SUBMISSION ON
PROPOSED NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

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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the Proposed NPS and seek that it be substantially amended in response to the concerns expressed below or otherwise withdrawn entirely.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 Northland Wood Council (NWC) represent 75% of Northlands current annual log harvest program. The below list shows the companies that make up the NWC, covering 200,000 hectares of forestry. The mission of the Northland Wood Council is to provide a forum for its members to promote, enhance and co-ordinate areas of strategic common interest in the Northland region.
   - Hancock Forest Management NZ Ltd
   - Rayonier Matariki Forests
   - PF Olsen
   - Northland Forest Managers
   - Summit Forests
   - New Zealand Farm Forestry Association Mid North Branch
   - Taitokerau Maori Forests Inc
   - China Forestry Group

2 NWC opposes the Proposed NPS on Indigenous Biodiversity (the Proposed NPS) in its current form.

3 NWC has a vision where Northland Forestry will be a vibrant, sustainable, and respected industry in the region. Overall NWC considers unless the document is substantially modified it will result in significant costs for limited environmental benefit, and creates real risk of exacerbating the loss of biodiversity on private land.

Support for indigenous biodiversity

4 NWC supports the broad objective of the Proposed NPS and is very conscious of the value of biodiversity. It prides itself on being an environmentally responsible region where over 55% of all forests, represented by NWC, have third party certification (FSC) which requires sustainable management techniques throughout its forestry operations to be adopted.
The NWC representatives currently undertake various biodiversity projects including pest and weed control to enhance kiwi, bat, bittern, fern bird, kauri snail, hochstetter frog and many other indigenous fauna. Many of these projects are done in collaboration with community groups, iwi, Department of Conservation, Kiwis for kiwi and Regional Council.

NWC chair the Northland RMA Forestry Development Group who aim to promote collaboration between agencies and the forest industry while improving environmental performance in forestry through education and innovation. This group works closely with the three District and one Regional council on all issues including biodiversity. This also includes forestry representatives sitting on kiwis for kiwi, various pest plant working groups and many catchment water groups.

Notwithstanding its support for indigenous biodiversity, NWC does 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.

General concern with Proposed NPS

NWC acknowledges that the Proposed NPS contains some recognition that plantation forest should be treated differently from other land uses. However these provisions are limited in scope, their meaning is unclear and their relationship with other parts of the Proposed NPS is ambiguous.

For example, 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.

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. In the Far North District 43% of land is already identified as SNA. This equates to over 700 individual sites and over 10,000 landowners. These figures do NOT include plantation forestry. Under the NPS criteria this percentage would rise further and consequently limiting the ability to develop land in an economically poor district.

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.

NWC is very concerned about what this means in practice. For example, it is unclear how these values will be identified, and what requirements will be imposed on plantation forest owners to manage and maintain them. This is of particular concern in Northland as the makeup of many forestry blocks, corporate or woodlot owned/managed, are small by nature. Therefore making the example given on page 49 of the Discussion Document where harvesting is encouraged to be undertaken over ‘consecutive rotations’ completely uneconomical.

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, NWC is very concerned about what this means in practice on how this relates to the National Environmental Standard for Plantation Forestry.

14 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 plantation forest harvesting activities.

15 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 operational costs on the companies that represent the NWC.

16 NWC considers 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. Non-regulatory measures have to date proven to be very effective in the forestry sector. This can be seen with increased kiwi populations, the presence of long tailed bats and hochstetter frogs along with many other rare threatened and endangered species currently residing in plantation forestry.

17 NWC supports 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**

18 NWC considers that plantation forest is beneficial for the maintenance and in many cases restoration of indigenous biodiversity. A typical rotation cycle can be anywhere between 25 and 30 years of often active forest management before harvesting occurs. While this habitat changes during a harvest period and after a harvest period there is still habitat available for many indigenous fauna. Consequently, NWC considers well managed harvesting activities present little threat to biodiversity values.

19 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.

20 NWC is 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**

21 NWC considers 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.

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

**Conclusion**
NWC opposes 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 such as the forest managers representing NWC that are already taking steps to actively manage biodiversity on their land.

NWC strongly supports 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.

NWC supports SNA protection through the provisions in the National Environmental Standard for Plantation Forestry and any further amendments should be incorporated with the National Environmental Standard for Planation Forestry review.

NWC seeks that the Proposed NPS be 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.

Dated 9th March 2020

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Ursula Buckingham

Executive Officer
Northland Wood Council