



**FOREST
OWNERS
ASSOCIATION**

Submission

On

**CONSULTATION ON THE DRAFT FIRE
PLAN TEMPLATE AND PROPOSED
CHANGES TO FIRE SEASON TRIGGERS
AND ZONES.**

Submission to:

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15 September 2026

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Introductory Comments

1. The New Zealand Forest Owners Association welcomes the opportunity to comment on the draft Fire Plan template and proposed changes to fire season triggers and zones. This submission is informed by advice from the NZFOA/NZFFA Fire Committee.
2. Given the importance of Fire Plans in informing fire season settings, local fire controls, and community preparedness, NZFOA is disappointed that partners were provided with only four business days to review and comment on the draft plans. This significantly limited the sector's ability to consult members and provide comprehensive feedback. As a result, the comments in this submission are necessarily high-level and should not be considered a detailed review of all aspects of the plans.
3. NZFOA supports the overall direction of the review and recognises the considerable effort that has gone into simplifying the Fire Plan framework, improving national consistency, and providing greater transparency around how Fire and Emergency New Zealand exercises its fire control powers.
4. NZFOA considers the proposed framework represents a significant improvement on the current generation of Fire Plans and provides a strong foundation for a more nationally consistent, transparent and risk-based approach to wildfire management.
5. NZFOA's comments are intended to support the continued development of the framework while ensuring it provides transparent and practical mechanisms for managing wildfire risk where significant values are exposed to elevated wildfire consequences.

Summary

6. NZFOA supports the proposed separation of Fire Plans into a nationally consistent Fire Control Framework and a Local Application section. NZFOA also supports the proposed nationally consistent fire season trigger framework, improved transparency around fire-control decisions, and greater recognition of targeted controls under section 52.
7. NZFOA supports the proposed nationally consistent approach to fire season triggers.
8. NZFOA considers the proposed framework represents a significant improvement on the current generation of Fire Plans and provides a strong foundation for a more nationally consistent, transparent and risk-based approach to wildfire management.
9. NZFOA's principal recommendation is that the framework include a nationally consistent process for considering additional localised controls where significant values are exposed to elevated wildfire risk and further preventative measures may be justified.
10. To support this, local Fire Plans should identify significant values at risk and provide greater transparency regarding how these considerations may inform the assessment and application of localised controls under section 52.

The Forest Owners Association (NZFOA)

11. The New Zealand Forest Owners Association (NZFOA) represents the commercial plantation forest-growing industry. Its members manage approximately 1.2 million hectares of New Zealand's 1.8-million-hectare plantation estate and account for more than 70% of the country's annual harvest.
12. NZFOA members range from large, professionally managed forest estates to businesses managing forests on behalf of a wide group of domestic and international owners. The wider sector also includes farm foresters and small-scale growers, who face many of the same wildfire

risks but generally have less ability to absorb significant losses or maintain their own specialist capability.

The Plantation Forestry Sector

13. The forest growing sector generates approximately \$6.7 billion in export earnings and contributes significantly to New Zealand's economy and regional communities.
14. The sector supports more than 40,000 jobs across forest growing, harvesting, transport, processing and associated services. It also contributes to the viability of regional infrastructure, export supply chains and processing facilities while delivering wider public benefits, including carbon sequestration, erosion control, water and soil protection, biodiversity habitat and recreation.
15. Plantation forests are long-term, high-value biological assets. Investment decisions are often made decades before harvest and a significant wildfire can destroy many years of investment while affecting employment, wood supply, exports, environmental values, infrastructure and neighbouring communities.

Wildfire Exposure and Sector Capability

16. Wildfire remains one of the sector's most significant risks. Since 1985, more than 23,000 hectares of plantation forest have been lost to wildfire.
17. Most damaging wildfires affecting plantation forests originate outside forest boundaries, highlighting the importance of applying preventative controls to identifiable ignition sources and fire-spread pathways outside the boundary of the value being protected.
18. Forest owners invest substantially in wildfire reduction, readiness and response. Industry estimates indicate average annual fire-protection costs of approximately \$16.1 million including insurance and approximately \$8.1 million excluding insurance.
19. The forestry sector also maintains substantial in-house wildfire capability, including trained Incident Management Team personnel, firefighters, specialist equipment, tankers, pumps, heavy machinery and aviation resources. This capability contributes significantly to New Zealand's overall vegetation fire response capacity.
20. Maintaining this capability requires ongoing investment, training and operational opportunities. Effective integration of forestry resources into wildfire readiness and response arrangements remains important to national wildfire resilience.

Consultation timeframe

21. The approximately four business days provided for consultation was insufficient for meaningful engagement with partners on documents of this significance. Future reviews should allow adequate time for affected parties to consider proposed changes, consult their members and provide well-informed feedback.

Simpler and clearer Fire Plans

22. NZFOA supports the proposed separation between:
 - Part 1 – Fire Control Framework; and
 - Part 2 – Local Application.
23. This approach should reduce duplication between districts, improve national consistency and make local fire control decisions more transparent. It should also improve the usability of Fire

Plans for landowners, land managers, permit holders, infrastructure operators, communities and FENZ personnel.

Increased transparency and predictability

24. NZFOA supports the greater clarity provided regarding:

- how fire season decisions are made;
- how trigger thresholds are selected;
- when and why fire-control powers may be exercised;
- the use of section 52 powers; and
- the factors considered when exercising fire control powers.

25. Improving transparency and predictability is consistent with the purpose of Fire Plans and should assist both Fire and Emergency and stakeholders to better understand how local fire-control decisions are made.

Greater use of targeted controls

26. NZFOA supports greater recognition of targeted and risk-based controls.

27. Wildfire prevention is most effective when controls target identifiable ignition risks and fire-spread pathways rather than relying solely on broad geographic restrictions.

28. Existing statutory powers already provide flexibility to apply targeted controls where circumstances justify them. NZFOA supports a framework that provides greater clarity regarding how and when those tools may be used.

Significant Values at Risk

29. NZFOA supports a risk-based framework that recognises wildfire consequences are not uniform across the landscape. Plantation forests, conservation areas, communities, processing and industrial facilities, critical infrastructure, water supply catchments and other assets may suffer particularly significant consequences if affected by wildfire.

30. The draft template does not explicitly provide for the identification of significant values at risk within the Local Application section of a Fire Plan. NZFOA considers that addressing this gap would improve transparency regarding how wildfire consequences are considered when assessing local fire-control measures.

31. Significant values at risk may include:

- plantation forests;
- conservation areas;
- communities;
- industrial facilities;
- processing plants;
- critical infrastructure;
- water supply catchments; and
- other assets where wildfire consequences may be particularly significant.

32. NZFOA is not advocating that the existence of a significant value at risk should automatically result in different fire season settings or trigger thresholds.

33. Rather, the identification of significant values at risk should provide an informed basis for considering whether additional local controls may be appropriate in situations where elevated ignition risks and significant wildfire consequences can be demonstrated.
34. The objective is to improve transparency regarding how wildfire consequences are considered within local fire-control decision-making.

Risk-Based Localised Controls

35. NZFOA supports greater recognition of targeted, risk-based controls alongside the nationally consistent fire season framework. Broad fire season settings provide an important general control, but they may not adequately address a specific activity, ignition source or fire-spread pathway that creates elevated risk to a significant asset.
36. The Fire Plan framework should establish a nationally consistent process for considering, assessing, implementing and reviewing localised controls under section 52 where circumstances justify additional preventative measures.
 - potential wildfire consequences are significant;
 - an identifiable ignition source or activity is present;
 - a credible fire-spread pathway exists; and
 - evidence indicates that further preventative measures may be necessary or desirable for fire control.
37. The framework should explain how landowners, land managers, communities, conservation managers, infrastructure operators and other affected parties may request an assessment. It should also specify:
 - the information required to support a request;
 - the factors FENZ will consider;
 - how the geographic area will be determined;
 - how affected parties will be engaged;
 - who will make and approve the decision;
 - how the decision and reasons will be recorded and communicated; and
 - when the control will be reviewed, varied or removed.
38. Any control should be evidence-based, necessary and proportionate. It should target the source or pathway of risk wherever practicable and avoid imposing unnecessarily broad restrictions across an entire district or fire season zone.
39. Such localised controls could include:
 - restrictions on specified activities within a defined area;
 - temporary restrictions or prohibitions under section 52;
 - controls applying within a clearly mapped area adjoining a significant value at risk;
 - additional controls during forecast periods of elevated risk;
 - controls targeted at a specific ignition source or fire-spread pathway; and
 - other proportionate measures necessary or desirable for fire control.
40. A nationally consistent framework for assessing and applying localised controls would improve transparency, predictability and stakeholder confidence while ensuring controls are directed toward identifiable wildfire risks rather than being applied broadly across entire districts.

Fire Season Triggers

41. NZFOA supports the proposed nationally consistent fire season trigger framework. A nationally consistent approach should improve transparency, predictability and consistency while reducing unnecessary variation between districts.
42. However, the framework should retain sufficient flexibility to allow appropriate local controls to be applied where wildfire consequences and local risk factors justify additional preventative measures.
43. NZFOA also considers that trigger frameworks should be supported by clear evidence, transparent decision-making and periodic review to ensure they remain fit for purpose as conditions and risk profiles change over time.
44. Localised controls under section 52 should operate alongside, rather than as modifications to, the national fire season trigger framework. This would allow FENZ to address specific ignition risks or fire-spread pathways without unnecessarily altering the fire season setting for a wider zone.

Conclusion

45. NZFOA supports the overall direction of the proposed Fire Plan framework.
46. The move toward a nationally consistent, risk-based and more transparent framework should improve the effectiveness, predictability and usability of Fire Plans across New Zealand.
47. NZFOA's principal concern is ensuring that the framework provides a transparent and nationally consistent process for considering additional controls where wildfire consequences are significant and local risk factors justify further preventative measures.
48. NZFOA's principal recommendation is that the framework provide a nationally consistent and transparent process for identifying significant values at risk and considering whether additional localised controls may be appropriate where elevated wildfire risk and significant consequences can be demonstrated.
49. NZFOA recommends that Fire and Emergency New Zealand:
 - retain the proposed two-part Fire Plan structure;
 - implement nationally consistent trigger frameworks;
 - identify significant values at risk within local Fire Plans;
 - explain any implications these values may have for local fire-control arrangements;
 - establish a nationally consistent framework for assessing and applying localised controls under section 52 powers;
 - retain flexibility to apply local controls where justified by risk; and
 - continue developing targeted controls that focus on the source and pathway of wildfire risk.
50. NZFOA looks forward to continuing to work constructively with Fire and Emergency New Zealand to refine the framework and improve wildfire risk management outcomes for landowners, communities, significant assets and the wider rural landscape.



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