

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

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

Submitter: **John Turkington Limited**

Address: PO Box 98  
Marton  
4741

Contact: John Turkington

Telephone: 0274458410

Email: john@jtl.co.nz

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the Proposed NPS and seek that it be substantially amended in response to the concerns expressed below or otherwise withdrawn entirely.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 John Turkington Limited (JTL) is a forest management and land use consultancy business. JTL manages approximately 10,000ha of forests across the lower North Island and lower South Island. Majority of these forests are small and medium sized woodlots on farmland.
- 2 JTL operates 20 logging crews and harvested and marketed 1 million tonnes of logs last year, creating more than \$140 million of value for the provincial economy and generating employment for over 200 families.
- 3 JTL's biodiversity management operates in strict accordance with relevant resource management laws, including regulations made under the National Environmental Standards for Plantation Forestry (NES-PF), rules in Regional and District Plans. JTL is also a major supplier of domestic wood processors registered under the Forest Stewardship Council (FSC).
- 4 JTL **opposes** the Proposed NPS on Indigenous Biodiversity (the **Proposed NPS**) in its current form.
- 5 Overall JTL 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**

- 6 JTL 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.
  - 7 Notwithstanding its support for indigenous biodiversity, JTL does **not** support the Proposed NPS in its current form because it is likely to result in unnecessary
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additional costs without achieving any material gains in maintaining indigenous biodiversity within plantation forest.

### General concern with Proposed NPS

- 8 JTL 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.
- 9 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.
- 10 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.
- 11 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.
- 12 JTL 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.
- 13 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, JTL is very concerned about what this means in practice.
- 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 costs on JTL's operations.
- 16 JTL 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.
- 17 JTL 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 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 multiple forests within a catchment area successive harvesting and replanting creates a constant supply of a range of habitat types. Consequently, JTL 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 JTL 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 JTL 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, JTL 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

- 23 JTL **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.
- 24 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 JTL that are already taking steps to actively manage biodiversity on their land.
- 25 JTL 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.
- 26 JTL 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 14 March 2020

A handwritten signature in blue ink, appearing to read 'J. Turkington', enclosed in a thin black rectangular border.

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**John Turkington**  
Director, John Turkington Limited