

Feedback

Forest sector issues with the Resource Management Act and related regulations.

Feedback to:

The Ministry for the Environment

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Introduction

The New Zealand Forest Owners Association Incorporated (FOA) and the New Zealand Farm Forestry Association (FFA) (together The Forestry Interests) welcome the opportunity to provide feedback on potential amendments to the Resource Management Act 1991 to assist in managing roadblocks to appropriate forestry management and operation.

This feedback:

- a. Outlines the overarching RMA-related issues for forestry;
- b. Provides an executive summary of the key RMA issues for FOA and FFA with reference to specific issues and examples;
- c. Provides further detail and context to the executive summary; and
- d. Sets out the background to FOA and FFA in Appendix One.

Overarching issues for forestry

New Zealand's key environmental legislation is of critical importance to the forest industry. The proposals expanded on below respond to the Government's proposed initial changes to the Act in advance of the more substantive changes to follow.

Outcomes to facilitate forestry

A significant factor in facilitating the growth and development of forestry in New Zealand is investment certainty. To achieve this the sector requires the following key outcomes from planning regulation:

- Efficient consenting processes that focus on key effects.
- Recognition of the cyclical nature of forestry and its long-term horizons.
- Certainty around the ability to harvest (for example, through controlled activity status).
- Consistent implementation of rules (such as via National Environmental Standards (NESs)).
- Supporting infrastructure and processing facilities.
- Recognition of the positive effects of forestry on the environment (for example, by mitigating climate change through afforestation, contributions to long term water quality outcomes).

At the outset, we record our support for the improvement of the natural environment and the adoption of NESs. The development of the NES for Commercial Forestry (the NES-CF) is generally regarded as a

proactive approach to achieving national consistency and while some of the amendments introduced in 2023 require further amendment, the NES is the preferred regulatory approach. Conversely, the Forestry Interests are concerned that the plethora of policy statements and ongoing amendments to those documents are contributing to increasing complexity and uncertainty.

We are also concerned about local government decisions that pick land use winners. Increasingly we are seeing decisions being made at a local level based on social issues and innuendo.

The RMA and associated regulation tends to focus on the effects of discrete activities. For the forest sector this creates problems with the definition of existing use rights, in the absence of regulatory acknowledgment of forestry as a comprehensive, cyclical process encompassing various stages. These include preparation, planting, growth, maintenance, harvesting, and replanting and ancillary activities such as roading and earthworks. Lack of certainty and confidence in the approach to land use planning is incongruent with the long timeframes for forestry from planting to harvest, and will deter investment.

We are concerned at the increasing challenges before the Courts seeking to import an “environmental bottom lines approach” to the legislation which, if successful will limit economic considerations. While we understand legal challenges are part of the checks and balances in our legal system, improved legislative drafting may assist.

We consider that regulation of forestry should bear in mind the positive contribution afforestation makes to climate targets. Given the slow progress with gross emissions reductions, the significant difficulties in developing solutions including an alternative to the Emissions Trading Scheme for agricultural emissions, and the cost and pest control constraints around establishing native trees commercial exotic forestry offsetting is 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 planting more trees. Roadblocks or impediments such as requiring resource consents for afforestation or overly onerous consenting process will have a significant impact on our ability to meet our climate targets.

Next steps

FOA/FFA acknowledges that decisions are taking too long and costing too much whilst environmental degradation continues - change to the RMA is needed. We are supportive of a redesigned RMA which removes time and cost barriers whilst promoting environmentally positive outcomes. Better economic outcomes will follow with reduced bureaucracy.

Whilst supportive of a redesign we do not agree that the Government should necessarily start again - there is merit in much of the work undertaken by the previous government, particularly in terms of spatial planning.

This feedback attempts to engage with provisions of the Act to address some of the ket roadblocks as an interim measure prior to the more significant planned reforms.

Summary of changes to the RMA

Some of the legislative barriers to the outcomes identified above are set out below. These are the key matters that respond to the Minister’s request of 28 March 2024 inviting views on changes to the RMA that will impact the industry in the short term. The changes proposed by the Forestry Interests are targeted to specific and practicable issues facing the industry.

Barriers

Response / Solutions

A. Lack of planning certainty

- National direction through national environmental standards is key to ensuring a consistent approach is applied to activities such as forestry.
- However, if national environmental standards enable district and regional plans to be more stringent than NES rules, this may undermine the benefits of such standards.
- The extent to which the Act protects property rights through existing use rights needs to be clarified for forestry because of the long term nature of its activities.
- It is appropriate to amend the Act to ensure that Council’s do not prematurely implement those National Policy Statement for Freshwater Management (NPS FM) provisions identified by the Minister as subject to imminent change.
- Increasingly complex, repeated and detailed requests for more information are adding to consenting costs and inefficiency. The Act could be amended to financially disincentivise councils from ongoing requests under s92.

B. Unnecessary duplication and conflicting considerations

- Whereas the NES-Commercial Forestry (NESCF) provides a pragmatic and useful approach to forestry operations, conversely, national policy statements are proving problematic. They increasingly overlap, contain inconsistencies and varying exemptions. They add to the complexity of consenting and have the potential for significant impacts on the property rights of landowners.
- Prior to resolving these documents, in the interim, the Act could enable the Minister to without using the Schedule 1 process:
 - prohibit or remove plan rules or other regulations that duplicate or overlap with the subject matter in national direction documents; or
 - clarify the hierarchy of national direction documents in the event of conflict.
- The Act could codify application of the “overall judgment approach” to allow decision makers to implement s5 of the Act.

- C. Provisions open to competing interpretation
 - To respond to ongoing litigation regarding the interpretation of provisions of the Act, amendments could make it clear that:
 - national environmental standards can provide for activities as permitted activities subject to standards;
 - s310 does not allow for declarations about the Minister’s assessments of the content of NESs.

- D. Appropriate management of discharges
 - Amendments could usefully provide a clearer pathway for discharges to land and water in circumstances where there are discharges that do not meet the bottom lines in s107, particularly over the short term.

- E. Other issues
 - We are aware that there has been some interest in reducing the current activity classifications, but this is opposed because of the lack of certainty this creates and the potential implications for the NES-CF.
 - Future extreme weather events are likely to be an ongoing source of liability / risk for forestry and other land owners. Enforcement risks associated with such events need to be addressed to ensure that forestry is not disincentivised. The next stage of reforms could include amendments to address the extent to which duties of care and defences are applied to such events.
 - We have been concerned at recent amendments through the freshwater regulations creating a moratorium on land use change. Flexible land use is a fundamental tenet of land ownership (subject to planning controls to internalise effects). The use of improved spatial planning may be an appropriate mechanism for identifying the appropriate location for some land uses.

Issue A - Lack of planning certainty

A1. Regional Council controls on plantation forestry that are more stringent than the NES-CF

Limit Council’s ability to make rules that are more stringent than the National Environmental Standard for Commercial Forestry (NES-CF) to give effect to the NPS FM by either redrafting reg 6 of the NES-CF, amending s86B of the RMA, or alternatively introducing a new section to the Act.

The Issue

The use of national direction through national environmental standards is key to ensuring a consistent approach is applied to activities such as forestry.

The value of an NES is undermined if district and regional plans can be more stringent than NES rules.

Section 43B of the RMA provides a rule that is more stringent than a national environmental standard (NES) prevails over the standard, if the standard expressly says that a rule may be more stringent than it.

Regulation 6 of the NES-CF provides that a rule in a plan may be more stringent than the regulations if *inter alia* the rule gives effect to any objective developed to give effect to the NPS-FM.

Throughout development of the NES-CF (formerly NES-Plantation Forestry), the Forestry Interests' ongoing understanding was that Councils would only override the NES-CF if a robust science-based assessment indicated that forestry was both a significant contributor to water quality problems and that the NES-CF rules were not sufficient to address those problems.

In practice, without undertaking the necessary analysis, some Councils have proceeded to implement rules that are more stringent than the NES-CF to give effect to the updated NPS FM. Plan provisions to over-ride the NES-CF for water quality reasons are already in place or under development in Gisborne, Canterbury, Otago, Greater Wellington and Northland. This approach to controlling forestry activities thwarts the purpose of greater efficiencies / reductions in bureaucratic load anticipated by application of a nationally consistent instrument. It severely undermines the usefulness of the NES-CF.

Underscoring this concern, a group of forestry companies in Canterbury have appealed to the High Court on points of law relating to a rule in proposed Plan Change 7, with a decision pending. They allege that Canterbury Regional Council did not undertake the required scientific studies to justify greater stringency for the discharge rules within the NES-PF. In the interim, because rules for the purpose of water quality have immediate effect, forestry companies have had to apply for discharge consents from their harvesting sites at significant cost.¹ For small forest owners or farmers who wish to convert a part of their farm to forestry these costs are likely to make such a project uneconomical.

Potential solutions

The Forestry Interests would prefer to retain a national and robust set of rules in the NES-CF that are not undermined region by region. We consider that regulation 6(1)(a) is being misused and should be deleted. However, in light of recent weather events we accept the need for a special case in some specific locations, most notably Gisborne. The logical way to achieve this is to draft a specific provision for Gisborne mudstone geology under regulation 6(3), as is already the case for Separation Point Granites.

A2. Councils' response to NPS-FM amendments

¹ The anecdotal evidence is that processing of the consents is about \$80,000 per application with no apparent difference in outcomes.

Amend s86B(5) to clarify that the term “immediate legal effect” as defined by that subsection does not extend to rules promulgated as part of the s80A freshwater planning process.

The Issue

The rules proposed by the Councils identified above have been introduced in response to the proposed freshwater planning process mandated by subpart 4 of Part 5 of the RMA, introduced by the Resource Management Amendment Act 2020. Despite the Resource Management (Natural and Built Environment and Spatial Planning Repeal and Interim Fast-track Consenting) Act 2023 amendments to s80A(4)(b) - which extend the date by which regional councils must publicly notify a freshwater planning instrument² - it appears that some councils are proceeding with notifying their freshwater planning instrument, and in so doing, applying rules that are more stringent than the NES-CF.

For example, Otago Regional Council is proposing to proceed with notifying its Land and Water Regional Plan by the end of October 2024. The draft plan provisions require most forestry activities to obtain resource consent, despite being capable of operating as a permitted activities³ pursuant to the NES-CF.

Section 86B provides that rules in proposed plans will have immediate legal effect before a plan becomes operative if the rule protects various elements, including water, soil and significant indigenous vegetation. This section did not contemplate the existence of a default position in a national environmental standard.

The result is that in circumstances where a council introduces a rule that is more stringent than the NES-CF, rather than the default position in the NES CF prevailing until the plan provisions are determined, the new rules take immediate legal effect.

Generally speaking, for many activities, when a regional plan rule replaces a permitted activity rule the activity may continue to operate as a permitted activity until the rule is operative, even if s86B applies.⁴

The issue for forestry activities is that s20A (Certain existing lawful activities allowed) may not apply to some forestry-related activities, such as a first rotation harvest. There is also some doubt whether the requirement that an activity has not been discontinued for a continuous period of more than 6 months would rule out the application of s20A to a second or third rotation harvest activity. This issue is also addressed separately in section A3 below.

The solution

The legislative “fix” is amendment of s86B of the RMA. This section stipulates when rules in proposed plans have legal effect. Section 86B(5) could be amended to clarify that the term “immediate legal effect” as defined by that subsection does not extend to rules promulgated as part of the s80A freshwater planning process.

² from December 2024 to December 2027

³ Subject to compliance with standards

⁴ A rule in a proposed plan has an immediate legal effect if the rule protects or relates to water etc under s86B but Rule20A applies notwithstanding.

Alternatively, in the same way as section 86BA relates to the “immediate legal effect of rules in the IPI prepared using ISPP”, a new section could be introduced specifying that the legal effect of rules prepared as part of a freshwater planning process relating to forestry activities do not have immediate effect until operative. There is no lacuna as the NES-CF would continue to apply until the rules were operative, or new (secondary) legislation is introduced or amended.

A3. Uncertainty as to when existing use rights apply to the suite of forestry activities

Sections 10 and 20A could usefully clarify when an activity such as plantation forestry is to be considered as part of a cycle of activities.

The issue

As existing use rights are a fundamental tenet of property rights, the Forestry Interests seek changes that clarify the retention of those rights. We maintain that such rights are key to the continuing successful operation of plantation forestry. However, it is the nature of forestry as a continuing series of long-term primary production activities that imperils the application of the principle of existing use rights.

Whether plantation forestry activities attract existing use rights under s10 was addressed in the Mawhinney case⁵ 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). The Forestry Interests’ 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 Under s20A, the period for continuous use is 6 months.

⁵ *Auckland Council v Mawhinney* [2018] NZEnvC 15.

⁶ In relation to s10.

Part 6 of the Legislation Design Guidelines 2021 provides that:

New legislation should only address matters already covered by the common law where it can result in improvement (such as increased clarity or a policy change). The common law is able to evolve flexibly and so is more adaptable than legislation. The cost and the potential risks of legislating should not outweigh the benefits of the new legislation.

Potential Solution

In view of the NES-CF, the Forestry Interests consider that it would be useful to codify the effect of the Mawhinney decision to add clarity to the concept of existing use rights and to provide certainty for foresters.

A3. Limit requests for further information

To speed up consenting processes and reduce costs, create a financial disincentive for councils to seek repeated requests for further information under s92 of the Act.

The issue

Some forestry operators report increasingly complex, repeated and detailed requests for more information under s92. These requests are adding to the processing time for consenting, to the overall costs of processing and overall contribute to consent inefficiencies. As applicants fund any requests, which may be delegated to external consultants there is no financial disincentive on councils or their advisors to apply a disciplined approach. Although applicants may decline to provide further information, refusals are discouraged by the adverse inferences if requests are not complied with.

Potential solution

Amend the Act to financially disincentivise councils from making ongoing requests under s92.

Issue B: Unnecessary duplication and conflicting considerations

B1. Conflicts in policy statements and plan provisions

The issue

Where there are inconsistencies in national policy statements enable the Minister to introduce regulations clarifying the hierarchy of instruments and or the status of regional or district plan provisions.

Foresters are becoming increasingly concerned at the complexity created by national policy statements. Several policy statements were written prior to the King Salmon decision using “avoid” language that has since been strictly interpreted by the judiciary.

Over recent years amendments to national policy statements have also applied a changing approach to policy making which creates uncertainty (for example, the numerous variations to the NPS FM). The introduction of new policy statements has resulted in greater overlaps, inherent inconsistencies and varying exemptions. These documents have added to the overall complexity of consenting. They potentially have significant impacts on the property rights of landowners.

The recent High Court decision of *Environmental Defence Society Inc v Minister for the Environment and Minister of Forestry* [2024] NZEnvC 24 highlights the onerous nature of policy statements and the detail with which they must be applied to applications for consent.

Potential solution

In terms of RMA amendments, a further regulation making power to s360 could usefully enable the Minister to prohibit or remove district or regional plan rules or provisions of national direction that duplicate or overlap with the subject matter in (other) national direction documents or which clarifies the hierarchy of national direction documents in the event of conflict without the need to use the schedule 1 process.

In the medium term, steps are required to “clean-up” the suites of national policy statements to reduce inconsistency and complexity.

B2. Codify the overall judgment approach

Amend the Act to codify the overall judgment approach.

The issue

Decisions by the Supreme Court have rejected the application of the overall judgment approach in favour of an approach that directly applies provisions of policy statements without recourse to Part 2 of the Act.

In our view, recourse to the provisions of Part 2 of the Act would enable an approach to decision-making that better reflects sustainable management of natural and physical resources.

The solution

Codify application of the “overall judgment approach” to allow decision makers to implement Part 2 matters of the Act, after consideration of the directive policies in national policy statements.

Issue C: Provisions open to competing interpretation

C1. Declarations under s310 and relating to s43A

Amend s43A to clarify that the Minister does not have a continuing obligation in respect of regulations and that national environmental standards can provide for activities as permitted activities subject to standards.

Amend s310 to clarify that the Environment Court does not have an inherent jurisdiction to make declarations regarding the vires of national environmental standards.

The issue

The Environmental Defence Society (EDS) filed declaration proceedings in 2023 challenging the vires of the NES-PF (later the NES-CF). The various challenges focussed on the wording of s43A(3) and the extent to which providing for plantation forestry activities as permitted activities in the NESPF breach section 43A. The Ministers for the Environment and Forestry together with the Forestry Interests challenged the jurisdiction of the Environment Court to make the declarations. A recent decision of the Environment Court confirms its lack of jurisdiction.⁷ This decision has been appealed by EDS to the High Court.

One declaration was not subject to the jurisdictional challenge and remains to be determined. This also relates to the operation of s43A(3).

The challenges posed by EDS raise questions regarding the clarity of drafting in ss43A. Despite this matter being *sub judice*, the Legislation Design Guidelines 2021 do not rule out amending legislation where litigation is on foot.⁸

EDS’s appeal challenges the scope of s310 and the extent to which the Environment Court should be able to determine matters relating to the content of the NES CF.

⁷ *Environmental Defense Society Inc v Minister for the Environment and Minister of Forestry* [2024] NZEnvC 24.

⁸ Refer to section 12.2. This is noted as being subject to several considerations which Crown Law would need to advise on.

Potential solutions

The Forestry Interests consider that amendments could be made to improve the drafting of s43A and s310 in relation to national environmental standards. For example, s43A could be amended along the following lines:

S43(3) If an activity has significant adverse effects on the environment, a national environmental standard must not, ~~under subsections (1)(b) and (4),~~ —

(a) allow the activity, unless it states that a resource consent is required for the activity; or

(b) state that the activity is a permitted activity unless requiring compliance with terms and conditions dealing with any significant adverse effects on the environment.

Section 43A could also usefully clarify that the Minister does not have a continuing obligation in respect of the regulations.

Amendments to S310 could usefully clarify that that section does not provide the Environment Court with jurisdiction to make declarations regarding the vires of national environmental standards. Any challenge to the vires of a NES should be subject only to judicial review by the High Court.

Issue D: Appropriate Management of Discharges

D1. Management of discharges to land and water

Amend s107 to extend the exceptions to replacement consents and s107(1) to include the matters set out in s107(3).

The issue

Broadly, s107 sets out circumstances in which consents for discharges to land and water must be declined.

Forestry activities typically have diffuse discharges of sediment that may be affected by s107.

A recent decision of the High Court⁹ illustrates the problems associated with discharges to land / water and the bottom line approaches directed by s107 of the Act. The High Court held that the Hearings Commissioner had erred in granting consent to an irrigation activity because the ongoing discharges of the existing consents had cumulatively contributed to significant adverse effects on aquatic life. Under s107, in determining whether a consent must not be granted a decision maker is not able to consider:

⁹ *Environmental Law Initiative v Canterbury Regional Council* [2024] NZHC 612

- the implications of declining consent for an existing activity, with associated economic implications;
- whether cumulative discharges may create significant adverse effects that are only short term and which may over the life of a consent reduce;¹⁰ and
- the extent to which consent conditions may stage reductions.

To grant a consent, the decision maker may only rely on the narrow exceptions under s107(2).

The scope of s107 is understood as providing a series of bottom lines which if not met, prevent the grant of a resource consent. In this regard, s107 is overly narrow and unless the exceptions are engaged, otherwise fails to allow consideration of the historical development of discharges and the potentially significant implications of not re-consenting existing discharges even in circumstances where those discharges are reducing and there is application of a continuous improvement approach.

Potential solutions

Amend s107 by expanding the exemptions to include effects that are short term (as opposed to temporary) and recognition of replacement consents. The latter may appropriately reference a continuous improvement approach.

Make s107(1) subject to both subsections (2) and (3).

Issue E: Matters to retain

E1. The suite of activity classifications

Retain the current suite of activity classifications to avoid issues with the NES-CF.

The issue

The NES-CF sets the activity status for the management of the various activities associated with plantation forestry (unless a plan is more stringent) and was developed with an activity cascade of permitted, controlled, restricted discretionary and discretionary activities.

The Forestry Interests are aware that some interests propose reducing the various classes of activities, but we sound a warning of the potential for unintended consequences, with specific reference to the NES-CF.

Our experience with the NES-CF is that the activity cascade is working well. Controlled activities, which cannot be declined, are a useful component of the suite of activities. The controlled activity status has been used where the existing permitted activity thresholds cannot be met. These ensure the

¹⁰ This is an important consideration for forestry activities which generate high levels of sediment at harvest which typically reduce to background levels over the life of the replanted forest.

consideration of associated matters of discretion provide for the ability to impose conditions while retaining certainty that the activity can be approved.

When drafting the NES-PF, thresholds for permitted activities and associated standards were carefully considered to ensure that the statutory tests for permitted activities were met.¹¹ The controlled activities were again carefully assessed and, were only used where considered to be appropriate.

As noted above, where there is some uncertainty as to the effects of an activity, the restricted discretionary or discretionary activity status has been utilised. This provides a council with the ability to decline a consent but more importantly, it provides the forum for a council to decide that a particular location is not appropriate for a proposed activity (for example, the location of proposed earthworks). This issue is particularly important to plantation forest owners given the long time frames involved, with a significant investment made up front and a long time period before returns from that investment can be realised. Controlled status is a useful tool to provide certainty to a landowner that an activity such as harvesting can take place in future, but while retaining the Council's discretion to impose site specific conditions.

Potential solutions

Should there be any suggestion that activity classifications be modified as per proposals under the NBEA, the Forestry Interests wish to record their position that the existing RMA activity classifications are working well and are integral to the operation of the NES-CF.

E2. Other issues

As noted above, the long-term nature of forestry, beginning with decisions made decades prior to harvest of where and what to plant, can be a causal factor in environmental outcomes during the life cycle of a forest.

These factors are not well recognised within the legislation and of late, have been exposed by extreme weather events. As concerns escalate over the risks associated with forestry management, to provide for the long term certainty for forestry operations we would welcome discussion under stage 3 of the RMA about the application of duties of care and defences to future extreme events.

We would also welcome discussion about the merits of spatial planning to address land uses in particular areas, noting concerns raised about recent amendments through the freshwater regulations creating a moratorium on land use change. Flexible land use is a fundamental tenet of land ownership (subject to planning controls to internalise effects).

Aspects of the National Policy Statement on Indigenous Biodiversity (NPS IB) and NPS-FM remain of concern to the industry. That said, care is required to ensure that any amendments to these regulations are not backfilled by piecemeal (and more restrictive) approaches under regional and district plans.

Concerning the NPS IB, a key issue relates to the mapping of planted production forests as significant natural areas and the associated impracticalities of managing highly mobile fauna. The Minister is referred to the FOA and FFA's detailed submissions on the proposed NPS-IB.

¹¹ Section 43A (3)

With respect to the NPS-FM, the Forestry Interests look forward to the opportunity to provide a more detailed submission in response to proposed changes. In the interim, it is noted that areas of concern include:

- Bottom lines for sediment (particularly if not assessed over the lifecycle of a forest);
- Use of the effects management hierarchy to apply a no-net effects / additionality approach (and which is already developing as a separate area of expertise);
- Application of the hierarchy of objectives; and
- The appropriate management of direct vs indirect discharges.

While there are many ways to address the core issues impeding forestry interests, it is also observed that many issues could be efficiently addressed through amendments that constrain Councils from providing for forestry activities in a certain way.

CONCLUSION

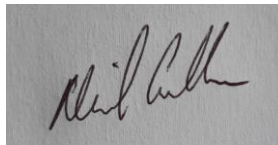
The Forestry Interests invite further direct discussion and any associated clarification on this feedback. We do not object to the submission being made public.

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Neil Cullen



President, FFA

Appendix One - The submitters

New Zealand Forest Owners Association (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.

FFA is the New Zealand Farm Forestry Association (FFA), it represents people who own, manage, or invest in small-scale private forests and/or are interested in the many values of trees. FFA currently has around 1,200 members, representing a good cross-section of the 14,000 entities owning private forests in New Zealand. Small forest owners are managing about 25% of the national plantation forest resource.

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 New Zealand 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.