

Submission

on

**Transitioning to a low-emissions and
climate-resilient future: emissions
reduction plan discussion document**

Te hau mārohi ki anamata

Submission to:

Ministry for the Environment,

PO Box 10362

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Contents

Contact Details..... 3

Submitters..... 3

NZ Forest Owners Association (FOA)..... 3

NZ Farm Forestry Association (FFA)..... 3

Forest Growers Levy Trust (FGLT)..... 3

Summary..... 4

Detailed commentary and answers to questions..... 5

 In Principle Decisions on Emissions Budgets..... 5

 Emissions pricing..... 5

 Planning..... 6

 Moving Aotearoa to Circular Economy 7

 Agriculture 8

 Forestry 9

 A new planning and advisory service 13

 Note on making this submission public 13

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Submitters

This is a joint submission by the three entities that collectively represent the interests of commercial forest owners in New Zealand.

NZ 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 around 60% of the annual harvest.

In 2019, the forest growing sector was worth \$6.93 billion in export value and has a 12% share of rural land use.

NZ Farm Forestry Association (FFA)

The NZ Farm Forestry Association represents people who own small-scale private forests and/or are interested in the many values of trees. Currently we have around 1,500 members representing a good cross-section of the approximately 15,000 entities owning private forests in New Zealand.

Small forest owners are managing about 25% of the national plantation forest resource, and many also have significant areas of indigenous vegetation growing on their land.

Forest Growers Levy Trust (FGLT)

The FGLT operates under the Commodity Levies Act to manage industry good activities on behalf of all commercial forest owners in New Zealand. Its members are drawn from a cross section of the forest growing industry.

Summary

Overall, the industry welcomes the improved recognition in this document of the role that not only forestry, but the down-stream products, can contribute in a multitude of ways to New Zealand's emissions reductions budgets.

We note, and support, the modification of the Climate Change Commission (CCC)'s advice based on updated survey information on forest planting and deforestation intentions. That said, we advise strong caution in concluding that since the level of planting achieved by 2035 will now be higher, the budgets should be adjusted accordingly. Many variables are at play and intentions often do not translate into reality. It is obvious, for example, that both the new projections, and the forestry intention survey results, will not have taken in to account any increased regulation that Government might impose on forestry; nor any constraints on the availability of resources such as seedlings and labour.

We agree that the Emissions Trading Scheme (ETS) is having its intended influence on afforestation but also agree that the price may need to be more than double to influence some gross emissions behaviour.

Given the ETS is a national policy instrument, it is appropriate for Government to monitor and manage the settings to ensure it delivers the outcomes intended. Land use change into forestry at the moment seems to be occurring at approximately the rate proposed by the CCC and we do not believe there is justification for land use controls applied to one specific land classes in favour of others. We support further clarification of the rules relating to 'permanent' forests under the ETS, notably in terms of delivery of outcomes, location and species involved.

We consider there is a role for Government in undertaking strategic spatial planning, particularly with respect to the intended outcomes of the Industry Transformation Plan. We also believe the Government has a role to support landowners through extension services, in collaboration with a range of other primary partners.

We support the development of indigenous forestry but note that a number of concerns that we raised with the CCC's report remain, including:

- Over assuming the role that native forests will play, and the area that may be planted.
- Not adequately recognising the continuum within forestry and instead portraying a simple choice between short-term exotic and long-term native afforestation.
- Failure to appreciate that different exotics provide different benefits.
- Ascribing values to native forestry while ignoring those same values provided by exotic forestry, and
- Not elaborating on any role for native forestry to contribute to wood production and the bioeconomy.

We would appreciate more research on the potential for recognising additionality within all pre-1990 forests, and the benefit this could provide for both the forest estate and New Zealand.

That said, the improvements to the ETS to facilitate involvement and management are acknowledged.

Detailed commentary and answers to questions

In Principle Decisions on Emissions Budgets

A key reason for the Government modifying the advice received from the CCC is new information related to forestry and projected forestry emissions. This is on the basis of an afforestation and deforestation intentions survey conducted recently.

“The combined effect of factoring the new information from the latest forestry intentions survey over the three emission budgets periods is to reduce projected emissions by a total of 14 MtCO_{2e}.”

We consider it appropriate to adjust the emissions budgets on the basis of the new information obtained from the afforestation and deforestation survey but would note that whether these planting intentions are realised will depend on a number of factors including land availability, wood markets, labour, seedling availability and Government policy changes in such areas as the ETS and land use.

It must be emphasised that while meat returns are good currently, there are still many reasons why hill country farmers are subject to a range of disincentives to farm livestock and will wish to plant trees instead. These include increasing frequency of drought in some regions, the emergence of synthetic food, farm input costs, freshwater exclusion policies, animal welfare standards, persistently low wool prices and succession planning.

For these reasons any estimate of future plantings should be treated with considerable caution.

In response to the consultation questions:

Emissions pricing.

Question 28: Do You have sufficient information on future emissions price paths to inform your investment decisions?

We consider that there is adequate information on future emissions price paths to inform our investment decisions. Emissions pricing is just one factor amongst many.

Question 29: What emissions price are you factoring into your investment decisions?

A significant continuing increase in the price of carbon is being built into investments in the forestry sector, consistent with the rising price corridor. We consider that to achieve sufficient alternate investment, behavioural change and sequestration by 2050 the current price will need to more than double.

We note that the discussion document refers to the climate change commission demonstration pathway (table 9, page 16) which relies on carbon prices that have already been exceeded. Given that the afforestation levels have been adjusted on the basis of the intentions survey we question the continued relevance of this table.

Question 30: Do you agree that the treatment of forestry in the ETS should not result in delay, or reduction of effort, in reducing gross emissions in other sectors of the economy?

We agree that the ETS rules pertaining to forestry should not be allowed to delay reducing gross emissions.

Forestry has a critical role to play in softening the transition for other parts of the economy, but it is not a long-term replacement for action on gross emissions.

Question 31: What are your views on the options presented above to constrain forestry inside the NZ ETS? What does the Government need to consider when assessing options? What unintended consequences do we need to consider to ensure we do not unnecessarily restrict forest planting?

It is appropriate for Government to adjust the settings of a public good policy instrument, the ETS, to deliver the most beneficial outcome for society. That said, the Government should proceed cautiously in placing any constraints on forestry, which is the single most effective mechanism to allow New Zealand to meet its targets. Investor confidence, especially with such a long-term investment, can be easily eroded. We concur with the observation (page 38) that forestry may also be needed “*as insurance if progress in other sectors is slower than forecast.*” This suggests we should plant more forest than we need.

Any restrictions on forestry units are likely to result in increased demand (and price) for those units, which should change emitter behaviour, but might not change forest planting since the incentive of earning fewer units of higher value might be the same as earning more units of a lower value. At present planting rates appear to be broadly in line with the CCC recommendations and it would therefore seem prudent to wait until there is a problem before deciding on such an intervention. The recent advice that New Zealand will need to spend billions of dollars buying offshore credits to meet its 2035 targets suggests we need fewer constraints on forestry, not more.

That said, we believe that there are areas of the ETS policy that do warrant review. This includes the requirements under the permanent forestry category and the type of forestry that is eligible within that category.

Carbon only forestry (non-production forestry) does have a role to play but like some agricultural land uses, we consider it is appropriate only under specific conditions. It is also appropriate to consider the impact of ETS policy on wood supply and the forestry workforce.

Question 32: Are there any other views you wish to share in relation to emissions pricing?

We do have other views to share; in particular, we are disappointed with some of the language used in the discussion. For example, we note the document (page 38 first paragraph) says “*while the emissions removed by exotic forest planting can offset gross emissions, this is a one-off benefit, and means the land must remain in forest permanently.*”

This statement is inaccurate and unhelpful. When farmland is converted to forest stock numbers and fertiliser use are both reduced, resulting in a permanent fall in agricultural emissions. The forest then delivers an ongoing stream of product benefits as well as a higher level of biodiversity, water quality and erosion control than the activity it typically replaces. Even judged on carbon benefits alone the continual improvement in genetics and therefore standing wood volume, as well as carbon locked up in harvested wood products means it is not a one-off benefit.

Furthermore, the word ‘permanently’ is used very loosely. One thing that is certain in the primary sector is that nothing is permanently locked up. If we are successful with our efforts on emissions reduction, then the price of carbon will fall to zero within a generation. Forestry will remain a land use only as long as it provides the net best option for the landowner.

Planning

Question 33: In addition to resource management reform, what changes should we prioritise to ensure our planning system enables emissions reductions across sectors? This could include partnerships, emissions impact quantification for planning decisions, improving data

and evidence, expectations from Crown entities, enabling local government to make decisions to reduce emissions?

We strongly support strategic planning and investment. The Forest and Wood processing Industry Transformation Plan is dependent on establishing new industries and resources that should be informed by spatial and resource planning that will support the investment decisions required.

The Natural and Built Environments Act and the Strategic Planning Act have the potential to assist in developing the land use development and infrastructure required to realise this potential. The alternative of allowing the forestry resource to be developed sporadically will not provide the confidence for processing investment that is required to deliver on the bioeconomy.

Moving Aotearoa to Circular Economy

Question 47: What should a circular economy strategy for Aotearoa include? Do you agree the bioeconomy should be included within a circular economy strategy?

The circular economy taking a whole of life approach is one that New Zealand has an opportunity to substantially benefit from, and a bioeconomy based on renewable, regenerative resources will be at the heart of that transformation. It will also be important for underpinning the 'Fit for a Better World' trading umbrella for the primary sectors.

It is pleasing to note the acknowledgement in the document that Aotearoa has a comparative advantage due to the role that forestry can play in our current climate change response. We note, for example, the statistics in the report (page 116) that there are sufficient wood residues to replace 70% of domestic aviation fuel consumption or 30% of all diesel consumption (assuming these residues to be available cheaply in the right places).

As well as the emissions reduction benefit the document rightly acknowledges the contribution from renewable materials as substitutes for emission intensive materials and the ability to support regional economies (page 115).

Transport

Question 54: Do you support the target to reduce emissions from freight transport by 25 per cent by 2035 and the associated actions?

We support the emissions reduction target for freight and any Government initiatives that assist the development and uptake of projects to decarbonize freight transport including for shipping, road transport and rail.

Corporate expectation is such that any moderately sized forestry company is already coming under significant pressure from customers, stakeholders, investors, and board members to demonstrate measures to reduce gross emissions, regardless of afforestation net gains.

Question 55: Do you support the target to reduce the emissions intensity of transport fuel by 15 per cent by 2035, and the associated actions?

We support any Government assistance for initiatives that facilitate the uptake and use of biofuels. Inevitably early adopters and trials are going to carry a high level of risk, the Government should provide transitional support to encourage the uptake and use of biofuels.

Energy and industry

Question 65: We have identified a proposed threshold of 1 kt CO₂e for large stationary energy users including commercial entities. In your view, is this proposed threshold reasonable and aligned with government intention to meet emissions budgets and ensure an equitable transition?

We agree that this should be mandatory for the large energy user that does not have equivalent or greater offsetting of emissions.

Question 68: What level of support could, or should Government provide for development of low-emissions fuels, including bioenergy and hydrogen resources, to support decarbonisation of industrial heat, electricity and transport?

We support the development of bioenergy and hydrogen resources as both an end user and supplier of biomass. We support Government initiatives encouraging the development of new technologies such as biochar.

Question 69: Are there any other views you wish to share in relation to energy?

Phasing out the use of fossil fuels in boilers is strongly supported. It will support the development of new domestic markets for biomass and subsequently will have the effect, in some instances, of reducing heavy slash.

Building and construction

Question 79: What should the Government take into account in exploring how to encourage low-emissions buildings and retrofits (including reducing embodied emissions), such as through financial and other incentives?

On page 94 the consultation document suggests the Government will consider ways to “remove barriers to lower-emissions building, and to encourage new products and ways of building.” One of the problems the Government should consider in exploring how to encourage low-emissions buildings is NZS 3602 “Timber and wood-based products for use in building.” This standard largely excludes exotic species other than radiata pine from construction, despite those species being fully acceptable as building timbers in their home countries. A more pragmatic approach to approving alternative species would widen options for timber design and construction, increase the demand for other plantation exotics and encourage their wider planting.

Agriculture

Question 83: How could the Government better support and target farm advisory and extension service to support farmers and growers to reduce their emissions?

- a. How could the Government support the specific needs of Māori-collective land owners?*

There is a significant opportunity for Government to use the Forest Service to support extension activities that support awareness of the opportunities that vegetation can provide for the landowner, whether via the ETS or He Waka Eke Noa. That said, such efforts should be taken in partnership with those groups that already have established relationships with landowners including Farm Forestry, Beef and Lamb NZ, Federated Farmers, FOMA, Landcorp and regional councils. The interest and awareness amongst farmers of the opportunities from forestry has increased significantly in the past six months but more is needed, and there is considerable common interest amongst these organisations in providing it. A coordinated effort involving such a coalition utilising common resources and messages

would deliver a more effective outcome than the Government undertaking extension work on its own.

Question 88: Are there any other views you wish to share in relation to Agriculture?

We support policies that acknowledge the right land use in the right place and acknowledge the right of farmers to use their land as they see fit, but we have concerns around an assumed primacy of agricultural land use over forestry. Establishing forestry on farmland in the right place has the benefits of net reduction in carbon emissions, carbon sequestration from trees and avoided stock emissions.

It is important for the economic welfare of New Zealand that our agricultural industry is seen by consumers and markets to be responding to climate change and forestry is uniquely placed to assist with that. Whether it is in the ETS or under the He Waka Eke Noa, agriculture will only face 5-10% of its emissions and even that level will require significant vegetation offsetting and land use change.

Forestry

Question 106: Do you think we should look to forestry to provide a buffer in case other sectors of the economy under-deliver reductions, or to increase the ambition of our future international commitments?

The document states that it is likely that forestry will over-deliver on the sequestration needed to meet our targets. This conclusion is premature, and certainly there is insufficient evidence that planting targets are ahead of the 380,000 required by 2035. Current plantings of exotics are approximately on track to meet the CCC's recommended planting level but whether this rate can be maintained is uncertain. By contrast the level of native planting is well short of the stated target and there are significant challenges to be overcome before it can be increased, in particular the prohibitive cost of successful indigenous tree establishment.

We believe that forestry should be used to provide an insurance policy or "buffer" in case of under-delivery elsewhere or alternatively allow New Zealand to lift its ambition and because trees take years to grow, this buffer should be created as quickly as possible. Until it is in place we believe it would be ill-advised to impose further constraints on the industry. However we agree that further afforestation should not be at the expense of action on emissions reductions.

Question 107: What do you think the government could do to support new employment and enable employment transitions in rural communities affected by land-use change into forestry?

Obviously, forestry will alter the patterns of employment and skill requirements in some rural communities. What form this will take and when will depend on market signals, as has always been the case for primary sector production. Land use change will necessarily need to take place and especially where it is rapid and on a large scale there may be a role for Government to assist with this process.

A number of reports, including the PwC report (*Ref: 1*) commissioned by the Ministry for Primary Industries, have shown that employment from forestry is on average greater than from grazing, though the pattern of employment can vary.

Ref 1: PricewaterhouseCoopers New Zealand, February 2019, Permanent Forestry and Operational Improvements Cost Benefit Analysis, prepared for the Ministry for Primary Industries.

In some cases, the Industry Transformation Plan will require forests of sufficient scale and concentration to support the investment that will deliver net new employment. In other cases forestry will be integrated with other land use activities and help improve the resilience of farming operations.

To assist Government should:

- ensure that its policies are not encouraging a net reduction in employment where this can be avoided while still achieving carbon emissions objectives.
- ensure that landowners' decisions are fully informed (through extension and research).
- undertake strategic spatial planning that can inform Government policy and support measures.
- encourage distributed processing and biofuel usage to minimise freight.

Question 108: What's needed to make it more economically viable to establish and maintain native forest through planting and regeneration on private land?

Given we're starting from an economic base of almost zero, virtually any incentive would make it 'more' viable. If the question was "what is needed to encourage people to plant and maintain native forests?" then the answers might include: free professional advice, free seedlings, a national pest control programme, research into forest bio-medicinals and fewer barriers to harvesting and marketing indigenous timbers. All of these would be popular and useful initiatives.

It should be noted that there is no viable case to be made that indigenous trees are cost effective at delivering carbon sequestration, whatever merits indigenous trees have for timber, biodiversity or cultural reasons.

While the CCC has argued that the greatest carbon benefits of indigenous trees will be delivered after 2050, the reality is that most such carbon sequestration will not occur until closer to 2100 or even after.

Furthermore, the Ministry for the Environment estimates that the cost of indigenous tree establishment is between \$1,500 and \$50,000 per hectare, compared to between \$1,500 and \$2,500 per hectare for pine trees.

Based on these estimates, the delivery cost of carbon in a pine tree in 2050 is up to \$10 per tonne. Compared with that, the actual cost of delivering the same tonne of carbon in a typical native tree in 2050 will most likely be some 100s of dollars.

At the same time, the increasing appreciation of the urgency of lowering global greenhouse gas emissions exemplified at COP26 makes consideration of 2035 targets now more vital than projecting to 2050.

We acknowledge that the levels of biodiversity in exotic forests will be different from those in indigenous forests, and we are supportive of the Government's aim to establish indigenous forests for habitat. We note that CCC have identified native afforestation as being complementary to, rather than instead of, exotic afforestation. The discussion document implies that native forestry provides a range of benefits that exotic forests do not, including biodiversity, erosion control, freshwater quality and social and cultural values. It is disappointing to see this nonsense suggested by a government agency. Not only do a large number of scientific studies demonstrate that all of these values are provided by exotic plantation forests, the fact is that those forests will be replacing grassland, much of which is erosion prone, carries stock that pollutes waterways, and on which biodiversity is actively discouraged. This comparison is absolutely relevant and totally ignored.

Question 109: What kinds of forest and forestry systems for example long-rotation alternative exotic species, continuous canopy harvest, exotic to native transition, should the Government encourage and why?

- a. Do you think limits are needed, for example, on different permanent exotic forest systems, and their location or management? Why or why not?*
- b. What policies are needed to seize the opportunities associated with forestry while managing any negative impacts?*

For generations land owners have been determining what sizes and kinds of forests, and what forest management systems make practical, social and economic sense; and by and large they have been very successful. We see no need to interfere with this. As much as possible Government policy should be implemented where it encourages forestry that delivers public good benefits that would not otherwise be provided, and on a least regrets basis.

As noted, it is questionable whether any land use can be considered permanent (with the exception in some instances of planting native forest for permanent cover) but within the ETS policy definition it is important to ensure that the public good benefits expected will in fact be delivered. We consider that this means the Government should stick to a long-term plan and confirm milestone achievements.

In a number of places the budget emissions document continues to portray forestry as a choice between long-term non-production native forestry and short-term production forestry. This unhelpful characterisation does not recognise the range of species and possibilities that exist. Forests can have any species mix and production forestry can have any rotation length.

There is a range of exotic species that are suited to long term production and the full potential for these alternate species has not yet been realised in New Zealand.

Exotic species such as redwood, eucalyptus and cypress can be grown as long-term production forests that do not require clearfelling (continuous canopy forests). These species, which are adapted for uneven-age forest structures, can be sustainably harvested to yield valuable timber through selective logging. Because they also grow rapidly, they have the potential to provide supplementary longer term solutions to climate change and also produce regular timber revenue. However, for production forestry to embrace a continuous canopy model the industry will require central government assistance.

The forest industry commissioned a report on production species for sites that require continuous canopy forests. This report "Trees for Steep Slopes," published in 2018 is available on the NZ Farm Forestry website.

We consider that forests established for carbon and protection rather than harvesting ('permanent' forests), should be restricted to those areas where harvesting is an unlikely option. Further, not all species are well suited to 'permanent' forestry and any forest established for that purpose – including indigenous - should be subject to a forest management plan showing how the regime, pests, natural hazards and any planned species transition will be handled.

In terms of policies to "seize the opportunities associated with forestry while managing any negative impacts," clearly it would pay to adopt policies that deliver higher value from our existing forests before planting more of the same on poorer country. Such policies could include encouraging more on-shore processing, encouraging more timber construction and reducing EITE subsidies for steel, aluminium and cement. The Government might also take

credit for the carbon sequestered by managing wilding pines on Crown lands, rather than destroying them.

Question 110: If we used more wood and wood residues from our forest to replace high-emitting products and energy sources, would you support more afforestation? Why or why not?

We take it as a given that we will be using more wood and wood residues from our forests to replace high emitting products and energy sources. Because there are practical, economic and nutrient constraints on the volumes that can be removed on harvesting, such replacement necessarily means we will need a greater supply of processing residues or more forests.

Question 111: What role do you think should be played by:

- a. central and local governments in influencing the location and scale of afforestation through policies such as the resource management system, ETS and investment*
- b. the private sector in influencing the location and the scale of afforestation?*

The location, situation and size of a forest are critical factors in determining its performance and the environmental benefits it delivers. Accordingly in terms of the roles of Government, local government and the private sector in determining the location of forestry it will be a combination of all three. The forest industry is supportive of a 'mosaic forestry' approach provided that at a regional level, there are also sufficiently large timber catchments to supply processing mills.

The industry remains supportive of establishing, at a minimum, the 2035 planting targets and the broader development of wood products capability but these planting targets are not an industry target, and the establishment of significant additional forestry is not mission-critical for most forest growers and levy payers who are focussed on maximising the return from their existing resources.

As noted, the location and scale of forestry needed will vary from protection forestry establishment, biodiversity enhancement, on-farm emissions reconciliation, and the on-going supply of sufficient quantity of wood to support large-scale processing. The private sector will respond to both wood price signals and Government policy. Government (central and regional) has a role to ensure public good policy is delivering the maximum benefit for the taxpayers or ratepayers (including ETS and Resource Management Act). Both also have a role in coordinating the planning necessary to deliver scale investment, which the private sector can respond to but cannot implement.

We do see it as a Government role to determine where forestry investment is best suited and to have policies that encourage such investment to be made by the private sector; but we do not consider it is Government's role to determine the investment decisions individual landowners choose to make in response to their own circumstances. For clarity, spatial planning that identifies key areas suitable for the development of afforestation to support scale investment is a function for Government. Imposing resource management rules that limit production forestry on the basis of retaining such land for other primary production purposes per se is not an appropriate function for Government. We strongly oppose the Commission's view that claimed community impacts are sufficient to justify regulatory intervention outside the ETS. If there is evidence that there are impacts due to a carbon policy setting on afforestation that need addressing, then this should be via carbon policy and/or ETS adjustments. The forest industry, and farmer representative associations, feels there is no justification for recommending blanket land use controls of a more general nature.

We acknowledge, and endorse, the comment on page 117 that the New Zealand ETS reforms have made it easier to participate in the scheme. We consider that officials have listened carefully to advice provided previously by the industry and have responded to minimise compliance costs and complexity. The development of the regulations anticipated from January 2023 will be an important next step and, in particular, further work is needed to better define and manage the “permanent” forest category.

Question 112: Pests are a risk to carbon sequestration and storage in new, regenerating and existing forest. How could the Government support pest control/management?

We acknowledge the pest problem and would welcome a national initiative to eradicate populations of deer, pigs, goats, possums, hares and rabbits. This would require a Government programme that led by example on the Conservation estate, and that subsequently encouraged private landowners to adopt the tools and practices that this programme showed as being the most effective. At the same time, it would require enforcement of penalties and for anyone caught releasing, encouraging or moving pest species. Greater engagement with landowners is needed. Hunter groups might object but if necessary, isolated forests could be set aside for hunting where there was no risk of pest species migrating to other areas and their numbers could be managed.

A new planning and advisory service

The development of forest extension capacity is welcome, and we agree it is an important element for supporting the target levels of afforestation. As we have previously recommended, there is a range of other parties that the Forest Service could and should partner with including Beef and Lamb NZ, Federated Farmers, the Farm Forestry Association, Pamu and Federation of Māori Authorities. Reach and adoption are both likely to be considerably enhanced through such collaborative extension.

The need for this support and incentives to encourage landowners and others to undertake afforestation is noted on page 117 and, while the level of awareness and participation has increased significantly in the last six months, there remains a strong need for adequate information for landowners.

It is noted in the list of ways for forestry to meet our targets that there is little mention of the contribution that additionality could make. We are aware of officials’ interest, and ongoing efforts to recognise additional sequestration from existing forests and woodlots. This is a potentially important element that will be an essential part of the He Waka Eke Noa on-farm accounting package, and it has much potential within the pre-1990 commercial forestry estate. The industry will continue to engage with officials to realise that potential so that it can be factored into Government budgets for the benefit of the industry and for Aotearoa.

Note on making this submission public

We consent to the submission being made public.

The parties would welcome the opportunity to discuss with officials any point or implication arising from this submission. The submitter wishes to be heard in support of its submission.

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