Dear Sir / Madam

Re: Revised Proposed National Environmental Standard for Plantation Forestry.

Introduction
While we, the Wellington Recreational Marine Fishers Association or members of the committee, did not take part in any of the workshops relating to this National Environmental Standard (NES) it was not that we did not have some knowledge of the impacts of pines it was just that time and funds limited our input.

We can not support the revised standard for Plantation Forestry as the proposal has failed to identify the impacts on the intertidal zone. In section 2.4 makes it clear the proposed standard has failed to identify a major impact on marine species from loss of habitat food and spawning opportunities.

2.4 Receiving environments
The proposed policy published in September 2010 alluded to the use of the Fresh Water Ecosystems New Zealand (FENZ) system to determine values for freshwater receiving environments. The water subgroup recommended to the main working group that FENZ not be used at this stage because it is not yet sufficiently developed to be incorporated into a national tool.

Without this information the revised national environmental standard for plantation forestry will have no outcome. It has become obvious over the years as we as an organisation has participated in
Government working groups and on committees including intertidal issues with the Wellington Regional Council that there is no formal information available for groups such as yours and your appointed sub committee to obtain the required information. All through the revised proposal it is painfully obvious that all those involved have no idea as to the value of the intertidal zone to marine species. It is all very well quoting the Freshwater Ecosystem system and that *it is not yet sufficiently developed to be incorporated into a national tool but* that is a totally different environment to the intertidal zone which this revised standard has valued to mention.

Therefore we do not support this revised version as there is a massive environment in all of our rivers and streams that has been forgotten as it is completely missing. There is also no attempt to acknowledge it is missing or what the impacts would be on our marine specie. I personally have described this environment through our submissions to the New Zealand Coastal Policy Statement review at the Proposed National Policy Statement for Freshwater Management and the power point has been placed on the MfE web site. In response to a request by the Wellington Regional Council I put together a power point that I presented to their senior managers and those from Wellington City Council, Porirua City Council and Capacity. There can be no excuse for the omission of the intertidal zone as I offered to give a similar presentation to MfE.

The omission of the intertidal zone appears on page 41 where a description mentions coastal marine areas, rivers and streams. The intertidal zone was defined in the revised version of the New Zealand Coastal Policy Statement and MfE must keep up and not carry on as if it has not been defined by Government.

The New Zealand Coastal Policy Statement also defines in Policy 21 to 23 impacts and these needs to be incorporated into the MfE standard.

On page 45 is the view from the working group that clearly describes this groups lack of intertidal knowledge where they have deleted a major condition and described that:

*Stabilisation to avoid adverse effects of sediment in water bodies or accelerated erosion*

Stabilisation, revegetation or replanting of exposed soil caused by harvesting being undertaken as soon as practicable.

Condition removed.

The working group considered that the condition is difficult to measure and will be ineffective because revegetation of the exposed soil normally occurs within 18 months.

This revegetation may occur in some areas but this is an attempt to create a national environmental standard which is conveyed in calling areas at different risk levels. So it is completely illogical to describe all areas will have revegetation in eighteen months when it will take well over three years in Wellington for a track to grow over mean while the hills continue to erode mud down rivers and stream when ever it rains. There is no attempt to stabilise the hills by DOC on Crown land when they harvested in Wainuiomata and cut tracks into the rock. The Wellington Regional Council also failed to ensure the tracks they cut were reseeded and three to four years later they remain exposed to erosion. Rather that removing the condition there should have been introduced measures to ensure hills do not wash into the sea.

The working group must have failed to understand the problem is a national issue as the Parliamentary Commissioner for the Environment (PCE), Dr J Morgan Williams, *Growing for good*, Section 3.4.2.
“Soil” page 50 only describes soil loss known from farming practices. If he was to include the soil loss from forestry, subdivision construction or dam construction and what can be seen though locked gates or threatening notices then the figures he quoted could easily be trebled. However, in his report he provided the following figures: “New Zealand loses between 200 and 300 million tonnes of soil to the oceans every year. This rate is about 10 times faster than the rest of the world, and accounts for between 1.1 and 1.7 percent of the world's total soil loss to the oceans, despite a land area of only 0.1 percent of the world's total”. It is unacceptable for a working group to be so uninformed of the issues.

On page 49 there is the statement significant adverse effects on aquatic habitat but no where has this been defined or described what constitutes adverse effect let alone a significant one.

On page 29 when describing Terrestrial habitat: there appears the view that some in the group considered that setbacks should be in place for the protection of terrestrial habitat as well as aquatic habitats. Then unbelievably there were some on the working group that felt that riparian setbacks should not be established to provide wildlife corridors. If the members if this working group were having difficulty understanding why aquatic habitats require protection then getting muddled up with how wildlife corridors and aquatic corridors are different then this working group lacked the skills, knowledge and resources to make such a judgement.

On page 53 under section 4.6 relating to pruning and thinning waste there carries the view that slash debris from pruning should not be placed where it may enter a water way then there is quoted in other parts of this paper the description of ten years floods when through the effects of climate change a fifty or hundred year rain fall may occur any where now. Under this proposal it is highly unlikely this requirement will ever work given how logs are recovered and transported from sites which are nearly always situated in valleys in a river or streams flood plan. Then given that flash flooding can be traced back to log jams creating dams which burst then even if it was a ten year rain fall it would have the same impact as fifty year rain fall.

On page 56 under 4.7 Earthworks there is the statement that there is no longer a monitoring requirement for water quality and refers to section titled Sediment discharge concentrations for information then we are informed the entire section has been removed!

Sediment discharge concentrations Sediment from land, after reasonable mixing, not reducing the annual medium visual clarity of receiving waters, measured against a reference, before harvest or an appropriate reference catchment by more than:. This is detailed although not appropriate as this detail has missed the point.

The revised policy then informs that the Entire section removed

The working group has decided that There is no longer a monitoring requirement for water quality as a number of members of the working group regarded such measurement did not provide data that could be used for any practical purpose and it is expensive.

The working groups view is rubbish and lacks experience what is the point of going to all the trouble to establish an environmental standard for plantation forests when it is obvious the greatest impact from pines is when they are harvested and water ways become filled with mud.
What is obvious is that the description of water quality standards has been poorly set out or described for the working group to make a judgement so they have instead deleted the requirement.

On page 68 under the heading 4.9 River crossings we find Maintenance of stream and river crossings and debris traps (this activity is not subject to any terms and conditions)

Maintenance of stream and river crossings and debris traps in all areas (this activity is not subject to any terms and conditions).

This is unbelievable and the impact of an abandoned river crossing was described through photos in our power point submission. If a construction site was required to describe how a stream or river was to be crossed through its resource consent application to lesson the impact on aquatic life, traveling through water ways, then it is unacceptable to find MfE is not going to require a forest plantation removal operator to have any terms or references for such crossings.

Maintenance of streams and river crossings and debris traps has to reach a far higher standard that at present and this can only be achieved through adequate terms and references.

The lack of river and stream crossing management was further exposed in the section 4.9 general conditions. Stream and river-crossing activities being subject to applicable district conditions in the permitted activity part of the Earthworks section.

Condition removed
There are no relevant district council conditions for earthworks, so this condition has been removed. MfE you are establishing an environmental standard so if councils have not a standard then you must establish a standard through this paper.

Also in section 4.9 River Crossings there is described culverts there size, height and how much water they can carry. What is missing is the current practice of using culverts to straighten streams and rivers. The impact is described as positive as (page 76) Culverts will normally pass significantly higher flows before any overtopping of the embankment. The down stream impact of water passing down culverts has not been described or any management plan required. The increase in velocity in a stream will be obvious immediately as banks become scoured away and aquatic life destroyed.

There are too many omissions and ill-informed recommendations made by those who have demonstrated they lack any practical knowledge of the impacts of harvesting plantations on aquatic and intertidal life for this version to be put forward as an agreed final version.

We await the final version with interest.

Yours sincerely

Jim Mikoz
President
Wellington Recreational Marine Fishers Association