

Submission

Consultation (Clause 3, Schedule 1,
Resource Management Act) on Draft Otago
Land and Water Regional Plan.

Feedback to:

Otago Regional Council

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Consultation Process

We were advised on 4 March 2024 that the Otago Regional Council (ORC) had forwarded an invite to New Zealand Forest Owners Association (FOA) to consult on a draft of the Land and Water Plan. The invitation was sent to a group of industry stakeholders on 10 January 2024. The consultation was evidently issued under Clause 3 of Schedule 1 of the Resource Management Act (RMA). We note that such consultation is subject to the Principles of Consultation under section 82 of the Local Government Act 2002.

FOA did not received the notification. We have been advised that the invite was forwarded by email to a person no longer employed by FOA. Under FOA practice any such email would have bounced back to ORC. For whatever reason a direct follow, up with FOA was not undertaken. FOA members approached ORC following discussions between Otago forestry companies and an ORC councillor about the lack of response from the FOA. We mention this as it is our opinion that the Principles of Consultation have not been complied with and in particular providing the forest industry with reasonable time to respond.

The half-hearted attempt to consult with the forest industry and the lack of understanding of the membership organisations of the industry is a concern. FOA is not Federated Farmers. We do not have branches. After the first draft of the plan was introduced various representations and submissions were made from farm foresters and by forest companies operating in the industry. The recent past president of FOA and CEO of City Forests Ltd, Grant Dodson, made such representations. ORC could have made enquires directly with Grant or with FOA as to how best to engage with consultation.

We are of the opinion that there has been inadequate time provided to the forest industry for their input on the draft Land and Water Plan. We state again that it our opinion that the Principles of Consultation have not been complied with.

Given the truncated time frame for a response, FOA has had discussions with the Southern Wood Council who will provide a consultation submission dealing with the particulars of the draft plan. The FOA consultation submission will focus on overview matters.

The Submitter

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 1.74 M ha of plantation forests and over 75% of the annual harvest. FOA members include both large forestry corporates and small wood lot owners.

Forestry export revenue was \$6.2 billion in the year ending June 2022 and this is expected to increase to \$6.47 in 2023. Harvest volumes reached 36 million cubic metres in the year ended March 2022. While 2022 saw a significant decrease in log export revenue due largely to the impacts of the Covid interventions in NZ and abroad, this is forecast to recover by 2024 and then see an increase (SOPi June 2022).

The forestry sector also supports employment (40,835 FTEs), investment, and development across New Zealand throughout its supply chain in both urban and rural New Zealand.

Not all the forestry companies operating in the region are members of the FOA. FOA has a small staff. FOA has an elected board from its members and has various committees including the Forest Resources and Environment Committee. Committees are represented by nominees from the members. FOA does not usually make submissions on council plans but at a national level makes submissions on legislation that affects the industry. Given the structure of FOA, had there been relevant communication between FOA and ORC the appropriate group to respond to the consultation invite could have been considered. In this instance FOA has engaged with this regional matter due to the potential for the draft plan to adversely affect the whole forest industry.

FOA by this submission is responding to the invite to consult but supports the submission by the Southern Wood Council which in this short time frame is able to comment on the particulars of the draft plan.

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Forestry In Otago

In the Otago Region has approximately 125,000 hectares of plantation forests which support forestry personnel/contractors, seed and nursery suppliers, downstream sawmilling and manufacturing industries and export ports at Port Chalmers and Bluff. The region's industry works closely with the industry in Southland. Wood from either region is supplied to domestic users and to the two ports.

Otago has a rich forestry history, dating back 160 years. Originally the industry relied on harvesting indigenous forests and then in the late 1890s the region's exotic plantations were established along with nurseries at Ranfurly and Tapanui. The first substantial plantings were developed at Naseby Forests and Conical Hill in 1900 and 1903 respectively.

While some of the country's major forest companies operate in the region there are smaller wood lots located on farms. A third of the estate is in the hands of small to medium sized growers. All benefit from the well-established industry infrastructure. Farm Forestry is particularly represented by its Mid Otago and South Otago branches.

Southern Wood Council and Otago Forestry Group

The industry led Southern Wood Council (SWC) includes both Southland and Otago regions.

We understand that when drafts of the plan were provided in 2023 that forestry companies and representatives from Farm Forestry Association in Otago made submissions. The Otago Forestry Group (OFG) is a subcommittee of the SWC.

History of Planning Provisions for controlling Erosion

Prior to the introduction of the RMA erosion and soil conservation was governed under the Soil Conservation and Rivers Control Act 1941(SC&RCA). Under the SC&RCA special controls to manage soil erosion could be introduced by either by-laws or notices of special areas. When the RMA was enacted, there was a two-year transitional provision to allow the continuation of such controls. The two-year time frame provided time for regional councils to consider replacement of any of these controls by way of a regional plan. ORC had the discretion to introduce a regional plan for controlling the use of land for the purposes of soil conservation and maintenance of water quality and water quantity.

It is noted that ORC did not introduce any regional land plan. This is not surprising as the geology of the region does not give rise to any major issue of soil erosion that requires land use controls for the purposes of soil conservation and or maintenance of water quality. The underlying geology of the region is reflected in the Land Use Capability mapping of the region and then the Erosion Susceptibility Classification mapping as set out in the National Environmental Standards for Commercial Forestry (the NES-CF, previously the National Environmental Standards for Plantation Forestry (the NES-PF)). Below we discuss the development of the mapping and the development of the NES -PF/CF.

Otago is not Gisborne. The catchment board in Gisborne had controls on vegetation clearance and earthworks under the SC&RC Act. The Gisborne Unitary Authority chose to carry over these controls under the RMA by introducing in 1993 a regional plan controlling land use activities of vegetation clearance and earthworks.

Development of the National Environmental Standards for Plantation Forestry/Commercial Forestry

The development of the NES-PF was commenced in 2009. Work was deferred until the government's 2013 resource management reforms were completed. FOA was a champion of the NES-PF as a key vehicle to achieve a more consistent regulatory treatment of forest activities across districts and regions. The background work found that most forestry activities were permitted under regional and district plans but that conditions required to comply with permitted activity rules varied around the country. The same was found for resource consents. Plantation forestry did not create many resource consents with the exception of Gisborne which was due to the amount of land with very high erosion susceptibility.

The NES-PF proposed to set regulations for the main stages of the forestry cycle (afforestation, harvesting, replanting and earthworks) and for two key associated activities,

quarries, and river crossings. The regulations were to primarily address the effects of forestry on soil erosion and water quality.

Working groups included representatives from large-scale forestry companies, farm foresters, local and central government, environmental NGOs and crown research institutes. One of the working groups specifically dealt with setback distances from water bodies. This group had representation from local government and Fish and Game. It was proposed that the setbacks would be imposed not only on afforestation but also on replant. The resulting setbacks were scientifically based. Furthermore, a cost benefit analysis was undertaken taking into account the removal of land from production and the impact of New Zealand Emissions Trading Scheme (ETS) liabilities at replant.

The width of the set backs is based on ensuring machines do not operate close to water bodies, that riparian areas remain vegetated and that roads cannot be created parallel and close to water bodies.

Underpinning the activity classifications is the Erosion Susceptibility Classification which is materially incorporated into the NES-CF. New Zealand is divided into four categories. Land areas coloured green (low) and yellow (moderate) have lower erosion risk and so forestry activities are permitted, where there is a high or very high risk of erosion (areas mapped orange and red) stricter requirements apply and some forestry activities cannot be carried out without a resource consent. **Most of the Otago region is mapped as green and/or yellow.**

Also incorporated in the NES-CF by reference is the Fish Spawning Indicator. It includes work undertaken in Otago of identifying native fish species, species which are thriving in plantation forests in Otago. The indicator is used to impose controls on certain forestry activities being required to not cause disturbance during spawning.

After two major public consultation processes the NES-PF 2017 was enacted. The NES-PF came into effect in May 2018. Further changes in 2023 changed the NES-PF to the NES-CF, the NES-CF now captures carbon forestry.

It is not known if ORC submitted on the NES-PF consultation in 2017 but more recent submissions on the NES-CF indicated that ORC was not concerned with how forestry activities including harvesting and replanting were managed under the NES-PF but rather the social and economic implications of afforestation and in particular carbon forests.

NES-CF

The NES-CF sets out permitted activities subject to various conditions. Where the risks of harm to the environment are too high or if a forest operator cannot meet the regulatory requirements for a permitted activity the operator needs to apply for a resource consent. **In the Otago region we understand that most forestry activities meet the permitted activity standards and do not require resource consent.** We are advised that consents for river crossings have sometimes been applied for.

The NES-CF is not a permissive regime. The activity of harvesting has regulations for sediment discharges, the development of a harvest plan, ground disturbance, disturbance of margins of water bodies and slash management.

Regulation 65 requires sediment to be managed to ensure after reasonable mixing that various effects are not exceeded. **The ORC has exercised stringency with regard to discharges of sediment and applied its more stringent rules for forestry discharges.** We understand that the council rules are being met and where they have not been met that enforcement action has been undertaken. Overall though, we have not seen any council report indicating a major concern relating to the discharge of sediment from harvesting activities or that harvesting is leading to major erosion in the region.

The content of harvest plans is set out in Schedule 6 of the NES-CF. We attach a copy of the schedule. Clause 4 (3) sets out the requirement to outline management practices that will be used to avoid remedy or mitigate erosion and sedimentation risks due to forest harvesting.

The council monitors that forestry operators carry out what is outlined in the management plan. Non-compliance with the management plan can result in enforcement action by the council. We understand that the process is working well, and that monitoring has shown little need for major enforcement action by the council.

Under the NES-CF the ORC can charge for monitoring certain permitted activities, including harvesting. We have viewed the ORC monitoring check lists which indicated a comprehensive and easily able to be followed process for both the council and the forest operator. As stated above, non-compliance with required management plans can lead to enforcement actions.

The monitoring process of the permitted activities as developed by ORC indicate that the process is working well. **The permitted activity conditions of the NES-CF can be monitored, are being monitored by the ORC, are being charged for and non-compliance is able to be enforced.**

Stringency

Regulation 6 of the NES-CF allows the ORC to provide regional rules that are more stringent than the NES-CF for various matters but in particular to objectives giving effect to the National Policy Statement for Freshwater Management (the NPS-FM).

While regulation 6 of the NES-CF allows for a council to provide more stringent rules to meet an objective giving effect to the NPS-FM, there is a process to be undertaken by the council to justify any application of stringency. We refer you to Section 32 (4) of the RMA which states:

“(4) If the proposal will impose a greater or lesser prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must

*examine whether the prohibition or **restriction is justified in the circumstances of each region** or district in which the prohibition or restriction would have effect. “*

The starting point when assessing the need for a more stringent rule under Regulation 6(1)(a) is firstly to demonstrate the NES-PF controls are not sufficient to achieve a plan objective that gives effect to the NPS-FM. sufficient.

The starting point when assessing the need for a more stringent rule under Regulation 6 (1) to firstly to demonstrate the NES-CF controls are not sufficient to achieve a plan objective that gives effect to the NPSFM. The next step is to then demonstrate how a more stringent rule will achieve that objective in a more effective and efficient way than the NES-CF and that the more stringent rule is justified in the context of the region. Simply proving a link between a proposed rule and a plan objective that gives effect to the NPS-FM is not sufficient.

We are advised by the forest companies operating in the region that the council has not undertaken any of its own research into how the NES-CF provisions have been operating in the region. We are also advised that the regular monitoring of forestry operations has not indicated any major issue with the operation of the NES-CF in regulating the impacts of forestry operations including the harvesting regulations.

We urge the council to review its own information it has on monitoring of forest operations, to focus on scientific research undertaken in the region on the water quality of waterbodies within forests. Information from numerous forestry companies on generation of suspended sediment, on the ecosystem health of the waterbodies adjacent to forestry operations and in particular to consideration if the provisions of the NES-CF are avoiding or mitigating the environmental impacts of forestry on water quality in the region is available and has been provided to ORC during the consultation process.

We state again that Otago is not Gisborne. The Erosion Susceptibility Classification maps most of the region as yellow and green. In Otago there is no history under previous legislation including the SC&RC Act and the transitional provisions of the RMA of any need to control land uses such as vegetation clearance and earthworks. The NES-PF introduced into Otago land use rules for forestry where there were none and yet the ORC has not reviewed the effectiveness or otherwise of these rules which have been in place since May 2018.

Resource Consents

Resource consents come at a cost, both time and money. If permitted activity standards are being met, then there is no planning need, that is to be more effective or efficient to require consents.

Even simple culvert consents in the region are being sent out to consultants and are taking approximately 4 months to process. The consultant costs are being borne by the forestry

operator. Given the inability of council to process such consents inhouse we suggest that resource consents for harvesting and replanting are going to be costly and time-consuming. The costs of consents will have to be part of the cost benefit analysis of any changes by the ORC.

A resource consent regime leads to an ad-hoc approach to harvesting and/or replant. If the council ends up applying the same conditions, then this would be no different to a permitted activity regime subject to conditions.

We urge the ORC to consider the monitoring information it has on forestry activities in its region and evaluate the effectiveness of the NES-CF process in mitigating the impacts on water quality. It must be remembered that the NES-CF and existing council rules regulate the discharge of sediment and to date we are not aware of major compliance issues with these rules.

Given the various requirements on harvesting including the sediment discharge rule which are imposed to mitigate any impacts, it is not obvious why the ORC wishes to impose greater setbacks for afforestation and replanting. It will be costly to go through resource consents to discover what set back distance will be imposed by the ORC. It is unknown what kind of conditions the ORC will impose. All of this leads to uncertainty for an industry that has been operating in the region for many forestry cycles with no known adverse effects on water quality. Given the thousands of hectares that are harvested each year and replanted a resource consent regime can only be described as an ad-hoc regime which will give rise to inconsistent response to activities that have shown to be able to be managed under the permitted activity regime of the NES-CF.

Replanting

Introduction of rules that would require replanting consents from 1 June will have major ramifications for replanting in the region.

The setback areas are vegetated but not in grass. Set back areas regenerate and include a mixture of vegetation. Forestry cannot convert to grass cover as there is a moratorium not to do so under the National Environmental Standards for Freshwater. We question the science if any and reasoning that proposes farmed grass can be up to 3m from a water body but planted forestry must be set back 20m from the same water body. The width of setbacks under the NES-CF prescribes an appropriate, evidence-based buffer to protect aquatic ecosystems.

Setbacks are just part of the regulatory regime of the NES-CF. The NES-CF has particular rules relating to disturbance in the riparian areas.

We are very concerned about the timing of the proposed timing of the Land and Water Plan. It is proposed to be introduced in the middle of the forestry planting season. Planting is from May to October.

Whether plantation forestry activities attract existing use rights under s10 was addressed in the Mawhinney case (Auckland Council v Mawhinney [2018] NZEnvC 15) where the Environment Court held that:

“an existing use of forestry includes the whole cycle from preparation, planting, through growing and maintenance to harvesting and removal. Ancillary activities, which are part of the use include construction of tracks, landings and roads (subject to regional plan requirements in relation to crossings of waterways and sediment control) and destruction/removal of understorey and adjacent vegetation. For a crop of Radiata pines the whole process may, as described above, take place over a period 25 to 35 years before the cycle can begin again.”

One of the consequences of the NES-CF, which was introduced after the Mawhinney decision, was the separation of the activities that make up plantation forestry into separate activities (eg land preparation, harvesting, replanting). FOA concern is that the common law as expressed by the Mawhinney decision is arguably altered by the NES-CF because the NES-CF treats plantation forestry activities as separate uses, some of which may “contravene a plan rule”. The implication is that because of the time between say, harvesting and replanting, the existing use right to replant under the provisions of the district plan will be lost if the use is deemed to have been discontinued for a period of more than 12 months (6 months for a regional plan).

Forestry cannot necessarily rely on existing use rights to undertake such activities such as harvesting and replanting. For many activities a regional plan rule that replaces a permitted activity rule will ensure that the activity may continue to operate as a permitted activity until six months after the rule is operative, even if s.86B RMA applies.

We endorse the submission of SWC with regards to the potential impacts on small woodlots. The imposition of a 20m setback either side of a stream/river could in some circumstances leave a small wood lot owner with no forest or a very small, unviable forest.

Climate Change

Given the slow progress with gross emissions reductions, the significant difficulties in developing solutions including an alternative to the ETS for agricultural emissions, and the cost and pest control constraints around establishing native trees commercial exotic forestry offsetting is arguably the most important tool currently available to enable New Zealand to reach its climate targets. The transition assistance that forest-planting provides for our emissions-intensive and trade-exposed industries is mission critical, it is infeasible to contemplate the achievement of New Zealand’s climate goals without the assistance of offsetting which is a legitimate tool that is internationally recognised. Roadblocks or impediments such as requiring resource consents for afforestation will have a significant impact on our ability to meet our climate targets.

Conclusions

- The consultation with the forest industry in Otago has not allowed adequate time for a fulsome response to the draft plan and therefore does not comply with the principles of consultation.
- Otago is not Gisborne and does not have an underlying geology that gives rise to erosion issues and certainly erosion issues that would justify the proposed level of regulation of the forestry in Otago.
- There is no scientific justification for the Otago region to impose more stringent rules than those set out in the NES-CF.
- The NES-CF is not a permissive regime but rather imposes major standards for forestry activities. The management plan requirements along with the regulations can and are being monitored and enforced.
- The industry cannot rely on existing use rights and replanting for 2024 will be adversely affected.

Note on making this submission public

We do not object to the submission being made public.



Rachel Millar

Environmental Manager

Forest Owners Association

Appendix 1

- (d) corrective action processes.

5 Plan information specification

The information required by clauses 1 to 4 must be submitted in a GIS-compatible format if requested by the relevant council.

Schedule 6 Harvest plan

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1 Person and property details

The person and property details are—

- (a) the plan and notice date:
- (b) the name of and contact details for the land owner or their agent:
- (c) the name of and contact details for the forest owner (if different):
- (d) the name of and contact details for the forest manager or relevant manager for the commercial forestry activity (if different):
- (e) the contact details for service—postal address, email address, phone number(s):
- (f) the region and district in which the forest is located:
- (g) the name of the road used for forest access and the rural number of the entry point:
- (h) the forest name or property location identifier:
- (i) the cadastral and map references, or GIS polygon reference.

2 Map

The plan must include a map or maps that include and show—

- (a) a scale not less than 1:10,000:
- (b) the record of title, the date, and a north arrow:
- (c) the external property boundaries within 200 m of the commercial forestry activity area:
- (d) the contour lines at intervals less than or equal to 20 m:
- (e) the erosion susceptibility classification (NESCF overlay map):
- (f) the location of any significant natural areas and vegetation clearance areas:
- (g) any water body or the coastal marine area, including—
 - (i) wetlands larger than 0.25 ha and lakes larger than 0.25 ha; and
 - (ii) rivers to their perennial extent; and
 - (iii) rivers where the bankfull channel width is 3 m or more; and
 - (iv) any outstanding freshwater body or water body subject to a water conservation order; and
 - (v) any setbacks from any identified water body or the coastal marine area:
- (h) any registered drinking water supply and any drinking water sources for more than 25 people within 1 km downstream of the commercial forestry activity:
- (i) the location of any forestry infrastructure, including existing and proposed—
 - (i) roads:
 - (ii) tracks:
 - (iii) landings:
 - (iv) firebreaks:
 - (v) river crossings (permanent and temporary):
 - (vi) fuel storage and refuelling sites:
 - (vii) end-haul deposit sites:

(viii) slash storage areas:

- (j) spatial information associated with the activity described under clause 3.

3 Activity

The plan must state—

- (a) the commercial forestry activity being undertaken; and
- (b) where the activity is taking place; and
- (c) when the activity will begin and end; and
- (d) how the activity is to be undertaken; and
- (e) the harvesting method, whether ground-based or hauler, or any other method, and the hauler system type; and
- (f) the planned timing, duration, intensity, and any proposed staging of the harvest.

4 Management requirements

Significant natural areas

(1) The plan must describe—

- (a) how any significant natural area identified under clause 2(f) is to be avoided when undertaking a commercial forestry activity; and
- (b) the operational restrictions, including restrictions on afforestation or replanting, earthworks operations, or harvesting, as applicable, that will be used to ensure that no commercial forestry activity occurs within the significant natural area.

Water quality and sediment

(2) The plan must identify, for sites with a water body, the risks from material that is mobilised, including woody debris, slash, or sediment, to the following if they are located downstream of the commercial forestry activity:

- (a) public roads and other infrastructure;
- (b) properties, including dwellings;
- (c) rivers, lakes, estuaries, and the sea;
- (d) drinking water supplies.

Erosion and sedimentation

(3) The plan must include a description of the management practices that will be used to avoid, remedy, or mitigate erosion and sedimentation risks due to commercial forest harvesting. Those risks include risks relating to features that must be protected during the operation, including significant natural areas. The features must be mapped. The description must include, in sufficient detail to enable site audit of the management practices to be carried out,—

- (a) the proposed erosion and sediment control measures to be used; and
- (b) the situations in which they will be used.

Slash

(4) The plan must describe the management practices that will be used to avoid, remedy, or mitigate risks relating to slash. Those risks include risks relating to features that must be protected during the operation, including significant natural areas. The features must be mapped. The management practices must include procedures for—

- (a) avoiding instability of slash and the ground under slash piles at landings;
- (b) keeping slash away from high-risk areas (no-slash zones);
- (c) managing slash in the vicinity of waterways, including identifying any areas where it would be unsafe or impracticable to retrieve slash from water bodies;
- (d) ensuring that slash is not mobilised in heavy rain events (5% AEP or greater) and contingency measures for such movement, including requirements for slash removal from streams and use of slash traps.

Indigenous birds

(5) The plan must describe the procedures required by regulation 102(2), if applicable.

Fish species

(6)

The plan must include,—

- (a) with reference to the map, a description and the location of any relevant species identified—
 - (i) using the electronic tool referred to in item 9 of Schedule 2 (Fish Spawning Indicator); or
 - (ii) by a freshwater fish survey required by regulation 97(4)(b); and
- (b) confirmation of areas where and periods when disturbance is not permitted; and
- (c) procedures to avoid disturbance of a wetland or the bed, or vegetation in the bed, of a perennial river or lake, including sequencing of harvesting and earthworks and operational restrictions.

Other indigenous species of fauna

- (7) The plan must include procedures to—
 - (a) identify any threatened or at-risk species of indigenous fauna present within the harvesting activity areas; and
 - (b) mitigate adverse effects on those species from the harvesting activity.

5 Plan information specification

The information required by clauses 1 to 4 must be submitted in a GIS-compatible format if requested by the relevant council.

6 Management practices for maintenance and monitoring

The plan must include—

- (a) the proposed routine maintenance and monitoring processes;
- (b) the proposed heavy rainfall contingency and response measures, including—
 - (i) specific triggers or thresholds for action; and
 - (ii) post-event monitoring and remedial works;
- (c) the post-harvest monitoring of residual risks, and the corrective action processes.

Rachel Hayward,
Clerk of the Executive Council.

Explanatory note

This note is not part of the regulations, but is intended to indicate their general effect.

These regulations amend the [Resource Management \(National Environmental Standards for Plantation Forestry\) Regulations 2017](#) (the **principal regulations**). These regulations come into force on 3 November 2023, but *regulations 13(2) and 44* (to the extent that it inserts *new regulation 79(5)(b)*) come into force on 3 April 2024, and the rest of *regulation 44* comes into force on 3 January 2024.

The amendments expand the application of the principal regulations to include exotic continuous-cover forests. These are forests of exotic species of at least 1 ha that will not be harvested or replanted or are intended to be used for low-intensity harvesting (where a minimum of 75% canopy cover is maintained at all times) or replanted. The Title of the principal regulations is changed to the Resource Management (National Environmental Standards for Commercial Forestry) Regulations 2017 as a consequence.

The amendments clarify that local authorities may make rules in relation to afforestation (including the location of forests) that are more stringent or more lenient than the principal regulations and that they may make rules for effects of afforestation that are not within the scope of those regulations. The amendments also provide for local authorities to have greater discretion in respect of matters relating to afforestation occurring on areas of land with very high erosion susceptibility and in respect of areas determined to be outstanding freshwater bodies by Treaty of Waitangi settlement legislation. The amendments also provide for local authorities to charge for the monitoring of afforestation.

The amendments also include—

- changes to provisions relating to river crossings;
- changes to wilding tree risk management requirements;
- changes to slash management requirements;

- provision of separate planning requirements for afforestation and replanting, forestry earthworks, quarry erosion and sediment management, and harvest activities:
- changes to notice requirements in respect of earthworks and forestry quarrying and a new notice requirement for replanting of commercial forests:
- provision for joint notice where more than 1 activity is required to be notified at the same time.

Regulatory impact statement

The Ministry for the Environment and the Ministry for Primary Industries produced a supplementary analysis report on 26 September 2023 to help inform the decisions taken by the Government relating to the contents of this instrument.

A copy of this supplementary analysis report can be found at—

- <https://environment.govt.nz/what-government-is-doing/cabinet-papers-and-regulatory-impact-statements/>
- <https://treasury.govt.nz/publications/informationreleases/ris>

Issued under the authority of the [Legislation Act 2019](#).

Date of notification in *Gazette*: 5 October 2023.

These regulations are administered by the Ministry for the Environment.