

26 July 2021



Environment Institute
of Australia and
New Zealand Inc.

The Director
Bushfire Affected Species Assessments Section
Department of Agriculture, Water and the Environment
GPO Box 858
Canberra ACT 2601

Dear Director,

Submission: Species Listing Eligibility and Conservation Actions for the Koala (*Phascolarctos cinereus*)

Thank-you for the opportunity for the Environment Institute of Australia and New Zealand (EIANZ) to make a submission on the Species Listing Eligibility and Conservation Actions for the Koala (*Phascolarctos cinereus*). This submission has been developed collaboratively across our south-east Queensland, New South Wales and Australian Capital Territory Divisions and our Ecology Special Interest Section.

The EIANZ is a non-profit, multi-disciplinary association of environmental practitioners. Its membership is represented by a diverse range of technical disciplines including scientists (e.g. ecological consultants), policy makers, engineers, lawyers and economists. We advocate for environmental knowledge and awareness and advancing ethical and competent environmental practice.

EIANZ recommends the following in finalising the Threatened Species Scientific Committee's (TSSC) advice to the Minister, including the draft Conservation Advice provided with the consultation material:

Recommendation 1: We support the proposed revision of the listing status of the Koala populations of Queensland, NSW and the ACT from Vulnerable to Endangered and recommend this is adopted by the Minister for the Environment with urgency.

Recommendation 2: The draft conservation advice and draft Recovery Plan be aligned to ensure final documentation is consistent, particularly regarding conservation and recovery actions.

Recommendation 3: Conservation and recovery actions listed in both the conservation advice and Recovery Plan draw on the considerable work that both states and territories have planned and are already undertaking towards Koala protection and recovery.

Recommendation 4: Given climate change is identified as a very high risk to Koala, with potentially catastrophic consequences, the Australian government prioritises taking leadership in the global response to climate change. This includes urgently adopting a national commitment to net zero emissions by 2050 and a redoubling of national effort and investment in meaningful climate change action.

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Revision of listing status to Endangered

It is with regret, that the EIANZ supports the proposal to revise the listing status of Koala from Vulnerable to Endangered. There is compelling evidence that the species' population has declined over the last several generations and there are ongoing risks of serious decline into the future. The effects of the 2019-20 bushfires on Koala populations, particularly in NSW were severe and these population-wide effects should be reflected in the reclassification of the species. The data presented in the proposed listing paper suggest that existing measures for the protection and conservation of Koala habitat are not halting population decline and therefore require strengthening, including via an Endangered listing status. We urge the Minister for the Environment to enact this change in listing status at the earliest possible time.

Alignment of conservation advice and Recovery Plan

We commend the work undertaken to date to develop the proposed listing status revision and draft Recovery Plan, noting both documents are currently open for public comment. We strongly recommend the finalisation of these documents is undertaken in a coordinated manner, to ensure consistency of conservation and recovery actions, in particular. We note there are an additional two months for comments to be received on the Recovery Plan and urge that the conservation advice is not finalised until those comments on the Recovery Plan have been considered and these important policy documents are aligned. However, this should not delay the listing of Koala as Endangered, as the additional regulatory protections afforded via an Endangered listing are critical.

Work of states and territories in Koala protection and recovery

Many of the conservation and recovery actions listed in the draft conservation advice rely on collaboration/partnerships with states and territories. We note that there has been significant recent work undertaken, particularly by the Queensland and NSW state governments and their collaborators to develop concrete, well defined and funded Koala protection and recovery measures¹. Many of these are already being implemented. We strongly urge the Australian government to adopt, support and build on this work to maximise the likelihood of achieving real conservation and recovery for the Koala. We also recognise the immense body of work, including both studies and related data, that is prepared by state and territory government agencies, consultants and proponents of projects that may impact upon Koala and its habitat. We strongly support the states and territories working closely with the Australian government in making these data available for the ongoing improvement of our understanding of the status of the Koala and efforts to address its conservation and recovery.

Action on climate change

The majority of threats listed in the draft conservation advice relate to climate change driven processes. These are predicted to be almost certain to occur and will have catastrophic consequences for Koala (refer Table 2). We support the incorporation of climate change impacts and effects in the proposed recovery actions listed in the draft conservation advice, as this will be critical to promoting the medium- to long-term success of any recovery program. However, we note with concern a complete absence of the acknowledgement that Australia,

¹ Examples include the South-east Queensland Koala Strategy 2020 – 2025 and the NSW State Environmental Planning Policy (Koala Habitat Protection) 2021 (Koala SEPP).

in collaboration with all other nations, must take urgent action to address climate change in an effective and meaningful way. Without such action, the threats to Koala will remain and indeed worsen over time, despite other recovery and conservation measures. As stewards of unique biodiversity values such as Koala, Australia must be a leader on the world stage for addressing climate change, as global action is fundamental to protecting our native species including Koala. Locally, a key part of this leadership is committing to net zero by 2050 and ensuring we have significant national investment in climate change adaptation and abatement measures across all relevant sectors. We strongly recommend the Australian government takes urgent action at both the global and national level.

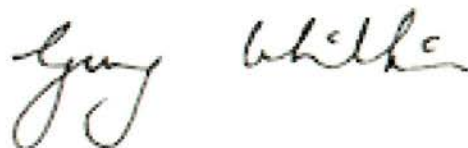
EIANZ thanks you for the opportunity to make a submission regarding Species Listing Eligibility and Conservation Actions for the Koala (*Phascolarctos cinereus*). We also intend to provide a more detailed submission on the draft Recovery Plan, addressing the proposed conservation and recovery actions, in particular.

In the meantime, we would be pleased to discuss any matters raised in this submission with officers as they finalise the listing eligibility advice. Please contact Ailsa Kerswell (Policy Chair, SEQ Division)² or Guy Williams (Chair Ecology Special Interest Section)³ to facilitate any future conversations.

Yours sincerely,



Vicki Brady
Vice President (Australia)
Environment Institute of Australia and New Zealand



Guy Williams
Chair, Ecology Special Interest Section
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Note – please attribute this submission to the Environment Institute of Australia and New Zealand (EIANZ) rather than any particular individual named above.

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