

Submission

Fast-Track Approvals Bill

Feedback to:

New Zealand Parliament, Environment Committee

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Contents

Contact for correspondence:	3
Background and summary	3
Wish to be heard	4
Recommendations	4
Conclusion	5
Appendix 1: The submitter	6

Contact for correspondence

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Background and summary

1. The New Zealand Forest Owners Association (FOA) thanks the committee for the opportunity to submit on the Fast-track Approvals Bill (the Bill) and recommends it proceed with amendments.
2. Implementation of the Bill must have regard for the importance of natural capital as the foundation of the economy – without a sustained natural environment the resources that support our communities will not have durability. We need this Bill to support high value employment that supports New Zealand’s role as a good global citizen and exporter of high value goods that are sustainably produced.
3. We support the purpose of the Bill in principle, particularly for infrastructure projects that will help New Zealand to meet its climate goals and address wider environmental and social issues.
4. Forestry and wood processing also often benefit from brownfields development on existing sites, to create manufacturing hubs. This Bill’s focus on new and additional projects may miss encouraging nationally significant growth and investment in existing wood processing and manufacturing infrastructure.
5. We support the Wood Processors and Manufactures recommendation to see a broader interpretation of the application of the Bill that facilitates both investment and reinvestment in infrastructure and development that provides significant economic benefits and social national benefits.
6. We also wish to see ambiguous processes and terms within the Bill defined more clearly and made consistent within the wider reforms. Given that our forests are managed across many territorial and regional boundaries, and are therefore affected by many different rules, clarity and consistency are vital for implementation certainty.
7. Clear overarching strategic goals for investment and a hierarchy to criteria are vital for the success of any long-term investment in infrastructure. Existing codes of practice identified priorities and national standards should serve as the basis for successful application.

8. Subsequent changes to resource management law will need to consider matters of national significance and the balance with regional control to respond to unique regional characteristics and challenges. Forestry is a strong supporter of National Direction and would not want to see the enactment of this Bill undermine environmental regulation that ensures the control of negative effects across council boundaries.
9. As part of implementing that certainty, we ask the committee to consider adding a clause into the Bill that allows for the reconsideration of the Fast Track mechanism following the passing of the new resource management law reform package. This would ensure that, with this legislation as the first bill implemented in that package, that the settings still align with the wider framework of the new legislation.

Wish to be heard

The FOA would appreciate the opportunity to be heard in relation to our submission.

Recommendations

Our recommendations on the Bill are provided as follows:

1. Amend Clause 3 to facilitate investment and reinvestment in infrastructure and development providing significant national benefits; this is vital for brownfields development on existing sites.
2. Amend and clarify in Clause 3 and Clause 7 about the knowledge and skills, and expert assessment of projects, to ensure that expertise is more clearly identified for evaluation of projects e.g. technical disciplines relating to applications.
3. Amend Schedule 4 Clause 14(a) to (g) to clarify the definitions of “landscape and visual” effects, “aesthetic considerations”, and “unreasonable emissions of noise”. These definitions should be standardized with existing resource management law and/or made consistent in any subsequent changes to law.
4. Amend Section 17 of the Bill to clarify the criteria, which are currently broad and do not specify how cost benefit might be demonstrated. We recommend that the applicant should also be required to undertake an assessment of the benefits or costs at a wider socio-economic scale over the life of any project.
5. We recommend that any application involving conservation land or threatened species should automatically include the Minister of Conservation as one of the Joint Ministers.
6. Given that communities including forestry owners may be impacted by proposed projects, we also recommend that there is provision in the Bill for grounds and clear pathways for fair compensation paid for by private project applicants or the Government through the Public Works Act in the case of Crown Projects.

7. We recommend a review clause in the Bill to ensure alignment with the wider resource management reform package.

Conclusion

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

Elizabeth Heeg

A handwritten signature in grey ink, appearing to read 'Elizabeth Heeg', with a stylized flourish at the end.

CEO, FOA

Appendix 1: The submitter

New Zealand Forest Owners Association 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.

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.