

Jervis Bay Regional Alliance

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SUBMISSION TO THE 10 AND 15 YEAR REVIEWS AND COMMENTS ON THE PROPOSED EXTENTION OF THE REGIONAL FOREST AGREEMENTS

Dear Environmental Protection Authority and Department of Primary Industries,

The Jervis Bay Regional Alliance (JBRA) is an environmental advocacy group covering the coast from Culburra Beach to Sussex Inlet and the catchments and ecosystems of Lake Wollumboola, Jervis Bay and St Georges Basin. The JBRA's charter includes advocacy for environmental, social and cultural heritage, as well as visual quality of the coast. Sound planning decisions at all levels of government are key areas of concern for our group.

We appreciate the opportunity to comment on the 10 and 15-year reviews and the extension of the Regional Forest Agreements (RFAs). This submission covers both elements of the consultation.

We do not support the extension of the RFAs, because we believe that that the body of evidence shows they are a failed model for forest management, despite being an effort to reconcile conservation and timber extraction. Instead we urge the Commonwealth and NSW Governments to:

1. Avoid signing new RFAs that risk locking taxpayers into further subsidising an environmentally damaging industry;
2. Restore effective Commonwealth oversight to public native forest management, including an assessment of the degree to which the RFAs have met their aims and to which the States have discharged their responsibilities under the *EPBC* accreditation;
3. Take seriously and act to reverse the large and increasing threats to forest wildlife that has seen declines in many species over the life of the RFAs;
4. Recognise the importance of restoring biodiverse forests for climate change mitigation and;
5. Seriously consider alternative options to logging forests (including conservation, carbon storage, water supplies, tourism and restoration) to fund a just transition away from logging public native forests.

We will not cover all environmental implications of logging public native forests in this submission, but will instead limit ourselves to a few salient points that we believe apply broadly to RFAs. We will then highlight a reserve proposal involving the reservation of State forests that our group has presented to the NSW Government, and again urge the Government to implement our proposal as the RFAs expire in order to improve the adequacy of the reserve network in the Jervis Bay area. We would also highlight the inappropriateness of rolling over RFAs without considering the requirements and potential of reserve proposals State-wide.

The reviews and the review process

The combining of the 10 and 15-year reviews, and the extreme delay in conducting the reviews, is damning evidence as to how the RFAs have failed to provide transparency for the public in the management of their forests. The reviews themselves make a compelling case for change, because the paucity of data presented not only fails to demonstrate that the RFAs have worked, but strongly suggests that no data have been collected. This is a breach of the social contract that the RFAs were based on.

In addition, the NSW and Commonwealth Governments have committed to extending RFAs prior to the outcomes of this review, which strongly suggests this is a box ticking exercise. The NSW Forest Industry Roadmap, which the Government has said is guiding the review process, was not subject to public consultation and states that there will be no reduction in wood supply or erosion of environmental protection. Given the evidence that the RFAs have failed to protect the environment, and that over-cutting has been widespread across the State (but particularly in the Southern and Eden RFA regions), it is difficult to envisage how this goal can be met. This statement essentially commits to business as usual, and therefore reinforces the impression that the consultation is meaningless.

Ecologically Sustainable Forest Management

It is clear that the RFAs have not resulted in the implementation of Ecologically Sustainable Forest Management (ESFM), supposedly the mechanism by which logging would occur while maintaining environmental assets. This is evidenced in declines of a wide range of forest specialist species such as greater gliders¹ (including a local extinction—not attributable to logging—in the Jervis Bay area²), large forest owls³ and koalas⁴. There are usually interacting factors in species declines—as is the case with koalas on the south coast⁵ for example—but Key Threatening Processes (KTPs) are activities that have a particular impact on species. Logging contributes to KTPs including the loss of hollow-bearing trees⁶ and bell-miner associated dieback⁷. ESFM is also supposed to consider the needs of future generations through the principle of intergenerational equity. It is becoming ever-clearer that future generations are going to inherit a country with diminished environmental and economic assets and an increasingly hostile climate. For example, the recent review of Wood Supply Agreements (WSAs) highlighted how the timber industry on the south coast of NSW will have to transition to processing ‘super-small’ logs, and how pulp logs (for woodchipping) make up 86% of the WSAs in the Eden region⁸.

The JBRA is fortunate to possess an expert in Australian orchids, and his opinion is that the logging assessment process completely fails to consider the protection of orchids in particular, and flora more broadly. A credible environmental assessment and full recognition of what endangered (and common) flora (particularly orchids) may be within the planned logging area is a pre-requisite prior to any logging.

Driving KTPs, contributing to declines in wildlife, declining timber volumes and the creation of swathes of even-aged regrowth forest violates the principle of intergenerational equity and strongly suggests that logging is not the optimal use of public land.

Climate Change

The Forest Industry Roadmap suggests that logging forests can help mitigate climate change. Independent research in southern NSW suggests that this is misguided. Instead, managing forests for conservation can have much greater carbon mitigation benefits as carbon stocks are recovered^{9,10}. It is highly likely that managing forests for conservation will therefore be immeasurably more valuable to the people of southern NSW than continuing to log them for woodchips, particularly were the Government to seek to monetise this carbon value.

Economics

The economics of the native forest logging industry are tenuous, and timber buy-backs have occurred throughout the life of the RFAs as a result of over-estimated wood supplies. It is difficult to disentangle jobs in the native forest sector from those of the plantation sector, but it is clear that the number of jobs is very low¹¹. The 2016 census puts the number of jobs in forestry and logging at just 1,444, and plantations provide 85% of NSW's timber¹². The number of hardwood mills has declined by 79% over the life of the RFAs¹² with just 36 hardwood sawmills receiving wood from wood supply agreements in RFA regions of NSW today⁸. Hardwood sawnwood production in Australia has declined by 43% across Australia in the last decade (comparable NSW figures are not given)¹².

Despite the poor economic performance, numerous subsidies are provided to the logging industry. These include the Community Service Obligation (worth approximately \$18 million per year); south coast haulage subsidies from the NSW Environment Trust following the creation of the Murrumbidgee Flora Reserves; rate-free access to public land for the for-profit Forestry Corporation¹³; extensive damage to infrastructure paid for by local Government and loss of assets like carbon and water that may be more valuable than timber¹⁴. The WSA review suggests that significant Government investment will be required to retool mills in southern NSW to process smaller logs.

It appears highly likely that logging is not the economically optimal use of forests in southern NSW, and we urge the Government to invest taxpayer money in industry transition away from native forest logging towards plantations and alternative fibres, rather than subsidising the ongoing decline in environmental values.

Reserve proposals

The JBRA presents two interlinked reserve proposals that are directly affected (i.e. hindered) by RFAs.

1. Extension to Jervis Bay and Jerrawangala National Park

We propose that Currumbene, Nowra and Tomerong State Forests be added to Jervis Bay National Park, and the northern part of Yerrilyong State Forest be added to Jerrawangala National Park to improve the adequacy of the local reserve network—particularly via increasing connectivity and protecting threatened species. We highlight the fact that, according to Map 5 on page 276 of the 10 and 15-year review documents, Currumbene, Nowra and Tomerong State Forests are reserved entirely by either prescriptions or as informal reserves, while approximately 20% of the northern part of Yerrilyong is reserved by prescription. We therefore contend that reductions in timber supply would be negligible, and the transfer of management to the National Parks and Wildlife Service would further conservation outcomes as that agency, unlike Forestry Corporation, has conservation as its primary goal.

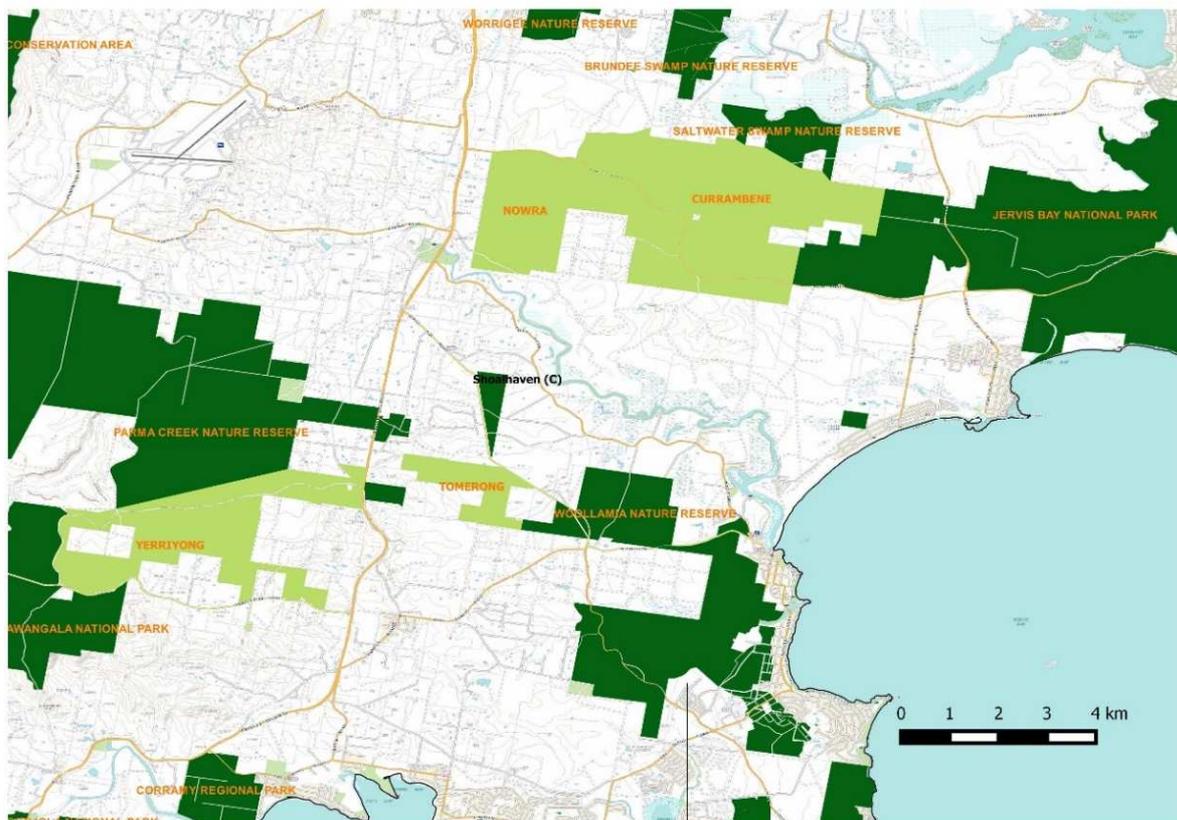
All areas are small. Tomerong is approximately 200 hectares and the northern section of Yerrilyong approximately 1000. The combined area of the contiguous Currumbene and Nowra State Forests is 2200ha. Yet all areas are strategically important additions to the state reserve network to consolidate the east—west link between the coast and the hinterland (see map below), as identified as a priority in the NSW National Parks Establishment Plan. Inclusion of Currumbene State Forest, which includes part of the Lake Wollumboola catchment, would assist in protecting the water quality of this internationally significant, highly sensitive coastal lake.

The additions of these areas would significantly enhance connectivity values. Tomerong is adjacent to Woolamia Nature Reserve, and the relevant section of Yerrilyong is bordered to the north by Parma Creek Nature Reserve and to the south by Jerrawangala National Park. Nowra and

Currambene State Forests abut the western extent of the northern portion of Jervis Bay National Park and Saltwater Swamp Nature Reserve to the north. These additions are all included in the Illawarra to Shoalhaven Great Eastern Ranges corridor, specifically the Tomerong and Currambene focal corridors.

All areas contain multiple records of national and state-listed threatened species including yellow-bellied glider; greater glider (recently EPBC listed); masked owl; sooty owl; powerful owl; glossy-black cockatoo; spotted-tail quoll; green and gold bell-frog and biconvex paperbark. Although not on the BioNet, there are also multiple species of orchid occurring in Tomerong.

The Jervis Bay area is contained within the global biodiversity hotspot, Forests of East Australia and is home to highly localised species such as the eastern bristlebird and the Jervis Bay leek orchid. It is also one of the most visited areas in the state of NSW due to its natural beauty. It is our contention that the overwhelming importance of the flora and fauna of the area to the local economy justifies the attention and funds that the NPWS has devoted to the area. These additions are reasonably simple, yet logical and important additions to a key National Park and in keeping with the National Parks Establishment Plan.



The locations of Nowra, Currambene, Tomerong and the northern section of Yerrilyong State Forests (light green) relative to the protected area network (dark green) in the Jervis Bay area. Note there are vegetated tracts of Crown Land subject to land claims to the south of Currambene State Forest which means north-south connectivity is currently high.

2. Morton-Colymea-Parma-Jerrawangala links proposal

This is a proposal to reserve under the NP&W Act all of the remaining Vacant Crown Land between Morton National Park, Colymea State Conservation Area, Parma Creek Nature Reserve and

Jerrawangala National Park situated on the western side of the Princes Highway, south west of Nowra. The northern section of Yerriyong State Forest is a key link to the Jervis Bay area.

The relevant parks and Crown land are identified in the map below.

The extensive area of Crown land constitutes the major part of the corridor referred to in the NSW National Parks Establishment Plan 2008 as one of its statements of intent, ie, “*Consolidating the existing east-west coast-to-ranges corridor near Jervis Bay*”.

In recognition of the importance of the Crown land identified in the map, the area linking Colymea SCA and Parma Creek NR east of Deans Gap Road and the area north of Yalwal Road linking Colymea SCA and Morton NP is identified by Shoalhaven City Council in its 2014 LEP as *significant vegetation and habitat corridor*.

To put this proposal in a historic context, the rugged Yarramunmun Creek and Boolijong Creek catchments were referenced by the NP&WS in the 1970s as additions to Morton NP. In anticipation of the proposed additions, four blocks of freehold land were purchased and reserved in the 1970s as outliers of Morton NP.

Biodiversity Values of the Linking Crown Land

Forest types

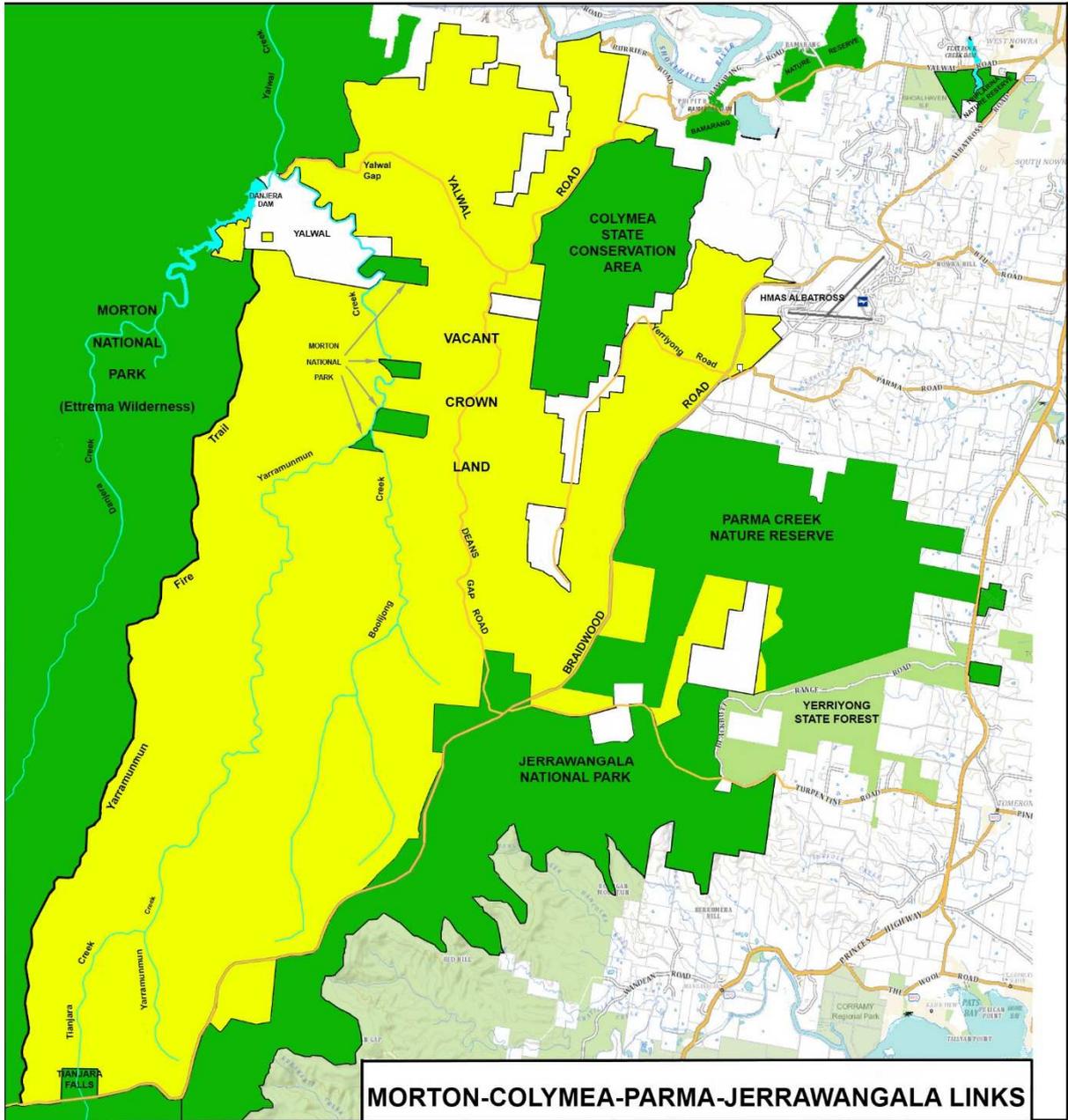
Barratt (1999) listed 19 forest types in public lands between Morton and Jervis Bay National Parks and noted that “Interspersed amongst these forest types are a range of dry and wet heaths, scrubs and sedgelands”.

Threatened Plant Species

Of the 47 orchid species recorded in the Crown land, 3 are threatened: *Speculantha ventricosa* (Critically Endangered – NSW/Aus), *Genoplesium baueri* (Endangered – NSW/Aus) and *Cryptostylis hunteriana* (Vulnerable – NSW/Aus).

Other threatened plant species include: *Hibbertia stricta* subsp. *furcatula* (Vulnerable – NSW), *Triplarina nowraensis* (Endangered – NSW/Aus), *Galium australe* (Endangered – NSW), *Melaleuca deanei* (Vulnerable – NSW/Aus), *Eucalyptus langleyi* (Vulnerable – NSW/Aus), *Eucalyptus sturgissiana* (Vulnerable – NSW), *Solanum celatum* (Endangered – NSW), *Acacia bynoeana* (Endangered – NSW; Vulnerable – Aus), *Syzygium paniculatum* (Vulnerable – NSW).

Threatened animal species include: Hooded Robin (Vulnerable – NSW), Scarlet Robin (Vulnerable – NSW), Pink Robin (Vulnerable – NSW), Little Lorikeet (Vulnerable – NSW), Turquoise Parrot (Vulnerable – NSW), Gang-gang Cockatoo (Vulnerable – NSW), Glossy-black Cockatoo (Vulnerable – NSW), Powerful Owl (Vulnerable – NSW), Sooty Owl (Vulnerable – NSW), Barking Owl (Vulnerable – NSW), Square-tailed Kite (Vulnerable – NSW), Striated Fieldwren (Endangered – NSW), Varied Sittella (Vulnerable – NSW), Giant Burrowing Frog (Vulnerable – NSW/Aus), Little-john’s Tree Frog (Vulnerable – NSW/Aus), Rosenberg’s Goanna (Vulnerable – NSW), Broad-headed Snake (Endangered – NSW, Vulnerable – Aus), Grey-headed Flying Fox (Vulnerable – NSW/Aus), Large-eared Pied Bat (Vulnerable – NSW/Aus), Eastern Bentwing Bat (Vulnerable – NSW), Eastern Freetail Bat (Vulnerable – NSW), Yellow-bellied Glider (Vulnerable – NSW), Eastern Pygmy Possum (Vulnerable – NSW), Southern Brown Bandicoot (Endangered – NSW/Aus), Koala (Vulnerable – NSW/Aus), Brush-tailed Rock-wallaby (Endangered – NSW, Vulnerable – Aus), Spotted-tailed Quoll (Vulnerable – NSW, Endangered – Aus), White-footed Dunnart (Vulnerable – NSW).



Map of the proposed Morton-Colymea-Parma-Jerrawangala links proposal. The northern section of Yerriyong State Forest to the east is incorporated in the 'Extensions to Jervis Bay and Jerrawangala' proposal.

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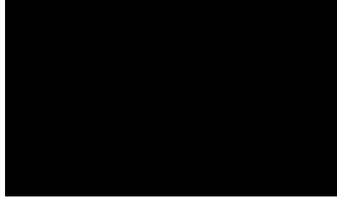
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The JBRA is willing to discuss any aspect of this submission that is required.

Yours sincerely,



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