

# Submission

on

**Draft: Forestry and Wood Processing  
Industry Transformation Plan**

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## Submitter

### **The Forest Owners Association (FOA)**

The New Zealand Forest Owners Association Incorporated (FOA) is the representative membership body for the commercial plantation forest growing industry. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand's plantation forests and over 75% of the annual harvest.

Forestry export revenue is forecast to reach \$6.3 billion in the year ending June 2021, an increase of 12.8 percent from 2019-20 when the forestry sector was prevented from operating during Level 4 lockdowns. Harvest volumes are set to reach 36.5 million cubic metres in 2020-21, up 14.5 percent from last year. Log export volumes are expected to increase 21.4 percent, reflecting increased demand for export logs (SOPI, June 2021).

# Summary

## 1. Vision

The Association commends the government for placing an emphasis on the development of the forest and wood processing sector and agrees there are significant potential benefits to be gained for New Zealand that justify this attention. We concur that achieving the vision of the Industry Transformation Plan will require a joint commitment by government and industry at both the national and individual investor level.

The various bodies representing constituencies within the forest growing and wood processing value chain including the Forest Owners Association, Farm Forestry Association, Forest Industry Contractors Association, Wood Processors and Manufacturers Association, Timber Industry Federation, Māori Forestry Association and NZ Institute of Forestry have collectively discussed the ITP. It is clear there is strong support for engaging with government to build capacity and value for the benefit of all.

We support the principles and objectives of the plan, notably improving the relative prospects across the entire value chain and extracting greater value from the resource.

Achieving the goals of the ITP (pages 26-29) will require significant funding and enduring political will. We are encouraged by the recognition in the industry transformation plan that Government has a role in several key areas to directly intervene to support change.

Given the critical role of the forest and wood products industry in achieving national emissions targets and underpinning a circular bioeconomy, the Government has as much interest in seeing this plan through to fruition as the industry. It is clear that the economy needs to change fundamentally and forestry is a key to enabling that to happen. The industry must think and act in new ways to respond to the challenges and opportunities ahead. It must adapt and innovate. Significant insights from overseas experiences, threats, trends and history must also shape how the sector adapts.


To make this plan a reality and truly transformational the industry needs to be seen in a new light. The plan should have a vision (p.25) that is commensurate with the level of change that will take place.

Noting that new afforestation is needed to deliver fibre and biomass as much as to reduce carbon emissions an additional aspirational goal should be considered as follows:

- New exotic production forestry afforestation of 200,000 ha by 2030 in line with the Climate Change Commission recommendations

The plan is currently silent on the level of additional supply that will be created.

We recommend that prior to finalisation of the ITP the Advisory panel is reconvened, with additional industry participants where appropriate, to confirm the Vision, aspirational outputs and priority actions.



The Vision, aspirational goals and key actions should be reviewed by an Industry Advisory Panel before the plan is finalised

## 2. On-going process

While the consultation process requires an initial response from industry, the deadline of 30 September only represents the beginning of the journey. Thereafter it will be important to ensure focussed and sustained engagement between government and whoever the most relevant parties are from within industry to progress the areas of common interest. The FOA considers that the draft document still requires significant development to ensure that the actions undertaken are adequately supported, focussed, and can be achieved in a meaningful timeframe - the roadmap (page 104). There are also parts of the sector, such as Māori and the workforce, where further specific consultation is required. Nonetheless we welcome the draft ITP as a significant contribution and acknowledge the efforts that officials and the advisory panel to give us this starting point.

## 3. Key ITP action items

The list of proposed action items is relatively large (53). It includes near term and longer term, specific and general, government and industry responsibilities, actions that are already in play and some that have yet to be even evaluated. Understandably, not all of the areas will have the same level of interest for all parties or the same priority weighting and the detail in several areas is yet to be expanded but there is broad support for some key areas that are either underway already and can be built upon further, or that warrant early development of the roadmap. The FOA considers the following to be the key priorities that have broad support:

- Expand forest productivity R&D programme (1.2 to 1.4)
- Diversification of production species beyond current work programme subject to this being led by the crown (2.1)
- Further work to increase residue recovery (3.1)
- Map biomass supply and demand (3.2)
- Provide direct government financial support and other assistance to attract wood processing capacity (4.1 and 4.2)
- Develop a national bioeconomy strategy (4.6)
- Facilitate planning and consenting processes to encourage investment (4.7)
- Develop a scheme to recognise the contribution of Harvested Wood Products (4.3)
- Develop a system to recognise pre-1990 additionality (new number 4.9)
- Identify and facilitate manufacturing clusters (5.1 and 5.2)
- Increase awareness and skills in wood construction including engineered timber (7 and 7.1)
- Tackle impediments to greater utilisation of wood - overhaul building standards, use mass timber (7.2 and 7.3)
- Solve aggregation of supply from small woodlots (1.1 but better placed at 9.4)
- Form a joint governance and management structure to implement the ITP (10.1)
- Industry and government create and tell a forest and wood product story that builds social licence with possible subsequent expansion to the export markets (10.3 and 8.1)
- Understand the future skills needs and refresh the Workforce plan (11.1 and 11.2)
- Review the funding model for public good research to allow improved innovation (12)

## 4. Gaps

One important item included above that should also have a section in the ITP (as a new 4.9) is recognition of carbon in pre-1990 forestry. This is consistent with improved genetics, sustainable forestry, and with the commitment to “investigate feasibility of a scheme to recognise carbon in harvested wood” (4.3 under Priority Area 2).

The plan is also relatively silent on the importance of biosecurity which is a current and future challenge for the sector. Given the importance, and implications, of biosecurity on productivity, affordability, sustainability, and market access for the forestry sector this appears to represent a significant gap in the future of forestry.

Biosecurity is a notable omission from the plan. It should include reviews of the forestry biosecurity system.

The biosecurity system as it relates to the forestry sector at a minimum should be reviewed to ensure that it is fit-for-purpose and that it is able to adapt to and protect the future potential and sustainability of the forestry sector including all aspects being proposed as part of this ITP.

Not only should this encompass the layers of defense offered by NZ's comprehensive biosecurity systems, it should also include affordable, sustainable yet effective phytosanitary treatment options, processes and system to protect our ability to trade competitively in the global trade environment.

## 5. Partnership

The ITP proposes a formal partnership with key stakeholders in the sector to support and deliver key actions.

The key actions envisaged span a range from pan-industry efforts to individual commercial investment arrangements that may be commercially sensitive. This indicates that a series of partnerships will be involved. It is also important to note the engagement that has already taken place with a wide group of sector groups as described on page 13.

The FOA is committed to working collaboratively with other industry representative bodies to provide a common framework for the vision in a similar way to the Food and Fibre Partnership that exists to advance the "Fit for a Better World" vision which this ITP is a key contributor to.

The Advisory Group which has already contributed to the development of this ITP illustrates the broad range of interests that exist within the industry, particularly given the defined scope of the ITP (page 14). In parallel to pan-industry association engagement there will be a need to progress elements of the ITP through commercial individual investors or consortiums.

## 6. Wider context, scope and risks

The draft document lists (page 14) a number of areas of proposed, or pending, policy changes to forestry that are "out of scope".

*"Other forestry changes are out of scope"*

*The Government is considering other changes to the forestry system. These proposals are part of separate consultation or legislative processes and are outside of the scope of this Plan. These proposals include changes related to the following.*

- *Resource management system: The Government will seek views on National Direction to enable greater local control over the location and type of new forests this year. This work will also consider expanding the scope of the existing National Environment Standards for Plantation Forestry to better manage environmental effects of existing permanent exotic forests.*

The ITP will not be successful if it operates in isolation. Other government policy, including what is listed as "out of scope" must be coordinated and aligned. Some of these other developments have the potential to seriously undermine the ITP otherwise.

- *New Zealand Emissions Trading Scheme (NZETS): The Government consulted this year on potential options for restrictions to exotic species being registered in the permanent forest category in the New Zealand Emissions Trading Scheme.*
- *Changes to the Overseas Investment Act: The Government is progressing changes relating to forestry investment by overseas persons. We are working to ensure this Plan and other possible changes to the sector align”.*

It is unrealistic to label these as out of scope. Notwithstanding the comment that officials “are working to ensure this Plan and other possible changes to the sector align”, all of the areas listed could have a significant negative impact on the ITP and, in practice, will not be out of scope. They all have the potential to severely undermine the ITP.

One of the key drivers of industry transformation is concentration of forests in clusters around processing centres to reduce the cost of delivered logs, at the same time as improving the profits from and reducing the risks of growing forest. By definition this means allowing / encouraging land use change from pastoral to forestry in those clusters. To then concurrently suggest this essential element be left to local councils and local politics is inconsistent.

It will be extremely important for this ITP to be aligned with other government developments to ensure a coordinated and supporting framework.

## Priorities and action items

The FOA has the following comments to make on the Priority Areas and associated action items listed within the ITP

### Priority Area 1: Grow Sustainable Forests for our future

#### 1. Improve the Productivity of our Forests

Improved productivity has always warranted a high priority with industry. The ability to increase supply, particularly from the same land area, deliver more fibre tailored to the customers needs, reduce risk to that supply and produce it in a sustainable manner is fundamental to achieving the ITP goals.

##### 1.1 Increase forestry benefits to Māori and small woodlot owners through aggregation

This topic (1.1) does not sit logically under the heading of “Improving Productivity”. It is not a productivity issue it is a coordination issue, and it would more logically sit under the 4<sup>th</sup> priority area “Improving System Settings”.

Options for achieving aggregation by owners of smaller woodlots is a high priority that would improve reliability of supply

We agree that small woodlot owners including Māori have not met their potential because of a lack of scale, funding and coordination. The benefits for the entire value chain from achieving greater coordination are substantial and warrant support such as through the development of aggregation pilots, adjusting tax settings, coordinated harvest planning, changes to allow aggregated purchasing and sale. Such intervention is also consistent with the Crown’s Te Tiriti O Waitangi obligations (page 14).

The unreliable nature of dispersed woodlots operating independently causes unhelpful and unnecessarily large fluctuations in the market and is destabilizing for the workforce and processors.

Aggregation solutions are overdue to improve returns and certainty for small growers and enable greater investment in forestry at property level, especially if farms are to diversify and mitigate on-farm emissions profiles as proposed under the waka eke noa. However, aggregation vehicles, while not new to places like Scandinavia, are new to NZ and complicated by the one-off opportunity for revenue implicit in the clear-felling regimes applied to woodlots. NZIF envisage that it will take significant government involvement and resourcing to develop a reliable and trusted model that farmers (in particular) would participate in.

The forest grower associations have an interest in working with government to improve the coordination of small woodlots.

### **1.2, 1.3 and 1.4 Improve Productivity**

The plan sees huge potential for Research and Innovation and a need to provide financial incentives, improve access to larger innovation facilities and increase technology transfer and absorption. This has been a long-standing priority for industry and aligns very well with the levy-funded Forest Growers Research programme. All of the action items in these categories - automation, robotics, precision silviculture, genetics, alternative species, the industry already puts significant emphasis on. There is the opportunity to expand the R&D programmes and accelerate the outcomes through further collaborative funding between industry and the government. Genetics research, for example, could be expanded to not only improve specific known characteristics but to diversify the genetic base to improve resilience to pests and diseases, and to achieve sterility to avoid future wilding problems. Such programmes would address issues of quality, productivity, resilience and social licence but implicit in this is the urgent need for NZ to address its legislative constraints on CRISPR and gene editing technology. Ongoing work on soils, nutrition and sustainability needs continuing support including maintenance of long-term silviculture and productivity trials and demonstrations. The application and use of technology in silviculture, harvesting and transport is delivering important improvements in terms of safety, efficiencies, economics and the environment. This work can be ramped up. It is also important to understand and effectively utilise the interactions between the components along the value chain.

The current R&D productivity programme can be expanded in a partnership between industry and the Crown

Dothistroma and Red needle cast are examples of two endemic pathogens present in NZ that are having significant impacts on forest health, productivity and performance, there are also others affecting Kauri, Totoro and other species that are likely to emerge as production issues. The ITP is silent on how to better detect, predict or manage these issues, or how to prevent, monitor for, or respond to the next emerging issues (whether for radiata pine or any new species considered as part the ITP).

## **2. Diversify our Productive Forests**

### **2.1 and 2.2**

The proposed goal is to develop alternate species to radiata with a goal of increasing the current 10% by area of alternate species to 20% by 2030. The industry also recognises the value of developing alternate species and will support directly. The Forest Growers Research

Programme already has invested a significant proportion of funds since 2015 in partnership with government and Scion investigating leading alternatives to radiata <https://fgr.nz/programmes/alternative-species/>. The opportunity to build on this in partnership with the Te Uru Rakau and add additional species such as Douglas Fir now exists.

The ambitious goal of doubling the area in alternate species reflects a higher level of priority for the government than the private sector and, as has been the case historically in New Zealand and globally, with developing commercial scale species, this will require a lead by government to achieved it. Any programme should consider markets matched to species and strategic growing concentrations

The suite of production species can be expanded but it will require government leadership and require new risks to be managed

Diversification of forestry species will also result in the diversification and potential expansion of the risk exposure to new or endemic pests and pathogens. Consideration should be given to the potential biosecurity risks and implications of any new species or diversification plans (biosecurity risk assessment), including identification, mitigation, and potential risk management options. These risks should be considered and addressed as the transformation plan is developed to ensure that we don't end up with an "ambulance at the bottom of the cliff" scenario when the threat arrives or emerges and there has been no consideration of how to mitigate or respond to the issue.

### 2.3

While the private plantation sector supports the development of native forestry including an associated processing industry this is considered primarily a role for the Crown.

As noted above, understanding the potential biosecurity risks and implications will be critical to the transition to the productive use of native species.

### 2.4

The role of government investing in alternate species is strongly encouraged. The existing industry built around radiata was only possible because of the preliminary work done by government

## 3. Increase supply and use of wood for high value products and fuels

Given that “New Zealand log harvest volumes are forecast to fall by around 35 percent in the next 15 years” largely from the small woodlots, the only way domestic supply can be increased is to:

- Utilise some of the 3.5M tonnes of residues left in forest annually
- Utilise more of the 60% of national log volume that is exported unprocessed
- Establish more short-rotation bioenergy forests.

All of these options should be pursued.

### 3.1 Forest residues R&D.

The forest growers R&D programme has the potential to undertake further work on the extraction and efficient utilisation of woody biomass. Such utilisation has the ability to deliver multiple benefits – bioenergy, employment, avoidance of slash, mobilization under extreme weather conditions, improved economics for marginal land etc but it requires intervention to change the existing economics.

The cost of delivered logs is a critical factor for improving returns and investment. From Gisborne the cost of logging and transport equals the amount of money wood processors can pay and remain profitable. This is clearly not a viable proposition. And that is for sawlogs. Doing it for logging residues is even more fanciful unless, as in Europe, the value of those residues is taxpayer subsidised or in some other way supported.

Further work on improving the economics of residue extraction and use is needed

### 3.2 Map biomass

To assist, a region by region mapping of supply and demand for woody biomass is planned “to enable deliberate direction for the use of this resource given the likely competing demands”. The aim being to “support it’s most strategic use” (page 23).. Government has also provided funding (\$73.5M / 4 years) for Crown Forestry to invest in commercial planting (alternate species) to increase supply of biomass in “targeted areas”. A number of forest owners are also actively assessing fast-growing plantations and bioenergy options.

Mapping biomass supply and demand is supported

We support a strategic assessment of supply and demand for woody biomass but caution the supply and demand is dynamic and evolving. In addition, the strategic goals of individual enterprises and/or regions may not align with the national priorities and that raises the question of how Government will seek to influence the allocation.

### 3.3 Increase biomass supply

A national (and regional) map of supply and demand will be useful for investors and government alike. It would help inform planting under 3.3 for example. The challenge is that this is a very dynamic area and some of the information will be commercially sensitive.

MPI’s projections see indigenous forest increase to 25,000 hectares per year from 2030 targeted at an estimated 1,150,000 to 1,400,000 hectares of marginal land. There is no talk however of any processing of this resource.

The Crown having a direct role in establishing 10,000ha of short rotation energy forests is supported. This will help test the validity of assumptions and socialize any land-use tradeoffs, but caution is also urged. Such planting should only take place where it is clearly needed and there is also market failure for whatever reason meaning it would not otherwise be available.

It will also be important to develop strategy to guide the utilization of any additional supply as discussed in 4.6.

The intent to supplement private sector bioenergy supply with additional government planting is supported

## Priority Area 2: Modernising and Expanding the Wood Processing Sector

Most domestic initiatives listed under Priority 2 are aimed at improving the business case for new investment with strong direct government involvement via incentives, information, planning and consenting, wood products carbon recognition, and direct investment. This is core to achieving the aspirations of the ITP and these actions appear to be ones that the collective industry can support. They rely on government action in tandem with private commercial arrangements.

## 4. Grow investment in the production of advanced wood products

### 4.1 and 4.2 Government investment and financial incentives

Tackling the impediments to investment and providing direct financial support are key roles for government particularly if the wood processing sector is expected to compete offshore with entities that already receive such support as is acknowledged in the ITP (Page 65). We support the examples listed on page 66 and 68 of how investment might be improved, although the detail on how the opportunities will be realized is still needed.

Processing an additional 3.5M m<sup>3</sup> will require establishing three or four modern large-scale mills focussed on processing lower-grade logs (page 23). De-risking the investment for commercial operators could take the form of low-cost funding or grants, accelerated depreciation and project-ready industrial land with services already in place (electricity/stormwater/appropriate zoning) and in some cases (e.g. Gisborne) land aggregation from multiple owners and support for geo-tech analysis and ground stabilisation or foundations.

Financial incentives and other support are needed to support wood processing investment as it is elsewhere in the world

As highlighted in the [Advanced Manufacturing Draft Industry Transformation Plan](#), Australia is adopting a range of programmes to expand and support their manufacturing sector, including the Full Expensing of Depreciating Assets (estimated to deliver AUD\$26.7 billion in tax relief over the Budget 2020-21 forward estimates and \$3.2 billion over the medium term). Other countries have also implemented similar programmes to stimulate their manufacturing sectors following the Covid-19 pandemic. For Australia and those other countries that New Zealand enjoys an open trading relationship with, substantial differences in investment incentives applying to their manufacturing puts at risk domestic and international investment in advanced wood processing and bio-product manufacturing plants in New Zealand.

### 4.3 Investigate recognition of carbon

Recognising and rewarding the sequestration benefits of harvested wood products has the potential to significantly encourage investment and increase our carbon store.

Since 2011 when methodology was agreed at COP 17 the ability has existed under the international rules for New Zealand to measure, monitor and account for such sequestration. We are now at COP 27 and urgency is needed to progress this. It is acknowledged that government will need to create a system that allows it to have faith that liabilities can be managed alongside any credit recognition just as it is for forest growing. Furthermore, the HWP potential for NZ has been assessed as lower than using the PICC half-lives. Nonetheless, the magnitude of the tonnes of carbon involved indicate that even an approach based on conservative assumptions is likely to deliver an outcome that fits the definition of transformational.

A scheme should be urgently developed to recognise and promote long lived carbon sequestration in wood products

We also consider that measuring and tracking carbon in wood products is considerably more complex than measuring in-forest carbon. For that reason, we expect that a system outside the ETS is likely to prove the most practical. One element that will need to be clarified is how the respective half-lives for products ranging from paper, (2-3 years) to solid wood (30-40

years) will be recognised. An averaging approach while simple to implement does not send an incentive signal to those investing in the products that store carbon the longest.

As the ITP notes “Emissions pricing plays an important role in incentivizing production” (p 66).

#### **4.4 Options to address leakage**

We also concur with the focus on managing “leakage” and the competitive advantage that competing concrete and steel firms have where they are able to take advantage of free industrial allocation under the ETS.

The EU is introducing border adjustment taxes from next year and it may well be justified in NZ particularly where New Zealand wood processors and manufacturers are being unfairly disadvantaged in competing with other countries that apply trade restrictions and an increasing array of non-tariff barriers. The principle underpinning border adjustment mechanisms is long accepted in New Zealand in the form of existing Emissions Intensive Trade Exposed (EITE) business protections under the ETS. Expansion of EITE protections to more of New Zealand’s wood processing sector would compensate in some measure for the indirect impact of domestic wood price distortions, as increasingly large bioenergy users (who enjoy substantive EITE protection) seek to expand their demand for wood fibre and logs as a biofuel to produce processed heat.

#### **4.5 Provide information to support investment**

The industry welcomes the commitment to improving information and advice to smooth the path for investment. Having an accurate assessment of wood available for harvest, and uncommitted wood, is a fundamental piece of information for processing investors

#### **4.6 Attract and facilitate new investment in the bioeconomy and advanced processing**

This area is strongly correlated with 3 “*Increase supply and use of wood for high value products and fuels*”

The International Energy Agency predicts that by 2026, renewable electricity globally will rise more than 60% from 2020 levels. That is equivalent to the total global power capacity in 2021 of fossil fuels and nuclear combined. Renewables are expected to account for almost 95% of the increase in global power capacity through 2026, with solar alone providing more than half.

Wind and solar will play a significant role but this will be insufficient. It isn’t always sunny, or windy, and the true transition transmission costs associated with this energy can be significant. Turbines, for example, require large amounts of steel and concrete. Hence the unprecedented investment interest in securing biomass for energy purposes we concur with the ITP that the demand for this biomass will grow quickly.

Fonterra is in the process of converting its coal-fired boilers to woody biomass. The dairy factory at Waitoa is the latest announced for conversion following recent conversions of plant in Te Awamutu and Balclutha. These, and eight other planned conversions, are based on more than today’s economics, they are future-proofing investments that take in to account the rising cost of carbon emissions, expectations of customers and border adjustment taxes already announced by the US and the EU. Energy security and bioenergy being storable are also important reasons for bioenergy investment.

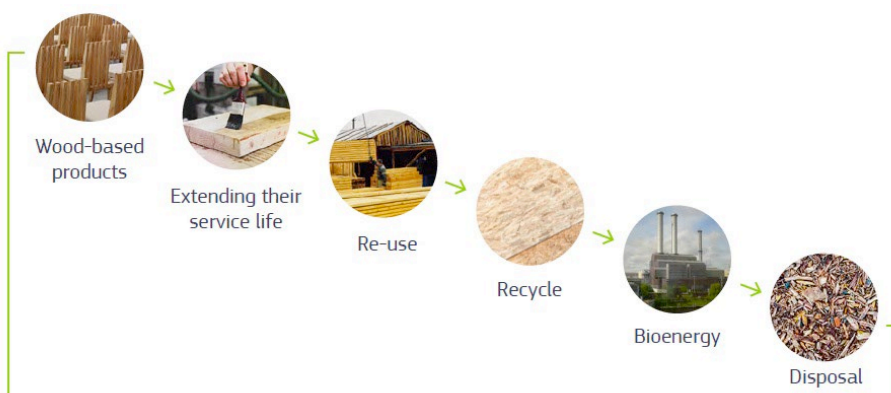
The development of a bioenergy industry will increase competition with existing resource users who have not faced such competition previously and who have sunk assets at risk. This does not mean the bioenergy industry should not have government support. The government has a legitimate role in facilitating the development of a bio-economy particularly given the relative price differential with fossil fuels means market economic s alone will be insufficient to

deliver the transition required, within in the time frame required. New Zealand’s net zero emissions goal and the need to reduce emissions by 150 million tonnes by 2035 require government stimulated change but policies and other incentives should also recognise a hierarchy of need and determine what is the highest and best use for the in-demand resource.

The actions listed in the Transformation Plan will assist in increasing the utilisation of existing sources – residues and low value logs as well as provide some additional supply through government planting 10,000ha. Unfortunately, a key influence on investment and utilisation is still missing – the bioeconomy strategy being developed by MBIE. FOA and the Bioenergy Association of NZ (BANZ) previously developed a proposed strategy to help inform this. Not only is this high-level direction required to understand supply and demand, it should also address the issue of highest and best use of fibre. Of the approximately 11.6M tonnes of biomass estimated to be available between 2026 and 2030 about 38% is K grade logs, 15% pulp logs (above and beyond those needed for domestic processing) with a further 22% in forest residues. What of this can be relied on for bioenergy and what is better suited to higher value end uses?

A bio-economy strategy is needed to inform the policy development around biomass utilisation and consideration should be given to establishing a hierarchy of biomass need.

In the EU bioenergy is well developed and it has led to policy governing its development and what is referred to as the cascading principle. This holds that to minimise a negative impact on the bioenergy market woody biomass should be used according to its highest economic and environmental added value in the following order of priorities:



EU policy requires that member states shall grant no support for the use of sawlogs, veneer logs, stumps, and roots to produce energy. From 2026 there will also be restrictions on using forest biomass in electricity-only installations.

New Zealand does not have the same energy profile as Europe, and such policies may not be appropriate here, but an over-arching energy strategy that addresses the question of national good is urgently needed.

**4.7 Facilitate planning and consenting processes.**

This is a area where the government can potentially make a significant contribution by working with local authorities to tackle the current uncertainty

Central government involvement in the planning and consenting process is needed to ensure investment takes place

and restrictions associated with the planning and consenting process but it is not clear how government will provide this much-needed planning and consent support, particularly given the concurrent intention to introduce other local authority legislation that poses a significant risk to the potential to realise the ITP goals.

#### **4.8 Industry engagement with the finance sector**

Familiarity by the financial sector with forestry, and particularly the valuation of carbon assets, has also been an impediment but this is changing and not as high a priority as the RMA process or its unknown successor. There is room to raise awareness of the credentials, and demand opportunities in the wood processing and manufacturing sector.

#### **4.9. Pre-1990 forestry sequestration (not currently included)**

A notable omission from the ITP is work to recognise additionality in the pre-1990 forestry estate. Like Harvested Wood Products this is recognised internationally, has the ability to help meet our carbon objectives from within existing forest land, has NZ government funding to develop and has industry support. The benefits of this recognition extend into native forestry and the conservation estate. This should be included as an additional action item and has strong industry support.

The ITP should include a section noting the approved work programme to develop a scheme to recognise additional C sequestration in pre-1990 forests

### **5. Support Co-location and collaboration**

#### **5.1 and 5.2 Cluster facilitation and development**

The benefits of clustering of related business entities are well made and represent an area where efficiencies are currently being lost.

The identification of, and government facilitation to establish, co-dependent clusters of investment is strongly supported and aligns with the need to address local authority consenting engagement under 4.7. With any such support it will be important to identify concrete interest in investment and work on what those impediments that are well known and understood, rather than a build it and they will come punt.

There is an opportunity to improve investment prospects through creating mutually supporting business clusters

#### **5.3 Commercialisation**

A precursor to full scale, expensive, long-term investment is pilot verification. The ITP acknowledgement of a role for government to support such proof of concept is welcome.

#### **5.4 Enhance circularity of the value chain**

The increasing emphasis on renewables and a bio-circular economy is something that must also be applied to the forest sector. While the sector has strong renewable credentials it also has its own emissions challenges and waste disposal issues that must be addressed.

Clear alignment is needed between this action and the Government's revision of the national waste strategy and the current Waste Minimisation Act 2008. Work on these programmes is well advanced, suggesting scope for direct reference to the national waste strategy and the ITP. Aligning these overlapping workstreams will enable wood processors, building industries, researchers and regulators to consider how these points could be implemented in practice,

including what changes need to occur to various regulations that cover the treatment and disposal of wood products and other waste streams from the construction and demolition of buildings.

## **6. Improve trading and transparency of markets for logs and woody biomass**

### **6.1 Improve information for market transparency**

It is proposed better information be made available on predicted harvest volumes and pricing with real time sharing of information allowing “*price-smoothing contracts*”. Greater information transparency can be welcomed, and supported by industry, but this will not necessarily guarantee “price smoothing contracts”.

We agree that improved data, forecasts, and trade updates are all types of information that can improve confidence. The industry welcomes the chance to work collaboratively such as through the NEFD and Facts and Figures initiatives to provide further support information.

### **6.2 Long-term trading contracts**

Supporting long-term trading contracts – short-term supply contracts are seen as inhibiting long-term investment. It is stated that forest owners prefer short-term contracts and it is proposed that: “*Government will partner with the sector (emphasis is placed on small woodlots) to develop log and biomass market trading arrangements through an iterative process to co-create improved trading arrangements*”.

It is acknowledged that longer term supply contracts provide an increased level of certainty, but it is not clear that forest owners necessarily prefer short-term supply contracts and there are existing examples of long-term supply contracts, with quarterly pricing negotiations. What is agreed in a contract will be what is mutually acceptable to both parties. Both parties in any supply contract will want a degree of flexibility to allow for unexpected changes in the market. Longer term supply contracts per se are not the challenge, it is achieving mutual agreement on the terms within the contracts that proves elusive and the longer the contract the greater the challenge. That said, we support further efforts, with government support, to develop models that may provide a starting point for further negotiation.

It should be noted that care is needed in this area to ensure that any activity does not represent collusion and or anti-competitive behaviour.

## **Priority Area 3: Grow and diversify domestic and export markets**

Actions under this priority are mostly related to working with the processing sector to grow the market in New Zealand and offshore. Proposed initiatives include support for the Timber Design Centre, standards, mass timber and non-tariff barriers.

## **7. Grow domestic demand**

As well as the economic, and strategic trading benefits of utilising more of a resource produced in New Zealand there are additional carbon sequestration benefits from significantly increasing the store of embodied carbon and substituting for fossil fuel dependent materials.

Construction timbers go into buildings that will store the carbon for decades or hundreds of years. The carbon stored in the wood accumulates over time. While there will be an upper limit to this, that limit will be well after the 2030 and 2050 timeframes by which emissions need to be reduced and will buy time for the economy to adjust – something that is currently a significant challenge to achieve. Recognition and encouragement of wood product carbon

storage is needed to maximise this benefit. This, and recognition of sequestration from additionality in pre-1990 forestry, will also lower the dependency on new planting and landuse change. Furthermore, there should be a focus on ensuring any non-production forestry should not be displacing what could be production forestry producing long-lived timbers.

Government support to increase awareness and skills in wood construction including engineered timber, and through procurement leadership, can lift use and demand

Residential buildings already have a high wood component at around 95% (2020). Structural timber is the most common type of framing used in residential building at 73% of new builds. The use of engineered timber as framing (LVL) in new residential builds is estimated to be 13%, with panel systems (including wood) making up 9% in 2020.

There are opportunities to look at more innovative wood products in residential builds, including mass timber ground floors, quick assembled prefabricated wooden structures, etc.

### **7.1 Timber Design Centre**

The role of the TDC remains critical and funding finishes in June 2023. It represents an example of what can be achieved by partnering between industry and government. Its continuing development is supported.

### **7.2 Technical barriers to innovation, e.g. standards**

This is a priority challenge for the processing sector and is therefore a priority challenge for the whole sector and is therefore a priority for the ITP. The misalignment of standards domestically and with Australia represents a significant impediment and lost opportunity. The FGLT has provided funds previously to WPMA to support the development of standards and, given the potential for alignment with Australia, this is likely to be an area where support has significant indirect benefit for levy payers and would likely be supported again but it also requires government involvement. Part of the challenge is that Standards NZ require a consensus-based approval for setting standards (plus industry funding – but from who or what industry cash bucket?) – this needs unblocking.

Building standards need amending domestically and potentially aligning with Australia to address a long-standing impediment to growth

### **7.3 Mass Timber**

Mass timber represents an opportunity to significantly increase stored carbon, timber demand on-shore and replace less sustainable alternatives. Concurrently increased domestic log demand would reduce forest owner exposure to log export (bio-security and sea transport) and single market (China) risks thus improving confidence in planting forests for timber supply. The challenge is whether there is enough production capacity to produce mass engineered timber products, such as cross laminated timber, laminated veneer lumber and glulam products, of the scale needed to meet anticipated growing demand. Despite emerging demand, the business case to invest is frustrated by risks associated with resource consenting, suitably serviced industrial zoned land (electricity supply, noise restrictions, stormwater, road/rail access, close to labour and support services), security of log supply of the right log grades, and access to skilled labour. Evidence to date suggests government support to de-risk investment into manufacturing engineered mass timber products will be needed.

#### **7.4 Low carbon procurement reference group**

This appears a useful action but does not need a separate reference. It can be included under 7.1 as it is an action of the Timber Design Centre.

#### **7.5 Grow demand for bioproducts**

These actions are supported but they are generic statements lacking specificity. The emphasis is on awareness raising and education. This action should be broadened to a wider promotional campaign extolling the many virtues of wood. This will also assist with license to operate. Why would we have a campaign to sell the story for the export market and not have a similar campaign for the domestic market?

### **8. Grow and diversify export products and markets**

Establishing and building an export market for unprocessed material is laudable but comes with significantly more challenge and risk than expanding the domestic demand. First priority should be extracting full uptake from the domestic market and it is not clear why telling the story is only suggested for the export market. In addition, any promotional effort offshore needs to be contingent on knowing we can supply. That said there may be opportunities because of supply and demand characteristics and geopolitical considerations to increase processed exports to Australia.

*“Exporting processed wood products would lower overall emissions”* needs a qualifying comment to note that optimal slow speed sailing and additional water ballast required to achieve loading to the plimsol line could be factors that lower the emissions savings.

#### **8.1 Create and sell our story (for the export market)**

As noted, a concentrated focus on developing export markets should come after concluding that stimulated domestic demand will not be enough to cater for what will be a reduced log supply. Export marketing introduces a range of additional risk factors.

A priority should be maintaining a joint commitment to developing a domestic programme that “tells the story”. This can then be modified as needed for an export audience.

#### **8.2 Establish offshore in-market presence**

A notable proposal within this section is to *“Establish offshore in-market presence”* and create and sell our story internationally. Canada and Finland are cited as respective examples of success. It is proposed that *“Government and the sector will co-fund market development staff in our key export markets to”* align local wood standards, build demand and gather intelligence. Aligned with this it is envisaged that there will also be co-development of *“an enduring marketing programme to deliver a sector wide marketing story...on the global stage”*.

If some of the initiatives in this section are to happen, they will require significant, and sustained, industry funding and the FGLT is clearly seen as a key partner (although not necessarily the only industry levy funding arrangement. Depending on what is involved, in-market presence could require large sums of money that under current setting is unlikely to be supported by FGLT funders.

#### **8.3 Reduce non-tariff barriers**

This is an on-going government role. Post Covid and with other geo-political tensions there is an increasing emphasis on shortening supply lines and being more self-reliant. This gives rise to increased protectionism in markets that New Zealand is trying to compete in. It reinforces the case to expand domestic wood use that would concurrently reduce exposure to coal and cement imports.

Market access will increasingly require a sound and effective biosecurity system and framework to provide assurances to our trading partners that NZ, or our wood products, are free of pests and pathogens. Not only will this require an effective and fit-for-purpose end-to-end biosecurity system that addresses biosecurity threats to forestry, but it also requires the availability of, access to, and the ability to use, a range (toolbox) of phytosanitary treatment options to meet importing country requirements. Currently NZ is reliant on a small number of treatment options, all of which have risks associated with them. With both domestic expectations and trading partner requirements changing and trending toward more sustainable and environmentally friendly yet effective options, the forestry sector will need to be able to front foot and quickly adapt to these changing requirements to ensure they do not become trade barriers.

## Priority Area 4: Improving System Settings

The focus of this priority is on collaboration, our people and innovation to support change.

### 9. Support Māori aspirations

As noted in the ITP Māori have a particularly strong connection with forestry. This is through both the workforce and ownership. The intergenerational nature of the investments in either forestry or wood processing also aligns with Māori horizons.

Much Māori land remains underutilized for a variety of reasons but access to capital is a key constraint. Many of the proposed ITP actions that will unlock the potential of the industry will have a direct beneficial effect for Māori, but some specific intervention is also warranted.

There is recognition Māori are strongly connected with forestry and its future development but that actions are needed to address numerous constraints that stand in the way of full participation including training, access to finance, and representation. Greater use of Mātauranga Māori (Māori knowledge) in research and development is highlighted and this aligns with the intentions of the forest growing research programme, and Scion and a continuous canopy totara pilot is presented as a possible model for achieving multiple objectives.

#### 9.1 Strengthen voice of Māori

The recent establishment of Ngā Pou ā Tāne – the Māori Forestry Association provides a dedicated voice for Māori and the FOA and other industry associations are regularly engaged on industry matters with Nga Pou a Tane.

#### 9.2 Support Māori leadership development

A dedicated programme to such as the Māori Primary Sector Leadership Programme is supported. This should be aligned with 11.5.

#### 9.3 Support Māori to develop forest and wood produced initiatives

As noted, capital is a key constraint for Māori. Options to enable better access and participation are welcomed. The action item is short on the details of how this will be done though there are models of what could be put in place. Whenua Oho, for example, is a three-year initiative funded in 2020 by the One Billion Trees Fund to assist Māori landowners to achieve their aspirations for their land. Whenua Oho means “awaken the land”. It provides a trusted and independent entity

Specific initiatives to unlock the potential of Maori land for forestry are warranted but need further development

with subject matter experts in forestry, tikanga and iwi issues. The initiative aims to increase Māori participation in the forestry sector – including both exotic and indigenous forestry. Māori experts provide education, assistance and connections, empowering Māori landowners with information and partners who can best help them with decisions for their land and their aspirations. The services of Whenua Oho have resulted in land management decisions being made by Māori landowners which contribute to both iwi and emissions reductions goals, including tree planting, carbon removals and storage, and erosion prevention on vulnerable land.

## **10. Create a strong collaborative sector**

### **10.1 Implement the ITP in partnership**

The government clearly wishes to engage with the sector through one entity to implement the ITP. Greater collaboration is seen as *“a prerequisite for industry transformation”* and *“There is a missed opportunity by not speaking with “one voice” about common interests and objectives”* such as co-investment in research and development and improving the sector’s social licence.

The sector having several different associations with different membership bases is seen as an impediment to coordination and funding of industry good activities (page 24).

Covid has demonstrated the industry’s ability to coordinate effectively. Where there are “common interests and objectives”, there is industry agreement that one voice, or at least an alignment of multiple voices, is preferable. The various entities within the sector however all represent legitimate constituencies and have a role to play in representing them. The priorities for these component parts will understandably vary and that should not be seen as a problem. Indeed, it can be complementary as the expertise and contacts are spread across the groups.

The absence of a formal single body, however, does not preclude collaboration and coordination between the existing entities, particularly with respect to the ITP. As has been discussed previously there are pros and cons to having only a single voice and international examples of forestry representation are mixed. Australia has AFPA but in the US, for example, leaving aside individual state organisations, there are over 20 national forest and wood industry bodies. A potential governance and management structure for implementing the ITP is discussed below.

### **10.2 Collaborate to invest in Industry good**

The document further comments that *“Drawing on the experience of the Forest Growers Levy Trust, it is important to recognise that it will take time to build consensus on the path forward and gain commitment”*. Without providing detail on the model the ITP states that *“Government will support the sector to explore organising and undertaking industry-good activities, such as developing new funding arrangements”*. It also refers to exploring governance and working group arrangements for jointly implementing the ITP.

The FGLT is not generally involved in industry representation but any *“governance and working group arrangement”* for the ITP will almost certainly need FGLT representation, and there will need to be collective agreement on scope, objectives, membership and, if required, funding.

The forest industry and government have previously created successful partnership arrangements on the basis of mutual benefits from an expanded industry. In 2001 a Wood Processing Strategy (WPS) was put in place and this was subsequently built on from 2005 via a Forest Industry Development Agenda (FIDA). Both of these joint industry/government programmes recognised that New Zealand’s international and domestic climate change objectives would be enhanced through increased development of the industry and that “the

potential of the forest industry to become the Country's leading export industry has a chance to be realized".

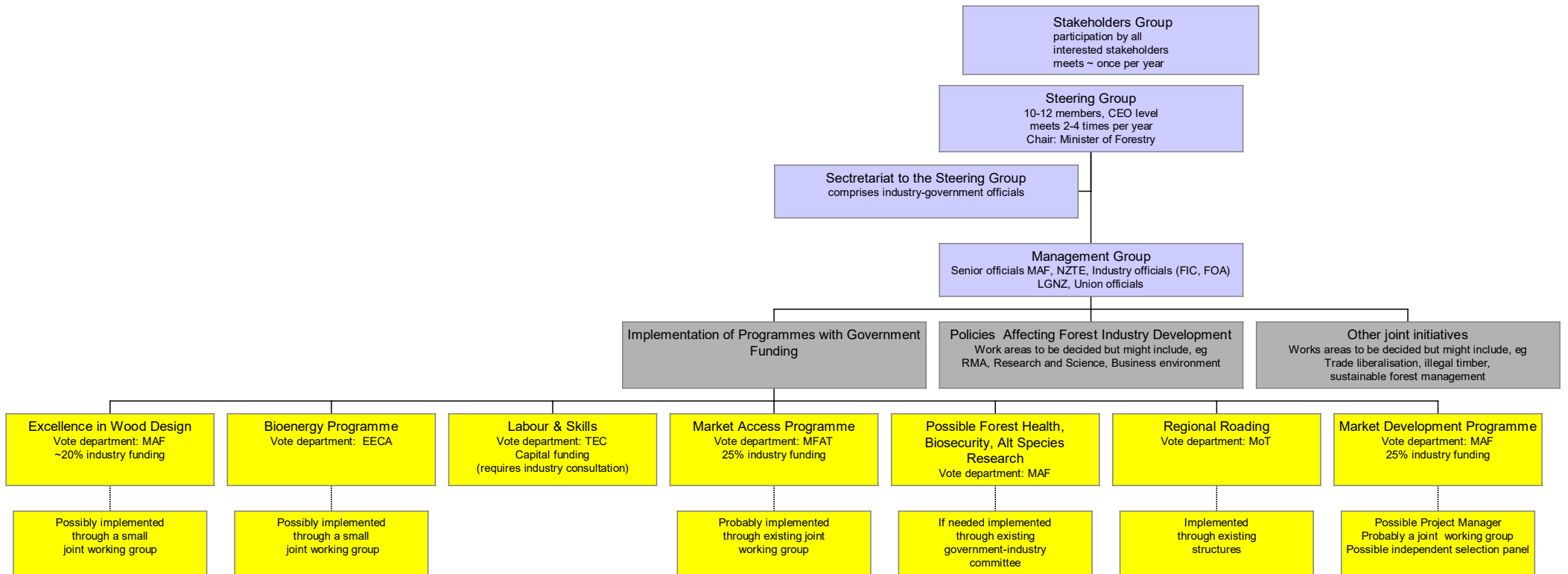
The sums of money made available by government were sufficient to ensure tangible outcomes were achieved and included Market Development (\$12M over 5 years), Market Access (\$1.4M / 5 years), Bioenergy (\$2.8M / 5 years), Labour and Skills (\$5M / 5 years), Excellence in Wood Design (\$2.3M / 5 years). Alongside this \$20.5M funding industry contributed \$4.2M. In addition, government made a further \$23M available for regional transport infrastructure development in Northland and Tairāwhiti.

This multi-year political commitment enabled several very positive initiatives to become a reality and included:

- completion of a 'RADI' centre (National Centre of Excellence in Wood Manufacturing)
- establishing two timber design professorships at Auckland and Canterbury universities
- development of a timber design software package
- improved industry training
- a programme of market access development which resulted in New Zealand radiata pine being included in the Chinese building code
- WQI (Wood Quality Initiative) – a joint venture R&D programme for wood products

A joint governance and management structure was agreed to oversee the implementation of the core elements. This comprised a broad stakeholder group, a narrower steering group and then a management structure underneath that, as follows:

A joint governance and management structure for governing and managing the ITP programme of work should be put in place



### 10.3 Support the industry to maintain and build social licence

The document lists social licence as a “key enabler” of future growth and states that “*the sector needs to raise awareness of the benefits it provides...*” (page 8). We agree that the sector has an important role to play in such communication and are committed to doing so, but it is disappointing that the document does not recognise that government, as a partner, also has an important role to play. There should be strong acknowledgement of this in the document.

The vision itself refers to the sector underpinning New Zealand’s low-emissions economy and there are many benefits listed in the document on page 8 and pages 10-11 that are described as New Zealand or national benefits such as economic development, emissions reduction more and better jobs, biodiversity, Māori cultural aspirations and a bioeconomy. To that list could be added - energy security and reduced international trading risk plus substantially reduced fiscal risk to taxpayers associated with purchasing off-shore credits in advance of the 2030 day of reckoning. These are the reasons why the forestry industry transformation was “prioritised” by government (page 13) but they are not industry priorities, they are New Zealand priorities. Furthermore, they are aligned with “*a range of wider government programmes*” (page 13). Government cannot be ambivalent about social licence if it is a key enabler of achieving such national objectives and should work alongside industry to communicate the multiple societal benefits and help maintain forestry’s social licence as it has done in the past.

Without a joint effort in this area both the industry and government will have their objectives put at risk, particularly as there is considerable misinformation repeated about the industry and the necessary change in land use creates unease and anxiety that needs to be addressed. As noted in the ITP – “improving public perceptions of the forest and wood processing sector is a critical part of supporting the sectors growth” (page 90).

The ITP should acknowledge the dual responsibility for maintaining social licence and express a commitment to jointly support the development of a campaign to “tell the story”

The current statement under 10.3 is supported but is inadequate given the importance of this action. We contend that this section should include a commitment to building upon the successful previous partnership efforts – the Time for Wood Campaign – our low carbon future and the NZ Wood Campaign.

Some challenges to social licence are listed in the ITP: land-use change, plant-and-leave carbon forests, foreign ownership of plantations, negative environmental impacts of pine trees, pest and wilding issues, fire risks, sediment or slash runoff, and landscape degradation from harvesting.

In recent times the industry has suffered constant misrepresentation by advocates of indigenous forestry who do not see a role for both types of forestry, and other lobbies who seek to impede afforestation on any “productive” land implying that forestry is not productive.

Societal concerns about forestry do need a coordinated effort to manage. Given the government’s expanded interest in forestry and wood processing as a result of its climate change goals and the forestry targets recommended by the independent climate change commission there is an unprecedented mutual interest in promoting a positive profile.

FOA and other industry bodies have responded as one would expect by having a presence in a number of fora and relationships to counter the anti-forest mythology. In particular, there has

been on-going engagement between FOA and Beef + Lamb NZ to attempt to reach common ground on land use issues. The industry has also engaged vigorously in the news media to respond to the many attacks.

More proactively, a “Love our Forests” promotional campaign has run for the past six years and prior to that the government and industry both invested considerable sums of money in the “NZ Wood” campaign over several years.

Over the course of 2021 and 2022 the industry and government have worked collaboratively to develop an informative, and positive, depiction of the industry through the “*Wood – our low carbon future*” campaign which Minister Nash recently launched. This jointly funded promotion primarily targeted to the public at large and features the whole industry supply chain. As such, it aligns closely with the ITP.

It would be disappointing if successor campaigns to the joint “Time for Wood” campaign cannot also be jointly funded even if the quantum of funding devoted to this area will always be a point of debate.

The industry is committed to maintaining this type of effort into the future but does so in the expectation that the commitment by our government partner will also continue. The document should reflect this dual responsibility and propose an ongoing jointly funded campaign. Such a commitment is needed now to allow adequate planning for a campaign. The following recommendations are made to ensure its success:

#### An industry/MPI working group

Such a group should be established to deliver a medium- and long-term strategic plan for the campaign and should involve the levy funded promotions committee given that it is the prime industry source of funding. An approach that is less ad hoc than the “Wood- Our low carbon future” and more resembling the governance and management structure of the “NZ Wood” campaign is needed to establish the themes and direction of a campaign for the future.

#### Greater use of social and economic research

This is central to any widescale and prolonged social licence campaign. The 2020 PwC report for instance, provided valuable confirmation of the economic benefits that flow from production forestry investment. However, thus far, research into public attitudes and values, has not been coordinated between MPI, Scion and the Forest Growers Levy Trust. There is considerable scope for utilising the data from research on the effects of environmental or economic consequences of different land uses, regionally or nationally for use in social licence efforts.

#### Securing domestic resources before developing an offshore programme

Such a strategy is resource demanding. It is complex. It requires heavy participation by local forest and processing and other supply chain partners. And it requires a sustained dual commitment by the funding partners. The ITP maintains that the benefits of the sector need to be more widely communicated and understood, including an offshore audience. We consider that there can be a role for generic promotion of the NZ forest story offshore but it is a secondary priority to developing a domestic story though the resources can be developed that serve dual purposes.

## **11. Grow and attract the future workforce**

### **11.1 Conduct a skills forecast**

We support undertaking an assessment of future industry skills and labour requirements. Some assumptions are currently made about the need for significant new labour requirements and the pan-primary sector “Fit for a Better World” vision (2021) includes the goal to “employ 10 percent more kiwis from all walks of life in the primary sector by 2030 and 10,000 more New Zealanders in the primary sector over the next four years”.

It is critically important this is assessed in more detail through engagement with existing investors particularly given the strong focus on automation and robotics that is a key component of lifting productivity (Priority 1). The skills of tomorrow will differ from those needed today. The forest industry Training and Careers Committee which has representation from across the value chain has a strong interest in working with government to deliver this fundamental information.

What the industry needs are currently, will be in 2 years and in 5 years, needs to be understood. The rate of change makes going further than 5 years too difficult except at a very high level.

This is a complex exercise which must get views from Māori Forest owners which may or may not put jobs ahead of other concerns, plus smaller growers that could have difficulty accessing capital intensive options.

### **11.2 Refresh the Workforce Action Plan**

We agree with this proposal. The existing plan is very good but needs updating. It struggled due to missing out on an industry launch to raise its profile due to Covid restrictions.

The existing action references meeting demand and leveraging new technologies. An almost immediate benefit would be to address demand from existing infrastructure (mills) i.e: many mills could move to additional shifts if appropriate staff could be sourced.

### **11.3 Support a just transition**

The Plan proposes that “Government and industry will work together to:

- close the disparity between low-, mid- and high-income earners in the sector
- increase female participation
- improve outcomes for the nearly 70 percent of Māori in the agriculture workforce”

Without knowing what measures are contemplated it is not possible to comment on their suitability or otherwise.

### **11.4 Develop tertiary pathways for innovative wood engineering and architecture**

The lack of knowledge and familiarity with new wood engineering options is a recognized impediment. It is the rationale behind the support for the Timber Design Society and the establishment of professorships at Auckland and Canterbury universities. This further tertiary development would complement that effort and is supported.

### **11.5 Develop Future Forest Leader qualification**

Develop a higher level (Level 5) qualification that uses online and on the job training to develop people for positions in leadership or management in the forestry sector.

There are already two very good high level management qualifications.

Adequate understanding of future skills needs is needed and a revitalisation of the Workforce Action Plan

- a) University of Canterbury (UoC) – Bachelor of Forestry Science (BFSc) with an option for Forest Engineering
- b) Diploma in Forest Management.

If developing a new qualification care must be taken not to damage these existing qualifications which may require additional support.

The UoC – BFSc is currently enjoying strong support. Every recent graduate has so far been employed in the industry if they have wanted to be. The success has been in part due to the Scholarship program run by MPI. In addition to financial support, MPI have provided substantial pastoral support and industry job placement facilitation. A number of forest companies have also been supporting students via scholarships and vacation paid working experience and training.

The Diploma of Forest Management has been significantly affected by Covid restrictions. Support similar to that offered to the Degree course is needed immediately. The content will be reviewed by Muka Tangata as part of their standard duties so content although needing improvement will be addressed through existing channels. Access to this course which is only offered through limited providers is the choke point.

## 12. Drive innovation across the sector

In order to drive innovation, there are Science system and funding challenges that need addressing

- Large proportion of funding is unstable with challenging processes
- Funding for high-quality applied research difficult to access
- Science providers - difficulty attracting and retaining staff
- Overall government / industry investment in R&D is small

The current public funding model does not serve our key research provider, or the industry, well. A new approach is needed.

Key strategic issues

- Forestry is well positioned to respond to many economic, environmental, social and cultural challenges
- How to get better traction in major R&D decisions?
- Climate Emergency Response Fund, Industry Transformation Plan
- Need forestry-aligned research providers, well connected to today's challenges and opportunities of the future

Key points

- Science & Innovation - critical for improving and future-proofing the industry
- Forest Growers Levy - funding successful, collaborative research
- FGR Ltd - experienced research company, good track record
- Challenges and opportunities ahead - requires proactive strategies and much larger investment

Scion (NZ Forest Research Institute Ltd) needs to be adequately funded / resourced so that it can deliver the science, innovation and development that the industry needs and build upon the strong history of forest industry research that our sector is based on.

Incentives and pathways are needed for industry to more effectively innovate and participate and also to utilise and apply the outputs from research programmes (technology transfer and

extension). Scale needs to be accommodated with more use of technology that can operate economically at smaller scales and that is more suitable for regional development and cluster development. Bigger isn't always better.

Need improved and enhanced mechanisms for collaboration and investment in 'industry good' programmes. This also needs to include clear and fair commercial behaviour and IP mechanisms.

All this needs to be driven by a unified, long-term vision and strategy.

### **13. Provide Sector insights to lift performance and innovation**

Several actions are included in this section to improve the operating environment. They comprise

- TUR - NZFS planning and advisory services based in the community
- the Log Traders and Forest Advisors regulations
- Improved data on log and biomass availability over time, freight and infrastructure needs, markets and climate change to enable better national and regional planning and investment
- The Legal Harvest Assurance scheme

These current actions all have the potential to make a positive difference and are supported. The Advisory Service function, in particular, will be a key means of improving awareness, and uptake, of forestry in rural areas, but it is important that TUR - NZFS integrate their activities with existing entities operating in the landscape such as Beef and Lamb NZ and NZ Farm Forestry Association who have knowledge and established relationships.

For further information please contact

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