



# **SUBMISSION ON THE PROPOSED NATIONAL ENVIRONMENTAL STANDARD FOR PLANTATION FORESTRY**

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## Background

1. The New Zealand Forest Owners Association (FOA) is the representative membership body for the commercial plantation forest growing industry.
2. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand's plantation forests and over 80% of the annual harvest.
3. FOA is submitting on behalf of its membership.

## Submission

After careful consideration of the document, the FOA:

4. Supports the objectives behind the National Environmental Standard (NES) and considers the issues facing plantation forestry are accurately described by the document.
5. Considers the conditions for permitted activities will manage the environmental effects well, but notes that there will be a need to ensure that the forest planning documents are fit-for-purpose and monitored.
6. Considers the rules to be unambiguous and well written. The FOA believes the rules should be easily enforceable, providing there is adequate resource available to councils for the completion of audits and/or monitoring.
7. Believes the matters where councils retain local decision-making are generally appropriate, however disagrees with the permitted activity status granted to afforestation in Land Overlay 3A within the Gisborne area. These concerns are also extended to other MPI Regional scale (Red Zone) target land and land that is included in a recognised Regional Council erosion management scheme (as per page 60 of the consultation document). It is the position of the FOA that councils should have the right to refuse consents to afforest very high-risk terrain, or to limit the afforestation of such terrain to plantation species that are more suitable for low intensity harvesting methods (as defined in the NES). It is recommended that all such land should be scrutinised as suitable for radiata or other species intended for clear fell, via a consenting process.



8. Believes the environmental risk assessment tools should provide an adequate base for informed decision-making for councils. However, FOA notes the tools will need to be easily accessible, as well as regularly updated to remain fit-for-purpose. There may also need to be work completed with councils to ensure that these tools are easily able to be used, interpreted and applied in real time.
9. Considers that the draft rules are consistent and fair, with the exception of the permitted activity status granted to afforestation as addressed in point 7 above.
10. Considers the NES is the best option to meet the assessment criteria as detailed in the consultation document.
11. Notes there may be a period during implementation where support and guidance will be necessary for both councils and forest owners. Councils will require guidance to ensure that the NES is effectively and easily implemented, as well as to ensure that the tools and information provided are user friendly. FOA acknowledges that some councils may face additional costs and resourcing pressures, particularly during phase-in, but notes this should be manageable provided there is adequate support and guidance from central government
12. Notes there is a potential risk that during legal drafting the intent of a process, rule or tool may be lost or its stringency significantly altered. While FOA considers this risk to be low, it suggests there may be a need to provide reassurance and/or assistance to councils and forest owners to ensure the integrity of the agreed NES is maintained. There may also be a need to establish a review date of the legal draft for involved stakeholders.
13. Considers that the NES will likely assist in the implementation of the National Policy Statement for Fresh Water Management (NPS-FW) to an extent; however it should be noted that as the NPS-FW is a community-engagement process, there may be more stringent controls placed on forestry in areas that have been identified by councils and communities as needing additional management.
14. Supports the Environment Protection Authority (EPA) having sole decision-making power over the introduction and use of genetically modified organisms. The FOA does not consider the intent of this clause to avoid community and wider stakeholder input to the decision, but rather acknowledges the importance of this decision to New Zealand on a national level. FOA considers that central government is best placed to assess the introduction and use of genetically modified organisms and should weigh up all considerations when doing so.



15. Recommends bullet point two under *Ground disturbance outside riparian margins* found on page 69 of the document (within the permitted activities of harvesting) is altered to read:

*All disturbed soil must be stabilised or contained so as to minimise the risk of sediment entering into any water body or coastal water resulting in...the sedimentation of the bed of any surface water body.*

Or alternatively:

*All disturbed soil must be stabilised or contained, with measures in place to prevent the movement of sediment into any water body or coastal water resulting in...the sedimentation of the bed of any surface water body.*

Thank you for the opportunity to submit on this matter.

Yours sincerely

Brigid Jenkins  
Analyst  
On behalf of the Forest Owners Association

