial Office  
1 William Street  
BRISBANE QLD 4000

By Post & by Email: [SEQKoalaStrategy@des.qld.gov.au](mailto:SEQKoalaStrategy@des.qld.gov.au)

Dear Minister Enoch

**Re: Draft South East Queensland Koala Conservation Strategy 2019-2024**

Thank you for the opportunity to provide comment on the draft South East Queensland Koala Conservation Strategy 2019-2024 (SEQKCS).

AgForce Queensland Farmers Limited (AgForce) is the peak rural group representing beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$6.2 billion in gross farm-gate value of production in 2017-18. AgForce's purpose is to 'Advance Sustainable Agribusiness' and facilitate the long-term growth, viability, competitiveness and profitability of these industries. The producers who support AgForce provide high-quality food and fibre to Australian and overseas consumers, manage around 40% of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

In the attached submission, AgForce details comments on several of the inclusions in the SEQKCS that are of particular interest to AgForce membership and primary producers of Queensland as a whole. Our omission from the formal consultation mechanism as a key group of land managers affected by this proposal is of great concern. We seek an urgent meeting with the Minister to discuss how best to proceed with protection of koalas given our existing land uses.

If you have any questions, please do not hesitate to contact Senior Policy Officer, Dr Greg Leach, on (07) 3236 3100 or [leachg@agforceqld.org.au](mailto:leachg@agforceqld.org.au)

Yours sincerely

Michael Guerin  
Chief Executive Officer

cc: Hon Mark Furner, Minister for Agricultural Industry Development and Fisheries  
By Email: [agriculture@ministerial.qld.gov.au](mailto:agriculture@ministerial.qld.gov.au)

ADVANCING SUSTAINABLE AGRIBUSINESS

## Submission on draft South East Queensland Koala Conservation Strategy 2019-2024

### • Introduction

AgForce would like to thank the Department for the opportunity to make a submission in response to the draft South East Queensland Koala Conservation Strategy 2019-2024 (SEQKCS).

AgForce Queensland Farmers Limited (AgForce) is the peak rural group representing beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$6.2 billion in gross farm-gate value of production in 2017-18. AgForce's purpose is to Advance Sustainable Agribusiness and facilitate the long-term growth, viability, competitiveness and profitability of these industries. The producers who support AgForce provide high-quality food and fibre to Australian and overseas consumers, manage around 40% of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

In summary, the SEQKCS looks to address an election promise of the current Queensland Government, to restore koala habitats. With primary focus on the south east Queensland region, AgForce applauds moves to address the longer-term sustainability issues for one of our national icons. Indeed, AgForce members with koala habitat and populations on their properties pride themselves on their opportunity to support the health of these emblematic animals. AgForce notes that the election promise has taken some time to materialise and has only got underway in the leadup period to the next election in October this year. This compressed timeframe is not conducive to well considered, effective policy responses

AgForce's submission below, focuses on the proposed actions in the implementation of six recommendations and associated objectives from The Queensland Koala Expert Panel (KEP). The following sections address particular parts of the SEQKCS and outline AgForce member concerns and suggestions in regard to them.

### Detailed AgForce Comments and Concerns

#### • ***A lack of scientific basis and baseline science upon which to build***

AgForce agrees that it is desirable for all stakeholders to maintain 'A sustainable koala population in the wild in South East Queensland that is supported by a coordinated and strategic approach to habitat protection, habitat enhancement and threat reduction.'

However, AgForce views that the SEQKCS suffers from a lack of firm scientific basis upon which to prepare regulations that impact on private landholders (ie, highlighted in the document on page 13, there "has been no comprehensive study undertaken to determine the exact numbers of koalas in SEQ in recent years").

For a population "to be maintained at least at its current density levels", it would be logical to argue that a comprehensive study be completed prior to developing regulations, with their associated impacts on landholders, that are based upon objective measurement and data rather than upon speculation and perceptions. The Australian Government estimates Queensland's koala population was 167,000 in 2010 with approximately 15,000 (9%) of the koala population from south east Queensland region<sup>1</sup>.

AgForce has serious concerns about that claim that "three quarters (74%) of core koala habitat has already been cleared in SEQ since 1960". A preliminary examination of historic photography over several locations in SEQ shows that vegetative cover has in many cases remained similar and in some cases, increased as opposed to the claim that most has been cleared (See: aerial photography at <https://qimagery.information.qld.gov.au/>).

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<sup>1</sup> Australian Government Species Profile and Threats Database – Koala [https://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon\\_id=85104](https://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=85104)

- ***Targeted consultation has omitted largest group of land managers***

It appears that agricultural industry, the largest stakeholder on a per land area basis, has been largely excluded from the development of the Queensland Government's plans for koala conservation. As outlined in the SEQKCS, "consultation with representatives from the conservation, building and development sectors, Traditional Owners and First Nations peoples, state and local government, through the Koala Advisory Council (KAC), to outline the actions needed to improve koala conservation."

AgForce holds concerns that despite the original intent of the SEQKCS, the framework and detail will at some stage in the future be rolled out in other regions. Being omitted from developing the framework in the formative years limits our input, minimises the 'ownership' of the resulting strategy amongst our membership and reduces our ability to maximise protections for koalas.

The SEQKCS states that "the Koala Expert Panel (KEP) met in July 2016 to provide government with recommendations on the most appropriate and realistic actions to address the decline in, and ensure the persistence of, koala populations in the wild across SEQ." At no time was AgForce made aware of the KEP or these meetings.

At no time has AgForce been consulted about participation in the KAC or about supporting delivery of the Strategy or representing member views. As noted above, the lack of engagement with broadacre agriculture precludes the ability of the agricultural industry and agribusinesses to proactively support the protection of koala habitat.

AgForce seeks inclusions of agricultural representatives, including AgForce, on the KAC from this point forward.

- ***The framework is silent on voluntary partnerships such as Nature Refuges***

AgForce notes that the SEQKCS is silent on its interplay with the Nature Refuges program – which has to date been the most successful method of promoting voluntary conservation on private lands. The program, which AgForce has been a strong supporter of, seems to be a natural fit to promote protection of koalas in the most effective way possible – a voluntary one. Indeed, the Nature Refuges program already has significant amounts of land under covenant for koala protection which appears to be working well.

AgForce seeks more detail from the Department about how this framework will interlink with the current Nature Refuge program, or alternatively why further promotion and development of the program has not been considered as an alternative to regulation.

- ***Urban Development the Primary Threat in SEQ***

AgForce considers that the main contributor to the koalas' plight largely rests with the urban and peri-urban development in the SEQ regional footprint. The SEQKCS mentions an "80% decline in koala population densities along the 'Koala Coast' (Wellington Point to the Logan River) and 54% decline in koala population densities in the Pine Rivers region between 1996 and 2014. This decline is the result of a number of factors, with habitat loss being the most significant. During this same period, Greater Brisbane's population increased at a rate faster than any capital city in Australia, growing by 40%."

Urban land clearing sees prime koala habitat destruction continuing to occur unabated for urban development which has some of the most valuable koala habitat in SEQ. Some prime examples include:

- Coomera shopping precinct and housing development
- Flagstone and Yarrabilba developments
- Greenbank housing developments
- Redland bay subdivisions
- Redcliffe rail link,
- Mt Lofty development proposal which is classed as Critical Koala Habitat.

This urban development is sanctioned by government policy that allows prime koala to be destroyed, but at the same time, proposes to tighten the screws even further on rural freehold land. To ensure “no further net loss of remaining habitat” the Queensland Government needs to seriously consider preventing further alienating development within koala habitat. As the Flagstone development progresses, for instance, thousands of hectares of koala habitat are effectively destroyed. Please see photograph below.



**Figure 1: Machinery at Flagstone south of Brisbane (22-Jun-18)**

According to the SEQKCS, “Given the importance of the most suitable habitat for koalas (as it has the ability to sustain higher densities of koala populations) it is imperative that there is no further **net** loss of remaining habitat.” Does no further “net loss” mean that offsets are possible? Have offsets been included within State Development projects such as the Flagstone and Yarrabilba development? The ultimate question is why does SEQ permit such extensive population increase within highly sensitive habitats when alternative less sensitive development sites might be available?

It is of particular interest that machinery contractors, who are not AgForce members, contacted policy staff through 2019 gravely concerned about “the decimation of 20,000 hectares of vegetation in the tender process Government has with plant operators. They are preparing contracts for moon-scaping the Flagstone area with complete removal of vegetation and landscaping large tracts of land. It is ironic that the State has a right to do this when private landholders are highly regulated.” (NB: name withheld however, if further inquiry is requested please contact Greg Leach on 0428 720 651)

- ***Short Timeframes and Poor Timing on Koala Mapping Layers***

AgForce’s members manage vast quantities of koala habitat and also land that has been incorrectly mapped as koala habitat areas and priority areas. The release for comment on this draft mapping just prior to Christmas 2019 and for such a short duration fails to take into account the informed comments and experiences of land managers that have a good understanding of these animals’ movements on their land. The Biomaps mapping tool used for the draft koala habitat mapping is not a common tool used by land managers, therefore disadvantaging affected people from responding by the required date of 22 December 2019.

The five ‘drop-in community information sessions’ during January 2020 at Daisy Hill, Beenleigh, Boakarina and North Ipswich did not service landholders from the large proposed priority area through Maleny, Woodford and Dayboro. Also, at these drop in sessions, there was no facility for landholders to query the mapping and regulations applying to their own property, with the response from DES staff to access information online or through an email address. One in particular spent considerable time at one location, but ultimately found that “no additional information was made available beyond that which was available on the DES website.” (NB: name withheld however, if further inquiry is requested please contact Greg Leach on 0428 720 651)

AgForce seeks that an ongoing process be put in place to improve the derived mapping which has not had the benefit of ground-truthing. This mapping should not be static, but be regularly reviewed to reflect ongoing improvements and information provided by landholders and not just satellite imagery. Once again, we see it is up to the landholder to instigate a ‘map amendment process’ to correct errors derived from departmental staff formulating maps from computerised information systems with limited ground-truthing.

- ***Spatial modelling for koala habitat in SEQ***

As mapping data has not been provided, we can only ascertain that identified koala-suitable RE’s have been selected and then a buffer applied around these areas to derive the KPAs. While there was a process for map correction (closing in December 2019), this was for infrastructure only and did not provide an opportunity to correct poor mapping, such as pasture areas mapped as remnant or forest, Category X areas being mapped as Koala habitat, incorrect labelling of vegetation type such as rainforest being koala habitat. Koala Priority Zone mapping has not been provided at property level thus a landholder is unable to readily determine if their land falls within the Zone, and thereby what level of impact the Strategy will have on the property.

Additionally, for the small number of landholders and other stakeholders who do have skills with GIS mapping software, the KPA mapping layer was not made available and other mapping information was only able made available on the website or by email enquiry until 22nd December. The lack of data provided means we have not been able to confirm the validity of the information on behalf of our members and so have not got confidence in its accuracy – something we have previously encountered in similar regulatory mapping layers, in particular the 2019 release of updated protected plants trigger mapping.

AgForce requests that DES extends the consultation period and makes the mapping meta-data and new modelling methodology available prior to finalisation and implementation.

- ***Koala Priority Areas – a mosaic approach?***

AgForce seeks further detail on how the proposed mapping has been crafted, so as to create vast corridors and areas of suitable habitat, as opposed to a mosaic landscape of small habitat areas which leaves animals vulnerable to surrounding pressures and predation.

- ***Strategic and coordinated approach to koala conservation***

The draft SEQKCS does not outline connectivity and coordination with the Australian Government requirements for protecting the vulnerable koala (a Matter of National Significance), as outlined in the EPBC Act referral guidelines<sup>2</sup>. These national self-referral guidelines provide attributes to readily assess and score habitat values, connectivity and mitigation measures to minimise threats such as dog attack and vehicle strike.

- ***Draft Koala Targets***

1. **Koala Habitat Protection**

The target of ‘no net loss’ is admirable though AgForce questions how it will be achieved in the absence of a baseline and significant investment in population monitoring?

*Collaboration and Voluntary Stewardship*

In order to maximise protections, the investment in land rehabilitation should be done in conjunction with landholders. Best conservation science suggests creation of corridors and habitat is best achieved in a voluntary manner through managing the most suitable areas within portions of land parcels, rather than through acquiring or managing the entire property for this purpose. We would like to work collaboratively with DES and Queensland Trust for Nature to achieve this.

*Prohibition on Clearing*

The discussion paper proposes prohibitions on clearing of koala habitat areas within a KPA, unless otherwise exempt. This statement lacks detail – particularly about what exemptions will apply. For example, will a person be able to conduct thinning, forest practices or rotational agriculture

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<sup>2</sup> EPBC Act Referral Guidelines for the Vulnerable Koala

within areas of the KPA where they have historically always implemented vegetation management practices? If not, the draft proposal is a significant infringement upon the purpose for which the property was purchased for and is managed for. This omission seems to indicate that scant regard has been given to how the agricultural sector will practically operate within the framework and this must be addressed with targeted consultation prior to implementation. At the very least, exemptions need to match those provided for in the VMA.

While the SEQKCS projects concern about the future of koalas, the reality is that Queensland Government is imposing the responsibility and cost of the Strategy on private landholders without due regard to their ability to manage their freehold land. The bundle of rights that accompany freehold land sees that such regulatory impositions such as the Vegetation Management Act 1999 (VMA) and the Nature Conservation Act 1992 (NCA), including the Koala Strategy, serve as a diminution of property rights without compensation. These laws are reducing the ability of a landholder to exercise their freehold rights to vegetation management and eroding rights including their ability to earn an income from the property and benefit from increased property valuation. We understand that the SEQKCS will not compensate landholders for costs or loss of income. At a minimum, compensation needs to be provided for loss of property valuation and costs including use of Koala spotters during silviculture operations, through to inability to access forest product for own use or for sale.

Existing native hardwood forestry areas and forestry plantation areas should be exempt of the proposal for no clearing in habitat areas.

Clearing of native woody undergrowth and invasive woody weeds such as lantana should continue, as this vegetation class would impede the movement of koalas between habitat trees.

#### *Assessment Processes*

The SEQKCS discussion paper outlines that the Queensland government will assess applications that involved clearing of koala habitat outside the KPA and that a new Code will apply. It is unclear why clearing outside the already mapped KPA is necessary – instead it will place additional and unnecessary controls on landholders who do not even have koala habitat. By virtue, all of SEQ will be covered by the proposal. This has significant and perverse consequences and will curtail the amount of clearing that will be undertaken. On the face of it, this might sound good, however good property management includes thinning, firebreaks, woody weed control and ongoing maintenance which will occur less frequently if the proposal is enacted as planned. While the discussion paper notes that other ‘reasonable’ exemptions will apply, the cumulative net effect of imposing regulation is that people become too scared to operate within the already complex framework governing vegetation management in Queensland. At no time does the discussion paper outline how it will assist land managers to understand and comply with the amendments – hence leading us to believe that this ‘lock up and leave’ mentality is the preferred one.

Clearing regulations not specified within the SEQKCS nor are there guidelines that inform landholders of koala conservation clearing laws would be or any other impost on freehold landholders. This is the case for both the mapped koala habitat areas and the Koala Priority Zone which will possibly have greater impost on the landholder. It is impossible to make an informed submission on the SEQKCS when information is withheld by Queensland Government. DES staff have confirmed that the clearing regulation would not be made public prior to the submission deadline. As a consequence, the consultation process should be restarted with the provision of this information.

No information has been made available in the SEQKCS regarding impacts to Category X land under the VMA. As AgForce has argued within other submissions, the integrity of Category X land must be maintained and these rights necessarily included within new regulations such as the SEQKCS.

As a significant land manager in its own right, the recent bushfire experience has outlined just how vital it is to ensure State land is actively managed with firebreaks and regular fire regimes in place.

AgForce argues that existing State reserves that include Koala habitat, namely National Parks, are not being managed optimally for koalas. Numerous examples include:

- Grossly inadequate fire management regimes resulting in high fuel loads and mortality of koalas in wild fires, as occurred in the 2019 fire season;
- Un-naturally high-density eucalypt vegetation resulting in over-crowded stems that are unsuitable for koalas;
- Excessive build-up of undergrowth vegetation resulting in habitat not conducive to koala movement through the landscape (which is particularly so in higher rainfall areas with rainforest species invading eucalypt country).

AgForce has further concerns about the processing ability of the local or Queensland governments having witnessed the lengthy delays the proponents face (without explanation) when waiting for an assessment decision under the VMA. Hence it is imperative that set response timeframes are incorporated in the framework for decision-makers to abide by.

## 2. Habitat Restoration

*Role of the Landscape Restoration Fund in Private Land Conservation*

As noted earlier, AgForce seeks involvement in how private land can best be utilized for conservation, particularly when the LRF (which was conceived for carbon farming) is to be utilized. Guidelines need to be provided on how co-benefits from koala habitat restoration will link to existing methods accepted by the national Clean Energy Regulator. How will the 150,700ha identified for habitat restoration align with eligible carbon farming methods such as plantation forestry, native forest from managed regrowth and reforestation 2.0<sup>3</sup>?

## 3. Koala Population

We have no comments on this proposed target.

## 4. Threat Reduction

AgForce comments specifically regarding wild dogs, which cause significant negative impacts and threatens biodiversity, preying on small remnant populations of native species such as bridled nail-tail wallabies, koalas and tree kangaroos. Previous data from Queensland Government in 2008 indicated 110 koalas were killed by dogs each year, with 1400 injured koalas from dog attacks presented to two wildlife hospitals over a ten-year period<sup>4</sup>.

The discussion paper omits reference to wild dog control as a shared responsibility between land managers, all levels of government and the community. The discussion paper only states actions such as the Queensland Government working with local governments to ensure local laws are effective and that appropriate/ adequate compliance is maintained.

The Queensland Government's *Biosecurity Act 2014* identifies wild dogs as invasive animals and restricted matter, therefore placing a General Biosecurity Obligation on all Queenslanders to manage biosecurity risks and threats under their control. The State Government's own responsibility to controlling this pest animal needs to be formally recognised and not merely devolved to local government alone.

Mitigation measures such as dog proof and koala proof fencing around strategic areas of Koala Priority Areas needs to be partially community funded. Research and monitoring within fenced koala areas needs to ensure nodes of koala populations are genetically viable and have limited

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<sup>3</sup> Australian Government Emissions Reduction Fund eligible activities <http://www.environment.gov.au/climate-change/government/emissions-reduction-fund/methods>

<sup>4</sup> Queensland Government – 2008. Living with wildlife – koalas [https://environment.des.qld.gov.au/\\_data/assets/pdf\\_file/0025/86524/koalas-and-dogs.pdf](https://environment.des.qld.gov.au/_data/assets/pdf_file/0025/86524/koalas-and-dogs.pdf)

impacts from koala diseases. The integrity of exclusion fences needs to be regularly checked to prevent subsequent access by wild dogs and other invasive predators such as foxes.

Community-based wild dog trapping and baiting programs across multiple tenures in peri-urban landscapes needs to occur to reduce the impact of free-ranging wild dog attack on koala populations. DNA research from attacked koalas from south east Queensland confirmed wild dogs rather than domestic dogs were responsible for koala predation (Gentle *et al.*, 2019<sup>5</sup>)

## 5. Community Engagement

The genesis of SEQKCS development in isolation to key SEQ land managers and the regulatory approach proposed sits at odds with the statements in the discussion paper that ‘successful koala conservation relies on a collaborative approach across all sectors of the community.’ Instead, through the imposition of regulatory codes and prohibitions, landholders and agricultural producers will be prevented from operating in their normal manner through unilaterally-applied rules created without adequate consultation with the primary stakeholders, those who own and manage land. To re-dress this, AgForce seeks urgent involvement from DES about how to best involve the agricultural sector.

- ***Online Survey is a Biased ‘Appreciative Inquiry’ Exercise***

Concerned stakeholders are provided with the options of providing submission on a Queensland Government SEQKCS pro-forma at: [https://haveyoursay.des.qld.gov.au/south-east-queensland-koala-conservation-strategy-2019-2024/survey\\_tools/south-east-queensland-koala-conservation-strategy-2019-2024-survey](https://haveyoursay.des.qld.gov.au/south-east-queensland-koala-conservation-strategy-2019-2024/survey_tools/south-east-queensland-koala-conservation-strategy-2019-2024-survey)

AgForce has considerable issue with the way in which the proforma is constructed with little or no opportunity provided for a concerned landholder, or any stakeholder, to provide additional suggestions within each question or to provide constructive or critical comment for the topics listed, or for unlisted areas of opportunity or concern.

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<sup>5</sup> Matthew Gentle, Benjamin L. Allen, Jane Oakey, James Speed, Lana Harriott, Jo Loader, Amy Robbins, Deidre de Villiers, Jon Hanger. 2019. Genetic sampling identifies canid predators of koalas (*Phascolarctos cinereus*) in peri-urban areas, Landscape and Urban Planning, Vol.190, 103591, <https://doi.org/10.1016/j.landurbplan.2019.103591>. (<http://www.sciencedirect.com/science/article/pii/S0169204618306650>).