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17 May 2004

Ms Sue Chate
Executive Officer
NSW Scientific Committee
PO Box 1967
Hurstville, NSW 2220

RP026-04

Dear Sue,

**Re: Submission on the proposed listing for Littoral Rainforest on the NSW Coast
as an endangered ecological community**

Thank you for providing Sydney Coastal Councils Group¹ (SCCG) with the opportunity to comment on the proposed listing for Littoral Rainforest on the NSW Coast and bioregions as an endangered ecological community.

1. INTRODUCTION

Littoral Rainforest communities on NSW Coasts and bioregions are currently protected by NSW State Environmental Planning Policy (SEPP) 26. Where SEPP 26 does not apply SCCG consider that areas of littoral rainforest along the NSW coast and bioregions are under constant threat from both human and natural pressures including land clearing, urbanisation, bushfires and exotic weed infestation. The SCCG supports in full the proposal of the NSW Scientific Committee to list Littoral Rainforests on NSW Coasts and bioregions as an endangered ecological community. Listed below is a summary of key issues and specific comments SCCG have in relation to the importance of Littoral Rainforest communities.

Recent ongoing investigations in to the pressures littoral rainforest communities face from increasing coastal urbanisation, agricultural practices and natural processes also highlight the need for further protection of this vegetation community (Mills, 1996, Mills & Jakeman 1995; Keith & Bedward 1999, NPWS 2002).

1.0 SPECIFIC COMMENTS

1.1 Support For Scientific Community

As outlined in Section 1 of this submission, SCCG recognise the importance of littoral rainforest communities and supports in full, the proposal by the NSW Scientific Community for this community to be listed as an endangered ecological community on the NSW Coast and bioregions.

1.2 Littoral Rainforest Communities Provide A Vital Habitat

Coastal Littoral Rainforests provide habitat for a diverse range of flora and fauna species and populations. They provide ecological connectivity within and among species populations for areas of habitat, protection, breeding, pollination and seed dispersal. Without these aspects that are provided by Littoral Rainforests, species assemblages, structure and ecological connectivity of flora and fauna populations is at risk, and may result in the irreversible fragmentation of populations.

1.3 Littoral Rainforests - Area and Pressures

Littoral Rainforest occurs in numerous but often small stands and in total comprises less than 1 per cent of the total area of rainforest in NSW (www.npws.nsw.gov.au cited 18/05/04). In light of the above statistic, these areas can be regarded as small pockets of vegetation within NSW vegetation communities. Therefore, what does this mean for SCCG Member Councils given many of SCCG Member Councils manage Natural Resource areas? SCCG acknowledges that there is a limited Littoral Rainforest area within the Sydney region. Therefore, can SCCG Member Councils further assist in the classification of Littoral Rainforests, aid in their identification or map known or potential Littoral Rainforest sites.

The largest known stand occurs in Iluka Nature Reserve, which is approximately 136 hectares. It is important therefore that the current area of Littoral Rainforest communities in NSW be preserved to accommodate the needs for present and future ecological populations and communities. The listing of Littoral Rainforests as an endangered ecological community would (a) aid in preserving existing Littoral Rainforest areas and (b) will reduce the likelihood of endangering other known or potential Littoral Rainforest sites from human pressures such as, land clearing and urbanisation.

Littoral Rainforest areas within the SCCG are limited given the scale of urbanisation and development that has occurred over past decades. Sydney Coastal Councils Group however, supports and encourages the conservation and enhancement of all existing SEPP 26 sites across the NSW Coast and bioregions. Sydney Coastal Councils Group also encourages, where possible, areas of potential Littoral Rainforest to be zoned under SEPP 26 and assist in identifying other possible sites within the Sydney region.

Sydney Coastal Councils Group are of the opinion that the proposed listing of Littoral Rainforest communities as an endangered ecological community would assist in raising public awareness, reduce human pressures and if successful, ensure that the proposal be linked to local planning instruments. It would also result in preserving the current area and composition of Littoral Rainforests in NSW as well as assisting in further scientific research.

2.0 Conclusion

It is the opinion of the Sydney Coastal Councils Group that without adequate protection of coastal Littoral Rainforest areas, the uniqueness of these ecological communities is at risk.

Despite the current listing of NSW SEPP 26, Littoral Rainforest communities continue to decline in number, extent and area. The Sydney Coastal Councils Group therefore supports the NSW Scientific Community in its proposal to list Littoral Rainforests across NSW and bioregions as an endangered ecological community. This action would ensure that Littoral Rainforest communities, their extent and associated ecological biodiversity are adequately protected and the risk of extinction to remaining and potential sites is reduced.

I trust that these comments and recommendations will receive appropriate attention when finalising the submission for the proposed listing for saltmarsh as an endangered ecological community. If you wish to clarify any matter in the submission or require further information, please contact the Group's Coastal Projects Officer, Richard Phillips on 9399 0675 or email on the following address, richard@sydneycoastalcouncils.com.au

Yours Sincerely,



Patricia Harvey OAM
Chairperson
