

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

To: Ministry for the Environment  
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Submitter: **Juken New Zealand 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the Proposed NPS and seek that it be substantially amended in response to the concerns expressed below or otherwise withdrawn entirely.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 Juken New Zealand Ltd (JNL) was formed in 1990 following the successful acquisition of Crown Forest licenses in Northland, Gisborne and Wairarapa regions under the then governments Crown Forest Asset Sale. JNL is currently undergoing treaty settlement negotiations with local Iwi.

The Crown Forest Lease, together with the further acquisition of freehold land, assignment of leases, makes up an estate of some 40,025 hectares in the Gisborne and Wairarapa regions. Of this, 80% of the estate is plantation forest, comprising mostly of *Pinus radiata* (Radiata Pine), the balance of the estate being non-commercial indigenous species held in reserve and or covenant areas.

JNL's Forests primary objective is the sustained yield management of the forest for the production of clear wood to be utilised in the manufacture of a wide range of products for the house, condominium and construction industry. JNL has two forest divisions located in Gisborne and Masterton which supply logs to their respective processing mills for the manufacture of Laminated Veneer Lumber, Plywood, Laminated Lumber, and Solid Clearwood. The company also owns and operates two processing plants in Kaitaia, producing Triboard, MDF, Strandboard and Veneer Products.

- 2 Juken New Zealand **opposes** the Proposed NPS on Indigenous Biodiversity (the **Proposed NPS**) in its current form.
- 3 Overall Juken New Zealand 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 Juken New Zealand 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.
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- 5 Juken New Zealand is committed to maintaining ingenious biodiversity throughout its forest estate and spends significant dollars on the following initiatives:
- Maintains ISO 14001 Environmental Certification
  - Maintains Forest Stewardship Council (FSC) Certification
  - Collaborates with Hawke’s Bay Regional council in the control of Old Man’s Beard.
  - Collaborates with the Gisborne Regional Council to improve biodiversity values in Waingake Waterworks bush through pest control.
  - Conducts goat and possum control over the entire estate, eradicating significant numbers of these pests.
  - Conducts further targeted pest control in 72 ha’s of high value indigenous SNA.
  - Surveys are conducted every five years in approximately 4200 ha of non-plantation forests assessing the condition of these areas and monitoring the impacts of neighbouring forest operations. These surveys were completed recently at a cost of \$20,000. Presence/absence surveys for short and long tailed bat project initiated in 2019 with goal of developing management strategies with the JNL Estate.
  - Water monitoring in key locations throughout the Juken Estate.
  - Collaborates with Department of Conservation for Goat control in and around Rewa reserve
  - Reporting programme for forestry workers and visitors to report RTE species.
  - Collaborates with Ospri and Greater Wellington Regional Council on Possum control
  - Regional Council bird surveys completed within the forest estate.
  - Wilding control in and around Rewa reserve and other non-plantation areas within the forest estate.
- 6 Notwithstanding its support for indigenous biodiversity, Juken New Zealand 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**

- 7 Juken New Zealand 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 “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.
- 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.
- 11 Juken New Zealand 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.
- 12 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. Again, Juken New Zealand 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 without any clarity on what these restrictions would be, what the benefits would be and what the associated costs are. Such measures could create uncertainty on Juken New Zealand's operations and place at risk a number of the current initiatives already in place to preserve and improve Indigenous Biodiversity across our estate. The is counterintuitive to the intent of the Proposed NPS.
- 15 Juken New Zealand 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.
- 16 Juken New Zealand 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 Juken New Zealand 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, Juken New Zealand considers well managed harvesting activities present little threat to biodiversity values.

- 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 Juken New Zealand 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 Juken New Zealand 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, Juken New Zealand 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 Juken New Zealand **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 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 Juken New Zealand that are already taking steps to actively manage biodiversity on their land.
- 24 Juken New Zealand 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.
- 25 Juken New Zealand 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 11 March 2020



[Sean McBride]

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Juken New Zealand Ltd