

## NATIONAL KOALA PROTECTION

The Koala Alliance is calling on organisations, individuals, and decision-makers to support our nine priority government actions aimed at halting the decline of koala populations across all states in Australia.

These actions have been carefully designed to complement each other, with the first step being urgent legislative change and the appointment of a National Independent Office of animal welfare. This will immediately stop further destruction of koala habitat and address the serious welfare issues facing koalas. The challenges koalas face is varied and complex, and their ongoing conservation requires long-term commitment to finding solutions.



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# PRIORITIES FOR KOALA PROTECTION AND CONSERVATION (Overview)

- 1. Immediately cease logging of all remaining koala habitat. Since blue gum plantations currently provide food, shelter, and breeding grounds for koalas who have limited habitat. In some cases, these plantations must also be recognised as critical koala habitat (See Appendix item 1 below for definition of "Koala Habitat")
- 2. Develop a National Independent Office of Animal Welfare at Federal level, that is responsible for welfare of all sentient non-human species, which includes an independent wildlife regulator who is not answerable to State based departments or agencies, such as DEECA and the Conservation Regulator in Victoria. This regulator will have executive authority over applications to remove native and blue gum vegetation where koalas are present.
- **3.** Reform of the Environment Protection Biodiversity Conservation Act. The proposed EPBC reforms focus on strengthening environmental protections for critical habitats and endangered species.
- 4. Comprehensive monitoring of koala populations nationally (inclusive of Vic and SA). Using heat seeking drones to monitor koalas nationally will ensure we accurately identify koala populations and can assess their status. More accurate population estimates will better guide future decision making and highlight the need for further protections.
- 5. An independent inquiry into the blue gum industry and its impact on koalas. For a balanced perspective this should include interviews with experienced rescuers and carers in areas where bluegum plantations are prevalent. It should also include interviews with former plantation personnel, offering them an amnesty on non-disclosure agreements for whistle-blowers.
- **6. Reform of the blue gum industry to protect koalas** from further injury and displacement.
- 7. Address and reduce the high mortality of koalas due to road trauma.
- **8. Government low interest conservation loans** that encourage conservation of private land for better connectivity of native vegetation to state parks, reserves, and national parks.
- 9. A review of the overwhelming and mounting evidence that shows current forest fire management practices are negatively impacting biodiversity and causing harm to native wildlife.



## **APPENDIX**

## 1. Cease all logging of koala habitat

Nationwide, it is critical to end the logging of all Koala habitats, including, in some cases, the logging of blue gum plantations established for harvesting. As native habitats continue to decline, plantations in Victoria and Kangaroo Island have become essential refuges for koalas. However, the plantation industry is largely self-regulating, with minimal government oversight of practices that have proven devastating for koalas. In areas where alternative habitats are scarce, these plantations must be preserved indefinitely, or at least until original habitats can be restored.

In parts of New South Wales, plantations scattered throughout the proposed Great Koala National Park play a vital role in connecting koala populations and ensuring their survival. Surveys of these plantations have been found to contain high densities of koalas due to the fertile soils and high-quality habitat. Despite their importance, these plantations are not included in future protection plans. In such cases, it is essential they be recognised as crucial koala habitat within the Great Koala National Park.

As a matter of urgency, the federal government must require the plantation sector transition to planting flora species that are not preferred by koalas.

Once a commitment is made to end native logging, no further logging of critical habitats should be permitted under any pretext. For instance, the Victorian government continues to clear trees, justifying logging as 'storm recovery' and 'fire fuel reduction operations' to protect human assets. Under new Victorian legislation, this has even led to the widening of access trails, further clearing more forest. Additionally, government departments responsible for these activities appear to be exempt from laws designed to protect endangered species. Any operations impacting endangered species must be tightly regulated.

### 2. An independent wildlife regulator

A National independent regulator must be appointed, within the National Independent Office of Animal Welfare, which is free from oversight by the conservation regulator or any state, territory or federal government department, to prevent conflicts of interest. Currently, government agencies manage both environmental protection and industries such as agriculture and primary production, which benefit from exploiting these environments—creating an inherent conflict.

Concerns over government conflicts of interest have fuelled long standing calls for an Independent Office of Animal Welfare to oversee and manage such issues. We support



this initiative and advocate for the inclusion of an independent wildlife regulator within its ranks.

The independent regulator must have executive powers to overrule development and vegetation clearance proposals—on both public and private land—if they pose a threat to koala populations. This includes restricting the harvesting of plantations where koalas are present, particularly in areas with limited access to primary and secondary koala food trees.

Operating under the Independent Office of Animal Welfare, the regulator should be staffed with experts in ecology and environmental conservation. Additionally, it must have the authority to impose penalties on governments, industries, and individuals that fail to comply with conservation and wildlife protection laws.

## 3. Amendments to federal legislation that will prevent further wildlife extinctions

#### **Reform of the EPBC Act**

- a. Increase funding for monitoring, compliance and long-term restoration projects: Stronger and more consistent enforcement of EPBC. Budget for more resources to monitor and ensure compliance, and increase penalties for noncompliance, including higher fines and legal action for companies and individuals that illegally log critical habitats. Ensure funding for long-term conservation and restoration programs, particularly for critical habitats.
- b. Remove the exemption of Regional Forest Agreements from the requirements of the EPBC Act. Where there is, may be, or is likely to be a significant impact on koalas or other endangered species who share the koala's habitat.
- c. Protect buffer zones and lower the Threshold for "Significant Impact": Broaden the criteria for what constitutes a critical habitat to include a wider range of environments which are essential for the survival of endangered species and include minimum buffer zones around critical habitats to prevent surrounding habitat degradation. These minimum buffers must be maintained at all times and variations by Government departments or corporations is not permitted. Plantation habitat should be considered critical habitat if there is not sufficient alternative habitat for endangered species, and/or if plantations connect critical habitats.

Lower the threshold for what constitutes a "significant impact" to protect environments from activities that are likely to cause more subtle or long-term degradation of critical habitats.



- d. Reform of approval process: Strengthen the requirements for conducting thorough environmental impact assessments (EIAs) particularly for infrastructure projects like logging, mining and infrastructure development in or near critical habitats. These assessments should include cumulative impact assessments that take into account the long-term effect of multiple projects in the area over time.
- e. Strengthen the role of Federal Government: Ensure federal protections are enforceable over state or local governments who approve development activities in critical habitat. Give the federal government more power to intervene to stop logging or land clearing projects.

For habitats identified as critical for endangered species, require automatic referral to the federal government for assessment before any major land-use changes (like logging or land clearing) can occur.

- **f. Greater Community Involvement**: Encourage community involvement in monitoring and reporting environmental issues. This can help ensure that any illegal or harmful activities, such as unauthorised logging, are quickly identified and addressed
- g. Restore and Strengthen Recovery Plans for Species and Habitats. Ensure that recovery plans for threatened species and their habitats are regularly updated and enforceable. Recovery plans should include measurable outcomes and actions for habitat restoration, monitoring, and protection.

#### h. Greater Accountability for Habitat Loss.

- i. Incorporate Habitat Loss into National Reporting: Make habitat loss and degradation a key national environmental indicator, so that the extent of critical habitat destruction is tracked and addressed at the highest levels of government. Ensure this reporting is fully available to the public, without redaction, and without any requirement for FOI requests.
- ii. **Make Industry Accountable for the Ecological Footprint**: Industries that impact critical habitats (like logging, agriculture, and mining) to take responsibility for the long-term ecological consequences of their activities. This could involve direct funding into habitat restoration.

#### i. Streamline listing of threatened species and habitats

Accelerate processes for listing endangered species and critical habitats and Implement a system for more frequent reviews of species' statuses and their critical habitats, ensuring that protections keep pace with changing environmental conditions and emerging threats.

#### j. Focus on Ecosystem-Based Management

i. **Holistic Ecosystem Protection**: Shift toward an ecosystem-based management approach, which considers the interconnectedness of species and habitats within a broader ecological context, rather than focusing solely on individual species. This



could help protect entire ecosystems that provide critical services for multiple species.

#### k. Recognise harvesting of bluegum plantations as a threatening process

### 4. Comprehensive monitoring of koala populations

Implement comprehensive monitoring nationally of koala populations, involving systematic and thorough approaches to tracking and assessing various aspects of koala demographics, health, behaviour, and habitat use. Comprehensive monitoring is crucial in providing essential data for evidence-based conservation planning, adaptive management strategies, and the long-term sustainability of koala populations in the face of increasing threats and environmental challenges.

Funding for monitoring programs must be prioritised to initiate a comprehensive program that includes Victorian and South Australian koalas. Current monitoring programs, such as the 'National Koala Monitoring Program' have largely been focused on QLD, NSW and ACT, the states where koalas are listed as endangered. However, koalas don't understand state boundaries, and considering the population estimates for Vic and SA are so uncertain, it would be prudent to monitor koala populations nationally, so we have accurate baseline data to guide longer term conservation efforts. National funding is also imperative for the mapping of koala food trees, habitat trees and fragmented areas of habitat to evaluate species, abundance, quality and connectivity of flora.

An example highlighting the value of comprehensively monitoring koala populations are the Strzelecki koalas. Situated in central Gippsland, and numbering less than 2000, the Strzelecki koalas represent the final genetically diverse population of koalas left in Victoria. Their genetic diversity enhances their capacity to adapt to climate change and decreases their susceptibility to certain diseases like Chlamydia. Whilst still vulnerable to the effects of habitat destruction and other threats facing all koalas, learning more about their unique genetics may help ensure the long-term survival of the species.

Presently, the Victorian Government has failed to disclose the source of koala population estimates, nor the methodology used to gather data, making it impossible to verify their figures. This is especially concerning in light of numerous non-government organisations raising concerns over the inflated population estimates presented by the government owned research facility, the Arthur Rylah Institute. These estimates do not align with the anecdotal evidence, nor do they reflect the likelihood of there being sufficient habitat to support the vast numbers of koalas reported.

Drone surveys are crucial for accurate population assessments. Surveys offer significant advantages in terms of efficiency and precision. By utilising drones, surveys can cover larger areas, providing more accurate population estimates and high-resolution imaging



that can be seamlessly uploaded to the Victorian Biodiversity Atlas (VBA). This approach is not only more cost-effective but also represents a more efficient allocation of resources and energy. Drone surveys streamline data collection processes, enhance accuracy, and facilitate the conservation of koala populations in a more sustainable manner.

Results of population and habitat monitoring should be readily accessible from a national public database.

## 5. An independent inquiry into the blue gum industry

Bluegum plantations have expanded significantly in Victoria and, to a lesser extent, South Australia over the past two decades. As the nation shifts from relying on native forests for timber to increasing plantation-based resources, we can expect a substantial rise in timber plantations, including species like *Pinus radiata*, *Eucalyptus globulus*, and other native hardwoods. This makes it crucial to learn from the experiences of Victorian plantations, as many of the issues discussed may also affect koalas and other vulnerable native species in South Australia, particularly on Kangaroo Island.

For over a decade, the bluegum industry has been linked to major welfare concerns for koalas. According to the Victorian government, approximately 47,000 koalas reside in southwest Victoria's plantations. However, research by Ashman et al. (2020), which surveyed 72 plantation sites across the region, found a mean koala density of 0.85 koalas per hectare, with some areas reaching 2.89 koalas per hectare. This raises doubts about the government's population estimates, especially considering there are over 80,000 hectares of bluegum plantations in this region alone. These figures don't account for other plantations across the state. As native vegetation dwindles, plantations have become a key koala habitat, but once harvested, these koalas face near-certain death.

The Victorian government has not disclosed how it arrived at its population estimates or what happens to koalas when plantations are harvested. However, local carers report that many koalas are killed by cars while searching for new habitats, and others die from starvation and stress due to the lack of available habitat. In Gordon, Victoria, five koalas were surveyed in a plantation prior to harvest. Within weeks, four were killed by car strikes, and a deceased joey was later found in the plantation, orphaned by the death of its mother (ABC, Kirkham, 2023). These tragedies are happening on a larger scale across the southwest.

Since plantations are largely grown on private land, there is no oversight of the welfare outcomes for koalas when these areas are harvested. The Victorian government does not monitor these private operations, leaving companies to regulate themselves.

This lack of government oversight is compounded by minimal regulation from the Department of Energy, Environment, and Climate Action (DEECA), which permits multinational companies to self-regulate. Companies may also have an incentive to



downplay koala populations, as higher densities could interfere with or delay harvesting operations.

**Harvesting injuries:** Koala spotters are not employed by the government or an independent regulating body tasked with protecting wildlife, instead they are paid by companies whose commercial interests are best served by there being minimal disruptions to their harvesting operations. Koala Management Plans require harvesters to leave 8 trees around a koala but there is no evidence to suggest that a koala can survive with only 8 trees. These trees are often immature saplings offering no protection from machinery, potentially causing stress myopathy, injury or death.

Furthermore, there is no independent regulator monitoring plantations to ensure companies are complying. We strongly recommend that DEECA conduct regular spot checks during harvesting operations with no advance warnings. There should also be compulsory checking of slash prior to ignitions. As most plantations are grown on private land, there are no witnesses, yet to prosecute harvesters, eyewitnesses must capture photographic or video evidence to allow prosecution. Following two high profile cases of harvesters not complying, companies are now installing surveillance cameras around plantations to ensure no members of the public can observe operations.

**Displacement and Starvation:** Current regulations do not require blue gum harvesters to leave trees behind for koalas. Over a plantation's 10-15 year life, koala populations grow rapidly due to a constant supply of high-quality food in fertile soils, making them dependent on the plantation for survival. Many of these plantations are located on private farmland with little native vegetation, leaving koalas with nowhere to go once the trees are harvested. This issue also extends to native habitats on private land, where koalas face uncertain futures with minimal oversight.

DEECA has stated that translocating koalas is no longer an option due to welfare concerns. However, translocation has been successfully carried out for over 100 years in Victoria. We believe DEECA's reluctance is due to a lack of suitable release sites. If this is the case, strategies should be developed to identify, protect, and replenish koala corridors across the state. DEECA's refusal to translocate koalas warrants urgent investigation.

The only remaining habitat for koalas is roadside vegetation, often along major roads and freeways, where they are at constant risk of starvation, illness, and road trauma. Koalas must expend significant energy searching for food, which is dangerous given their low-nutrient diet. Without adequate food or shelter, they face severe health problems, often leading to death.

In the Portland area, it's common to see koalas along roadsides with no trees in sight, confused and lacking food. Some die from starvation, while others are hit by vehicles.



Unauthorized landowners have also been capturing and relocating koalas to undisclosed areas, leading to certain death, yet these illegal practices go unregulated.

**Road Trauma:** After a plantation harvest, displaced koalas are at high risk of being hit by cars or trucks in search of new habitat. The absence of requirements to preserve adequate habitat points to poorly written legislation, and without changes to the law, these predictable deaths will continue. Government departments are well aware that koalas cannot survive without food or shelter, yet they refuse to relocate koalas before harvests and avoid responsibility for the consequences of their actions.

Current legislation offers no protection to koalas from habitat loss, leading to likely death when plantations are cleared. The bluegum industry is being permitted to inflict systemic cruelty on a protected species. The Victorian Government is condemning koalas in plantations to a slow, painful death and despite knowing the risks, they have failed to improve the legislation to protect and conserve these populations.

A well-documented case in Gordon, Victoria in 2023 illustrates the tragic consequences of this policy. After a plantation harvest, all five koalas surveyed were killed by vehicles on the Western Freeway over five weeks. Despite a suitable relocation site being just 5km away, the Conservation Regulator refused to allow the move, claiming it would cause stress. Instead, the koalas were left to suffer, surrounded by noisy harvesters and stranded near a freeway, ultimately dying in their search for food. Such decisions have severely damaged the credibility and social license of the Victorian Conservation Regulator.

## 6. Reform of the plantation industry

#### **Plantation forestry**

As discussed, bluegum plantations provide much needed habitat for koalas, yet leave them more vulnerable than ever after harvesting occurs. As native forest habitat continues to diminish and koalas are increasingly at risk, the bluegum industry requires immediate reforms to ensure the long-term survival of koalas.

- Koalas need a comprehensive investigation into the blue gum industry and its negative impact on koalas and other wildlife. Once the extent and impact is clearly understood, then strategies that allow for a sustainable timber industry without negatively impacting koalas, instead conserving their habitat and their food trees, can be formulated.
- All plantations existing on private and public land must be listed on a public register with full transparency listing the harvester, harvesting dates and permits, fauna assessments, alternative surrounding habitat (with a species list), potential hazards for koalas, what other habitat is available for them, and post-harvest reporting on their welfare for at least 8 weeks. Harvesting operations must be monitored and regulated by a governing body independent from the conservation regulator. Spotters must be employed by and report to an independent regulator. The Code of Practice for Timber Production 2014 must be updated to mandate independent fauna assessments of all commercial timber plantations on private and public land and these must be submitted



to an independent office of animal welfare, not DEECA, who currently regulate both wildlife protection and timber harvesting, a clear conflict of interest. Harvesting operations must be monitored and regulated by this same independent body. Spotters must also be employed by the independent regulator and under no circumstances should ever be employed by, or report to, the harvesters,

- Timber Harvesting Plans must include a certified flora and fauna assessment (performed by an independent consultant or authorised by the office of wildlife welfare) outlining the proximity of 'other' native forest, including a flora species list, and connectivity of vegetation to prevent koalas from crossing roads or needing to travel long distances to find another habitat. Plans must also highlight any other possible risks to koalas including machinery, dogs, cattle, major and minor roads, and what mitigation strategies will be put in place to minimise these threats.
- Mandatory surveying for wildlife prior to harvesting must be performed by local and certified environmental consultants and reports must be made public for community scrutiny.
- A requirement of growing timber for commercial purposes on private land must be that Koalas are relocated to safe and suitable habitat, or an adequate percentage of trees are left permanently for koalas.
- Severe penalties for noncompliance must be enforced.
- Landowners and companies need to plant a minimum proportion of their farmland (e.g. 15-20%) as native koala food trees when establishing plantations. These trees cannot be harvested with the plantation timber and can provide some habitat for remaining koalas.
- Establish govt grants to support this requirement.
- Conduct an investigation into the Office of Conservation Regulators mandate to not translocate koalas from plantations.

## 7. Address and reduce the high mortality of koalas due to road trauma.

In addition to addressing the factors that destroy koala habitat, forcing them to navigate unsafe terrain such as roads in their search for new habitat, we must also investigate strategies for making roads themselves safer for wildlife. We need to invest in new solutions to reduce road trauma of koalas. There are a range of mitigation strategies that can be explored if funding is allocated to trial different strategies, targeting the unique geography of different areas, and utilising the expertise and knowledge of local wildlife and environmental groups during the consultation, planning and evaluation stages.

Priority should be given to research projects on koala movement in fragmented habitats, with urgent action to restore connectivity across roads and in areas with identified wildlife collision hotspots

Identifying major trauma hotspots and installing Koala-safe fencing along roadways, or building vegetated wildlife bridges can help to prevent koala road deaths. Installations of



crossings, signage, motion activated lights & speed limits also be taken into consideration. Strategic planting of koala food trees along existing wildlife corridors can improve connectivity, negating the need for koalas to 'come to ground' to find and access the trees they need. Additionally, planting roadside vegetation as far back as possible from roads will prevent wildlife from entering high-traffic areas and also improve driver visibility, allowing them extra time to identify and avoid wildlife.

Finally, mandating wildlife detection technology on major roads and freeways in high-risk accident areas will protect the safety of koalas and humans.

# 8. Introduce low interest government conservation loans to reduce net loss of vegetation removal

Despite koalas needing specific Eucalyptus species to survive and thrive, there is no added protection for koala food trees in any state. This needs to change if koalas are to survive in the wild.

The (Victorian Auditor-General Office, 2022) reports that Victoria loses some 10,380 Ha of native vegetation from private land every year. In Victoria, the Vegetation Offset Program requires developers and landowners who clear native vegetation to offset the loss by protecting or restoring an equivalent area of native vegetation elsewhere. This model is contributing to local extinctions of koalas because their preferred food trees are being destroyed from the location where they are needed. Although there are options for landowners to offset on the same property, this is uncommon. Koalas cannot benefit from trees planted at an established conservation reserve far from where they reside. Koalas' complex digestive systems are also conditioned to tolerate eucalyptus trees from their own locality and translocating koalas elsewhere is not supported by the Conservation Regulator. This offset model is a broken model that will continually allow koala habitats to be chipped away and corridors to be broken.

Offering financial incentives for landowners to encourage preserving or actively converting land to more wildlife friendly habitat will ease the burden and responsibility on government as well as improving ecosystem connectivity across the state. The following ideas can assist those who would like to increase their conservation efforts but may face barriers in achieving this.

- Invest in Government funded low interest conservation loans to allow the purchase of land for the purpose of conservation.
- Land purchased with conservation loans is to be guarded in perpetuity via land conservancy Covenants
- Annual grants should also be offered to conservation groups for revegetation on public and private land.
- Create financial incentives for landowners to grow natives that are indigenous to their
  area to reconnect corridors and provide habitat for koalas. These trees should require
  a covenant to protect from clearing by future landowners.



- Introduce tax breaks for landholders who actively engage in koala conservation or reforestation efforts.
- Introduce annual landholder koala guardianship payments to compensate for retaining koala habitat, specific high value food trees and corridors.
- Financial incentives & increased wildlife education for veterinary practitioners, supported by government & industry.

## 9. Forest Fire Management

Current fire management practices often increase forest flammability and neglect biodiversity and animal welfare. This must change. Fire strategies must be guided by ecological science, prioritizing natural fire resistance, wildlife protection, and community safety.

We urge government agencies to:

#### **Adopt Science-Based Fire Stewardship**

Consult leading experts such as Dr. Phil Zylstra and Prof. David Lindenmayer, to ensure fire policies reflect current research.

Acknowledge that government fire regimes often increase flammability in the long-term and can irrevocably alter soil structure and water quality, disrupting ecosystems that had been functioning for millennia, and putting whole communities at risk. The entire way fire risk is addressed needs thoughtful reconsideration, with a focus on long term protection of entire ecosystems, rather than knee-jerk reactions to current events. Fire management policies should be developed by independent authorities, in collaboration with traditional owners, to ensure decisions are based on science and best practice, rather than appeasing vested interests.

#### **Mandate Comprehensive Wildlife Surveys**

Require pre- and post-burn surveys using field research, citizen science, and local knowledge. Ensure survey data is freely accessible to the public, in order to rebuild public trust, which has been destroyed by recent forest fire policies.

#### Prohibit burns in critical habitat.

Implement Wildlife Protection and Post-Burn Response, involving local shelters and their volunteers, to restore community faith in wildlife rescue and protection by state authorities, which has been severely damaged by the actions of state-based fire management in recent years.



Notify regional wildlife rescue groups and local shelters before any planned burns to enable them to prepare accordingly. Collaborate fully with local shelters to ensure best animal welfare outcomes.

## Establish independent post-burn searches and monitoring by the Independent Office of Animal Welfare.

Provide funding for shelters and rescue volunteers involved in assisting, transporting, treating and rehabilitating wildlife injured or orphaned in planned burns. Incorporate fireground safety training into wildlife rescue training packages, in collaboration with regional fire brigades, to ensure greater safety for all and foster positive relationships between fire personnel and wildlife volunteers.

#### **Strengthen Indigenous Knowledge Integration**

Support genuine partnerships between Indigenous and non-Indigenous groups for cultural land management.

Reject the misrepresentation of cultural burning as a justification for broad-scale hazard reduction burns that harm biodiversity, and lead to tension and misunderstanding between First Nations and non-Indigenous community members in rural areas impacted by planned burns.

Foster greater community understanding of Caring for Country by sharing knowledge and allowing First Nations elders to lead the decision-making process around all Cultural Burning.

#### **Ensure Accountability & Transparency**

Require the relevant state or territory department to fund and support wildlife rescue efforts.

Implement cost-benefit analyses for all burns, including impacts on biodiversity and habitat and long-term impacts on soil and water ecology, as well as costs involved in fire mitigation when a "controlled burn" becomes an out-of-control bushfire, which has occurred on multiple occasions.

Ensure policies prioritize both wildlife and human communities in the face of increasing fire risks.

A shift toward ecologically sound fire management—one that respects biodiversity, supports wildlife welfare, and strengthens natural fire resilience—is essential for a safer, more sustainable future for all Australians.

#### **Victorian forests**



The following section focuses mainly on the Victorian context, as it is within this state that the greatest loss of biodiversity, loss of essential habitat, and loss of life of koalas and other unique Australian native animals, has occurred as a direct result of "Forest Fire Management" policies. Biodiversity conservation has typically been a secondary goal in fire management, with animal welfare generally overlooked. This needs to change. Proper fire management can help maintain forests and landscapes that sustain biodiversity, so they are not overwhelmed by fire when it does come. This knowledge and practice can be easily integrated into contemporary fire management by government agencies for the betterment of all Australians and the Country on which we all depend.

- It is essential to recognise that existing fire management practices may inadvertently contribute to the creation of more flammable forests. Current management practices may bow to community or political pressure, resulting in distorted priorities guiding decision making. We recommend prioritising animal welfare and conservation of biodiversity as the guiding principles for fire management practice decision making.
- We recommend consulting with prominent scientists well-versed in the latest research to gain a comprehensive understanding of the negative impacts of current fire management practices. Phil Zylstra and David Lindenmayer are esteemed experts who can provide valuable insights into the science behind fire management and its implications for forest ecosystems. By engaging with these experts and advocating for fire management strategies that prioritize the protection of koala habitats while minimizing risks to human and wildlife communities, we can work towards fostering a more sustainable and resilient environment for all species.
- Koalas and other arboreal animals, including critically endangered species such as Leadbeater's Possums, and endangered marsupials such as southern greater gliders and yellow-bellied gliders, face challenges in escaping fires due to their limited mobility, underscoring the need to reassess our current practices. Extensive surveys of all species in a forest and a plan for ensuring their safety, must be mandatory prior to setting any fires. Surveys must incorporate data from recent field surveys as well as citizen science groups and local knowledge and data. Surveys not only must be done immediately before, and immediately post "fire management practices" including clearing, bulldozing and fire-setting; they must be publicly witnessed. The public cannot be expected to simply take it on trust that these surveys have been completed, when independent wildlife groups are prevented from accessing "fire management" zones and there is no evidence to be found that surveys have been carried out at all. A statement by the department involved in "fire management" that a survey has been completed is not sufficient to win back public trust.
- Wildlife Victoria and Wildlife shelters, and the equivalent organisations in South Australia, New South Wales, ACT and Queensland, must be notified in advance of any planned burns to allow them to sufficiently prepare for a potential influx of animals and to monitor the local area more closely. Post burn onsite monitoring must be conducted by The Independent Office of Animal Welfare to identify and rescue any wildlife injured as a result of the burns.



- Any wildlife shelters admitting injured animals in areas where planned burns are
  occurring, must be financially compensated for time, medicine and materials required
  for care resulting from planned burns. DEECA (as well as the relevant departments in
  other states) must also provide practical and financial rescue support.
- Foster partnerships between Indigenous and non-Indigenous groups to exchange knowledge and enhance understanding of cultural burning practices. By integrating traditional ecological knowledge, communities can adapt to evolving fire patterns and contribute to urgent climate crisis mitigation efforts.
- Ensure that these collaborative initiatives prioritise the protection of wildlife, ecosystems, and communities, fostering resilience and sustainability in the face of escalating environmental challenges.

#### **Conclusion**

Koala populations across Australia are plummeting at an alarming rate. Koalas in Queensland, New South Wales, and the Australian Capital Territory are now officially listed as Endangered. In Victoria and South Australia, local extinctions are increasingly common, yet state governments are investing minimally in monitoring the remaining populations. According to the (Australian Koala Foundation 2021), koalas are now extinct in 47 of Australia's 128 federal electorates, including 18 electorates in Victoria and South Australia, where koalas lack formal conservation status.

In 2020, Victorian Environment Minister Lily D'Ambrosio claimed that koalas in Victoria were "abundant and thriving." and based this comment on population estimates developed by the Arthur Rylah Institute (ARI), a government owned research facility. These estimates were derived using computer modelling and the data used to inform these estimates remains undisclosed. This has raised a lot of questions in the community about the reliability of government population estimates (VKMS,2023) and many believe they have been inflated to prevent a possible conservation listing.

Informal data from wildlife carers and citizen scientists tells a different story. In 2021, the federal government funded the National Koala Monitoring Program (NKMP) in partnership with CSIRO to monitor koala populations in Queensland, New South Wales, and the ACT. In contrast, monitoring in Victoria has been limited to small-scale projects.

The (NKMP, 2024) estimates for Victoria show a 30% annual decline, with a population of just 129,000 to 286,000 koalas—far lower than the government's estimates.

Despite this, koalas in Victoria still lack formal conservation status. Without legal protection, they remain vulnerable to ongoing threats like stealth logging, poor fire management, and habitat loss from tree clearing for development. Many of these koalas depend on bluegum plantations, which are harvested for timber, leaving them exposed. Planning legislation fails to adequately consider koalas' needs, further jeopardizing their survival.



Without protection under the Environment Protection and Biodiversity Conservation (EPBC) Act, koalas in Victoria and South Australia will continue to decline. The situation is dire, with the potential for local extinctions and widespread fragmentation of populations.

The Koala Alliance is deeply concerned that without urgent and meaningful national action, this iconic species faces widespread population fragmentation, local extinctions, and functional extinction.

Habitat destruction remains the most critical issue, as koalas cannot survive without adequate shelter and food. Secondary threats like car strikes, dog attacks, and health problems are exacerbated by habitat loss and stress. The lack of strong legislation, poor enforcement, inconsistent population monitoring, and ineffective fire management all contribute to the koala's rapid decline.

The Koala Alliance has identified nine essential actions for securing the survival of koalas. Without immediate intervention, koalas are on a path toward extinction.

We urge the Federal Government to prioritize and implement these actions as a matter of urgency.



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