

South East Timber Association Submission on the NSW Koala State Environment Planning Policy 2019 Draft Guideline

1. Introduction

South East Timber Association (SETA) members advocate for policies that allow for active and adaptive management of native forests on both private and public land. SETA expects government policies and practices will maintain environmental values in the long term.

It is of great concern that the Koala State Environment Planning Policy 2019 (Koala SEPP 2019), the draft Guideline and the Ministerial Direction, will fail to maintain environmental values, including koala populations in the medium to long term.

See **Attachment 1** for a summary of the key policy development failures that have enabled the Ministerial Approval of the environmentally, socially and economically destructive Koala SEPP 2019 and failure of the Department of Planning to consult on the terms of the draft Guideline, until the Koala SEPP 2019 had commenced.

For the reasons set out in comments section of Attachment 1, South East Timber Association members request that Recommendations 1, 2 and 3 be adopted. All other recommendations are made in an attempt to minimise the damage the Koala SEPP 2019 will do to the broader native forest environment and affected stakeholders.

2. Recommendations

Recommendation 1

It is recommended that SEPP 44 be reinstated, while an independent review of the Koala SEPP 2019, associated documents and approval processes is undertaken and the identified policy failings addressed.

Recommendation 2

It is recommended that the Department of Industry (DI) document the full impact of the Koala SEPP 2019 and draft Guideline on previous allowable land uses. DI then undertake a comprehensive cost benefit analysis and socio-economic assessment of the policy, so all ministers, relevant agencies and affected landowners are aware of the potential cost of the negative impacts associated with the Planning Minister's decision to make this policy. These documents should then be used to inform a new, more environmentally and cost sustainable koala management framework.

Recommendation 3

It is recommended that briefing notes and advice to Ministers be reviewed, as part of Recommendation 1 and action taken to ensure key impacts of policies are not shrouded in semantics in future.

Recommendation 4

If the current Koala SEPP 2019 and draft Guideline is not withdrawn, it is recommended that the coverage of the documents be limited to peri-urban housing and industrial



developments and an adaptive conservation framework be developed for the broad rural landscape.

Recommendation 5

It is recommended the following text be deleted from Table 1 of the draft Guideline. *"Core koala habitat should not form part of the Asset Protection Zone (APZ). The APZ should occur beyond any koala habitat"*.

Recommendation 6

It is recommended that all koala core and other habitat be excluded from the environmental zoning regime, to allow private landowners to adopt active and adaptive management programs to ensure the biggest risks to koalas, including megafires and predators can be properly managed.

Recommendation 7

If the Koala DA or Koala Plans of Management mapping have errors or are otherwise incorrectly applied, the DPIE must pay to fix their own mistakes. The unconscionable requirement for landowners to pay to fix government mistakes, must be deleted from the draft Guideline.

Recommendation 8

It is recommended that if the government wants biodiversity information, that has been paid for by private landowners, then the government **MUST** reimburse the landowner for the costs of surveys and report writing.

Recommendation 9

It is recommended that all koala core and other habitat be excluded from the environmental zoning regime, to allow private landowners to adopt active and adaptive management programs to ensure the biggest risks to koalas, including megafires and predators can be properly managed.

3. Shifting the Cost of Koala Management Failure on Public Land to Private Landowners

The draft Guideline is a green tape document that ensures compliance is expensive, with little or no benefit to koala conservation. Most private landowners will have no other choice, other than to allow land covered by the Koala Development Application Mapping, to be subject to management by neglect. Management by neglect dominates large areas of public land and has been one of the factors underpinning the mass deaths of koalas in the 2019-20 megafire season.

The koala has been used as an icon to justify the addition of an initial area of 6,368,645 hectares of **private property** (Koala Development Application Map) to the NSW parks and reserves system. An unquantified portion of the 24,874,389 hectares of the Site Investigation Area for Koala Plans of Management Map will also be added to the reserve



system. By comparison, there is approximately 7.2 million hectares currently in the public land parks and reserves system.

As affected landowners become aware of the potential impact of the Koala SEPP 2019 this month, they are deeply concerned as to why a policy, with heavy socio-economic impacts, was signed on a Friday, two business days before Christmas, in the middle of the largest ever wildfire emergency in NSW.

As a result of the failure of government agencies to sustain koala populations in the parks and reserves system, the public conservation burden is being shifted to private land owners. Consequently, this policy has usurped the freehold rights of land owners across up to 31,243,034 hectares of NSW private property. This has been done without any cost benefit analysis, socio-economic impact assessment or consideration of 'public good' or other compensation payments to private landowners.

Is there any evidence to show that koala populations living under a Koala Management Plan regime have fared any better than populations in non-plan areas?

It is understood that the following two recommendations is outside the terms of the submission. However, due to the deep flaws in the policy, from environmental, social and economic perspectives and unconscionable elements, senior Department of Planning, Industry and Environment (DPIE) and DPIE cluster Ministers, need to give these recommendations very serious consideration.

Recommendation 1

It is recommended that SEPP 44 be reinstated, while an independent review of the Koala SEPP 2019, associated documents and approval processes is undertaken and the identified policy failings addressed.

Recommendation 2

It is recommended that the Department of Industry (DI) document the full impact of the Koala SEPP 2019 and draft Guideline on previous allowable land uses. DI then undertake a comprehensive cost benefit analysis and socio-economic assessment of the policy, so all ministers, relevant agencies and affected landowners are aware of the potential cost of the negative impacts associated with the Planning Minister's decision to make this policy. These documents should then be used to inform a new, more environmentally and cost sustainable koala management framework.

4. Key Changes to SEPP 44 Reduce the Area the Policy Applies to, But Increases the Area Affected by the Koala SEPP 2019

SEPP 44 defines koala habitat as:

"Core koala habitat means an area of land with a resident population of koalas, evidenced by attributes such as breeding females (that is, females with young) and recent sightings of and historical records of a population."

"Potential koala habitat means areas of native vegetation where the trees of the types listed in Schedule 2 constitute at least 15% of the total number of trees in the upper or lower strata of the tree component."



Ten feed species are listed in Schedule 2.

Koala SEPP 2019 defines koala habitat as:

"Core koala habitat means—

(a) an area of land where koalas are present, or

(b) an area of land—

(i) which has been assessed by a suitably qualified and experienced person in accordance with the draft Guideline as being highly suitable koala habitat, and

(ii) where koalas have been recorded as being present in the previous 18 years."

"Koala habitat means koala habitat however described in a plan of management under this Policy or State Environmental Planning Policy No 44—Koala Habitat Protection, and includes core koala habitat."

One hundred and twenty three "feed" tree species are listed in Schedule 2.

The bureaucrats state that the SEPP 44 applies to almost 54 million hectares. They then state that the Koala Development Application Map (Koala DA Map) applies to 6,368,645 hectares, while the Site Investigation Area for Koala Plans of Management Map applies to 24,874,389 hectares.

The use of 'applied' fails to differentiate between application and effect. Due to the changed definitions in the Koala SEPP 2019 outlined above, the actual area affected by the new Koala SEPP 2019 has massively increased. Have the DPIE cluster Ministers, who approved the Koala SEPP 2019 and the responsible Minister, who signed the Koala SEPP 2019 been misled by these semantics to believe the Koala SEPP 2019 would have less impact on private property rights than SEPP 44?

Recommendation 3

It is recommended that briefing notes and advice to Ministers be reviewed, as part of Recommendation 1 and action taken to ensure key impacts of policies are not shrouded in semantics in future.

5. The Koala SEPP 2019 and Draft Guideline Lockout of Farming and Forestry Activities from Private Property 'Koala Habitat,' Despite Evidence Showing Koalas can Co-exist with these Activities.

In 2011, the University of Sydney published a Science Alert with the heading: "Planting trees arrests koala decline," study finds. The Alert noted in part:

"University of Sydney researchers have gained a rare insight into the habits of koalas, discovering simple tree planting may be the solution to expanding their habitat and allowing their populations to grow."

"We were interested in studying the koalas in Gunnedah because we wanted to work out why the population was increasing in this particular place," said Dr Crowther. "We knew a massive tree planting effort had taken place in the 1990s, so we wanted to know if that campaign had led to an increase in koalas and whether we could use this information to guide areas of koala decline."



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"Results showed that koalas were actively using the newly planted trees in Gunnedah, which are likely to be the reason for the growth in koala numbers. They prefer to use a variety of trees throughout the night, including some old growth trees, and are limited to a small range of movement, generally less than two kilometres, mostly within small patches of trees."

Koala surveys in, and adjacent to what is now the Murrah Flora Reserves, since 2009 have shown koala activity in seven percent of the plots in Biamanga National Park, 14 percent in the former Murrah State Forest and twenty two percent in the former Mumbulla State Forest.

An overlay of disturbance history shows over 70 percent of koala activity was associated with regrowth from harvesting and a relatively small, 1980 wildfire. Only a change in weather conditions, during a major run of the Badja Fire, was the Murrah Flora Reserve koala population saved from incineration. Unfortunately, thousands of other koalas across NSW were not so fortunate.

Landowners, who have undertaken farm woodlot plantings, that have created koala habitat, as in the case of the Gunnedah farmers, will be economically punished by the Koala SEPP 2019. What landowner, dependent on generating income from their property, will be prepared to risk having their land management rights taken away, if they create koala habitat?

The Koala SEPP 2019 and draft Guideline have more in common with the Wilderness Society's WildCountry ideology than with ecological principles for active and adaptive management.

The SEPP 44 was written to manage development impacts in peri-urban environments. By changing the definition of koala habitat and increasing the koala 'feed tree' list by 1,230 percent, among other things, the blunt instrument, now Koala SEPP 2019 now sprawls across millions of hectares of rural land.

Recommendation 4

If the current Koala SEPP 2019 and draft Guideline is not withdrawn, it is recommended that the coverage of the documents be limited to peri-urban housing and industrial developments and an adaptive conservation framework be developed for the broad rural landscape.

6. The Koala SEPP 2019, Draft Guideline and Wildfire Risk Management

It is ironic that the DPIE, over 6 months of the spring/summer season, have overseen perhaps the largest slaughter of koalas, since koala hunting was banned in NSW in 1927.

Despite this disaster, for all biodiversity, including koalas, the Koala SEPP 2019 does nothing to address the biggest threat to the medium to long term survival, of koalas. The draft Guideline potentially locks in future wildfire disasters, as Table 1 states:

"Core koala habitat should not form part of the Asset Protection Zone (APZ). The APZ should occur beyond any koala habitat."



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The Rural Fire Service advises, *"An Asset Protection Zone (APZ) is a fuel reduced area surrounding a built asset or structure. This can include any residential building or major building such as farm and machinery sheds, or industrial, commercial or heritage buildings."*

This issue, among many, highlights the failure of the authors of the Koala SEPP 2019 and draft Guideline, to establish a management framework that will sustain koala and all other biodiversity over the medium to long term. They do not understand how their Green-tape approach will actually do more harm to koalas, than allowing low intensity burning within koala habitat, including core habitat.

Page 14 of the draft Guideline sets out what constitutes core koala habitat.

Criteria 1. *"The site is established as core koala habitat if it occurs on the Koala Development Application Map or by undertaking a site area survey undertaken in accordance with the methods outlined in Appendix C of this Guideline."*

This requirement will effectively exclude managed fire from all designated koala habitat, somewhere between 6.35 million and 31.24 million hectares of private land. There may be some inadvertent recognition by the draft Guideline authors, of the inevitable impact of managed fire exclusion from koala habitat, as the draft Guideline then states:

"Develop an emergency response plan that identifies key contacts in RFS, local wildlife carers and vets, and list of appropriate Government resources." This follows a classic emergency response model, rather than a risk mitigation model.

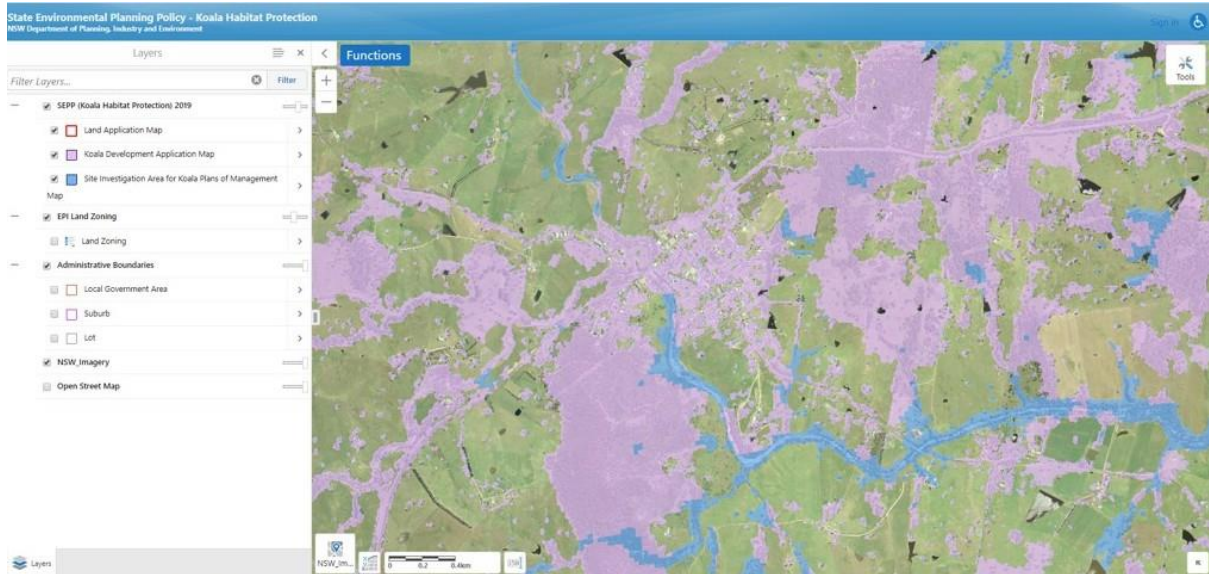
What will the elimination of fuel management mean for fire impacted communities?

The following illustrates the impact the draft Guideline requirement that APZs should occur beyond any koala habitat will have in rural NSW.

Cobargo was decimated by wildfire on New Year's Eve 2019. The map below shows the Koala DA mapped areas in and around Cobargo, coloured pink. This is core koala habitat, according to the DPIE koala and koala mapping experts. The area coloured blue is *"the Site Investigation Area Map for Koala Plans of Management identifies areas that are likely to have koala use trees and excludes areas with a low probability of koala habitat."*

Cobargo is slightly left of centre of the map. If the draft Guideline is enforced, residents, who choose to rebuild after being burnt out and those whose houses and businesses survived, in future, will not be able to undertake any asset protection works within the pink zones. This will ensure the New Year's Eve disaster will be repeated in future decades at an enormous cost to the community and recovering biodiversity.





The Cobargo situation is not unique, with small to larger communities from the Victorian to the Queensland borders potentially caught in future megafire traps, underpinned by the Koala SEPP 2019. It became clear in two belated consultation/information sessions, that the DPIE staff who wrote the documents seem unconcerned about the deadly impacts this policy parcel (Koala SEPP 2019, draft Guideline and proposed Ministerial Direction) will deliver to NSW biodiversity, rural landowners, livestock and communities.

Recommendation 5

It is recommended the following text be deleted from Table 1 of the draft Guideline. "Core koala habitat should not form part of the Asset Protection Zone (APZ). The APZ should occur beyond any koala habitat".

Recommendation 6

It is recommended that DPIE staff are rapidly educated in the practise of undertaking low intensity ecological/fuel reduction burning in and around core and other koala habit, to reduce wildfire risk to koalas, all other biodiversity within the treated areas and to adjacent landowners and communities.

7. Koala DA and Koala Plans of Management Mapping Errors

The Koala DA Mapping has numerous errors. On the basis, that the Koala Plans of Management mapping uses the same software, there is a high probability, that this mapping also has errors. For the purposes of this submission, comments will focus on the Koala DA Mapping, as it is the most economically damaging instrument to private land owners.

The DPIE Koala SEPP 2019 Frequently Asked Questions document, dated December 2019 states:

"The Koala Development Application Map is informed by the NSW Government's Koala Habitat Information Base which was used to identify areas that have highly suitable koala habitat and that



are likely to be occupied by koalas. See Appendix A for further information about how the map was created."

Appendix A states the Koala DA Map **excludes**:

"8. cleared areas using the NSW Native Vegetation extent map (2018 version) – the NSW Native Vegetation extent map provides a high precision (5m) surface that differentiates native tree cover from native grasslands, non-native areas, forestry plantation and water bodies."

Material mapping errors noted in cursory checks to date, include:

- (a) Pinus radiata windbreaks mapped as koala habitat;
 - (b) Willows (salix species) along creek lines mapped as koala habitat;
 - (c) Norfolk Island Pines and palms in a caravan park mapped as koala habit;
 - (d) Radiata pine plantations between 2 and 29 years of age mapped as koala habitat;
- and
- (e) Eucalyptus Nitens plantations, mapped as koala habitat. E. Nitens is not one of the 123 listed koala 'feed trees,'

Why is this an issue?

Part 1.6 of the draft Guideline states:

*"The **Koala Development Application Map** identifies areas that have highly suitable koala habitat and that are likely to be occupied by koalas. Landholdings captured by the map (whether the whole lot or only a portion is covered) need to consider the impact of their development on koalas **or need to undertake a survey if they believe the map has been incorrectly applied to their land (in accordance with Appendix C).** The Koala Development Application Map applies where there is no approved Koala Plan of Management for the land and identifies which areas trigger the development assessment requirements for core koala habitat."*

This clause is unconscionable. The Koala SEPP 2019 has shifted the economic cost of koala protection to private property owners, to make up for the failures of public land managers. Landowners with planted woodlots, plantations and native forest, that has generated revenue from timber harvesting, will in future, lose that revenue and have to find other revenue to cover fixed costs of rates, weed management and fire control.

Now the Minister for Planning is saying to these same landowners, if my department has made mistakes, either wear it or else pay to fix the government's mistake!

To fix the mistake, will among other things, require the engagement of a "suitably qualified and experienced person" at \$100+ or – per hour, to undertake two koala surveys. If there are no koalas detected by the first survey method, the landowner must undertake a second survey, using a different method, to be sure, to be sure there are no koalas.



That is not the end. If you don't find any koalas, the land owner is then required to undertake a full floristic survey to map Plant Community Types to determine if there is any "*highly suitable koala habitat*". This is another example of bureaucrats forcing private land owners to pay to gather data, that is of greatest use to the State, as the assessment report and maps **MUST** be provided to the DPIE Environment, Energy and Science Division (EES) to update the **GOVERNMENT'S** Biodiversity Values Map.

Recommendation 7

If the Koala DA or Koala Plans of Management mapping have errors or are otherwise incorrectly applied, the DPIE must pay to fix their own mistakes. The unconscionable requirement for landowners to pay to fix government mistakes, must be deleted from the draft Guideline.

Recommendation 8

It is recommended that if the government wants biodiversity information, that has been paid for by private landowners, then the government MUST reimburse the landowner for the costs of surveys and report writing.

8. Environmental Zoning and Wilderness Ideology - Fuelling Future Megafire Disasters and Species Decline

It is clear that the authors of the Koala SEPP 2019, draft Guideline and the proposed Ministerial Direction 2.6 – Koala Habitat Protection, are implementing a wilderness agenda, as millions of hectares of private native forest is ringfenced into Environmental Zones. These zones are governed under the "precautionary principle."

In Australia, the precautionary principle defaults to a 'do nothing' position for government land management agencies. Doing nothing means expenditure on 'managing' public land can be minimised, while no one will be held responsible, as disturbance dependent species of flora and fauna drift to extinction or incinerated in megafires. If government departments do nothing, how can species extinctions or megafires be their fault?

The failed NSW public land management by neglect model is now being laid across millions of hectares of private native forest in the blind hope, koalas and many other flora and fauna species will miraculously increase in number.

It is ironic, that in the middle of the biggest mass slaughter of native fauna in the past 232 years, the DPIE Ministerial Cluster approved a 'Conservation' policy that will underpin future megafire disasters.

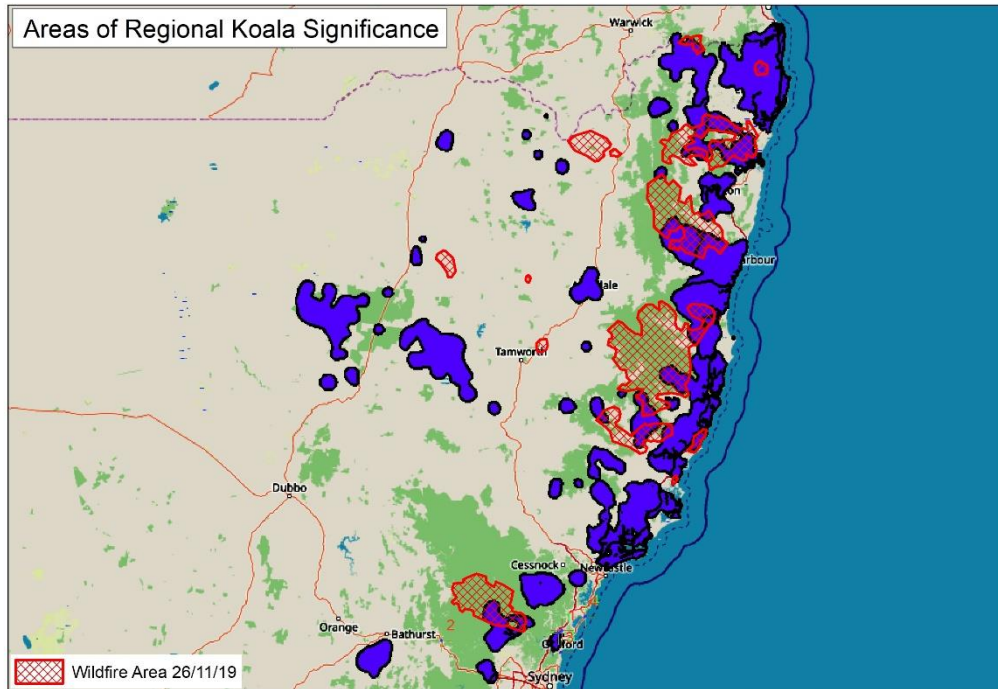
The 2003 wildfires burnt 1.4 million hectares in NSW and the ACT, including 60 percent of Kosciuszko National Park. After studying the impacts of the fires, CSIRO scientist Noeline Franklin said it would take up to 100 years to recover the number of animals lost.



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Most of the 2003 Kosciuszko Park fire foot print burnt again in January 2019, only 17 years later. With about one billion native birds, mammals and reptiles exterminated in NSW in the last megafire season, ecologists are now speculating that recovery will take more than 100 years and the flora and fauna in burnt areas may never fully recover. Despite this reality, government policy bureaucrats have not got the memo and continue to implement the same management by neglect framework to 'protect' biodiversity.



Map

Showing Wildfire Impacts on Koala Habit. State Wide Burn Area was 1.7 million Hectares, Which Increased to Over 5 Million Hectares by Mid February 2020

How many thousands of koalas and billions of other fauna have to be slaughtered before public land managers, environment departments and governments accept the wilderness agenda is a failure and active and adaptive management, including the broadscale use of fuel management burning, in most native vegetated landscapes, must be facilitated, not obstructed?

Under the Koala SEPP 2019, draft Guideline and the proposed Ministerial Direction, millions of hectares of agricultural land will be rezoned into Environmental (E) Zones. The backdoor regulatory lockup uses Part 5A of the Local Land Services Act 2013 (LLS Act). Land currently zoned RU1 and RU2, will be picked up by the Native Vegetation Regulatory Mapping (NVRM) and designated as Category 2 -sensitive regulated land. This land will then fall under the direction of the DPIE EES. Bureaucratic solipsism will ensure the millions of hectares of private native forest is subject to the same lock up and neglect framework, that has decimated our public lands.



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Landowners cashflow will decrease as thinning or harvesting of woodlots, planted with any of the 123 'feed species' and most private native forest will be stopped. Landowners who have responsibly undertaken predator management programmes to the benefit of native species and livestock will have to cut costs, minimising predator control and wildfire risk reduction works will be part of the enforced cost cutting. These are just a few of the perverse environmental outcomes that flow from ideology lead policy.

Recommendation 9

It is recommended that all koala core and other habitat be excluded from the environmental zoning regime, to allow private landowners to adopt active and adaptive management programs to ensure the biggest risks to koalas, including megafires and predators can be properly managed.

9. Conclusion

The Koala SEPP 2019 is a case book example of ideology driven policy, aimed at moving land away from human interference (management) delivers perverse outcomes against three key deliverables being environmental, social and economic outcomes.

The ideology is underpinned by the simplistic assurance that the Koala SEPP 2019 policy package will 'protect' koalas.

For example, in the Department of Planning (why not a Planning Minister release?) media release on 20 December 2019. Deputy Secretary of Planning and Assessments Marcus Ray said: *"This new policy will help deliver on the Government's objective to stabilise and protect koala protections across the State, as outlined in the NSW Koala Strategy,"*

Given the widely publicised koala death toll, at the time, which has proved to be conservative, who, with even the most simplistic grasp of koala protection issues would believe this statement?

Yet multiple government agencies and Ministers have given the Koala SEPP 2019, the go ahead. The full extent of the potential environmental, social and economic damage that this policy package will deliver, has only become apparent in the four weeks since the Koala SEPP 2019 came into force, as a result of DPIE being forced to consult on this Guideline.

For the reasons set out in comments section of Attachment 1, South East Timber Association members request that Recommendations 1, 2 and 3 be adopted. All other recommendations are made in an attempt to minimise the damage the Koala SEPP 2019 will do to the broader native forest environment and affected stakeholders.

Peter Rutherford

Secretary

South East Timber Association



ATTACHMENT 1

Koala State Environmental Planning Policy 2019 (Koala SEPP), Draft Guideline and Draft Ministerial Direction: Process and Actions Benchmarked Against a Framework That Should be Used by Government Policy Professionals.

ACTION	COMMENTS
<p>Confirm the need for the policy, the issues being addressed and the intended policy objectives.</p>	<p>The policy does not apply to public land, despite documented evidence that koala populations in 'protected' areas of public land, such as the Pilliga Forests, have declined by 80 percent or more, during the lifetime of SEPP 44.</p> <p>There is no publicly available evidence to show alternative policy or action agendas have been considered.</p> <p>There is no publicly available evidence to show if koala populations in local government areas (LGAs) subject to a koala management plan have fared any better than LGAs with no plan.</p>
<p>Determine the major benefits, costs and risks involved.</p>	<p>There is no publicly available evidence to show that the social and economic impacts of the new policy have been given any consideration. The Koala SEPP ignores wildfire risk, while the draft Guideline will increase the risk of koalas being killed by wildfires.</p>
<p>Ensure consistency with related policies and whole-of-government policies.</p>	<p>The Koala SEPP 2019 and draft Guideline, appear to be drafted to deliberately override other land use legislation and policies, including activities currently allowed by the Local Land Services Act 2013.</p>
<p>Identify the target audience and key stakeholders.</p>	<p>Socially and economically affected stakeholders were generally ignored during the development of the Koala SEPP 2019 package over the past three years.</p>
<p>Confirm the authority required to formally initiate the policy development process and approve the final document(s).</p>	<p>The DPIE cluster website states: "<i>The department represents a change in how NSW administers its planning, industry and environment portfolios. Together, these portfolios form the engine room of the state economy from agriculture to resources and industry.</i>"</p> <p>If the Koala SEPP 2019 and draft Guideline is representative of the engine room for agriculture,</p>

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	the industry is being transformed from a V8 to a single cylinder 2 stroke.
Determine and communicate the timetable for the policy process including the documents to be produced and other key deliverables.	The final draft of the Koala SEPP 2019 was not released for public consultation. The draft Guideline was released for consultation after the Koala SEPP 2019 commenced. Responding to a question, during a webinar on the draft Guideline, 18 days after the SEPP commenced, a copy of the proposed Ministerial Direction 2.6 was shown on screen.
Confirm who is responsible for leading the policy development process and people to be involved in its development.	A key piece of environmental policy, for an 'icon' species has, in the end, been lead by a bureaucrat with town planning expertise. The environmental input has been lead by a bureaucrat with expertise in environmental economics.
Determine and communicate consultation arrangements to be adopted at various stages in the policy development process – identifying how key stakeholders, particularly those who will be affected by the policy and the community, will be involved.	Most attention appears to have been paid to activist NGOs campaigning for koala "protection." Affected stakeholders, who understand what is practical and what actions are already working have, in the main, been ignored in developing the Koala SEPP 2019 and draft Guideline.
The aims and objectives of consultation are clearly identified and communicated with stakeholders before proceeding with the consultation process so they are aware of why they are being consulted, how the consultation process will work, and how much influence they can realistically hope to have in decision-making.	The "<i>Explanation of Intended Effect</i>" (EIE) dated November 2016 is a key document in the 'consultation' process. Despite a significant increase in the reach and increase in the social and economic impact of the Koala SEPP 2019 compared to SEPP 44, this document was not updated in the 3 years prior to the signing of the Koala SEPP 2019 by Minister Stokes. The EIE flagged a 650 percent increase in koala feed trees compared to SEPP 44. The signed Koala SEPP 2019 included a 1,230 percent increase in the listed species.
The techniques used should clarify the perspectives of those affected by a policy and ensure the stakeholders and public have effective and appropriate input into developing policies.	There is no evidence to show that affected stakeholder input was obtained, other than on an ad hoc basis. No affected stakeholder input appears to have been included in the Koala SEPP 2019, draft Guideline or proposed Ministerial Direction.
Undertake a cost benefit analysis of the proposed and alternative options;	There is no evidence to show alternative options to an update of SEPP 44 were considered and no



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	<p>cost benefit analysis on the Koala SEPP 2019 has been made public.</p>
<p>Undertake a socio-economic assessment of the proposed total policy package; and</p>	<p>This policy, could more than double the size of the formal "conservation" reserve system in NSW, without compensation to affected landowners. Despite the ongoing social and economic impacts of the drought, the impacts of wildfires and now the Corona virus, no socio-economic assessment of this policy have been released.</p>
<p>Identify implementation issues which will need to be addressed.</p>	<p>The Departments of Planning and Environment decision to present each part of the private property lockup mechanism one step at a time, with minimal or no public consultation, has ensured the industry bureaucrats did not address socio-economic factors in the Koala SEPP 2019 and draft Guideline. The relevant rural and industry ministers still seem oblivious to the massive negative impacts of the three-part package. Implementation issues will emerge on a piecemeal basis, as affected and unaware landowners are caught by the increased reach of the Koala SEPP 2019.</p>

