

30 January 2020

Department of Environment and Science  
Queensland Government  
Email: [SEQKoalaStrategy@des.qld.gov.au](mailto:SEQKoalaStrategy@des.qld.gov.au)

Dear Sir or Madam

### **Submission on Draft Koala Conservation Strategy**

Gecko Environment Council Association Inc thanks the Department of Environment and Science for the opportunity to comment on the Draft Koala Conservation Strategy. The decline in koala populations in SEQ is a matter of deep concern to our members and we are keen to see this Strategy succeed where other measures have not.

Gecko Environment Council Assoc. Inc. is a not-for-profit environment association founded in 1989 and has been active for the past 30 years in protecting the environmental values and ecological sustainability of the Gold Coast, Queensland and, when appropriate, nationally. Gecko's Mission is "*To actively promote, conserve and restore the natural environment and improve the sustainability of the built environment of the Gold Coast region in partnership with our member groups and the wider community.*"

#### General comments:

The Impact of bushfires throughout eastern Australia and South Australia has brought home to all Australians the fragility of our wildlife populations and the impact of human actions in destroying their homes and means of survival. These fires in addition to loss of habitat due to ongoing development have raised community awareness to a high level and this can be seen as an opportunity to make a meaningful difference if the Koala Conservation Strategy is carefully framed, fully implemented and fully funded. We will not get another chance to reverse the decline in koala populations in SEQ and it behoves government, business and community to ensure koalas don't become extinct in the next 10 years.

In the context of overall biodiversity decline across Australia over recent decades and currently, including the impacts of severe drought, altered weather patterns and the raging fires that imperil multiple ecosystems and the wildlife they support in Queensland and other states, the status of koalas has been brought into sharp focus. The intense efforts that have gone into strategies to save the SEQ koala populations will have to be replicated in other jurisdictions which may look to Queensland for an exemplar. The final contents of this Strategy and its implementation will play a key role in ongoing efforts to protect Australia's biodiversity.

For too long the economic imperative of development has dominated all aspects of life in Queensland and while development is inevitable and necessary to provide work for the growing population, there is little effort to ensure this development is genuinely sustainable and that there is an ethical commitment to protecting wildlife.

This slide in acceptance of the primacy of economic development at any cost is tied to the loss of the primary purpose of the Nature Conservation Act, namely the conservation of nature. We must all recognise that our own survival and health depends on a healthy environment not just for our species, but all species. In addition to the loss of the concept of genuine sustainability, the precautionary principle is now universally ignored though there has never been a repeal of the 1992 Intergovernmental Agreement on the Environment. The principle states “3.5.1 precautionary principle - Where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.” Similarly the principle of intergenerational equity is of prime importance here if future generations are to enjoy seeing koalas in the wild, “3.5.2 intergenerational equity -the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.” (<https://www.environment.gov.au/about-us/esd/publications/intergovernmental-agreement>)

This Strategy cannot succeed unless the development industry in its various forms embraces and supports it. The “goals” are really quite modest and should be acceptable to the development industry, though we note that the Property Council and the Urban Development Industry’s statement about their joint submission on the Strategy appears to relate to possible errors in mapping and its impact on approved, but not constructed developments. They also express concern for a reduction of land available for development. Errors in mapping can be fixed, but an attitude which, in a conflict situation between koala habitat and development that development must prevail, demonstrates the need to educate members of the PCA and UDIA of the importance of this Strategy. The claim that the implementation of the Strategy will immediately drive up housing prices does not appear to be based on any evidence and the solution of having a single national park for koalas for the public to visit is a sad reflection of a view that human rights to dominate and control nature prevail over all other species. Gecko however does agree with their concerns about a lack of certainty regarding the possible changes to planning regulations, which have not been released.

We offer our comments below in table form for ease of reference to the draft strategy.

Issue:	Comments	Recommendations
<p><b>Objective 1: A strategic and coordinated approach to koala conservation</b></p>	<p>In general this is supported as the exchange of information between stakeholders has been lacking and piecemeal up to the present. The establishment of a webpage is a step in the right direction, though it is important to determine how information will be uploaded on to the webpage in a timely manner. It is also important to ensure the webpage does not simply become the preserve of government as community members involved in koala conservation are usually the front line and best able to advise on whether policies and practices are working effectively. Some type of repository for documents that could be shared would also be useful e.g. Google docs or drop box.</p> <p>A website is a quite slow method of communication and alternatives such as Instagram or Facebook should also be considered. A hotline would also be useful.</p> <p>The Koala Collab conferences every five years is a long time interval. Circumstances relating to koala survival can change a great deal in 5 years and there are issues of different time cycles for State government elections as well as membership of the KAP.</p> <p>Cross-border (intra and interstate) strategic coordination anticipatory and pre-emptive measures should be identified; c.f., example of Somerset Council's desire to be included and potential for regenerative habitat to be utilised for corridors. NSW Government and NSW Councils should be invited to participate, so facilitating positive, cooperative outcomes for KAP and connectivity extension/establishment.</p> <p>First Nations specialized knowledge of koalas down the ages should be acknowledged and incorporated into the actions from the Strategy including involvement in implementing the Strategy as well as being incorporated into the training as rangers or suitable roles is essential and welcomed.</p>	<ol style="list-style-type: none"> <li>1. That other methods of communication be considered such as Instagram, Facebook and Google docs or similar for sharing of documents.</li> <li>2. That there are clear guidelines relating to content and who can have information uploaded on to the webpage etc and the mechanisms to ensure this occurs in a timely manner.</li> <li>3. The Koala Collab conferences should be every 2 or 3 years, not 5 years.</li> <li>4. Gecko fully supports the training, which incorporates First Nation's specialised knowledge and employment of First Nation people in the care and conservation of koalas.</li> </ol>
<p><b>Objective 2: Koala habitat is protected</b></p>	<p>It is evident that the <u>serious loss of habitat</u> from development, an estimated 74% of core koala habitat in SEQ cleared since 1960, is now compounded to a serious degree by loss of habitat to fire. It is reported that in Queensland 2.5m ha of bushland has been lost thus far in the 2019-2020 fires, a significant proportion of which would have been koala habitat and research predictions are leading to the expectation of such conditions becoming regular and even more drastic in subsequent seasons. The evidence of the impact of a drying and heating climate and fire risk is clearly before us in all states of Australia and it will take extraordinary measures to ensure that viable populations of koalas (and other wildlife)</p>	<ul style="list-style-type: none"> <li>• Moratorium on clearing until the Strategy is adopted by Cabinet, planning changes are completed and offset review is completed.</li> </ul>

	<p>survive). While it is necessary to have a starting point, using 2017 figures for habitat means that there is no recognition of the losses of habitat in the past 2 years over which time development has continued apace and the fires have occurred. The starting point needs to be the date at which the Strategy commences.</p> <p>While consultation on the Koala mapping took place over a relatively short time frame and closed in December, we comment that the many discussions since then with koala protection groups and other wildlife and land care groups has heightened awareness of the importance of regrowth vegetation outside of what the mapping identified as Koala Priority Habitat. Many sightings have been recorded in the habitat immediately adjacent to these areas, yet there is no protection of this habitat. Gecko requests that the Strategy is flexible enough to include such areas for protection as information is received on actual koala utilisation of the landscape. This data may come from a number of sources including citizen scientists, landcare groups and land managers and should be reflected in a timely manner to ensure koala protection is in place where it is needed.</p> <p>The <u>dominant paradigm of economic development</u> having first priority has to be set aside if we are to save our remaining populations of koalas. For decades we have talked about an ecological balance with the triple bottom line, but the evidence is before us that there is no balance and that economic development always comes first when there is a choice. <b>An urgent temporary solution to this situation is for a moratorium to be made on all clearing of koala habitat vegetation until the koala strategy and planning regulations are ready for enactment, which is only a matter of a few months now.</b> We have been advised that a moratorium is not being considered because the mapping is not complete. However we argue that the mapping will be continually modified as sightings of koalas are seen and additional data is added to existing maps. In the meantime important koala habitat is being bulldozed and we cannot afford to lose more.</p> <p>The inadequacy of <u>Vegetation Management</u> Act in protecting koala habitat in SEQ is clearly demonstrated by the ongoing decline of the population and special and immediate action is needed to arrest this decline. The emphasis should be on positive gains rather than the weaker “no further loss of habitat or koala populations”. The very strong, immediate and ongoing public reaction to the appalling impact of the fires on koalas and other wildlife provides an opportunity to enact meaningful changes to policy, practice and legislation and for these measures to be more willingly accepted by the public.</p>	<ul style="list-style-type: none"> <li>• Adopt a target of net gain of habitat rather than no net loss.</li> <li>• That DES mapping of koala habitat includes protection for high value regrowth.</li> <li>• Encourage a cultural shift to accept genuine sustainability.</li> <li>• Strengthen the provisions of the Planning Act in order to empower planners to make and uphold decisions that meaningfully protect koalas, koala habitat and wildlife corridors</li> <li>• Improve clarity in planning regulations regarding exemptions.</li> <li>• No strategic assessment – retain dual assessment and rights of objection</li> </ul>
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The Planning Act 2016 is profoundly inadequate in protecting koala habitat in areas of high population growth such as Coomera, Helensvale and Tallebudgera, where even self-referral to the EPBC Act has been insufficient to halt or reduce clearing and no attention at all has been paid to the necessity of connectivity. The koala has just been viewed by developers as a nuisance which delays their project and evidence of koalas is even downplayed. The concept of performance based planning gives the developer undue advantage and *council planners are powerless to require outcomes that better protect koalas in a particular area if these do not conform to the Act as it currently stands.*

Every council's planning scheme must include strong specific directions on protection of koala habitat and corridors e.g. Gold Coast City Plan states "3.7.4.1

*1. The Gold Coasts biodiversity areas and other matters of environmental significance are conserved, protected, enhanced and managed to maintain a diversity of terrestrial, aquatic and marine species, ecosystems and ecological processes. Poorly protected regional ecosystems and habitat for threatened species such as koalas, are enhanced.*

*Biodiversity areas are fundamental elements of the city's green space network. These areas are conserved to maintain the diversity of terrestrial aquatic and marine species, ecosystems and ecological processes. Mapped biodiversity areas include: hinterland to coast critical corridors that link core habitat systems and isolated areas of biodiversity value by retaining existing vegetation and restoring degraded areas to enhance fauna movement between different ecosystems and landscapes.* However even statements like these in the planning scheme of Gold Coast does little to protect the habitat of koalas in areas with high development pressures and stronger measures are clearly needed and which can be upheld, in need, in the Planning and Environment Court.

Reform of the planning legislation through regulations and a code in terms of what precise level of exemptions for clearing are being considered and consistency of decisions in planning assessment is urgently needed and should have been made available for public comment along with this strategy. The intended reforms should have been developed over the 2 years we have been waiting for the strategy. It is difficult to make informed comment on these without the actual reforms and regulations before us.

The principle of No Net Loss of koala populations throughout SEQ is not accepted as being an effective "target" for the Strategy. This concept has not been found to be effective in any area of conservation in which it is used and should be replaced with a principle of Net Gain. Associate Professor Martine Maron discusses the vagueness of this concept of

no net loss and states “Context is important. Without that frame of reference the term no net loss becomes meaningless.” <https://www.uq.edu.au/news/article/2018/01/lost-translation-what-does-no-net-loss-mean>. Only a net gain can begin to make up for the massive losses of the past 30 years of development, the unfolding climate change impacts and stop the ongoing erosion of koala habitat that will continue under the Strategy.

In assessing new developments it is difficult to see how movement corridors can be preserved or created unless the development is in a greenfield site with no previous development. Development in existing urban areas will likely result in islands of remaining habitat with no likelihood of connecting with other patches of habitat. Decisions in this situation must be to use the less than successful offsets policy or translocation of the koala population on that site to another site.

Development construction: It is unclear exactly what the third aim of the new State code means - development “is constructed and undertaken in such a way that does not increase the risk of injury to, or death of koalas.” Does this refer to the method of vegetation clearing or translocation of onsite populations or improved training and implementation of the role of the spotter catcher?

It is generally recognised by the conservation movement and probably government itself that the offsets legislation has been a failure in protecting any habitat or protected vegetation. It has been progressively weakened since its first implementation in 2006 so that replacement habitat or vegetation of equal quality to that which is cleared no longer applies and indeed to find such in SEQ is a major achievement and it is futile to purchase habitat of equal quality outside of SEQ to protect SEQ koalas. There is also the issue of allowing development in prime coastal habitat in exchange for an offset further west that is of lesser quality and may well be subject, not only to a drying and heating climate, the result of which is lower grade food sources, but also to an increased risk of bushfires. Developers generally have opted to pay the financial offset fees rather than go to the bother of finding suitable habitat and having to maintain it. This was supposed to be an option of last resort and instead has become the first choice. It is Gecko’s understanding that the Government (and perhaps Local Governments?) has consequently acquired a large sum of money by this means, but spent little of it over recent years for the purpose of retaining habitat. The result is, with rising land prices, the banked money is no longer sufficient to buy anything of useful quantity and quality. It also indicates that the amount of the financial offset is too low and should be revised upward to reflect realistic market values.

The Strategy gives no indication of when the Offset policy review will be completed or whether it will be put out for public consultation. The relationship of this review with the current EPBC Act review (which will include offsets) is also unclear at this stage.

Clearing exemptions. It is unclear whether the clearing for bushfire breaks is in addition to the clearing of 500m<sup>2</sup> for a development site. If this is the case it could result in total clearing of some sites. There is also no detail of ensuring that the 500m<sup>2</sup> permitted clearing is done so that connectivity of habitat remains. Further there is no mention of monitoring the clearing after the initial clearing for additional structures or gardening or other purposes. If a developer or initial or subsequent owner does clear more than the original 500m<sup>2</sup>, are there any penalties or requirements for restoration? Other exemptions are mentioned but there is no detail to enable reasonable comment. It appears that extractive industries will be exempt from clearing prohibitions (p19) and in this context Gecko raises the issue of the Oxenford Nucon quarry. This quarry was intended to close in 2017, but was given an extension until February 2022 and the owners applied to Gold Coast City Council for an extension to 2068 with an expanding extraction area over that time period. The site is known koala habitat and there have been many sightings. If the quarry as a Key Resource Area is given an exemption this important habitat will disappear. The site is almost surrounded by suburban housing and connectivity for dispersal is limited.

The lack of detail on whether there will be extensive exemptions for infrastructure and development under the Economic Development Act is also of great concern. The assessment of development outside of the KPA by SARA may or may not be beneficial. However the assessment benchmark “the condition of koala habitat is not impacted by factors such as changes to soil condition, or the introduction of weeds or pests” will be impossible to achieve. People living in these developments will bring in topsoil, plant exotic plants which can and do escape into bushland and introduce pets. Injury and predation of koalas and other wildlife by cats and dogs are well documented.

Strategic Assessment: Gecko does not share the KEP’s confidence that strategic assessment will provide the protection of MNES that is needed and we oppose this latest push to Strategic Assessment or as it was previously known, “the one stop shop”. Having the two levels of assessment, State and Federal has meant there is an avenue of appeal if the initial assessment is inadequate or faulty. While strategic assessment might work under an environmentally conscious State government it could be a disaster under one that has

	<p>protection of the environment as a very low priority. The concept of one stop shop is a boon for developers, but achieves little for protection of biodiversity.</p> <p>There is nothing in the Strategy to indicate that <u>SARA</u> will have increased resources to be able to undertake the additional responsibility of assessment of development in koala habitat. SARA is generally already under pressure to assess as rapidly as possible and find a balance between competing planning objectives. The reliance on SARA also consigns the Department of Environment and Science, the Department with the responsibility for the carriage of this Strategy, to a minor role. If DES was given concurrence powers again in relation to this Strategy, Gecko might have some confidence that SARA can adequately assess development in koala habitat. SARA is also expected, in this scenario, to have the detailed information of habitat in every local government area in SEQ and it is unclear what the relationship between SARA and Councils will be in this assessment process. Can Councils offer relevant local information to SARA or could Councils impose additional conditions on top of a SARA decision?</p> <p><u>The EPBC Act</u> is currently under a review that is unlikely to be completed by the end of this year, due to the submission date being extended to 17<sup>th</sup> April. The EPBC Act has proved to be failing in its role of protection biodiversity in Australia as the number of extinctions and flora and fauna placed on the endangered and threatened lists climbs every year. The concept in that Act of self-referral by developers has been a failure as well, as many developers do not self-refer and there is no real mechanism for the public to bring this to the attention of the Federal department of environment or make the developers comply. It is Gecko's understanding that Councils have the ability to refer development applications to the EPBC unit themselves but this ability is not exercised. Unless there are major changes to the EPBC Act and adequate funding of the assessment and compliance departments, the concept of a 'one stop shop' will not stop the decline in biodiversity abundance.</p>	
<p><b>Objective 3: Strategic and Landscape scale of koala habitat restoration.</b></p>	<p>In summary, the habitat restoration will occur with private land agreements; improved offsets; on council reserves; as a result of carbon farming and the Land Restoration Fund; and through partnerships with conservation groups. It appears that the body overseeing these processes is the Trust for Nature.</p> <p>The following aspects are worthy of comment:-</p> <p><u>Restoration on private land:</u> Since most koala habitat is on private land this is a logical arrangement, however there is no detail in the Strategy as to how this will be organised except for a vague reference to undisclosed incentives. There is also no information on</p>	<ul style="list-style-type: none"> <li>• The community needs to be provided with more details on the private land agreements particularly whether they are binding on the title deed.</li> <li>• The financial offset threshold needs to be</li> </ul>

	<p>whether these agreements are binding in perpetuity or whether they are extinguished with the sale of the property to new owners. Will there be a covenant on the title deed?</p> <p><u>Offsets:</u> Gecko’s comments on the failure of the offsets legislation have been made in the previous section. We are pleased to note that offsets will be considered as a last resort, which is a change from current practice. It is unclear from the KEP report section 9.3.2. Table 3, what the difference is between the Government response of “support” and “support in principle.” The latter appears to be the lesser, but in reality all of the recommendations in this section need to be acted upon. Since the preference of the KEP is for financial offsets, there must be some mechanism put in place to ensure the money is spent for this purpose and does not sit in a Government bank account.</p> <p><u>Council reserves:</u> Gecko supports the development of effective partnerships with councils to use reserves as restoration sites, particularly those that improve connectivity, provided the other threats of vehicle strike and dogs can be adequately controlled.</p> <p><u>Trust for Nature:</u> This body appears to have had considerable experience in working with private land holders and councils for positive environmental outcomes, though no detail is provided in the Strategy about the Trust. There is also no detail of what monitoring of work and outcome there will be or who will monitor the Trust’s outcomes over the 5 years of the agreement. Nor is there any information about the Government’s ability to change or exit the agreement, without penalty, should the Trust fail to achieve whatever the goals are that Government has set for it. The role of the Trust will require resources, but again there is no detail on the funding made available to the Trust other than an initial \$2 million, what percentage or amount will be spent on administration of the restoration programs and the actual on ground work. The target of restoration of 1000ha in five years seems very low when around 5000ha of woody vegetation is cleared annually.</p> <p><u>Land Restoration Fund:</u> It is unclear what amount of percentage of the \$150 m in this fund can be used for koala habitat restoration in SEQ. It is also unclear what other funding is available specifically for koala habitat restoration.</p>	<p>raised to account for rising land prices and should have a mechanism of automatic adjustment.</p> <ul style="list-style-type: none"> <li>• A lot more information needs to be provided to the community about the role and responsibilities of the Trust for Nature and their accountability.</li> </ul>
<p><b>Objective 4: Coordinated Threat reduction and koala population management</b></p>	<p>In addition to the loss of habitat the Strategy recognises that there are other threats to the viability and wellbeing of the koala population of SEQ. These include vehicle strikes, dog attacks, disease, climate change, heat stress and bushfires. While DES has recognised these threats, the response to them in this Strategy is somewhat lacking, though we commend the \$600,000 in grants into various aspects of research about koalas and the improvements to Moggil wildlife hospital. Prevention of the extinction of koalas in SEQ is a massive</p>	<ul style="list-style-type: none"> <li>• That the Fauna Sensitive Road Design manual recommendations are implemented.</li> <li>• That a partnership with local governments in</li> </ul>

	<p>undertaking and must be embraced by all government departments and local government and adequately funded. It is a now or never situation.</p> <p><u>Vehicle strikes:</u> The Strategy suggests that only 10 hot spots for vehicle strikes in the whole of SEQ will be targeted for some kind of remedial action, hopefully resulting in a 25% reduction in morbidity and mortality. This seems to be a very small number of hot spots and Gecko could easily recommend 10 hot spots for the Gold Coast alone. The Department of Main Roads manual for Fauna Sensitive Road Design is to be updated, but unless the recommendations in the manual are actually put in place e.g. under or over passes for fauna, this will not help a great deal. The cost of fauna under or over passes is a very small component of new road construction and should be made mandatory as well as retrofitting fauna sensitive features to major roads that sever koala habitat. The Gold Coast City signage used this summer to alert drivers to koala movements has been evident around the city, but Gecko is unaware whether it has made any difference to driver behaviour or saved any koalas from injury or death. Is there any form of research report that demonstrates its effectiveness before it is rolled out to other local government areas?</p> <p><u>Attacks by dogs</u> on the Gold Coast are generally from domestic dogs often as a result of owners letting the dog/s out for a run at night without any restraint or supervision. A great deal of education is needed for dog owners to raise their awareness of the consequences of their behaviour and to change it so that the dog/s are always under human control when off their fenced home property. An increase in fines for those caught may also act as a deterrent.</p> <p><u>Climate change:</u> it is understood that koalas are highly likely to suffer from increased temperatures arising from global warming, especially if the canopy of trees stressed from drought is reduced so providing less shade to koalas. In addition research is indicating that <i>“increases in CO<sub>2</sub> affect the level of nutrients and 'anti-nutrients' (things that are either toxic or interfere with the digestion of nutrients) in eucalypt leaves”</i> and <i>“What currently may be good koala habitat may well become, over a period of not so many years at the rate that CO<sub>2</sub> concentrations are rising, very marginal habitat...”</i>  <a href="http://www.sciencedaily.com/releases/2008/05/080508131118.htm">www.sciencedaily.com/releases/2008/05/080508131118.htm</a>  It is imperative then that all levels of government and business work towards reducing greenhouse gas emissions. Gecko recognises this is a difficult task in the current political climate, but we urge the State Government to actively pursue its efforts in this regard and also stop supporting coal mines and coal fired power stations with royalty holidays and subsidies.</p>	<p>regard to remedial action of hot spots is developed to extend this program.</p> <ul style="list-style-type: none"> <li>• That urgent research is undertaken into the impacts of global warming and fire frequency and intensity on koala food sources</li> <li>• That Government implement strategies to mitigate climate change in addition to adaptation.</li> <li>• That scientific research is undertaken into the effectiveness of the proposed translocation policies</li> </ul>
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	<p><u>Bush fires</u>: The experience this summer of the catastrophic intense and ongoing bush fire events has meant that efforts to protect koalas in Queensland is more important than ever. However information from these fires in Queensland is not in the Strategy since it was written before the advent of these fires. The Strategy needs to be revised as a result of research following the fires.</p> <p>The changes to <u>the translocation policy</u> and practices appear to be beneficial since it is often impossible to release koalas back into habitat anywhere near their capture when this habitat no longer exists. Only time will tell whether the outcomes are positive and we request that there will be ongoing research in this area.</p>	
<p><b>Objective 5: Strong community engagement and partnerships</b></p>	<p>Gecko strongly supports better and more consistent <u>community engagement</u> and partnerships as an essential component of the Koala Strategy. The community awareness of the plight of koalas has been greatly heightened by the terrible scenes of burned and injured koalas as a result of the bush fires so this is an ideal time to launch community education and engagement. The engagement must include strengthening relationships and partnerships with First Nations people and a sharing of their knowledge and expertise with the general community.</p> <p>The interest in <u>citizen science</u> has also increased exponentially in recent years and can be leveraged to improve koala safety and well-being, however it does need to be funded. It is unreasonable to expect non-government conservation groups to train citizen science volunteers out of their existing rather meagre budgets. In addition to residents being involved in citizen science, the engagement and involvement by tourists is also an avenue worth exploring. This is a strategy already used by universities in field research programs and is well supported, even when the cost of participating is quite high.</p> <p>While it is recognised that Daisy Hill has a good program, is it rather unrealistic to expect people to travel there from all over SEQ. A preferred model would be to have representatives from NGO's and councils in each local government area trained there and take their training back to their area.</p>	<ul style="list-style-type: none"> <li>• That government take advantage of the heightened public awareness of the vulnerability of koalas following the fires and rapidly develop a koala community engagement strategy.</li> <li>• That government investigate the possibility of engaging tourists as paying citizen scientists</li> <li>• That training is offered at Daisy Hill centre to disseminate to other parts of SEQ.</li> </ul>
<p><b>Objective 6: Continuous monitoring and improvement based on best available science</b></p>	<p>The success of the whole strategy will depend on the best scientific continuous monitoring to guide improvements and updates and must be funded adequately.</p> <p>The Queensland Government response to the KEP recommendations for Objective 6 are presently expressed in the future tense, which gives these statement a promissory tone that is disconcerting for stakeholders wishing to see real outcomes at last after decades of</p>	<ul style="list-style-type: none"> <li>• That research into the effectiveness of the Strategy is funded adequately and the results are made public.</li> </ul>

	<p>aspirational statements too often contradicted by action. Statements of timeframes, measures and other actualities which can make these promises manifest are required for public confidence at the very least.</p> <p>We aren't going to get a second chance at saving our koala population so we need to know if these actions in the Strategy are working.</p>	
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We thank the Department for its consideration of this submission and look forward to a final document and accompanying regulations that will address seriously declining koala populations, bring them back from the brink of localised extinctions. We are also very keen to see the planning regulation changes in the very near future and trust that the welfare of koalas will be dominant consideration rather than the profit concerns of the development industry.

Yours sincerely



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