

**SUBMISSION ON
PROPOSED NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY**

To: Ministry for the Environment
PO Box 10-362, Wellington 6143

Submitter: **Hawkes Bay Forestry Group**

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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the Proposed NPS and seek that it be substantially amended in response to the concerns expressed below or otherwise withdrawn entirely.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 The Hawkes Bay Forest Group (HBFG) is an incorporated Society based in Napier and one of a family of organisations known as Wood Councils. We have been functional for 4 years. Membership comprises 11 companies with commercial scale forest management responsibility. WE exist to enhance the role of commercial forestry and processing in Hawke's Bay. We achieve this by providing a forum for forest managers on issues of common interest and, as required, we establish a collective response within our sector.
- 2 HBFG opposes the Proposed NPS on Indigenous Biodiversity (the **Proposed NPS**) in its current form.
- 3 Overall HBFG 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 HBFG 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 society that promotes sustainable management techniques throughout its members forestry operations.
- 5 Notwithstanding its support for indigenous biodiversity, HBFG does **not** support the Proposed NPS in its current form because it is likely to result in unnecessary additional costs without achieving material gains in maintaining indigenous biodiversity within plantation forest.

General concern with Proposed NPS

- 6 HBFG acknowledges 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 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
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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 HBFG is 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 PFBA, 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. These policies could lead to new and stringent regulation of harvesting activities. Again, HBFG is 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 plantation forest harvesting 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 – in effect, another level of governance on a heavily regulated sector. This could be used to impose considerable additional costs on HBFG forest owners' operations.
- 14 HBFG 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.
- 15 HBFG 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

- 16 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. Harvesting operations can sometimes disturb indigenous biodiversity values. However, these values typically make a full recovery over time after the forest is replanted. Furthermore, studies have confirmed that the disturbance of harvesting creates habitat 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. For larger forests, harvesting and replanting creates a constant supply of a range of habitat types. Consequently, HBFG considers well managed harvesting activities present opportunity rather than threat to biodiversity values.

- 17 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.
- 18 HBFG 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

- 19 HBFG 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.
- 20 In contrast, HBFG considers that the risks and costs of the Proposed NPS are much more significant and certain. These costs have been discussed above.

Conclusion

- 21 HBFG 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.
- 22 It will create another tier of governance on an already heavily regulated sector. Potential costs of compliance could be prohibitive and without material gain.
- 23 Moreover, 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 forest owners that are already taking steps to actively manage biodiversity on their land.
- 24 HBFG strongly suggests that continuance and even enhancement of non-regulatory methods and incentives is 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.
- 25 It follows that HBFG 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 12 March 2020



Keith Dolman, CEO

