13 June 2011

Ministry for the Environment
PO Box 10-362
WELLINGTON 6143

By email to: standards@mfe.govt.nz

Dear Sir/Madam

**JOINT SUBMISSION ON REVISED NES FOR PLANTATION FORESTRY**

1. This is a joint submission on behalf of the Hawke's Bay Regional Council (HBRC), Pan Pac Forest Products Limited (Pan Pac), Forest Management New Zealand Limited (FMNZ), and the Hawke's Bay Branch of the Farm Forestry Association (HBFFA). We have opted to make this submission jointly as a clear signal of our common opposition to the Revised NES for Plantation Forestry, irrespective of the differences in our own variable operating activities.

2. We represent about 40 percent of the total plantation area in Hawke's Bay. Pan Pac, as a sole Hawke's Bay company, also owns the largest single site sawmill in New Zealand, has a pulp mill and re-manufacturing plant, and exports wood chips. It is a major regional employer.

3. We remain unconvinced of the need for, and appropriateness of, the Revised NES. The Revised NES will increase the level of regulation for the forestry industry in Hawke's Bay without an anticipated increase in forest operational standards. Unfortunately this would lead to increased bureaucracy with little reward. It would create a new business of producing, processing, and monitoring/compliance of consents for both HBRC and company staff.

4. We feel more emphasis should be placed on the uptake of forest industry guidelines and best practice. Regulation can be a poor incentive to continuously improve work practises because the threshold can 'cap' improvement.

5. The Revised NES refers to "consistent" management of resources but it does enable regional and district plans to be more stringent than the NES on many matters. In Hawke's Bay we are interested in local variability for less regulation in some instances. The requirements of the red and some of the orange rules are not appropriate in Hawke's Bay. For example, we need to ensure afforestation and harvesting can take place for the economic and environmental viability of the region.

6. The Revised NES could lead to a perverse outcome for soil conservation. The 2011 Easter storm that hit coastal areas of Hawke's Bay particularly hard, demonstrated the
value of trees on erodible land. Sixty four percent (approximately 900,000ha) of the region's rural land is classed as erodible to highly erodible hill country; of that approximately 300,000ha is under a land use that is likely to exceed the sustainable capacity of the soil. We oppose any unnecessary regulatory impediments to sustainable use of erodible hill country. The Revised NES de-incentivises changes from unsustainable pastoral farming on orange and red areas to more sustainable forestry plantings.

Hawke’s Bay Easter storm April 2011

7. We still consider the 'plantation forestry' definition to be problematic. Many of the forestry initiatives that HBRC is associated with are multi-dimensional and involve a variety of species. Exclusion of one or two species for a particular purpose from the meaning of 'plantation forestry' is problematic.

Hawke’s Bay Easter storm April 2011
8. Farm forestry is an integral part of sustainable land management in Hawke’s Bay. We fear many Hawke’s Bay farm foresters would not have the capacity to adapt to a one-size-fits all NES primarily aimed at facilitating large-scale commercial forestry – even if it were to only apply to farm plantings over 1 hectare in cover.

9. Collectively, we are of the view that the Revised NES will not provide any net environmental or economic benefit and we seek that the NES be reconsidered (or abandoned) in light of our concerns.

10. Thank you for the opportunity to make this submission jointly on the Revised NES for Plantation Forestry.

Yours faithfully

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Hawke’s Bay Regional Council

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