

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

To: Ministry for the Environment
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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the Proposed NPS and seek that it be substantially amended in response to the concerns expressed below or otherwise withdrawn entirely.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 Insert details of Treloar Trust (**The Trust**) owns several pinus radiata plantation properties in Te Kapua Road near Matawai. The planted area is 25 hectares.
- 2 The Trust **opposes** the Proposed NPS on Indigenous Biodiversity (the **Proposed NPS**) in its current form.
- 3 Overall The Trust 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 The Trust 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, The Trust 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

- 6 The Trust 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.
- 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 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 The Trust is very concerned about what this means in practice. For example, its 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'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, The Trust 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. Such measures would impose considerable additional costs on The Trust's operations.
- 14 The Trust 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 The Trust 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 The Trust considers that plantation forest is beneficial for the maintenance and restoration of indigenous biodiversity. 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, The Trust considers well managed harvesting activities present little 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 The Trust 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 The Trust 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, The Trust 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

- 21 The Trust **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 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 Trust that are already taking steps to actively manage biodiversity on their land.
- 23 The Trust 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.
- 24 The Trust 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 10th March 2020



Mark Treloar

Trustee
Treloar Trust



