Introduction

1 Frank Briant Family Trust jointly owns 310 hectares of Forestry land located on Kanakanaia Road in Gisborne. The land was planted after Cyclone Bola in March 1988 which caused severed erosion damage in the Gisborne region. The forestry block is being managed by PF Olsen’s.

2 Frank Briant Family Trust opposes the Proposed NPS on Indigenous Biodiversity (the Proposed NPS) in its current form.

3 The Trustees consider that 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 Trustees support the broad objective of the Proposed NPS and are very conscious of the value of biodiversity. They pride themselves on being environmentally responsible and adopt sustainable management techniques throughout its forestry operations.

5 Notwithstanding its support for indigenous biodiversity, Trustees do 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 Trustees acknowledge 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 Trustees are 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 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, Trustees are 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 Trusts
operations.

14 Trustees consider 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 Trustees support 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 Trustees 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, Trustees consider that 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.
Trustees are 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

Trustees consider 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.

In contrast, Trustees consider that the risks and costs of the Proposed NPS are much more significant and much more certain. These costs have been discussed above.

Conclusion

The Trustees oppose 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.

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.

The Trustees strongly support 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.

The Trustees seek that the Proposed NPS by 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 13 March 2020

Frank Briant
Frank Briant Family Trust