



Koala (*Phascolarctos cinereus*) in eucalypt tree, Swan Bay, NSW Australia. © WWF-Aus / Stuart Blanch

SUBMISSION TO REVIEWING THE NSW KOALA STRATEGY 2022 DISCUSSION PAPER

The World Wide Fund for Nature-Australia (WWF-Australia) welcomes the opportunity to make a submission to the review of the NSW Koala Strategy 2022.

WWF-Australia is part of the WWF International Network, the world's largest independent conservation organisation. WWF's global mission is to 'stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature'. WWF-Australia has approximately two million financial and non-financial supporters.

WWF collaborated with partners to review the NSW Koala Strategy 2018,¹ which may provide useful background information for this review as well.

WWF RESPONSES TO FOCUS QUESTIONS

The following responses are made in relation to the focus questions posed in *Reviewing the NSW Koala Strategy* (2022) Discussion Paper (DCCEEW 2024).

¹ Blanch, S., Sweeney, O., and Pugh, D. (2018). *The NSW Koala Strategy: ineffective, inadequate and expensive. An assessment of the NSW Koala Strategy against Recommendations made in the Independent Review into decline of koalas in NSW*. Report produced by WWF-Australia, National Parks Association of NSW and North East Forest Alliance. Published by WWF-Australia, Sydney. 17 pages, available for download at <https://wwf.org.au/news/2018/nsw-koala-strategy-ineffective-inadequate-and-expensive/>

The current NSW Koala Strategy (overarching questions)

1. *Do you think the goal of doubling the number of koalas in New South Wales by 2050 provides a sound foundation for the NSW Government's approach to koala conservation into the future? If not, what do you think the goal should be?*

WWF supports the goal of doubling koalas in NSW by 2050.

WWF's [Koalas Forever](#) program has this explicit goal. It aims to demonstrate how this can occur through a range of projects, partnerships, developing innovative financing models, law reform, protected areas and investment.

The NSW Koala Strategy, including the commitment to double koala by 2050, has no statutory weight and is unenforceable. The revised NSW Koala Strategy should provide for setting a goal or targets in law. The *Biodiversity Conservation Act 2016* (NSW) could be amended to include a target of a 100% increase in the state's koala population by 2050, with a mid-term target of stabilising the state's population by 2035. Alternatively, a legislative instrument under the BC Act could contain medium and long term targets. Legislating a target to double the state's koala population would mirror the statutory emissions reduction targets in the *Climate Change (Net Zero Future) Act 2023* (NSW). Alternatively, the objectives and targets in the State Water Management Outcomes Plan Order 2022, established under the *Water Management Act 2000* (NSW), provides a model for developing such a delegated legislative instrument.

An alternate approach of framing this scale of ambition, that would be more meaningful from a conservation science point of view but arguably more challenging to communicate and inspire action, would be a goal of stabilising and increasing the state's koala population to enable it to be downlisted from endangered to vulnerable, or near threatened, by 2050 or sooner.

WWF acknowledges the great difficulty of establishing an accurate baseline for doubling the koala population. The statewide koala survey currently underway should provide a more reliable statewide baseline population estimate in 2025 than existing population estimates. However, there will need to be an increase in investment to support repeatable standardised longitudinal surveys to permit progress towards this goal to be objectively assessed over the next 2-3 decades.

2. *In your area of expertise, what gaps do you think there are in the Strategy?*

The Strategy ignores strengthening regulations to protect koalas and their habitat from deforestation and native forest logging on both public and private land. This is an egregious omission and undermines the strategy's goal. A revised Koala Strategy needs to commit to better implementation of existing laws and amendment of legal regulations that impact on koala habitat.

The Strategy should adopt the mitigation hierarchy, being avoidance (e.g., of deforestation and logging of koala habitat), minimisation, restoration and offsets.

If adopted, the Strategy would need to commit to amending key statutes, regulations and codes to protect koala habitat from clearing, logging and development. These include:

- regulation of native vegetation management in Part 5A of the *Local Land Services Act*, relevant schedules and the Land Management (Native Vegetation) code,
- Chapter 2 (Vegetation in Non-Rural Areas), of the State Environmental Planning Policy (Biodiversity and Conservation) 2021,
- *Forestry Act 1912* and the Coastal Integrated Forestry Operations Approvals and protocols,
- *Biodiversity Conservation Act 2016*,
- *Environmental Planning and Assessment Act 1979*,
- Private Native Forestry code,
- Koala Habitat Protection SEPP,
- *Mining Act 1992*,
- *Petroleum (Onshore) Act 1991*.

The Strategy fails to commit to accurate, ground-validated mapping of koala habitat statewide as the basis for habitat protection. This should supersede the need for each of the 83 Local Government Areas in the koala range to individually map koala habitat within Koala Plans of Management as the basis for assessing development applications. Urgency is needed for consistent, comprehensive mapping across NSW to ensure legal protections apply to all koala habitat.

Prioritising koala populations

3. *Are the current categories of strongholds, populations for immediate investment and populations to fill knowledge gaps the right ones for koala conservation? Are there other important koala populations that should be identified for conservation management?*

The boundaries of strongholds, populations for immediate investment and populations to fill knowledge gaps appear to align with, collectively, the Areas of Regional Koala Significance (ARKS v1, 2018) across the state. The ten strongholds selected appear to be high priorities for protection, though the same may be said for other parts of the ARKS which include strongholds, or indeed ARKS that were identified as populations warranting immediate investment and regional partnerships.

Spatial prioritisation of populations should be reviewed to address priority populations:

- by including all koala hubs;
- in light of the revised ARKS (v2), when released;
- to incorporate updated modelling of koala climate refuges; and,
- informed by genetic and disease mapping.

The importance of Aboriginal ecological knowledge to koala conservation

4. *How could a revised Strategy further empower Aboriginal communities? What, if any, are barriers in the current framework?*

Conservation strategies aimed at key species of significant cultural and ecological value to First Nations communities can be a powerful framework that enables custodianship of Country. However, these strategies must be robust enough to deliver meaningful on the ground outcomes for Indigenous peoples. WWF-Australia through its Inclusive Conservation agenda, acknowledges that Indigenous peoples have been excluded from the conservation conversation for too long. Indigenous ecological knowledge should be a key component in any future strategies with explicit objectives to enable First Nations communities to contribute their experiences and knowledges in both the conversation of Koalas in NSW and in providing key data for the mapping and evaluation of the overall strategy. Financial support should be provided to communities to enable them to contribute to the outcomes of the strategy.

Addressing the impacts of climate change

5. *How do you think the NSW Government can more effectively identify and protect climate refuges in a revised Strategy?*

The NSW Government could update climate projections for koalas for a range of global emissions scenarios and then deploy an enhanced range of interventions to protect priority climate refuges to enhance protections. These could include:

- identifying koala climate refuges in public native forests and declaring such areas as conservation reserves (National Parks, Nature Reserves, State Conservation Areas, Flora Reserves, etc) or Aboriginal conservation land tenure to protect them from logging;
- declaring koala climate refuges as Category 2 Regulated Sensitive Land on the Native Vegetation Regulatory Map established under the *Local Land Services Act* (or a similar or stronger mechanism under an amended *Biodiversity Conservation Act*). This should at least require stronger environmental assessment of proposed clearing, and preferably prohibit damaging activities from significantly impacting upon much of the climate refuge;

- Koala climate refuges will have most benefit with good landscape connectivity to ensure koalas can move between such refuges as the state's climate becomes increasingly hot and dry, particularly in response to extreme weather events.

6. *What support should the NSW Government be providing to koala populations in areas that we know will be subject to serious climate change impacts?*

Support for koala populations should be prioritised for climate refuges that are likely to support koalas, and their habitats, in 2050-2100 under global heating scenarios of 2.0-3.0°C. Intact forests and partly-forested farmlands on high-nutrient soils in higher rainfall areas coastal areas, and at higher altitudes, are the priority regions for protection and restoration.

Unfortunately, projected climate change impacts on the western slopes of the Dividing Range, and in the extensively cleared landscapes in the agricultural zones in the Murray-Darling Basin, appear to make koala populations unviable under warming scenarios of >2°C.

Regions projected to experience more severe global heating impacts that nevertheless should receive government support for koala populations are:

- areas with that have reliable water supplies to buffer weather extremes (e.g., near Naranderra, and along the Murray and Castlereagh Rivers);
- landscapes sufficient intact or connected forests/woodlands that enable dispersal in response to extreme weather and other threats;
- highly engaged farmers, government agencies, communities and ecologists who are effectively intervening to protect and expand local koala populations, including through habitat restoration and approved translocations;
- in areas where effective sustained artificial watering could enable koalas in hotter drier landscapes to persist through long hot droughts;
- koala populations in forested hilly terrain, particularly where rainforest or rocky outcrops provide an effective buffer from bushfires.

Such koala populations from hotter and drier inland areas may provide very important climate-resilient genetic adaptations that, through science-based translocation, could assist coastal and high-altitude populations to adapt to global heating of potentially 2-3°C in the next few centuries.

7. *How could a revised strategy support better adaptive responses to climate change?*

A revised koala strategy focused on supporting better adaptive responses to climate change would likely involve several key elements:

Habitat Protection and Restoration: Increasing efforts to protect and restore koala habitats, including forests and woodlands, is crucial. This can involve measures such as conserving existing habitats, establishing wildlife corridors, and reforesting areas that have been degraded or lost due to human activities.

Monitoring and Research: Investing in ongoing monitoring and research programs can help track the impacts of climate change on koala populations and habitats, guide management action and investigate opportunities for building resilience at the population and landscape scale. This information is essential for identifying trends, assessing risks, and developing targeted conservation strategies. Incorporating this information into a state-wide koala adaptation plan will provide important guidance on priorities for wildlife corridors, climate refugia and potential future habitat.

Climate-Smart Conservation Practices: Incorporating climate-smart conservation practices into management strategies can enhance the resilience of koala populations. This may include activities such as revegetation with climate-adapted plant species, water provision during droughts, implementation of Cultural Fire practices, community engagement and awareness especially in places of high vehicle collision, and predator control to reduce additional stress on koalas.

Pillar 1: Protecting koala habitat

8. *Do you think the combination of habitat acquisition, private land conservation and habitat restoration is the right approach to protecting important koala habitat? What else should the NSW Government be doing to protect koala habitat?*

No. These actions are important complementary measures that WWF supports, but the most cost-effective science-based interventions are to protect existing koala habitat across land tenures. The key gap in the NSW Koala Strategy is to commit to strengthening regulatory frameworks to prevent and reduce bulldozing, logging and degrading of forests and woodlands that provide koala habitat. BioNet records indicate most koalas are observed and reported on private land.

Habitat acquisition, private land conservation (e.g., conservation covenants) and restoration are critical interventions to complement habitat protection. WWF strongly supports them.

Further critical measures to protect koala habitat need to include:

- End logging of koala habitat in NSW by 2025, following the lead of Victoria and Western Australia which exited public native forest logging in December 2023.
- Introduce an immediate moratorium on all logging of koala habitat within the Great Koala National Park and within all known koala hubs across NSW.
- Tighten regulations around allowable activities under the *Local Land Services Act* and clearing for bushfire hazard reduction under the Rural Boundary Clearing (RBC) code.
- Close the loophole whereby landholders can clear land under the LLS Act or RBC code prior to a development application to reduce their offset liability under the Biodiversity Offsets Scheme.
- Increase funding for monitoring and compliance of illegal clearing.

9. *How can landholders be better supported to protect, restore and enhance koala habitat on their land? What are the barriers?*

The cost of protecting and restoring koala habitat on can be obstacles for landholders considering taking action. Financial incentives or support should be provided to assist landholders with the upfront costs of restoration works. These include larger financial incentive payments, lowering the threshold for priorities to qualify for BCT incentives and conservation agreements, rate reductions, provision of technical support, larger subsidies to cover the cost of tree planting and site management, streamlined access to conservation agreements, an increase in staffing capacity at the Biodiversity Conservation Trust. The cost of tree planting, site preparation and ongoing maintenance, can be a major barrier on private landholdings that have high potential to support koalas but where other market-based options, such as the earning of high-integrity carbon credits, is not feasible.

The Biodiversity Conservation Trust lacks the funding and staff capacity necessary to work with sufficient numbers of interested landholders to enter into conservation agreements, and other private land conservation mechanisms, at the scale and pace required to slow and reverse the decline in koalas. Increased funding for conservation agreements is also required to compete with Private Native Forestry.

10. *How can landholders be supported to participate in natural capital markets and other opportunities that drive improved outcomes for koalas?*

Natural capital markets remain nascent; however, landholders should be supported to prepare and to take advantage of opportunities as they emerge in natural capital markets. Landholders can be supported to participate in natural capital markets that drive improved outcomes for koalas through a combination of education, incentives, and collaboration:

Technical Support and Guidance: Offering technical support, expertise, and guidance to landholders can help them implement conservation practices effectively. This support can include access to research-based information, training workshops, and consultations with conservation experts or agronomists. This support should also focus on how measurement and improvements

in natural capital, such as restoration of koala habitat, can improve the productivity and resilience of other agriculture activities on their land.

Financial Incentives: There should be clear financial incentives for landholders to improve natural capital on their land. This might include grants, subsidies, payments for ecosystem services or tax breaks to encourage landholders to engage in activities that benefit koalas and their habitats. For example, subsidies, tax breaks or tax offsets could be offered for reforestation, habitat restoration, sustainable land management practices, or participating in carbon offset programs that recognize the value of preserving koala habitats.

Further, as the carbon market represents the largest natural capital market, at scale, currently available to landholders in Australia, greater incentives and support should be provided to establish carbon projects that target improved habitat for koalas. WWF-A is demonstrating how to do this successfully through its Koala Friendly Carbon program which uses the Environmental Planting carbon methodology to underpin a business case for private landholders to restore koala habitat. However, the scaling of this program is slowed by the additional costs associated with undertaking a planting project specifically focused on maximising impact for koalas. A koala focused planting increases costs, thereby reducing financial feasibility and returns for landholders. Increase financial support to meet upfront costs would improve financial feasibility, as would premiums paid by the NSW government to purchase carbon credits generated by restoring koala habitat. Further, reduced paperwork and red tape with the NSW Department of Primary Industries to establish large scale tree plantings (>30 Ha) for koala habitat should be addressed.

Certification and Recognition: Establishing certification programs or recognition schemes for landholders who adopt sustainable land management practices beneficial to koalas can incentivize participation. Certification can enhance market access and provide a competitive advantage for products derived from koala-friendly landscapes.

Collaborative Initiatives: Facilitating partnerships and collaborations between landholders, conservation organizations, government agencies, and businesses can create synergies and leverage resources for koala conservation. Collaborative initiatives can range from landscape-scale conservation projects to market-based mechanisms that incentivize sustainable practices.

Market Opportunities: Exploring market opportunities for products and services associated with koala conservation can create economic incentives for landholders. This may include eco-tourism ventures, sustainable forestry practices, carbon offset trading, or biodiversity offset programs that compensate landholders for conserving koala habitats.

Education and Outreach: Increasing awareness and understanding among landholders about the importance of koalas, their habitats, and the benefits of conservation efforts is crucial. Educational programs, workshops, field days, and information resources can empower landholders to make informed decisions and take proactive steps to support koala conservation. Outreach should also educate landholders on approaches to measure and improve natural capital on their land.

By combining these approaches, stakeholders can support landholders in participating in natural capital markets and other opportunities that drive positive outcomes for koalas while promoting sustainable land management and conservation practices.

11. How can the NSW Government better support local councils to identify and protect koala habitat?

The NSW Government should provide additional funds to Councils to enable them to complete Koala plans of management in their LGAs, including expensive koala habitat mapping, which is currently a requirement for having core koala habitat gazetted pursuant to the *Environmental Planning and Assessment Act* and thus afforded stronger protection from residential and

infrastructure development. Councils should also be supported to administer KPoMs and monitor compliance.

Pillar 2: Supporting local communities to conserve koalas

- 12. Do you think the regional partnership model is an effective delivery model for delivering on-ground koala conservation actions? Do you know who the regional partnership is in your area?*

While the delivery model highlights important regional partnerships, the strategy only sets a 5-year plan and funding, which are not enough for on-ground activities to be fully successful in supporting koala populations in the long-term. The model appears to be working effectively however there are gaps, therefore we recommend expanding the model statewide to cover all koala habitat areas.

- 13. Are there any threats or issues specific to your region that you think should be given more attention?*

Koala vehicle strikes are a real concern in the Northern Rivers region, with several hotspots reported. The strategy sets out that the NSW Government will identify and take action at 10 or more vehicle strike hotspots across the whole state. This seems to be a small target given the state's size and that the Northern Rivers alone has several hotspots. The strategy touches on habitat protection and restoration, however it seems to miss investment on properties that are not of high-quality habitat, but that provide important connectivity in fragmented landscapes.

- 14. How can the NSW Government work better with philanthropic and business partners to leverage investment to deliver outcomes at the local level?*

A business case exists for business partners and philanthropists to support activities that focus on restoring and regenerating koala habitat. WWF-Australia has proven this through its Koala Friendly Carbon project. However, given that the full value of positive externalities created by restoring koala habitat are not valued by existing markets, namely Australia's carbon market, support is needed to make the business case preferred *vis a vis* current land practices. To do this, the NSW government should provide matched funding to go alongside philanthropic and business funding looking to invest into restoration activities. Matched funding from the government would make finance available for restoration efforts 'blended' and thereby improve the business case for both landholders and commercial investors to commit to restoration. The NSW government should commit significant resources to this activity, with it estimated that Koala Friendly Carbon alone will require up to \$100M to achieve its restoration target of 10,000 hectares.

Pillar 3: Improving the safety and health of koalas

- 15. What else can the NSW Government do to better mitigate vehicle strike?*

Act quicker on effective mitigation strategies. Signs alone are not enough, the government should enforce speed-limits in hotspots, include road designs to slow traffic, and mandate fencing to direct dispersing koalas to underground and overpasses. Some of our partners reported that more than 20 koalas have been killed near the Eastern Forest Nursery in the last years, yet the NSW government is still to act.

New linear infrastructure such as roads require koala connectivity, such as overpasses or underpasses, as is now proposed for Appin Road in relation to the Lendlease development Figtree Hill. Planning and road construction regulations should mandate science-based koala connectivity in all new development and expansions where moderate-high koala habitat will be fragmented.

16. *What can the NSW Government do to better support the wildlife carer sector?*

The NSW Government should establish a program to provide funds to cover (at least some) salary and operational costs of koala/wildlife vets and nurses. Why should koala/wildlife charities have to raise the funds to pay the employment costs of essential, highly trained, expensive frontline staff who are critical in caring for injured and sick koalas and releasing them to the wild?

Further, the NSW Government should establish a wildlife carer support program to enable wildlife care organisations to reimburse reasonable costs incurred by wildlife carers when rescuing, caring for and releasing koalas (such as reimbursement for travel and accommodation, collection of leaf, construction of aviaries, purchase of medicines, and mental health and trauma support).

The wildlife carer sector provides an important function during crisis and non-crisis times, however, attempts to provide necessary wildlife treatment and care are often hindered by a lack of coordination and capacity. During recent crisis events such as the 2019-2020 bushfire and flooding events that followed, the number of injured animals that required emergency care have often overwhelmed the capacity of wildlife rehabilitation organisations and veterinary professionals that face existing and ongoing challenges such as a lack of funding and knowledge regarding wildlife care. Therefore, increasing coordination, training, capacity, and resources would significantly improve the sectors ability to provide high quality care.

17. *What measures should the NSW Government be taking to address koala disease, including chlamydia?*

Research and Monitoring: Invest in research and monitoring programs to better understand the prevalence, transmission dynamics, and impacts of chlamydia and other diseases in koalas. This includes conducting surveys, diagnostic testing, and epidemiological studies to gather data and inform management strategies.

Disease Management Plans: Develop and implement comprehensive disease management plans specifically targeting chlamydia in koalas. These plans should outline strategies for disease prevention, early detection, treatment, and rehabilitation of infected individuals.

Veterinary Care and Treatment: Provide funding and support for veterinary care, treatment, and rehabilitation of koalas infected with chlamydia. This includes establishing dedicated wildlife health clinics or partnering with existing veterinary facilities to ensure timely and effective treatment for affected animals.

Biosecurity Measures: Implement biosecurity measures to prevent the spread of chlamydia and other diseases among koala populations. This may involve protocols for quarantine, disease testing, and hygiene practices in wildlife rehabilitation centres, zoos, and other facilities that interact with koalas.

Habitat Management: Improve habitat quality and resilience to reduce stressors that can exacerbate disease susceptibility in koalas. This includes protecting and restoring native forests, managing land use practices to minimize habitat fragmentation and degradation, and addressing threats such as urbanization, climate change, and invasive species.

Community Engagement and Education: Engage with local communities, stakeholders, and the public to raise awareness about koala diseases, including chlamydia, and the importance of disease management efforts. Education programs can promote responsible behaviour, such as avoiding feeding wild koalas and reporting sick or injured individuals to wildlife authorities.

Collaboration and Partnerships: Foster collaboration and partnerships between government agencies, research institutions, conservation organizations, veterinary professionals, and community groups to coordinate efforts and share expertise in koala disease management.

18. *How could the NSW Government improve the koala translocation program to ensure conservation outcomes are met?*

No comment

19. *How can the NSW Government better protect koalas and their habitat in response to hazard reduction burning and bushfires?*

There is mounting [peer-reviewed evidence](#) that hazard reduction burns can make forests more flammable. Instead, enabling First Nations to access their ancestral lands to revitalise cultural burns should be a priority.

20. *How can the NSW Government improve emergency coordination with koala carers, vets and other partner organisations in the event of a bushfire or extreme weather event?*

Develop Emergency Response Plans: Develop comprehensive emergency response plans specifically addressing koala rescue, evacuation, and treatment during bushfires or extreme weather events. These plans should outline roles, responsibilities, and procedures for each stakeholder group, including coordination with emergency services and wildlife authorities.

Training and Capacity Building: Provide training, workshops, and capacity-building opportunities for koala carers, veterinarians, and partner organisations on emergency response protocols, wildlife rescue techniques, first aid for koalas, and handling of injured or distressed animals during emergencies. Mandatory accreditation or certification schemes would ensure wildlife carers are sufficiently well trained.

Resource Allocation: Allocate sufficient resources, including funding, equipment, supplies, and personnel, to support emergency response efforts for koalas. This includes ensuring access to veterinary care, temporary shelters, transportation facilities, and specialised equipment for rescuing and treating koalas in emergency situations.

Pillar 4: Building our knowledge

21. *What do you see as the most critical knowledge gaps in understanding the distribution and relative abundance of koalas across New South Wales?*

Survey bias undermines an accurate assessment of distribution and abundance of koalas, with private land being a key gap. The lack of availability of thermal drones, with high-definition cameras and spotlights, has until very recently hampered accurate estimates of koala abundance. Just as binoculars in the hands of citizen science birders has helped to greatly increase the availability of reliable data produced using standardised survey techniques, citizen scientist koala enthusiasts should be supported to acquire thermal drones and be trained in their use and uploading of koala observations to BioNet.

There also exists a need to update state mapping with existing survey data held by Councils, universities, consultants and environmental organisations. This requires a user-friendly database that is accessible by the public to input koala data.

22. *What changes should be made to the koala research plan to make sure it delivers research that directly benefits koala conservation?*

No comment

23. *What data do you need to effectively carry out koala conservation work? What changes would you recommend to how the NSW Government manages koala data?*

Accurate koala *abundance* data that is derived from standardised survey techniques is required across the koala range. Management decisions can not solely or predominantly be based upon koala *occupancy* data, as appears to occur in public native forests based upon acoustic surveys of koalas. Abundance data and models should be regularly updated.

NSW needs a statewide map of koala habitat that is based on high resolution plant community type mapping, with on-ground validation, which meets the accepted threshold of 80% accuracy. WWF has been advised by mapping experts that the existing model mapping used to produce the State Vegetation Type Map (SVTM), from which koala habitat suitability models are derived, produces model maps that often fall well below this threshold. Plant community type mapping produced using 3D digital aerial photographic interpretation is the basis for koala habitat mapping. Accordingly, the NSW government should commission an independent external review of the adequacy of the SVTM as the basis upon which a highly accurate statewide koala habitat map is able to be produced. New 3D digital aerial photographic interpretation should be prioritised for Areas of Regional Koala Significance where existing koala habitat suitability modelling, based upon the SVTM, is demonstrated by on-ground validation has poor inaccuracy.

An analysis should be conducted to identify gaps in the availability of koala hospitals and other koala welfare facilities across the koala's range, as well as areas requiring additional training and capacity for koala welfare (e.g., for commercial vets, wildlife carers and koala/wildlife hospitals).

A database and maps detailing the genetic integrity of the state's koalas, including resilience to global heating impacts, should be produced and made publicly available.



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