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The international organisation dedicated to saving the koala and its habitat.

## Planning Assessment Commission Meeting Watermark Coal Project SSD4975

Comments of behalf of the Australian Koala Foundation  
11 December 2014

This document has been prepared by Ms. Deborah Tabart OAM, CEO of the Australian Koala Foundation in conjunction with Dr. Douglas Kerlin, Chief Ecologist (10 years' service), and Mr. Dave Mitchell, Landscape Ecologist, (24 years' service), scientists for the AKF.

The professional fees of all three have been donated by the members of the AKF worldwide so that an independent voice can be heard about the Gunnedah Koalas. These comments have been paraphrased into layman's language, but there is scientific evidence to support my comments.

### 1. What is the status of the koala population likely to be affected by this proposal in terms of health, numbers and current habitat ("this population")?

The Watermark Koala Plan of Management (KPoM) suggests there are between 8,613 and 16,893 Koala in the Gunnedah LGA. But this is only a 'pers. Comm.,' which means no one really knows.

The New South Wales Government and the Federal Government have said there are only between 10,000 to 21,000 Koalas in the whole State<sup>i,ii</sup>, so no logical person can agree with the Shenhua figures, given the quality of the habitat which has suffered from drought in recent times.

Whilst it is very difficult to accurately assess koala numbers in Australia (there are no more than 80,000 nationally, across Queensland, New South Wales, Victoria and South Australia), the AKF estimates there are as few as 800-1,300 in the Gunnedah Local Government Area - which encompasses the Shenhua site. If AKF is correct, as was

### No Tree No Me

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vegetation community means that the current assessment has not been sufficiently comprehensive.

- c) Undertaking proper geological samples is a critical step in understanding whether Koalas are present or absent and how they use their habitat – it is widely recognised that soil types determine tree preference. This has not been done here.
- d) The assessment has also failed to consider seasonal changes in Koala habitat use; sites appear to have been sampled once and only once. This is not thorough science.

While Shenhua has identified a range of impacts the proposed mine will have on local Koala populations, any meaningful consideration of the magnitude of these impacts is lacking. The section of the Mine Koala Plan of Management dealing with impacts of the proposal on Koalas reads like a high school project.

Shenhua has also failed to properly consider the impacts of this substantial disturbance on Koalas in the surrounding landscape. Reliable research demonstrates that within 2 kilometres of a major disturbance population extinction almost always follows<sup>v</sup>. This mine will compromise movement throughout the site, and disturb Koalas in the course of their normal activities including dispersal and recruitment to other areas of habitat. It's not as simple as looking at a group of Koalas on the site – accumulated impacts over time and space must always be examined and here, they have not been.

**3. Is there enough information available about this population for a decision maker to form a reliable view as to the near and long term impacts of this proposed mine on this population?**

No. The current assessment is not sufficiently robust to allow a decision maker to form a reliable view regarding the impacts of this proposal. Indeed it is remarkable to think that Shenhua and the Office of Environment and Heritage believe that this assessment is sufficient to get any sort of approval by the Federal Government, given the requirements of the EPBC Act.

It is difficult for a scientific organisation to criticise the work of professional colleagues, but given the severity of the impact due to this site on this discrete and otherwise safe Koala population, we are forced to make comments.



**4. If this population is either currently or, by reason of this proposal, likely to become threatened, what precautionary measures should be applied to adequately address this risk?**

Gunnedah has for some time been the self-proclaimed “*Koala Capital of the World*” - and the “*Food Bowl Capital of NSW.*” Can it also be the “*Coal Capital*” without conflict? AKF thinks not.

So, what would AKF suggest? Do good science before anything happens. The documents we have assessed are not good science.

*Offsets*

I cannot finish my commentary without making the point that the AKF is 100% opposed to environmental offsets. May I ask you to consider this childish notion? That you come home tonight and your house has been destroyed. If you are lucky and you get translocated to another house miles away and it is empty, you might be allowed to stay. If not, you are then told, well, we will build you a new one and it will take ten years. Does anyone really take this seriously?

So to be even more frank, some hypothetical trees, planted in the distant future are not going to cut it – what is the point of replacing habitat 30 years or more in the future if there are no Koalas around to use it? If we do nothing else in this PAC, it will be a victory if we can end this childish notion that we can take animals from one site, move them to another site (in this case a site with significantly lesser quality habitat), and they will live happily ever after.

AKF habitat mapping shows that most of the existing vegetation to be removed is preferred Koala habitat (higher quality). The Mt Watermark Offset area, is supplementary Koala habitat (lesser quality), and will be totally isolated by mining infrastructure to the west and north, and by agricultural land to the east and south. Offset Area 6 is mostly supplementary habitat. The main criterion for offsets, i.e. “like-for-like”, doesn’t even come close to being satisfied. In layman’s terms, the food available on the mine site is a 5 star restaurant, while the offset sites, are cafés for the Koala.

While it may be true that Koalas are known to begin using food trees at 10 years post-planting, it is also obvious that a tree this old can’t provide much in the way of a food resource, and it will take at least 20 years to begin to provide a sustainable food resource. With regard to shelter trees, as Dr Crowther from the University of Western



Those maps would cost in excess of \$50,000 to produce, and could have underpinned a better KPOM for both the Shire and Shenhua. AKF was prepared to donate them for free, in the interests of better outcomes for Gunnedah's Koala population.

Mr. Silver pushed them back across the table and said "no thank you". The PAC may want to question Mr. Silver and Mr. Marshall about that refusal.

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<sup>i</sup> Threatened Species Scientific Committee (2012) *Phascolarctos cinereus* (Koala) Listing Advice. Department of Sustainability, Environment, Water, Population and Communities

<sup>ii</sup> Senate Inquiry into the Status, Health and Sustainability of Australia's Koala Population (2011).

<sup>iii</sup> Threatened Species Scientific Committee (2012) *Phascolarctos cinereus* (Koala) Listing Advice. Department of Sustainability, Environment, Water, Population and Communities

<sup>iv</sup> Koalas and climate change: a case study on the Liverpool Plains, north-west NSW (D. Lunney et al, in *Wildlife and climate change: towards robust conservation strategies for Australian fauna*, Edited by D. Lunney and P. Hutchings, Royal Zoological Society of NSW, Mosman NSW, Australia

<sup>v</sup> McAlpine, C., Rhodes, J. et al. (2006) The importance of forest area and configuration relative to local habitat factors for conserving forest mammals: A case study of koalas in Queensland, Australia. *Biological Conservation* 132: 153-165.

<sup>vi</sup> Crowther, M., Lunney, D., et al. (2013) Climate-mediated habitat selection in an arboreal herbivore. *Ecography* 36:1-8.