

Dear Members of Springfield City Group,

I am responding to the two documents currently out for public comment, being the Preliminary Documentation Reports (the Reports) for the controlled actions under **EPBC case numbers 2020/8629 and 2020/8651**.

As I consider these two areas as part of the greater area known as Woogaroo Forest, I am writing one letter encompassing comments on the Reports for both.

I am a wildlife veterinarian with decades of experience in wildlife, wildlife research and animal welfare. I have worked in multiple state government head offices, as a policy officer and inspector under several different pieces of legislation. I have worked in both NSW and Qld state environment departments in their head offices in threatened species and general wildlife units. I have also worked overseas, in the UK's agriculture department. I have been part of several research teams while working as a team leader in the Queensland department of environment's koala hospital at Moggill. I have euthanased hundreds of koalas, including as emergency volunteer vet for the local koala rescue group. In addition, I have examined post-mortem hundreds of koalas to establish their cause of death and the extent of their condition from injury or disease.

I am a resident of Collingwood Park, formerly of Goodna, and have spent many, many hours walking through council reserves, parks and private properties locally as well as across the Ipswich local government area, looking for evidence of koalas. I have also talked to hundreds of people at various events, while manning an education stall for local koala rescue and koala habitat conservation groups, and at meetings, workshops and other specialised events, such as presenting a paper at the Second National Koala Conference in Port Macquarie, NSW.

As my expertise and knowledge relates to koalas, I shall confine my comments to this species.

1. Koalas are listed as endangered, yet the reports both contain only 'business as usual' processes and clearly state that all koala habitat will be cleared. This is an anomaly I am unable to resolve from the information provided, as the reports are both dated 2025.

a. If we take that the documents relate only to the situation in 2020 when the original applications were lodged, then the following is surely true: since 2020 koalas have become in danger of extinction in Queensland, indicating that business as usual (ie. total clearing of all habitat in areas where it remains, while allowing koalas to move on – or be “flushed in the direction of safe haven areas”) has failed to protect them.

b. A far more effective reporting would have been to retain the entirety of the 2020 document and add addenda dated so that it is clear what has changed.

c. The reports claim to be operating under best practice; however, the standards of this 'best practice' seem to have frozen in 2020 and is therefore insufficient to the standards of managing 2025 koala populations in Qld.

2. I would urge you to consider that koalas (and all other mammals) feel pain and suffer to the same extent that humans would in the same circumstances. This is the opinion many animal pain experts not simply my own. They may not show overt signs of this because they are herbivores and have evolved not to exhibit them to potential predators.

3. Koalas are not owned by the people or organisation that owns the land on which they happen to be found. If any one “owns” them, it is the state (ie. the people).

4. The documents that the general public is asked to comment on are long and complex and have appendix documents adding up to hundreds of pages of text. Interestingly, this is in contrast to various other environmental assessment documents I have read that are far shorter, for applications to clear other areas of Woogaroo Forest, including by Saunders Havill. Perhaps these two preliminary reports (notably also by Saunders Havill) are different in purpose to those, or perhaps they have been made

deliberately longer and more difficult to read and understand. Possibly it is because of the objections from over 19,000 people to any development of Woogaroo Forest. Again, I am unable to resolve this question.

5. However I can comment that the documents are hardly user friendly, overly complex and bury key information about how koalas are going to be displaced; what is going to happen to them; where these “safe havens” are located; how Springfield City Group is going to ensure koalas are not already there (no vacant home ranges); and how displaced koalas are going to get there.

6. There is no discussion of the uniqueness (or perhaps otherwise?) of the koala population within the wider adjoining forest, let alone the effect of clearing of these two blocks on the koalas located there. Nor is there any discussion of the flow on effects of reducing the size of available koala habitat within Woogaroo Forest which seems, based on my personal knowledge of the area and discussions with koala ecologists, to be the main area supporting breeding female koalas. Any reduction in Woogaroo Forest will reduce the capacity for the population to sustain itself. Koalas will die out from all the remaining places they are seen, from Redbank to Bellbird Park, Springfield and Brookwater. Neither of the reports mention the impact on breeding female koalas.

7. Because these are preliminary reports, there are no details that share for instance a koala management plan. There appears to have been no attempts over the past 5 years since 2020 to study the population of koalas in either area covered by the Peninsula or Scenic precincts development applications. For example, I would have expected a koala ecologist to be engaged to capture and radio track resident koalas to establish their usage of the areas and their movements into other adjoining areas.

8. Similarly, the use of infrared camera equipped drones to survey koalas is now considered standard, given that it provides up to 95% accuracy for population estimates, and is far more effective than ground surveys. The claim that up-to-date, best practices are being or going to be used therefore seems spurious.

I am therefore unconvinced that either of the Reports contains any useful information regarding mitigation of the impacts on the koalas that have part or the whole of their home ranges within the areas proposed to be cleared. The Reports themselves in fact state that ALL the koala habitat will be cleared and the koalas will be “allowed” to move on to unidentified “safe haven” habitat.

I also lodge my complaint that neither of the reports and their addenda are conducive to being understood – and therefore meaningfully commented upon – by the general public.

Anyone who believes that Springfield City Group and Saunders Havill have done due diligence to assess and make plans to mitigate the impact of the proposed clearing of Woogaroo Forest on the resident koala population would surely be disappointed.

Yours sincerely,