



ABN No 22 481 038 058/ Charity Licence No CH2167

149 Grigor Street West, Moffat Beach QLD 4551

koalarescue\_qld@hotmail.com www.koalarescueqld.org

12 October 2022

Dear Mr Scott Sullivan and Dr Geoff Lundie-Jenkins

I have reviewed your response (dated 23rd September 2022) to my request to the Honourable Meaghan Scanlon MP for urgent government action to help Koalas.

Whilst it is encouraging that the government published the South East Queensland Koala Conservation Strategy 2020-2025 and that the Prime Minister has announced that no species will go extinct under the Labor government, I do not believe this strategy is going to save the koala from extinction. In fact, your response corroborates the issues that I raised in my original correspondence.

Achievement of 18 of the 50 detailed targets and outcomes are already off track in the first year. Despite this, I see no remediation plans nor a 'Plan B' to breed and reintroduce koalas should the current strategy fail.

I have a number of more detailed comments and questions below, which I have numbered for your ease of reply.

### **1. Koala Habitat – no reliable baseline**

You describe refinements to how this is measured may include the removal of areas that were previously mapped as KHA but have since been determined to not meet the criteria of koala habitat and state that loss of these areas in your measures will not be accounted for as a 'loss' in the overall reporting.

You cannot successfully measure and implement a strategy if your baselines are repeatedly changing.

You state that there is already a decrease to the baseline of 25,580 hectares compared to the previous mapping update of September 2020. This is not insignificant and should be counted as a loss.

Perhaps where areas that were included as KHA are now identified as not having the required vegetation, measures should be taken to plant koala vegetation in those areas rather than exclude them from the measures completely.

## **2. Rate of clearing koala habitat areas should not be reported as on track**

How is the status considered 'on track' when there are no measures available to support this?

## **3. Area of impacted koala habitat requiring offsets under the Environmental Offsets Act 2014 (since the regulations were introduced in February 2020)**

You report that, to date, 100 per cent of developments impacting koala habitat have used financial settlements to offset impacts.

Have you tracked financial settlements?

What has the funding be allocated to?

How does the funding offset the impact to koalas?

What are your processes to validate this?

How can you be certain that local governments are not continuing to approve development in koala habitat that should be avoided?

In our experience, councils across SEQ are approving development in koala habitat at an alarming rate with seemingly no repercussion. It is increasingly difficult to release koalas back to the location in which they were found due to habitat loss. I provided some photographic evidence in my previous letter.

## **4. Koala habitat restoration – who is holding LGAs to account?**

Restoration in three locations is stated in your performance so far (Lake Wivenhoe, Aroona Cattle Station and Flinders Peak).

I note that local governments in SEQ, the Koala Habitat Restoration Partnership Program and the offsets fund are seeking partnerships with landholders to deliver restoration. There is no target only a statement of intent.

Are there specific targets for local governments to partner to landholders?

Where can I find these targets/local government commitments?

Who is tracking and holding them to account?

## **5. Proportion/number of regenerated sites subsequently occupied by koalas – not achievable**

You state that the Koala Habitat Restoration Partnership Program will not report on the presence/absence of koalas in revegetated areas under the program as the trees may not be mature enough for koala occupation during the life of the Strategy.

Does this mean that this measure is not achievable?

How will you determine the success or otherwise in this area?

## **6. Koala injury and mortality rates decline in areas with threat-management responses in place**

\$1.5 million per annum is provided to continue existing arrangements with the SEQ Wildlife Hospital Network to maintain a coordinated wildlife care network to respond to natural and human-induced factors impacting on wildlife health.

How was this funding distributed? Is it a fixed amount? An amount per koala attended to (whether euthanised or treated) or an amount per koala successfully treated, rehabilitated and released?

Rumour suggests that wildlife hospitals may be incentivised to euthanise treatable koalas to avoid extensive treatment and rehabilitation costs.

## **7. There is nothing in the strategy support preventative treatments for disease.**

For example, a team at the University of Sunshine Coast are trialing a chlamydia vaccine. If successful, they will likely need funding and assistance to develop a plan and roll out the vaccine.

Funding for all koala rescue groups to access this vaccine will be important also so that all koalas in care can be vaccinated prior to release.

## **8. Progress against targets for engaging with the community and partnerships in particular seem to be falling behind.**

What is being done to remediate this?

## **9. Lack of remediation plans and a Plan B**

Given that 18 of the 50 measures are not on track;

Is there a remediation plan?

Why is there no plan B in the strategy?

If this strategy fails, koalas will be extinct. It will be too late to save them.

There needs to be a plan B to set up predator and disease proof breeding facilities as a backup. This would enable reintroduction of koalas into the wild similar to what is being done for Tasmanian Devils where a breeding facility is being successfully run on the mainland in NSW.

**10. Lastly, can a member of Koala Rescue QLD participate in the Koala Advisory Council (KAC)?**

We want to be a part of the solution.

I look forward to your prompt response.

Yours Sincerely,

A handwritten signature in cursive script, appearing to read 'Ray Chambers', is enclosed in a light green rectangular box.

**Ray Chambers**

**President**

**Koala Rescue Queensland**