



Natural Resources Commission  
GPO Box 4206  
SYDNEY NSW 2001

Facsimile: 8227 4399

Dear Madam/Sir

**Re: River Red Gums and Woodland Forest Regional Assessment**

I write on behalf of the 370 members of Friends of the Koala, a voluntary advocacy and wildlife rehabilitation group which is licensed by the Department of Environment Climate Change and Water to rescue, rehabilitate and release koalas in the local government areas of Ballina, Byron, Kyogle, Lismore, Richmond Valley and Tweed. Our mission is conserving koalas, particularly in the Northern Rivers Region of New South Wales, in recognition of the contribution the species makes to Australia's biodiversity.

The Preliminary Assessment of the River Red Gum and Woodland Forests of south western New South Wales released by the Natural Resources Commission (NRC) has highlighted the extreme stress that these internationally significant areas are facing. The report paints a bleak future, predicting that a number of areas will not survive under current management practices. It also discusses the importance of these areas within a landscape context, as the last remnants of vegetation in one of the most heavily cleared landscapes in the country.

Regrettably the Assessment falls short of being a credible scientific document in that it fails to address a number of key issues such as the conservation values of River Red Gum Forests in the study area, consideration of the national reserve criteria or how they will be met, the impact of logging on ecosystems, identification of refugia, corridors and linking habitats in the region, and the CSIRO's findings that large protected areas are vital to the survival of species in a warming world.

**Koala status**

Of particular interest to Friends of the Koala is the status of the region's remnant koala populations. The approved *Recovery plan for the koala* (2008) describes this as 'poorly known' in the Far West and South West, noting 'scattered populations in forests along the Murray and Darling river systems' (p.13).

Along the Murray River there are small populations centred on the Millewa State Forest and areas immediately upstream from there, in Barooga, Cottadidda and Boomanoomana State Forests. The koala was considered rare within the study area by Webster (2003). In the Barmah Forest, koalas were abundant in the forest until about 1910, but subsequently became extinct in the area.

A koala population has become established on Ulupna Island following the 1976 translocation of animals from disease-free coastal populations. We agree that the status of the population in the Red Gum State Forests of New South Wales is not clear – whether a population re-establishing from Ulupna Island, or possibly a remnant population (probably the former). What is clear is regardless of origin, its conservation status must be considered high.

Koalas were re-introduced to Narrandera Common and associated areas in 1975, in a bid to re-populate areas along the Murrumbidgee. The Narrandera Koala Regeneration Centre conducts annual counts of the population. There have been a number of koala records in the state forests to the east of Narrandera, over the last decade.

*Volunteers conserving koalas and their habitat on the Northern Rivers.  
Friends of the Koala services the local government areas of Ballina, Byron, Kyogle,  
Lismore, Richmond Valley and Tweed.*

*It is a member of the New South Wales Wildlife Council, Inc.*

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### **Logging and koalas**

In regard to koalas, the Assessment's failure to discuss any negative impacts associated with current logging operations is no less than astounding. Whilst Friends of the Koala has expressed concerns with the observance of s120 Licence logging prescriptions in the north east, we acknowledge they are far stronger than in the south west. Indeed, the comparison below between the River Red Gum Region and the Eden Region, where koalas are equally scarce and then the north east, highlights the extreme inadequacy of the koala prescriptions in the south west.

### **Comparative koala prescriptions under s120 licence logging**

#### **River Red Gum Region**

Only trees that have more than *fifty* koala scats underneath the canopy need to be retained, with an exclusion zone of fifty metres (50m) radius established around it. If a koala is detected in a tree, prior to or during the harvest operation, that is not a high-use tree, a temporary exclusion zone of a minimum of 30m radius must be established around it, until the koala vacates the tree.

#### **Eden Region**

Any evidence of a koala triggers a 50m radius zone, a 40m wide corridor zone and increased browse tree retention, plus a habitat protection zone of 150ha where no gapping is allowed.

#### **North East Region**

Specified forestry activities are prohibited from within all koala "high use" areas (ie. a koala is spotted, OR a tree has more than *twenty* koala scats beneath OR three out of any ten consecutive trees have scats, OR scats are in two sizes AND a subsequent star search finds scats under 3/10 trees.) A 20m wide exclusion zone must be implemented around the boundary of koala high use area. In koala "intermediate use" areas, per two hectares of net logging area ten primary browse trees must be retained where available and no AGS is to be used in preferred forest types.

### **Conclusion**

The state government has given its commitment to koala recovery in New South Wales. However few their number, the River Red Gum koalas must be protected and conserved. The forests through which they roam are a vulnerable ecosystem facing extreme water stress as well as being subject to on-going logging operations.

The easiest and most effective means of stopping the logging in the River Red Gum State Forests and achieving reservation of 60% of their remaining extent which is the nationally agreed criteria for a vulnerable ecosystem, is to convert the entire estate into a national park.

We call upon the NRC to address the issue of koala habitation in its forthcoming report and to recommend establishment of a River Red Gum National Park which encompasses the state's River Red Gum State Forest estate in its entirety.

Yours faithfully



Lorraine Vass  
President  
for the Friends of the Koala Committee  
21 October 2009

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