

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

To: Ministry for the Environment
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Submitter: **Bodis Forest Farms Ltd**

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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the Proposed NPS and seek that it be substantially amended in response to the concerns expressed below or otherwise withdrawn entirely.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 **Bodis Forest Farms Ltd** is a private forestland owner in the Central North Island. The nature of our business is to establish, grow and harvest plantation species to supply both domestic and international markets profitably. We established the company for the benefit of our family, children and grandchildren.
- 2 Bodis Forest Farms Ltd **opposes** the Proposed NPS on Indigenous Biodiversity (the **Proposed NPS**) in its current form.
- 3 Overall Bodis Forest Farms Ltd considers unless the document is substantially modified it will result in significant costs for limited environmental benefit, and will create real risk for investors seeking to expand New Zealand's forest estate as it will restrict flexibility and increase their costs at harvest time.

Support for indigenous biodiversity

- 4 Bodis Forest Farms Ltd 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 company that adopts sustainable management techniques throughout its forestry operations.
- 5 Notwithstanding its support for indigenous biodiversity, Bodis Forest Farms Ltd 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 a plantation forest.
- 6 During the 1990's the industry signed the Forest Accord with environmental groups, where area's of native forest were put aside and not harvested or cleared to convert to plantations. In exchange environmental groups agreed to let the forest industry get on with focussing their effort in making existing plantations and newly established plantations on farmland more profitable. Bodis Forest Farms Ltd fully support the intentions behind the agreed Forestry Accord.

General concern with Proposed NPS

- 7 Bodis Forest Farms Ltd 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.
- 8 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.
- 9 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. This is unacceptable to a forest investor that harvests their plantation forest once in their lifetime. The surveys required to complete this task would come at enormous cost and achieve little benefit in terms of maintaining indigenous biodiversity.
- 10 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. This will limit a private forest owners ability to harvest the trees he planted for his or her retirement and is completely unacceptable.
- 11 Bodis Forest Farms Ltd 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 and who will pay for this.
- 12 With respect to other indigenous biodiversity within PFBA's, 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, Bodis Forest Farms Ltd is very concerned about what this means in practice.
- 13 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.
- 14 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 Bodis Forest Farms Ltd's operations. These new restrictions will impose higher costs and reduce flexibility on when and how quickly a plantation forest can be harvested. None of these restrictions are acceptable without recompense.
- 15 Bodis Forest Farms Ltd considers that the Proposed NPS should be substantially modified to address the above concerns and should place much more emphasis on voluntary non-regulatory measures and incentives to support positive outcomes for indigenous biodiversity within plantation forest.
- 16 Bodis Forest Farms Ltd 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

- 17 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, 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. For larger forests harvesting and replanting creates a constant supply of a range of habitat types. Consequently, Bodis Forest Farms Ltd considers well managed harvesting activities present little threat to biodiversity values. This is the natural cycle of a plantation forest grown for production and very acceptable.
- 18 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.
- 19 Bodis Forest Farms Ltd 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

- 20 Bodis Forest Farms Ltd 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.
- 21 In contrast, Bodis Forest Farms Ltd 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

- 22 Bodis Forest Farms Ltd **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.
- 23 Private landowners that have established and grown production forests with no income for 25-30 years must be allowed to harvest their forests with no harvesting restrictions placed on them through this proposed policy. Any threat to an investors ability to harvest their forest estate in the future, through the implementation of the Proposed NPS, will send very negative signals to forest investors at a time when NZ wants to substantially grow its forest estate.
- 24 Bodis forest farms Ltd is very concerned that private property rights on land used for plantation forest will be severely eroded if the NPS is implemented in its current form with no mechanism for recompense to the landowner for this.

- 25 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.
- 26 Bodis Forest Farms Ltd strongly supports the continued and increased use of voluntary 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.
- 27 Bodis Forest Farms Ltd 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 10 March 2020

A handwritten signature in blue ink, appearing to be 'Rens Bosman', written over a light blue grid background.

Rens Bosman
Bodis Forest Farms Ltd