

The Institute of Foresters of Australia

ABN 48 083 197 586



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Forests Assessment
Natural Resources Commission
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Attention: Pia Zadnik

Re Submission on Cypress Forests Assessment

Thank you for the opportunity to comment on the Summary of Available Information and Call for Submissions - South Western Cypress State Forests.

The Institute of Foresters Australia (IFA) is the peak professional body for forest scientists, forest educators and forested land managers in Australia. We are a non-profit organisation with 1350 members who are committed to the principles of sustainable forest management and the processes and practices which translate these principles into outcomes.

The IFA has a long history of involvement and interest in the science and sustainable management of the South Western Cypress State Forests. Our submission includes contributions from IFA members who are senior foresters from the public and private sectors who are working or have worked in these forests for many years, both in management and scientific research capacities

The IFA's submission makes comment on issues that we would like the NRC to give careful consideration to. We are disappointed to note that the NRC has not provided for further public comment following completion of submissions, however, we look forward to ongoing involvement in the assessment process prior to completion of NRC's final assessment report.

Yours sincerely,



Nick Cameron
Chair
NSW Division

The IFA wishes to put forward a number of broad points relating to the cypress forests of South Western NSW rather than a detailed report on each of the key issues for submissions numbered 1 through 28.

1. The cypress forests which are the subject of this assessment, including public and private forests, are generally island forests scattered throughout the region and do not form a large block such as the Pilliga. These forests range from highly productive, (generally with better rainfall in the east) to lower productivity forests (generally in the lower rainfall belt in the west). They also range from actively managed (i.e State forests) to unmanaged forests for timber (generally all other tenures).
2. The growth habits of cypress have been well documented (Lacey, 1973, Vanclay, 1988, Jurskis, 2009). A key feature of these south western forests is that they exist in landscapes which are highly altered from their pre-European condition. Dense regrowth cypress forests have lower resilience to drought because they transpire more water than sparse stands (Jurskis, 2009). Cypress is also a shade tolerant species which generally does not form lower density stands by natural thinning but will become an unthinned thicket. If stressed for moisture, trees stagnate and ultimately die. Old trees are most vulnerable, and pre-European cypress and box trees in dense new stands have suffered high mortality in the last decade. Cypress responds readily to thinning, by either non-commercial or commercial processes, to form healthy stands. In the absence of active management it can be difficult to maintain the health and existing values of Cypress forests. Cypress is regarded as an invasive native scrub by some Administrations in the region, which allows streamlined approval for clearing. This in turn leads to a potential loss of recruitment of cypress trees in those areas.
3. The Cypress Industry Strategic Plan (CISP) is another important document that considers the management of cypress State forests. The forest management objectives of the CISP are as follows:
 - The maintenance of healthy and dynamic forests;
 - To provide a sustainable supply of forest products;
 - To ensure conservation of flora, fauna and soils;
 - To provide for a range of cultural, recreational and educational pursuits.
4. The State forests identified within the assessment area have been actively managed by Forests NSW over the past 95 years and are the key supply areas for the NSW cypress timber industry. These forests have had funds invested over a long period for forest works including thinning of regeneration, protection from fire, control of feral animals and pest plants and road access. It is the IFA's understanding that these forests are needed to meet the commitments made to the timber industry under 20 year timber supply agreements and for the longer term supply to the western communities which are dependent on this industry. These forests are referred to below as "key forests" and are to be defined as part of the assessment process.
5. The IFA understands that resource commitments to the timber industry are reasonably in balance with current resource availability from State forests within the assessment area. Cypress rotations are in the order of 100 to 150 years and the NRC document forecasts regarding impacts of climate change indicate that there may not be any significant changes to long term growth rates for the key forests. If any of these key forests are removed from timber supply status there will be impacts on timber supply commitments to the industry.

6. Forests NSW has managed the key forests to meet both conservation and timber supply objectives under varying prescriptions over a long period. The nature conservation regime implemented in these forests includes forest management zoning and a range of prescriptions specifically designed to enhance conservation outcomes. (ESFM Plan – Western Region NSW). The IFA believes that these key forests actively managed as part of the timber supply zone for the existing industry should remain under Forests NSW management.
7. The IFA believes that the Government's conservation objectives for these key forests and their reliant communities can be effectively provided by a multiple purpose management approach, including management prescriptions under IFOA and dedicated (formal and informal) reserves in some instances. Other cypress forests which are generally not part of the timber supply and are not expected to contribute to timber supply in the future could be given priority consideration for conservation.
8. The IFA believes that the selection of any SW cypress State forests for reservation into National Park must be scientifically justified by the NRC. The IFA supports the reservation of high conservation value forests only where existing management can be demonstrated to pose a threat to these values and a case for better protection under national park can be justified. The IFA remains doubtful of the need for further reservation of SW cypress forests for the following reasons:
 - There are approximately 371,838 ha of conservation reserves located amongst the state forests subject to this assessment. (3.1.2 Conservation reserves).
 - There are also around 350,000 ha of cypress forest reserved in National Park in the Brigalow Bioregion resulting from the 2005 decision.
 - Over the last decade Forests NSW has developed an excellent track record in the conservation management of native forests with the introduction of sophisticated environmental management systems and a proven capacity to regulate integrated forest operation activity.
 - There are extensive areas of privately owned (freehold and leasehold) cypress forests within the south west where forest management is poor or non-existent. With minor improvements to the management standards in these forests there is enormous potential to enhance regional conservation outcomes. The IFA strongly believes that this should be a key focus of the NRC's assessment.
 - The growth habits of cypress and its history demonstrate that the fine stands of mature forest have resulted from human intervention, mainly thinning. If these forests are reserved without pro-active management they will stagnate and become locked up with regeneration over time.
 - Cypress is a fire sensitive species demonstrated by the 2006 fire in the Pilliga region where around 17,000 ha of merchantable cypress was killed by fire. This species of tree does not regenerate like eucalypts with the result that forest values and timber production are impacted. Effective protection of cypress from wildfire requires an active fire management culture. The IFA believes this culture is well developed and embedded within the existing management of Forests NSW who have extensive experience in hazard reduction, suppression and are equipped to undertake salvage operations in the event of future destructive wildfire events. The potential loss of this fire management expertise and understanding is a real possibility under a tenure change scenario.
9. The cypress timber industry has expended a considerable effort, with Government assistance, under its Cypress Industry Strategic Plan, as amended from time to

time, such that it is now a sophisticated export and value-adding industry. There are a number of important conditions in the environmental certification of Australian cypress timber which depends on a continuing supply of sawlogs from State forests. This includes Australian Forestry Standard certification, Australian Timber Industry Certification (ATIC), chain of custody and export approvals in China and Japan such as the Japanese Agricultural Standard (JAS Accreditation). The IFA understands that a resource reduction from State forests to this industry would seriously harm its marketing and sales with consequences for employment and the affected communities.

10. Further to point 10., the IFA is aware that use of private property timber resources have been attempted in the past and have generally failed due to the geographical spread and often small holdings of quality cypress forest. Most private cypress forest has not been actively managed as it has for State forest and is not managed for on-going supply of sawlogs meeting industry specifications. We believe that the organisation of any private cypress would require complex administrative arrangements with individual forest owners over long periods to become a reliable source of timber to a sophisticated timber company. Government purchase of cypress forests would have the difficulty of needing a long lead time and cost to bring such forests into timber production.
11. Contrary to the limitations of the private cypress to provide a reliable source of timber, there are significant opportunities to improve the conservation values of privately held forests in order to achieve regional conservation outcomes. It is proposed that government investigate options for achieving these outcomes. There is a precedent for acquisition of such land from the private sector in the Brigalow Belt Bioregion following the 2005 decision.
12. Thinning of regrowth cypress is a key to ongoing management for forest values and timber production. "Active management through thinning, logging and fuel reduction improves biodiversity in comparison with forests that are not managed" (Phil Cameron - Western Plains Zoo from CISP). Previous thinning has been carried out with depression employment programs in the 1930s and in other unemployment schemes from time to time since then. In the 2005 Brigalow RFA decision there was specific acknowledgement by government of the need for cypress thinning on all land tenures. Since this decision the IFA is aware that Forests NSW has been actively undertaking thinning as a necessary activity to meet its ongoing timber supply commitments. The IFA is also aware that no thinning of cypress has occurred in the community conservation reserves which are managed by the Department of Conservation, Climate Change and Water (DECCW). For this reason the IFA is understandably concerned that if SW cypress forests are reserved as national park or conservation reserve that are unlikely to be thinned and as a consequence will have their future health put at risk.
13. The IFA is aware of an initiative in the Pilliga area where research has been conducted into the feasibility of a small scale biofuel plant supplied by thinnings of young cypress and other non-productive timber within cypress forests. The IFA believes that this initiative, and related commercial applications to achieve thinning, should be further explored by Government as a cost effective and employment generating program. Such initiatives may require Government assistance in the development stages but could provide a lower cost way of achieving forest improvement than non-commercial thinning.

References

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