SUBMISSION ON
PROPOSED NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

To: Ministry for the Environment
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Submission: Oppose the Proposed NPS and seek that it be substantially amended in response to the concerns expressed below or otherwise withdrawn entirely.

Introduction

1 I am a [Redacted] in Marlborough. I am also a [Redacted] and [Redacted] with 55 years of experience throughout New Zealand and overseas.

Education: [Redacted], [Redacted].

2 I oppose the Proposed NPS on Indigenous Biodiversity (the Proposed NPS) in its current form.

3 Unless the document is substantially modified it will result in significant costs for limited or negative environmental benefit, and creates real risk of exacerbating the loss of biodiversity on private land.

Support for indigenous biodiversity

4 I support the broad objective of the Proposed NPS and am very conscious of the value of biodiversity. On my own property, I am actively achieving native forest recovery and am actively managing to improve native biodiversity within my exotic forest area.

5 Notwithstanding my support for indigenous biodiversity, I do not support the Proposed NPS in its current form because it is likely to result in unnecessary additional costs without achieving any material gains in maintaining indigenous biodiversity within plantation forest, and because of a likely negative effect on native biodiversity.

General concern with Proposed NPS

6 I acknowledge that the Proposed NPS contains some recognition that plantation forest should be treated differently from indigenous forest remnants. However these provisions are limited in scope, their meaning is unclear and their relationship with other parts of the Proposed NPS is ambiguous.

7 Policy 3.10 provides that plantation forest identified as containing Significant Natural Areas (SNA) are deemed to be "plantation forest biodiversity areas" (PFBA). However, as currently drafted Policy 3.8 of the Proposed NPS would
require all SNA within plantation forest to be identified and mapped in district plans.

8 The excessive breadth of the criteria for identifying SNA at Appendix 1 of the Proposed NPS means that large areas of plantation forest would be identified as SNA. The surveys required to complete this task would come at enormous cost and achieve little benefit in terms of maintaining indigenous biodiversity.

9 Policy 3.10 applies to PFBA and requires that adverse effects of plantation forestry activities on (a) threatened or at-risk flora must be managed, and (b) significant habitat for threatened or at-risk indigenous fauna must be managed, to maintain long-term populations of such fauna.

10 I am very concerned about what this means in practice. For example, it’s unclear how these values will be identified, and what requirements will be imposed on plantation forest owners to manage and maintain them.

11 With respect to other indigenous biodiversity within PFBAs, policy 3.13 and policy 3.15 require local councils to maintain indigenous biodiversity (including highly mobile fauna) by amending their plans to manage adverse effects of land use on such indigenous biodiversity. These policies could lead to new and stringent regulation of harvesting activities. Again, I am very concerned about what this means in practice.

12 When a resource consent application is triggered by indigenous biodiversity controls, policy 3.19 contains onerous requirements for assessment of potential adverse effects which would be very expensive to complete in the context of large scale land use such as logging activities.

13 Overall, it is reasonable to anticipate that the Proposed NPS in its current form will be relied upon to impose significant new restrictions on plantation forestry. Such measures would impose considerable additional costs on my operations.

14 I believe that the Proposed NPS should be substantially modified to address the above concerns and should place much more emphasis on non-regulatory measures and incentives to support positive outcomes for indigenous biodiversity within plantation forest.

15 I support the broader and more detailed submission filed by the Forest Owners Association and the proposals for amendment to the Proposed NPS detailed in that document.

Potential implications for biodiversity

16 It is important to understand that forest management provides a dynamic environment, with opportunities created for different native species as the stand matures and is finally cut. The presence of these species is prima facie evidence of the ecological value of managed forests. Numerous studies in plantation forests confirm that plantation forests are beneficial for the maintenance and restoration of indigenous biodiversity. Production forest is planted to be harvested. During the growing phase the plantation forest provides habitat for a range of indigenous species that would otherwise not exist. However these values typically make a full recovery over time after the forest is regenerated. Furthermore studies have confirmed that the disturbance of harvesting creates habitat, in particular for species such as the NZ Falcon that nest and feed in cutover areas, and long-tailed bats that preferentially feed along forest edges with cutover. Logging operations can disturb indigenous biodiversity values, but
also create opportunities for some species. For example, on my property, active logging operations are visited by wekas, encouraged to seek newly-disturbed food, and NZ falcons. Both of these species are commonly seen in the immediate proximity of logging machinery and operations, and fortunately are seen to escape moving logs and machines without injury. Across a landscape, forest management and disturbance across ownerships create a constant supply of a range of habitat types. Consequently, well managed logging activities present little threat to biodiversity values.

The presence of thriving native species within exotic forests is prima facie evidence of the efficacy of exotic forests in providing suitable habitat, under current management practises. The proposed NPS in its current form threatens to “kill the goose that laid the golden egg” through discouraging ongoing investment in forestry.

In addition, many forest owners take active steps to maintain and enhance indigenous biodiversity values in plantation forests through monitoring biodiversity, pest and predator control, and partnerships with other stakeholders.

I am concerned that forest owners may be deterred from pursuing these voluntary initiatives if they perceive that improving biodiversity outcomes within plantation forest will lead to more onerous regulatory control over harvesting activities. This is not a good outcome for biodiversity, but one which is at real risk of occurring if the Proposed NPS is introduced in its current form.

**Overall costs, benefits and alternatives**

I believe that the intended public benefits to biodiversity will not eventuate and that the Proposed NPS in its current form will not be effective at achieving its objective on plantation forest land.

In contrast, I consider that the risks and costs of the Proposed NPS are much more significant and much more certain. These costs have been discussed above.

**Conclusion**

I oppose the Proposed NPS in its current form on the basis that it will not be effective or efficient at achieving its objective of protecting biodiversity on plantation forest land.

It will potentially generate an adverse reaction from forest owners that threatens the very values that the Proposed NPS seeks to protect and will create significant and disproportionate costs for responsible landowners that are already taking steps to actively manage biodiversity on their land.

I strongly support the continued and increased use of non-regulatory methods and incentives as the most effective way to achieve the desired biodiversity objectives. Such measures can encourage and support positive actions from forest owners and ensure that the costs of such measures are equitably distributed amongst all those who benefit from the shared biodiversity values.

I seek that the Proposed NPS by substantially modified to address the concerns raised above or otherwise that it be withdrawn.

Thank you for the opportunity to submit on the Proposed NPS.

[Signature], 9 March 2020