13th June 2011

Ministry for the Environment
PO Box 10362
Wellington 6143

Dear Sir/Madam

Proposed National Environmental Standards for plantation forestry

Thank you for the opportunity to comment on the Proposed National Environmental Standards for Plantation Forestry Information Booklet.

NZ Farm Forestry Assn has a membership spread throughout New Zealand, with members owning on average forests less than 20 hectares in size. But a total forest cover of approximately 100,000ha. The majority of these small forests are on farms where farming is still the main land use and income earner for the property. Overlapping of District Council and Regional Council is not an issue for our small forest owners. Most existing plans provide good representation of all activities on our farms and forests, not one sector in isolation. The Proposed NES provisions will have a considerable effect on the management of our numerous small forests, and we do not believe enough attention has been given to the small forest plantation on farms.

We note that the NES ‘Outcome Statement Objective’ is to create a more consistent and appropriate plantation forestry management framework.’ We do not find the proposed NES outcomes being more appropriate for the small forest grower.

Comparing the provisions of the proposed National Environmental Standard (NES) to many of our existing Regional and District Plan provisions, we find that overall the NES will be more onerous for small forest growers than plan provisions at present. As an association we want to support further forestry plantings, especially on farms, as a more sustainable land use than in many places what exists at present. We are concerned that the NES may create more impediments and provide less incentive to plant on farms.

Our preference is to remain with the status quo.

NZ Farm Forestry Association

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Wellington