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Koala Management Plan, Kangaroo Island, for Harvest and Remediation Operations

Updated March 2024

I, the Hon Susan Close MP, Minister for Climate, Environment and Water, being the Minister for the Crown to whom the administration of the *National Parks and Wildlife Act 1972* is for the time being committed, approve this document as a *controlled activity management plan* for the purposes of regulation 44A of the National Parks and Wildlife (Wildlife) Regulations 2019 and the notice published in the South Australian Government Gazette on Thursday, 7 March 2024 (No. 16, page 433) that declared the felling of plantation Tasmanian Blue Gum (*Eucalyptus globulus* subsp *globulus*) on Kangaroo Island, South Australia to be a controlled activity in relation to the protected animal species koala (*Phascolarctos cinereus*).

The Minister intends to monitor the effectiveness of this *controlled activity management plan* over the next 6 months.

Signed .....

Date 25 March 2024

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Overview

This plan defines the strategies and methods which AAG Investment Management Pty. Ltd. (AAGIM), as the manager of Kiland Limited's (Kiland) estate, will protect koalas as harvest of the forestry resource is progressed.

Koalas are not native to Kangaroo Island, having been introduced in 1920. By 2020, pre the fires, it was estimated that there were at least 55,000 koalas on the Island. Post fires, that number was estimated to have declined to 10-15,000.

There is little doubt that the pre-fire population of koalas was sustained through a combination of the extensive areas of eucalyptus plantations owned by Kiland Ltd (and others) and native vegetation. Post-fires, a significant area of this food resource has been destroyed. However, coppicing post-fires and wildling regrowth is rapidly creating a new food source for the koala population.

It is the intention of Kiland, through its appointment of AAGIM, to pivot from being a forestry company to remediating the land and converting same to farmland. In the process of conversion, 100% of standing hardwood and softwood will be harvested. Concurrently, AAGIM intend to destroy all regrowth within the planted area (including bluegum wildlings).

We note that bluegum wildlings have been declared weed on Kangaroo Island by the SA Government in 2023. AAGIM and Kiland are working with the KI Landscape Board to manage and co-fund the eradication of all bluegum wildings.

The potential feed resource for koalas will be limited to those areas left unharvested such as native bush areas, wet areas and not-for-agriculture areas.

There will necessarily be significant pressure placed on the remaining koala population.

Neither private landowners nor the Department for Environment and Water (DEW) have expressed a strong interest in re-homing koalas on or off-island given the considerable challenges and animal welfare considerations.

AAGIM is committed to ensuring that operations in plantations are carried out in such a way as to minimise interference with koalas and to ensure that the Manager meets its obligations under the *National Parks and Wildlife Act 1972* and the *Animal Welfare Act 1985*. Koalas are not listed as threatened in South Australia under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*.

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HARVEST SYSTEM	
Overview	AAGIM exercises avoidance as our primary koala protection policy. Intervention will only be exercised as a last resort if no possible avoidance option is available and only following a safety review, noting no personnel are allowed foot access to fire damaged plantations due to tree-fall risk. The harvest system has been designed to maximise the effectiveness of the avoidance approach. Pre-harvest koala reconnaissance depends on the plantation situation. 1. In radiata pine plantations, operators will undertake daily checks to ensure that there are no koalas in their planned area of operation for the day. If a koala is located, operators will make three hourly checks until no koalas have been located for three days. 2. In unburnt bluegum plantations, where the trees have structural integrity, a pre-harvest check is done using thermal imaging binoculars, standard high-power binoculars and normal vision. Koala trees and another eight trees will be marked with hi-vis flagging tape. 3. In burnt bluegum plantations where the trees no longer have structural integrity, it is not safe to have spotters working within the plantations. Therefore, the spotters work outside the cut face of the plantation and identify koalas with the same tools as 2 above, maintaining contact with the harvester driver by UHF radio at all times. Harvest is progressed by wheeled feller-bunchers or using a processing head harvester mounted on a wheeled or tracked vehicle. The harvested tree-stems are laid in a pile by feller-bunchers in groups of approximately 5-9 stems (bunch). Bunches are hauled to a central landing and consolidated into a pile by skidders. Harvest operators will have daily updates on the location of koalas spotted within that day's harvest area. As harvest operators approach an area known to contain a Koala the operator will either avoid the marked koala trees (standing forest with structural integrity) or, through their communication with the ground based spotter on UHF radio, will avoid the koala trees and leave a nine tree buffer around the identified animal.
TRAINING	
Training Requirements	All staff that will conduct works proximate to koalas will have training to manage their interactions with koalas. Specifically: • Koala spotters (plantation based or outside plantation) • All machinery operators (harvesters, skidder operators) Training includes: understanding how to manage wildlife rescue situations and who to call, instruction on the use of and interpretation of thermal imaging technology (handheld devices, UHF radios) and a clear understanding of the Koala management plan. AAGIM will train all staff before they start and all harvest and spotting staff will have key contacts on hand.
KOALA RELOCATION	
Capture and relocation	It is not the intention that any part of the harvest operation will involve capture or relocation of koalas. If there is an organisation that seeks to capture and relocate koalas, this will be first discussed with and approved by DEW and other relevant stakeholders. Any relocation and capture will be undertaken outside of active harvest or remediation areas – such as in native vegetation reserves – where there is zero threat to humans or koalas from mechanised operations. Capture of koalas for relocation must be undertaken by trained handlers who hold a valid Wildlife Management (Controller) permit from the Department for Environment and Water.

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HARVEST OPERATIONS	
Spotters	In all Eucalyptus plantations spotters are to be used to locate koalas ahead of harvesting. • In unburnt bluegum plantations, where the trees have structural integrity, a pre-harvest check is conducted on foot before harvest commences, using thermal imaging binoculars, standard high-power binoculars and normal vision. Typically, spotting will commence one (1) hour before the harvesters and spotters operate in the forest for the whole day, staying a safe distance away from harvesting equipment. There would typically be 15 minutes to 2 hours between spotting and harvest. Koala trees and another eight trees will be marked with hi-vis flagging tape. Spotters will also work during harvest to update the harvest operator of any changes to koala positions to enable real-time information and refuge tree adjustments. • In burnt bluegum plantations where the trees no longer have structural integrity, it is not safe (extreme OHS risk due to falling limbs) to have spotters working within the plantations for pre-harvest checks. Therefore, the spotters work outside the cut face of the plantation and identify koalas in real-time with the same tools as above, maintaining direct and immediate contact with the harvester driver by UHF radio at all times. Spotters start at the same time as the harvest operators. o Each Identified koala will be geo-located using a "drop-pin", recorded on a GPS device in the harvest operators cab. The GPS device is a standard GPS tracker/plotter which can work on or off-line and record the location of the machine within 3 m. The driver then leaves the identified koala tree and several others and returns to the harvest row. On the way back down the row, the driver leaves additional trees to make up the 9 (total) refuge trees. • Spotters will continue to work with the harvest team in plantations with structural integrity, to ensure that koalas have not moved since the pre-harvest identification process. If they have moved, the flagged tree area will be adjusted for the new koala location. • A refuge group will be created consisting of the tree the koala is in and the eight trees immediately adjacent (a total of nine trees). The goal is to minimise spotters working close to harvest machinery and to minimise the risk of koalas being injured but still provide every possible opportunity for constant identification. AAGIM will maintain a crew of one spotter per one harvest machine. AAGIM will also arrange to have a stand-by spotter to rotate through the active spotting crew to minimise spotter fatigue. A 'Senior Spotter' will be nominated to ensure that training, processes, reporting and rostering are all maintained at the highest standard at all times. The Senior Spotter will also engage with rescue crews or veterinary services if required. Spotters will be equipped with equipment that is the best available for the task. Additional aids such as bipods for thermal equipment will be purchased to reduce spotter fatigue. Spotters communicate with harvesters using UHF radios: all harvesters will be clearly identified with a hi-vis number to make spotter-driver communications more accurate. Skidder drivers will undertake visual checks of bunches for koalas prior to bunch consolidation. Skidder drivers will report the presence of koalas in bunches to the Senior Spotter and avoid the bunch until the koala has self-relocated.

Records	AAGIM will work with the spotters and machinery operators to maintain a log of checks/spotting. The data collected by spotters, harvest operators and machinery movement logging will enable records to be kept of: 1. Monthly maps of where harvesting has occurred 2. Vehicle tracking maps for harvesters 3. Geo location of where koalas have been spotted (in cab device) 4. Records of koalas spotted per day 5. Records of koalas injured and rescued per day 6. Records of "near misses": - see section below 7. Records of koalas killed per day 8. Number of tree harvesters working, numbers of spotters working 9. This section should be read in conjunction with "Reporting" below.
Location	When a koala is located, the location will be GPS mapped using an in-cab GPS device. This information will be collated and mapped. Mapping will include the koala location and hence the refuge trees unharvested. This section should be read in conjunction with Records (above) and Reporting (below) sections. Harvested trees (the full tree, including the head) will be collected after felling and transferred to a stacking location ("skidding") where the trees will be stacked in large piles.
Refuge Trees	At the end of each day of harvesting and at the end of each week, spotters will conduct an assessment of koalas in refuge trees using binoculars, assessing koala welfare (e.g. for injuries) to determine whether veterinary assessment is required. The 'Injured Koalas' protocol described below would be followed if required. Refuge trees will be checked regularly, using visual and/or thermal imaging equipment. If there are no koalas present in the refuge trees, they will be harvested. Due to practical harvest considerations, it is unlikely that refuge trees will be harvested within a short time of the koala's identification, as the harvest will have progressed past that point. When there is a significant number of empty refuge trees, AAGIM will task a harvest team (including a spotter) to re-check the refuge trees and refuge trees which are clear of koalas will be harvested.
Public Access	No members of the public will be permitted to access harvest areas. Access to harvest areas is subject to approval by AAGIM (e.g. for AAGIM staff or contractors, including vets or carers or for government staff undertaking regulatory functions). Harvest operations are unsafe for the public to access, particularly given the amount of fallen or part fallen trees, the density of coppice in some areas preventing clear lines of vision, the significant number machines operating concurrently, the pattern of movement of several of these machines to and from landing areas and the focus of all of the harvest teams on the job at hand rather than persons at large in plantation areas.
Signage	Signage will be erected at all entrances to the harvesting areas warning the public not to enter under any circumstances and directing them to the area supervisor. The signage will include contact numbers for the public to call if required.

OHS Induction Protocol	All of the harvest crews and all spotters will also be required to induct via OHS sign-in system (signing off on an understanding of all hazards and risks) prior to entry on or work commencing on site. A safety induction is required to be completed by any visitor to any Kiland asset.
REMEDIATION OPERATIONS	
General	All harvest and remediation operations will be carried out with due regard to the presence of koalas. That said, given that there will likely be few if any plantation trees left standing post-harvest, the presence of koalas is expected to be extremely low during the remediation (stump, grinding, cultivation, land levelling etc.) phase of works.
Burning	Prior to undertaking any planned burning operations, any koalas in the burn area will be identified. Given that burning will take place post-harvest and there will be few (if any) remaining standing trees, any identified koalas will be on the ground. These animals will be shepherded away from the burn area, prior to the burning commencing. If necessary, the remediation team will engage with the Senior Spotter to arrange a wildlife rescue crew to move koalas in a burn area. Appropriate controls are to be implemented during burning operations, which will be conducted with the active involvement of the CFS and significant Kiland personnel and equipment support.
INJURED KOALAS	
General	All injured koalas, koalas suspected to be injured, are to be immediately reported to the AAGIM Harvest Manager by the Senior Spotter. The Senior Spotter will then liaise with a veterinarian as the primary point of contact and further action. If a koala needs to be transported to a veterinarian, this will be done by the Senior Spotter on the advice of the vet. If the AAGIM Area Manager cannot be contacted immediately then the Senior Spotter is to contact a veterinarian directly. A veterinarian or other suitably qualified person may euthanise a koala if the condition of the koala requires it. In the event that it is suitable for rehabilitation, a veterinarian may transfer koalas to the holder of a DEW-issued Wildlife Carer Permit for rehabilitation prior to release back into the wild. In the event that the Senior Spotter is not available, then the closest trained spotter will take on this role. To be clear, it is not safe for any person (spotter, veterinarian, rescue worker or Manager) to enter an unharvested forest area or to attempt to find a possibly injured koala within recently harvested trees. Where a rescue can be safely undertaken, the Senior Spotter will undertake that task and refer the koala to the veterinarian. The Senior Spotter will require clearance from the DEW to undertake safe rescues. The cost of all veterinarian treatments and rehabilitation are to be paid by AAGIM. The directions of the veterinarian are to be followed on management of the injured koala. Contact details for veterinarians are in the *Contacts* section, below.

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REPORTING	
Monthly reporting	AAGIM will maintain records of: 1. Monthly maps of where harvesting has occurred 2. Vehicle tracking maps for harvesters 3. Geo location of where koalas have been spotted (in cab device) 4. Records of koalas spotted per day 5. Records of koalas injured and rescued per day (cross referenced with incident and near miss reports) 6. Records of 'near misses' - see section below (cross referenced with incident and near miss reports) 7. Records of koalas killed per day (cross referenced with incident and near miss reports) 8. Number of tree harvesters working, numbers of spotters working This reporting will be provided to DEW on a monthly basis to [redacted] within ten (10) business days of the end of each month.
Pre-harvest reporting	AAGIM will provide DEW with 14 calendar days notification prior to plantations being felled with details of location, access points and the name and details of a contact. AAGIM will specify if the plantation is pine, eucalyptus trees with structural integrity or eucalyptus trees with no structural integrity.
Incident and near misses	A koala 'incident' includes any situation where a koala is physically impacted during plantation management operations (including injury or death). The impact could be by trees, machinery, chemicals, fire or people. It includes a koala falling from a tree in the harvest zone or a dependent juvenile koala being separated from its mother. A 'near miss' is a dangerous incident where no harm comes to a koala, but it is exposed to an immediate or imminent serious risk. It includes any incident where a koala is almost physically impacted during operations, either by trees, machinery, chemicals, fire or people, for example a koala walking past a working harvester or other machinery. Notwithstanding the Monthly Reporting requirements listed above, AAGIM will notify all incidents and near misses to [redacted] within 24 hours of the incident.

Reference number	Type	Time	Date	Date reported to DEW	Location (e.g. GPS coordinates, road address)	Description of incident or near miss (e.g. Fell from tree, dependant juvenile separated, injury, death, koala walked by machinery)	Date and time vet contacted for incidents	Name of vet	Outcome	Additional comments (if required)
	Incident								Euthanased	
	Near miss								In rehabilitation (with carer)	
									In care with vet	
									Reunited with mother	
									Buried	
									Released	
									Other - describe in comments	

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CONTACTS		
AAGIM	[redacted]	[redacted]
DEW	[redacted]	[redacted]
Veterinarian	[redacted]	[redacted]
Carers	[redacted]	[redacted]