



F1. What do you consider are the strengths and weaknesses of the NZ ETS forestry settings?
Generally the nz ets forestry settings are good, it is a shame that erus cannot be used for harvesting surrender. There is still ambiguity on areas that cannot be registered as there is no clear evidence they are post 89 even though they had been registered as such previously.

Harvesting and replanting emissions returns can be hard to calculate, better guidance needed

F2. Do the NZ ETS forestry settings discourage deforestation? If not, what settings do you think would? No

F2A. Please explain your answer

Deforestation requirements are dictated by the use of the next land use and the profit that can be made. Carbon prices and expected return on investment affects deforestation more.

F3. Do the NZ ETS settings incentivise afforestation and replanting? If not what settings do you think would? No

F3A. Please explain your answer

More AGS grants should be allowed. Land that was pre 1990 then changed to post 89 should be allowed in the scheme

F4. Does the NZ ETS provide effective incentives for smaller foresters to participate in the scheme? If not, what settings do you think would? No

F4A: Please explain your answer

Carbon prices fluctuating affect land owners and the requirement to pay all units back at harvest when there are is no safe carbon allowed, can defer people, most arent in the game to trade carbon they are conveservative farmers who do no want to create liability on their land when units are monetized,

F5. Does the NZ ETS work well alongside other forestry programmes? If not, how do you think these programmes could be better aligned? Unsure

F5A. Please explain your answer

F6. What changes could be made to NZ ETS forestry sector provisions to improve the scheme?

More certainty around the ets rules
more flexibility in ags grants
better guidance on emissions returns for harvesting

F7. What are important factors when considering changes to forestry accounting settings in the NZ ETS?
Retrospective allocation of units if averaging is brought in for older post 89 forests.

F8. Do you think a different forestry accounting approach in the NZ ETS would change the scheme's incentives for afforestation? Yes

F8A: Please explain your answer

If forest owners can see that they do not have to repay all units at once and can say pay as they go this may incentivise more longer term planting, as they safe carbon option is a one off opportunity, this could be used to cover annual maintenance costs etc depending on the market.



F9. Do you think averaging should be introduced for post-1989 forests? If so, why? Yes

F9A: Please explain your answer

Even though i am unsure how this would work for older forests i think it has real merit for long term plantations.
More guidance required

F9B: Do you think it should be optional or mandatory?

optional, as not everyone will have the same long term view however it is unclear how MFE would keep track of this.

F10. Should there be limits on the types of forests that can use an averaging accounting method? For example, new forests only or forests under a size threshold. No

F10A: Please explain your answer

It should be offered to all however if there are other options for people to look at this decision would naturally be made

F11. How might averaging impact on your business decisions?

It would make us look at green fields investments as more profitable and rotations being more than once.

F12. Do you think deferred liability for emissions from Harvested Wood Products (HWPs) should be recognised domestically? If so, how? Unsure

F12A: Please explain your answer

Yes, from what we have read the data proves this can be calculated, however as around 70% is exported we are unsure on how much of an impact this would have on look up tables

F13. How might the options for deferred liability for emissions from HWPs impact on your business decisions?

It would impact on the longevity of the project and whether forests stay in the ETS or exit before harvest.

F14. Do you have any other comments or things you think are important? No

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