Queensland University of Technology
Gardens Point campus
2 George Street GPO Box 2434
Brisbane QLD 4001 Australia
www.qut.edu.au

12 March 2026

Senator the Hon Murray Watt
Minister for the Environment and Water

Australian Government
PO Box 6022
Canberra ACT 2600

By email: epbc@springfieldresidential.com

CC: senator.watt@aph.gov.au; senator.waters@aph.gov.au; admin@savewoogarooforest.com.au; EPBC.Referrals@dcceew.gov.au; Milton.Dick.MP@aph.gov.au; jordan@parliament.qld.gov.au; deputy.premier@ministerial.qld.gov.au

Dear Minister Watt,

RE: *Environmental Protection and Biodiversity Conservation Act 1999 (Cth)* (EPBC) Case Referral 2019/8575 – Springview Village 2 & 3 (Woogaroo Forest)

We represent legal academics with expertise in environmental, social and governance (ESG) and sustainability law at the QUT School of Law. We educate the next generation of legal professionals about the importance of federal laws that protect Matters of National Environmental Significance (MNES).

We ask that you reject the Springview Village 2 & 3 Proposal (Woogaroo Forest) referral 2019/8575 under EPBC due to its unacceptable impact to EPBC-listed species, including the endangered koala.

Our reasoning, outlined below, is shared by eminent scientist, mathematical ecologist and former Queensland Chief Scientist Professor Hugh Possingham, and ecologist herpetologist Dr Christina Zdenek. It also reflects the sustained community opposition to the proposal that has sought to preserve this high conservation value bushland in SEQ over many years.[1]

[1] Grace Koo, 'Ipswich residents plan protest action, huge petition to save koalas in Woogaroo Forest' *The Courier-Mail* (29 May 2024); *ABC News Broadcast*, 'Locals concerned over Queensland housing and commercial development' 8 May 2024; Joe Hinchliffe, 'The fight for Woogaroo Forest: new housing, could silence some of Queensland's virtuoso songbirds' *The Guardian* (25 May 2025); Courtney Kruk, 'Homes v habitat: The fight to save a forest amid a population boom' *Sydney Morning Herald* (30 October, 2024).

1. **Critical importance of the site for the endangered koala (*Phascolarctos cinereus*)**

The proposed action will result in serious, irreversible, and scientifically well-established harm to the South East Queensland (SEQ) koala population. Koalas living within the Woogaroo Forest landscape comprise part of the SEQ koala cohort, which has undergone severe decline due to habitat loss, fragmentation, heat stress, and urbanisation.[2] The remaining habitat in Woogaroo Forest is not a 'nice to have' but is essential to the ongoing viability of the species in this region.

The ecological characteristics of the site, combined with the scale of proposed clearing and the species' known biological vulnerabilities, demonstrate that the action is highly likely to have a significant impact under the *EPBC Act Significant Impact Guidelines 1.1* and the *EPBC Referral Guidelines for the Vulnerable Koala*.

The project area contains ecological features fundamental to koala survival. These include:

- Mature eucalypt forests providing high quality, stable food resources;
- Deep, shaded gullies functioning as microclimatic refuges during extreme heat events;
- Continuous canopy corridors enabling safe movement between shelter trees; and
- Hydrologically intact riparian zones supporting moisture rich microclimates.

Collectively, these features constitute one of the last functioning habitat refuges for koalas in SEQ, and land clearing the Woogaroo Forest habitat for development will directly undermine the survival prospects of this endangered species.

2. **Other EPBC threatened species within the referral area**

The Woogaroo Forest area is also a critical habitat for the Shaggy-Leaved Plectranthus (*Coleus habrophyllus*), Angle-Stemmed Myrtle (*Gossia gonoclada*) (Endangered, EPBC; Critically Endangered, NCA), Greyheaded Flying-fox (Vulnerable, EPBC), Swift Parrot (Critically Endangered, EPBC) and Regent Honeyeater (Critically Endangered, EPBC).[3]

3. **Loss of habitat critical to survival**

The proposal involves clearing 136 ha of mature forest and degrading an additional 26 ha through indirect impacts. Under the *EPBC Koala Referral Guidelines*, this constitutes the removal of habitat critical to survival. Key scientific concerns include the fact that koalas depend on mature eucalypts with predictable leaf chemistry and moisture content. Land clearing disrupts established home ranges, forcing koalas into hazardous areas, and the loss of habitat increases koala mortality from vehicle strikes, dog attacks, dehydration and heat stress. Habitat fragmentation isolates individuals within the population, which reduces genetic flow and their long-term viability.

Given the species' reliance on large, connected habitat blocks, the proposed clearing meets multiple significant impact criteria under the EPBC Act.

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[2] Aaron Tkaczynski and Sharyn Rundle-Thiele, 'Koala conservation in South East Queensland: A grey literature review analysis' (2023) 5(3) *Conservation Science and Practice* 1; South East Queensland (SEQ) Koala Conservation Strategy 2020-2025.

[3] Submissions by Professor Hugh Possingham and Dr Christina Zdenek, EPBC referrals 2020/8651 and 2019/8575.

4. **Disruption of movement and survival networks**

The project area forms part of a 500-hectare functional habitat block, one of the last remaining in the region. Koalas require safe, continuous pathways, both canopy and ground level, to move between feed trees, shelter trees, and climate refuges.

The proponent has not provided any credible landscape-scale modelling of koala movement, climate refuge dependency, or home range disruption, despite these being fundamental to assessing impacts on an Endangered species.

5. **Cumulative impacts on a declining population**

The SEQ koala population is already experiencing severe cumulative pressures, including ongoing loss of mature eucalypt canopy, increased frequency of lethal heatwaves, reduction of climate resilient refuges and intensifying urban encroachment and associated mortality risks.

The EPBC Act requires the Minister to consider cumulative impacts. The proposed clearing directly contributes to the collapse trajectory of a population already listed as Endangered. In this referral case, the surrounding areas (Springfield, Augustine Heights, Bellbird Park, Springfield Lakes, Spring Mountain, and Springfield Central) have all been developed (habitat destroyed) in the past 10–15 years, totalling 396 hectares of native vegetation that had no avoidance or mitigation (100% 'offset').

The referral area is part of the largest remaining intact habitat in this region, and one of the last remaining substantial land parcels in all of SE Qld, making it exceptionally valuable from a biological perspective.

6. **Indirect impacts: heat, disturbance and fragmentation**

Koalas are highly sensitive to elevated temperatures from canopy loss, artificial lighting and noise, domestic dogs, construction disturbance and reduced moisture availability in fragmented landscapes. These factors all reduce habitat quality, increase physiological stress, and can render otherwise suitable habitat unusable.

7. **Offsets cannot replace lost koala habitat**

Offsets proposed by the proponent cannot replicate the ecological function of the habitat being destroyed. Mature feed trees for koalas require decades to reach functional value. Offsets cannot recreate microclimatic refuges essential during heatwaves, nor do they address fragmentation, the primary driver of koala decline.

Under the *EPBC Environmental Offsets Policy*, offsets must maintain or improve species viability. We do not consider that this will occur in this case.

8. **Application of the precautionary principle**

Under s 3A of the EPBC Act, where there is a risk of serious or irreversible harm, lack of full scientific certainty cannot justify approval. Here, the evidence demonstrates that harm is not only likely but unavoidable. The proponent's assessment does not adequately address the species' ecological requirements, climate vulnerability, or dependence on large, connected habitat refuges. It relies on offsets that cannot replicate lost ecological function.

The proposal involves irreversible clearing of habitat critical to survival, fragmentation of one of the last functional habitat blocks in SEQ, increased mortality risk for an endangered species, and cumulative impacts in a region already experiencing severe koala decline.

The Minister cannot be satisfied that significant impacts will be avoided under ss 18, 18A, or 136 of the EPBC Act. **EPBC 2019/8575 must be refused.**

Please contact Dr Monica Taylor m242.taylor@qut.edu.au in relation to this submission.

Yours faithfully,

Dr Monica Taylor
Lecturer
School of Law
Queensland University of Technology

Dr Rowena Maguire
Professor
School of Law
Queensland University of Technology

Dr Bridget Lewis
Professor
School of Law
Queensland University of Technology