

1. Objective

This plan details ABP’s approach to koalas inhabiting ABP plantations that are at risk of harm from harvesting and silviculture operations.

2. Koala Information

2.1 Description

Koalas are an easily recognisable, well known Australian native marsupial. Male koalas can weigh up to 14 kilograms and females up to 10 kilograms (DEPI 2013). Juvenile koalas remain dependant on their mother until about 12 months of age. According to independent advice to ABP, a juvenile less than 1.8kg (or about the size of an Aussie Rules football) is unlikely to survive in the wild alone. Koala breeding season runs roughly from September to March (Koala 2011). Because of their low energy diet of eucalypt leaves, koalas must rest for much of the day. They are often active for only about four hours out of the 24-hour day, usually after dark (DEPI 2013). Koala scats (fecal pellets) are easily identifiable, being very hard on the outside, of a slightly ridged and oval shape, green-brown in colour and consisting entirely of vegetable matter. Scats are usually found at the base of trees and when fresh, smell strongly of eucalyptus.

Spotting koalas in trees can be very difficult. Figure 2 below illustrates just how difficult it can be to spot a koala sitting high up in a plantation blue gum.



Figure 1. Close up photo of a koala in an ABP plantation

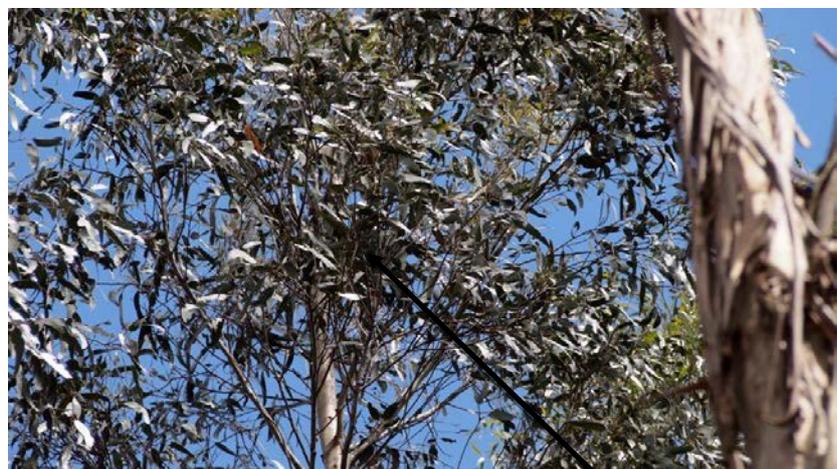


Figure 2. This photo illustrates the difficulty in spotting koalas

2.2 Conservation status and legislative requirements

The koala’s conservation status varies across the country. Nationally, populations of koalas in Queensland, New South Wales and the Australian Capital Territory are listed as *vulnerable* under the *Environment Protection and Biodiversity Conservation Act 1999*. Koalas are listed as *rare* in South Australia and are not listed in Victoria. According to DSE (2004), Victoria has a large and thriving koala population.

Koalas are protected animals under all jurisdictions. South Australia and Victoria have wildlife and animal welfare legislation that is applicable to koalas. This includes:

Victoria:

- *Wildlife Act 1975*
- *Prevention of Cruelty to Animals Act 1986*

South Australia:

- *National Parks and Wildlife Act 1972*
- *Animal Welfare Act 1985*

Essentially, a person is guilty of an offence if he or she:

- Wilfully/recklessly injures protected wildlife or wilfully/recklessly causes protected wildlife to be injured.
- Wilfully/recklessly separates protected wildlife from their young or wilfully/recklessly causes it to be separated.
- Is in charge of a sick or injured animal and unreasonably fails to provide veterinary or other appropriate treatment for the animal.
- Fails to obtain a permit/licence to take or mark an animal for research purposes.

To prevent a breach of legislation, it is essential that relevant staff and contractors follow the requirements of this Koala Plan and relevant supporting Standard Operating Procedure/s.

3 Situation assessment

3.1 Koalas in blue gums

ABP acquired approximately 76 000 hectares of blue gum plantations in the Green Triangle region in 2010. These plantations were established on cleared agricultural land from 1999 onwards. The widespread extent of koala habitation in ABP plantations is something the company did not fully comprehend. In July 2013, DEPI (now DELWP) released a statement acknowledging:

“There are significant numbers of koalas across suitable habitat in the South west. The high population densities have resulted in many koalas moving into the blue gum plantation estate in the region. This is a significant issue for the timber plantation industry that they haven't had to address in such magnitude before”.

ABP plantations will be harvested but the company is committed to doing so in a manner that protects koalas from injury. It is a complex issue with many interested stakeholders and high social sensitivity; however ABP and its contractors are firmly committed to working with all stakeholders to continually improve our internal policies and procedures. As a result of this, ABP has made significant improvements regarding the management of plantations with respect to koalas. It is the company's expectation that this will significantly reduce the number of interactions between our forest operations and koalas.

3.2 Risk to koalas

ABP has assessed the risk to koalas when undertaking harvesting and silviculture activities. ABP has determined that harvesting, roading, and burning operations pose the greatest risk to koalas in blue gum plantations. There is also a potential risk of loss of food source from spraying coppice. The particular risk assessments for ABP activities are included in ABP's Risk Register.

Other factors that can increase the risk to koalas, which require consideration, include:

- Times of increased presence of juveniles; which are harder to spot in the canopies.
- Degree of isolation from adjacent and nearby suitable habitat.
- Weather conditions - increasing exposure to extreme cold and hot temperatures.

4 Harvest Planning

4.1 Planning koala spotting

Whether koala spotters are required or not depends if the plantation to be harvested falls within the defined Koala Zone (refer to Appendix 1). Below is the broad policy for koala identification, whilst the operational considerations are detailed in the SOP for Harvest and Coppice Grinding Operators and SOP for Koala Spotters.

4.1.1 The Koala Zone

In plantations identified to be within the Koala Zone, koala spotters will be implemented in accordance with the following policy:

- Koala spotters will be assigned at a ratio of one spotter per feller buncher or a maximum of up to three single grip harvesters and two spotters for between four to six single grip harvesters.
- No harvesting is to occur unless the area has been surveyed by a spotter.
- If no koalas are spotted for 14 continuous days, spotters can be withdrawn and revert to harvest operator inspections.
- If a koala is sighted, koala spotters are reintroduced.

4.1.2 Outside the Koala Zone

- If koalas are sighted in plantations outside the Koala Zone, a survey shall be undertaken to determine the extent of the koala population. Based on the results of this survey, the ABP Project Officer shall decide if koala spotters are to be deployed on the plantation.

4.2 Planning the sequence of harvesting

In the Koala Zone, the sequence of harvesting is to be planned to progress towards identified refuge areas. If there are no refuge areas present, an area of plantation can be retained as a control option. On freehold land, consideration should be given to phasing harvesting over time to reduce the adverse impacts to koalas.

4.3 Other considerations

4.3.1 Harvesting System

Consideration is given to the use of harvest systems which pose a lesser risk to koalas, where present. Whilst ABP's understanding of this is still developing, current anecdotal evidence suggests that the use of feller bunchers (as opposed to multiple single grip harvesters) may result in a more controlled harvesting environment and lesser risk to koalas.

4.3.2 Use of aids

The Company will continue to investigate the use of technology and other operational control methods to assist in reducing the risk of ABP's harvesting operations to koalas.

4.4 Timber Harvest Plans

The following information is to be recorded on the Timber Harvest Plan:

- The contact details of wildlife carers and the relevant DELWP
- If the plantation is within the Koala Zone
- Identified refuge areas

5 Harvest Operations

The detailed instructions for implementing the koala protection policy for harvesting operations in the Koala Zone is covered in the Koala SOP for Harvest and Coppice Grinding Operators.

The koala spotting instructions are detailed in the SOP for Koala Spotters.

6 Harvest Monitoring

6.1 During harvest

During harvesting activity, the following monitoring protocols apply:

- The ABP Representative or koala spotters will be responsible for ensuring the monitoring of koala welfare in plantation areas.
- If the welfare of a koala is in doubt, the procedure in Section 9 Koala Incident Reporting will be implemented.
- During monitoring, the ABP Harvesting Supervisor may decide to retain a larger number of trees in a strategic position in order to provide a greater refuge for koalas.
- Contractors shall be monitored on a minimum monthly basis by the ABP Harvesting Supervisor to ensure compliance with these requirements. Results are documented on the *Harvest QA* form.
- If during harvesting the koala concentrations rise to a high level, the ABP Harvesting Supervisor and ABP Project Officer review the Harvest Plan and undertake a risk assessment.

6.2 Post-harvest welfare monitoring

Upon completion of harvesting operations, or where harvesting has been suspended due to high koala density, the following post-harvest monitoring protocols apply:

- A post harvest assessment of the plantation shall be undertaken by ABP and a wildlife carer (if available), to ascertain:
 - The number of koalas remaining on the plantation.
 - If any of the remaining koalas appear to be injured, ill or found dead.
 - Requirements for any ongoing monitoring.
- Details of this survey shall be recorded in ABP's *Koala Record Register* by the ABP Representative and forwarded to DELWP and ABP Harvesting staff.
- Injured, ill or dead koalas shall be treated as per the Koala Welfare Incident Reporting in Section 9 below.
- If the area harvested is to be reverted to agriculture or maintained for another rotation, details of the post harvest assessment must be communicated in a *Harvest Completion Report* and forwarded to the ABP Silviculture Manager or new land manager.
- Depending on the outcome of the post-harvest assessment and land tenure, the plantation may need to be visited on a number of occasions to monitor the welfare of the remaining koalas.

7 Roding Operations

When preparing roads in a plantation for harvesting (which can be up to 18 months prior to harvesting), there may be requirements to clear vegetation which can pose a risk to koalas. Under these circumstances, the procedures in the *Plantation Access and Roding Specifications* are to be followed.

8 Burning Operations

Where koalas are located on sites which are proposed for burning operations, a detailed risk assessment will be undertaken by the Silviculture Manager for each property. The following actions shall also be employed:

- Relevant stakeholders shall be engaged when developing the operations plan for input and consideration.
- High level of monitoring during and post burning operations.
- A hand over to the new owner detailing koala numbers and location.

9 Koala Incident Reporting

ABP has defined a koala related incident as:

"... any interaction between a koala and activities conducted by ABP or its contractors related to plantation management, including harvesting, roads, silviculture and site management."

It is important that if an incident does occur, processes are in place to ensure the koala receives appropriate treatment and the correct reporting processes are followed. All incidents must be reported by contractors to ABP immediately. Detailed incident instructions for contractors are detailed in the SOP for Koala Spotters and SOP for Harvest and Coppice Grinding Operators.

In relation to a koala incident, ABP will implement the following process:

- Koalas with apparent or potential injuries are to be conveyed to an approved veterinary clinic.
- Suspected ill koalas are to be conveyed to the appropriate wildlife carer.
- If a juvenile koala is found, assess the juvenile for weight and injuries. Assess immediate area for possible mother. If juvenile is underweight, injured or unsure of condition, convey to vet or wildlife carer, as appropriate. If the juvenile remains up a tree, it shall be monitored daily by the spotters.
- If a dead koala is found, an investigation shall be undertaken to ascertain the causes. The koala is to be buried and the incident details reported to DELWP.
- The ABP Representative or ABP Harvesting Manager will document all incidents (including near miss) on an ABP Koala Report Form. Incidents must be investigated thoroughly to determine the cause. Determining the root cause assists in assigning appropriate preventative actions.

9.1 DELWP reporting requirements

- DELWP requires ABP to report all cases of near misses, separated juveniles, injured and dead koalas located on ABP harvesting sites regardless of the cause. This includes animals determined to have died from natural causes. Details are to be entered in the *DELWP Koala Register*.
- Updates shall be provided by the ABP Representative to the appropriate contact within DELWP, forwarding the *DELWP Koala Register* as required.

10 Training

The ABP Project Officer is responsible for ensuring relevant ABP employees as well as contractors and their employees receive adequate training to ensure compliance with this plan, using the relevant SOP as required.

Principal contractors must ensure that all operators do not commence operations until they have received training in the relevant SOP and are provided adequate supervision to ensure correct implementation.

11 Landscape Management

Managing koala populations and welfare on a landscape level is a multi-stakeholder responsibility. ABP is committed to working with DELWP, industry, and key stakeholders toward achieving improved outcomes for koalas at a landscape level. Various ways ABP may be able to assist include:

- Retaining refuge areas on plantations
- Establishing koala habitat areas in unplanted freehold areas
- Harvesting freehold plantations over time to minimise impacts on koalas
- Working with DELWP on koala related strategies
- Involvement in reviewing relocation options with stakeholders
- Participating and contributing to independent research projects
- Participating in stakeholder meetings

12 Audit and Review

This plan shall be subject to a biennial audit. This may be through the surveillance audit process with ABP's Certification Body and/or ABP's internal auditing process. If using ABP's internal auditing process, an independent stakeholder (representative from DELWP or wildlife carer) should be asked to accompany the ABP auditor to ensure a level of transparency. Results of the internal audit shall be made available to interested stakeholders upon request.

Management reviews will examine incident frequency and trends, research findings, results of compliance monitoring, and operational experience. Updates to this plan will be made accordingly.

13 Related Documents

Internal Documents
ABP Koala Report ABP Risk Register Harvest QA (CL-7400) Harvest Plan (PF-7400) Harvest Completion Report (CL-7409) Koala Standard Operating Procedure for Harvesting Contractors Koala Standard Operating Procedure for Koala Spotters Plantation Access and Roding Specifications ABP Environmental Policy
External Documents
DELWP Koala Register Relevant legislation including: <ul style="list-style-type: none">• <i>Wildlife Act 1975 (Vic)</i>• <i>National Parks and Wildlife Act 1972 (SA)</i>• <i>Animal Welfare Act 1985 (SA)</i>• <i>Prevention of Cruelty to Animals Act 1986 (Vic)</i>

14 References

Department of Environment and Primary Industries (DEPI) 2013, The State of Victoria, viewed 11th December 2013 <<http://www.depi.vic.gov.au/environment-and-wildlife/wildlife/koalas-in-victoria>>

Department of Environment and Primary Industries (DEPI) 2013, The State of Victoria, viewed 11th December 2013 <<http://www.depi.vic.gov.au/about-us/media-centre/media-releases/statement-on-koalas-in-blue-gum-plantations>>

Department of Sustainability and Environment September (DSE) 2004, *Victoria's Koala Management Strategy*, Department of Sustainability and Environment September, Victoria viewed 11th December 2013 <http://www.depi.vic.gov.au/_data/assets/pdf_file/0014/220424/Koala.pdf>

Koala 2011, The Koala, viewed 09th December 2013 <<http://www.thekoala.com/koala/index.htm>>

