

SUBMISSION ON PROPOSED NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

To: Ministry for the Environment
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Submitter: **Aratu Forests Ltd (AFL)**

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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the Proposed NPS and seek that it be substantially amended in response to the concerns expressed below or otherwise withdrawn entirely.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 Aratu Forests Limited (AFL) is one of the largest forestry estates in the Gisborne District, and a significant contributor to the regional economy. AFL manage around 27,000 hectares of radiata pine plantation on 35,000 hectares of freehold, forest rights and leasehold land.
- 2 AFL **opposes** the Proposed NPS on Indigenous Biodiversity (the **Proposed NPS**) in its current form.
- 3 Overall AFL 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 AFL 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 AFL is certified via both the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). Both organisations promote sustainable forest management and have a strong focus on protection of indigenous flora and fauna.

Within the AFL estate are 570ha of Protected Management Areas, 480ha protected under QE2 or Tasman Accord, and more than 1000ha identified as Forest Accord.

AFL actively monitor for Long Tail Bats and NZ Falcon and have management plans in place to minimise our effect on these species when identified.

- 6 Notwithstanding the support for indigenous biodiversity, AFL 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 forests.
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General concern with Proposed NPS

- 7 AFL 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.
- 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. The surveys required to complete this task would come at enormous cost and achieve little benefit in terms of maintaining indigenous biodiversity. Various reviews of the NES identify the significant cost of implementation to be borne by both local government and landowners. Simpson-Grierson state the identification process will be “costly and complex”, while Gisborne District Council’s (GDC) own impact report states the NPS have substantial financial implications for council.
- 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.
- AFL is 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.
- The NES-PF is already in effect. The inclusion of Policy 3.10 within the NPS is interpreted by AFL to mean additional actions will be required to show compliance with 3.10.
- 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 on such indigenous biodiversity. These policies could lead to new and stringent regulation of harvesting activities. AFL 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 AFL 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 to forest operations. Indeed, GDC’s own report on the impact of the NPS states the impacts could be very significant on landowners (18-417).
- 14 AFL 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 AFL 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 Plantation forest is beneficial for the maintenance and restoration of indigenous biodiversity. GDC’s commissioned report on protecting indigenous fauna within production forests makes this point several times. Production forest is planted to be harvested. Harvesting operations can sometimes disturb indigenous biodiversity values. However, these values typically make a full recovery over time after the forest is replanted. Consequently, AFL considers well managed harvesting activities present little threat to biodiversity values.

- 17 AFL take active steps to maintain and enhance indigenous biodiversity values within its plantation forests through monitoring biodiversity, pest and predator control, and partnerships with other stakeholders.

These steps include monitoring for the presence of Long-tailed Bats and NZ Falcon, as well as actively managing operations to reduce impact on these species. AFL spends significant amounts on pest control for goats, possums, cats, and mustelids; and promote recreational hunting within the estate to control populations of deer and pigs.

AFL have recently partnered with a group in Tolaga Bay to replant an area of the forest estate in natives rather than pines.

Overall costs, benefits and alternatives

- 18 AFL 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.
- 19 In contrast, AFL 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

- 20 AFL **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.
- 21 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 AFL that are already taking steps to actively manage biodiversity on their land.
- 22 AFL 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.
- 23 AFL 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



Andrew Knudsen, on behalf of Ian Brown

Aratu Forests Ltd