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## National direction for plantation and exotic carbon afforestation

Thank you for the opportunity to comment on the above document.

The Wood Processors & Manufacturers Association of New Zealand (WPMA) would like to provide the following comments on the Discussion Paper on the National direction for plantation and exotic carbon afforestation (the Discussion Paper).

WPMA represents the perspectives and interests of its members, including sawmill operators, timber and engineered wood manufacturers, pulp and paper producers, and suppliers that make a significant contribution to New Zealand's domestic economy and primary export sectors. Our members are companies that have made major investments in adding value to New Zealand's annual forest harvest and increasingly have a critical role in developing a bio-circular economy. WPMA members provide economic growth and employment opportunities across regional and metropolitan areas throughout New Zealand.

Domestically processed and manufactured wood products are a significant contributor to the New Zealand economy, with exports expected to increase by 12 per cent to \$2.85 billion in the year to 30 June 2022,<sup>1</sup> which includes the export of sawn timber, paper and packaging, engineered timber products, manufactured panels, as well as other wood products. The wider wood processing sector is a large employer of workers across New Zealand, with 30,645 workers employed mostly in the regions close to log supply.<sup>2</sup>

## Overall comments on the Discussion Paper

WPMA completed a submission on MPI's Discussion Document on the Proposals to change forestry settings within the NZ Emissions Trading Scheme (ETS).<sup>3</sup> In many ways the issues raised within this Discussion Document would appear to apply to the Discussion Paper.

Within WPMA's submission on the Discussion Document we expressed our concern over the prospect of a diminishing supply of wood fibre resulting from land being locked up for 'carbon farming', and the associated impact this has on wood processors' and manufacturers' ability to invest in updating or expanding their production capacity. This comes at a time when the Government has signalled its expectation of the increased use of sustainable low carbon building materials in the form of wood products under its Building for Climate Change programme and greater use of wood fibre within a low emission bio-circular economy. Increasingly, the forestry and wood processing sectors will have a key role in helping New Zealand achieve its net zero emission aspirations within the bio-circular economy by 2050.

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<sup>1</sup> MPI's Situation and Outlook for Primary Industries June 2022 ([link](#)).

<sup>2</sup> Forestry and Wood Processing Workforce Action Plan 2020–2024 ([link](#)).

<sup>3</sup> WPMA's submission on the [Proposals to change forestry settings within the NZ Emissions Trading Scheme](#)

The escalating price of New Zealand Units (NZUs) under the ETS will continue to exacerbate the future availability of wood fibre if productive land is increasingly used to sequester carbon rather than produce primary products, whether this be production forestry, sheep and beef farming or whatever else domestic and international consumers' demand. New Zealand adopted a 'market-led' rather than a government-directed approach to determine optimal land use in the 1980s. A government-mandated price for carbon, in conjunction with the market-driven cost of harvesting, labour and resource consent compliance, makes permanent carbon forestry an attractive short-term land use option in optimising investment returns to the detriment of the long-term use of New Zealand's productive farmland for future generations.

As acknowledged within the Discussion Paper, there are inevitable economic and social effects on rural communities caused by changes in productive land use, including being locked up as permanent forest with no intention of harvest. Permanent exotic carbon forests are entirely a product of statute. A simple solution to the perceived problems is to amend the Climate Change Response Act (CCRA) to preclude the recognition of carbon value, in whatever form, of permanent forestry.

The proposed amendments to the National Environmental Standards for Plantation Forestry (NES-PF) to expand the scope to include an 'exotic carbon forest' further compounds current problems disrupting investment in afforestation for plantation forestry and further expansion of the production capacity within the wood processing and manufacturing sector.

It is regrettable that the Government has chosen to largely ignore concerns widely held by both businesses and community groups about the long-term economic and social implications of permanent exotic forestry arising from the ever-increasing price of NZUs under the ETS. Continued unchecked, this will severely undermine the prosperity from demand-driven land use investment, as well as risk the social fabric of regional communities by fewer employment opportunities and a loss of economic returns from forestry and wood processing-based activities.

## **Part A Managing the environmental (biophysical) effects of exotic carbon forestry**

### [Q A1 Do you agree with the problem statement set out above? Y/N Are there other things we should consider?](#)

In part. In broad terms we generally agree with the problem statement, but note the lack of any recognition of the influence the Government plays in mandating both the price of NZUs and the forest types to which that process applies. This represents a significant oversight in the Discussion Paper.

The problem statement described in the Discussion Paper is a manifestation of the regulatory settings established under the ETS. Greater attention and analysis is needed about the influence of government policy in creating the causation effect of more land being planted into exotic carbon forests. In particular, that analysis needs to focus specifically on the apparent disconnect between the short-term effect of the CCRA on the Government's long-term stated goals of a low emission bio-circular economy, the greater use of naturally renewable and recyclable products, and improvements in environmental measures such as water quality and biodiversity outcomes.

The rising price of NZUs is the key reason for the expansion of exotic carbon forests. As the demand and price for NZUs continues to rise, this has forced up farmland prices and displaced other productive land-based activities (such as production forestry and sheep and beef farming) into exotic carbon forests. The Government's evolving policy settings on the ETS and rising (and potentially declining) price of NZUs will continue to influence the expansion of exotic carbon forests and should be included within the problem statement.

**WPMA strongly recommends that the ETS be included within a new problem statement as the rising price of NZUs will influence the expansion of exotic carbon forests.**

Further, consideration needs to be given to the second and third points on 'exotic carbon forests' transition to indigenous forest', which assumes that the land will readily revert to an indigenous forest over time on a uniform basis across the country. As we understand it, the ability for an exotic forest to return to its natural state is highly dependent on factors such as regional climate conditions, soil types, typography, existing indigenous vegetation already growing in the area as a seed source, and active management of the forest to control weeds and pests.

Extrapolating the management and cost of the Department of Conservation's stewardship of the conservation estate provides some insight, with declining forest health in some regions and ongoing costs of pest and fire management requiring a substantial fiscal annual outlay in maintenance. Similar expenses can be assumed for permanent indigenous carbon forest in the management of environmental risks.

It is an oversimplification to expect exotic carbon forests to transition to indigenous forests once they reach their end of life on a nationally consistent basis as suggested in the Discussion Paper. To develop sound policy for the NES-PF, we would have expected this to be informed by robust scientific and research analysis in assessing the land's capacity to naturally transition into an indigenous forest across different regional catchments. Unfortunately there is no such evidence in the Discussion Paper of this type of analysis occurring which severely undermines the validity and presumptions under second and third points that 'exotic carbon forests' transition to indigenous forest' particularly in areas with unfavourable climates and difficult growing conditions.

[Q A2 Have we accurately described the environmental effects of exotic carbon forests \(Table 2\)? Y/N What other environmental effects \(if any\) need to be managed that are different to those of plantation forests? Please provide evidence of the impact of these effects.](#)

No, accepting the very brief descriptions of environmental effects contained in Table 2. In large part this is a selective reiteration of the views and perspectives of identifiable sections of the community. Many of the effects asserted in Table 2 have been challenged repeatedly in council hearings and found to be based on a selective interpretation of submitters, council staff and vested interests. Visual impact, including the claim forestry is a monoculture, is difficult to rationalise when afforestation displaces rye grass-based pasture. Wilding spread is difficult to attribute to plantation forestry where the risk and therefore regulatory constraint does not apply to shelterbelts, woodlots and amenity plantings.

Claims of erosion risk, including the mass movement of unstable geologies. is difficult to understand in catchments where government-funded science and investment determine the need to transition away from shallow-rooting pasture-based systems into deeper-rooted vegetation to address major erosion issues. The water yield from vegetation is a function of leaf area and unrelated to species type, with the management of overallocation of the natural water yield by councils through regulation of afforestation a matter of regulatory expediency rather than sustainable management, as prescribed in under section 5 of the Resource Management Act (RMA).

[Q A3 Do you agree that the environmental effects of exotic carbon forests should be managed through the NES-PF? Y/N Why?](#)

Yes. The environmental effects of forestry and applicable controls have been determined with a sufficiently high degree of precision so as to enable national prescription. The value of management via an NES-PF is that it reduces the selective regulation of land uses on the basis of arbitrary rather than actual impacts. It also avoids the significant dead-weight cost by

reducing the need for repeated reassessment of the same and similar situations on a consent-by-consent basis. The NES-PF does not preclude forestry innovating where that is deemed desirable in the application for a resource consent.

[Q A4 The right-hand column of Table 2 sets out possible new regulatory controls. Please indicate if you disagree with any of these potential controls or feel we have missed anything, and explain or provide evidence.](#)

As noted above, WPMA contends that the unacceptable economic and social effects of permanent exotic carbon forestry are best managed by a change to the CCRA that precludes such afforestation from the financial benefits afforded by a government-approved forest type.

In considering the right-hand column of Table 2, this has been written in absolute terms without necessarily considering the biophysical elements within a forest system:

- Under 'Cumulative impact on surrounding community' [p. 22], it assumes that exotic carbon forests will naturally revert to indigenous forest over time at the end of its life. Yet this overgeneralised assumption has not been informed by robust scientific and research analysis on a catchment-by-catchment basis. As noted above, the ability to achieve this in practice will vary widely across different regions (including regional climate conditions, local seed source, soil types, typography and active management of the forest – to name some).
- In the case of 'Forest diseases' [p. 23], there is an expectation that exotic carbon forests should be subject to some form of biosecurity requirements. WPMA questions how this requirement would be applied in practice, given there is no incentive or management planning requirement (currently) to actively monitor disease risks in exotic carbon forests as would normally occur for plantation forestry destined for harvest. This does present a very real biosecurity risk to the health of New Zealand's forest estate.

[Q A5 Do you agree with option 2 for managing the environmental effects of exotic carbon forestry \(amend the NES-PF to include exotic carbon forests\)? Y/N Why?](#)

WPMA does not support proposed changes to the NES-PF to include exotic carbon forests.

We consider council control of patterns of productive land use to be a retrograde step and an unnecessary intervention. To the extent that permanent exotic carbon forestry is undesirable it can and should be managed by way of a change to the CCRA as noted above.

WPMA acknowledge its position is predicated on the assumption that the interests of domestic wood processors and regional communities are benefited where forests are planted and managed with the intention of harvest. We therefore accept the unfairness of selective intervention under the CCRA precluding some landowners from benefiting from carbon storage because erosion and other risks associated with their properties under permanent forest cover.

Without claiming any detailed analysis, we would assert that such landowners could be recompensed in ways that reward them for other desirable traits of their chosen land use (e.g. payment for biodiversity as happens now via Vote Conservation). We further acknowledge that such arrangements risk the same 'distortion' in land use patterns as are observed flowing from the CCRA.

[Q A10 Do you agree with option 3 for managing the environmental effects of exotic carbon forestry \(amend the NES-PF to require forest management plans for exotic carbon forests\)? Y/N Why?](#)

No. For the reasons set out above, WPMA recommends management of permanent exotic carbon forestry by way of appropriate change to settings in the CCRA.

The requirement for landowners and/or investors to have forest management plans in place for exotic carbon forests would provide a level accountability to ensure the active management of environmental effects over the life of the forest. We observe that given the long-term time horizons of exotic carbon forestry (over 50 years), it is important to consider how councils intend to monitor the compliance of landowners' and/or investors' obligations under forest management plans that are likely to involve the succession changes of different owners over time. The difficulties of this, particularly as they relate to absentee owners, cannot be discounted.

[Q A11 Do you agree that forest management plans should manage \[choose one\] \(a\) environmental effects only? Y/N or \(b\) environmental effects and forest outcomes, including transitioning from predominantly exotic to predominantly indigenous specie\(s\)? Y/N Why?](#)

WPMA is concerned at the risk of poor advice arising from the 'forced choice' and selective nature of this question. We are uncertain that there is a meaningful difference between 'environmental effects' and 'forest outcomes', particularly given the breadth of definition of 'sustainable management' in section 5 of the RMA.

Ideally, WPMA would favour forest management plans prescribing actions to manage the environmental effects and forest outcomes on exotic carbon forestry blocks in terms that include the intended use and harvest of the trees, so that local communities could be assured of enhanced economic activity from harvest and wood processing activities.

Exactly what value such prescriptions and undertakings under a forest management plan would serve in the long-term is unclear, recognising that the period between planting and harvest encompasses over a generation and 10 national and local electoral cycles. We would further observe that for the NES-PF, the subject of this Discussion Paper, well-intentioned long-term plans should be relied upon with a high degree of caution.

[Q A12 Based on your answer to the previous question, what content should be required in forest management plans?](#)

A forest management plan should be restricted to recognised and potential environmental risks associated with an exotic carbon forest block and include clear actions to minimise such risks. Plans should include a statement of intent to harvest, and a silvicultural regime to enable the opportunity of eventual utilisation of harvested logs for further processing in contributing to New Zealand's aspiration to transition to a low emission bio-circular economy.

As noted throughout the Discussion Paper, it is inferred that exotic carbon forests will readily transition to predominantly indigenous species over time. We are not entirely convinced this to be the case for reasons stated above. Therefore, the transition process to indigenous species within forest management plans needs to be based on good science and current research applicable to the catchment, with progress actively monitored against the plan's stated actions.

Regulatory parameters currently support an increasing price of NZUs. The reasonable assumption over timeframes commonplace in forestry is that as New Zealand's economy adapts toward net zero emissions, the price of additional NZUs falls to zero. The same outcome could also be assumed if the Government determines that the ETS is failing to

achieve the necessary reduction of greenhouse gas emissions and/or the cost of emissions reduction exceeds the country's economic and political willingness to pay. It is therefore reasonable to extrapolate that at a future time where the NZU price might drop, this will influence land values based on diminished future investment returns.

In the case of this occurring, there is a risk of landowners and/or investors walking away from the land rendering forest management plans meaningless and/or unenforceable. Consideration needs to be given to councils' liability in such circumstances and who would bear the costs to continue to manage exotic carbon forests estates where owners abandon their investment.

[Q A13 How effective would option 3 \(amend the NES-PF to require forest management plans for exotic carbon forests\) be in managing the environmental effects of exotic carbon forestry? \[select from a range/scale not effective – highly effective\] Why?](#)

This is highly dependent on the enforcement regime applied by councils. As noted in the Discussion Paper, 'few councils have experience with compliance' in regulating exotic carbon forests. That lack of expertise and capacity at local council level is likely to be compounded by the probability of difficult and ineffective enforcement actions 'at harvest' of plans prepared at planting by individuals and/or investors who are no longer directly accountable.

There is no consideration in the Discussion Paper of the potential for councils to gain the necessary experience with compliance. We recommend this be given specific consideration, including the fact that 'few councils have experience with compliance' in regulating exotic carbon forests, despite 30+ years of regulating forestry prior to the NES-PF being gazetted.

[Q A14 What implementation support would be needed for option 3 \(amend the NES-PF to require forest management plans for exotic carbon forests\)?](#)

Further to A13, Central Government does have a role in assisting councils in ensuring the consistent application of enforcement actions and penalties. It is a matter of consistency and logic that councils seeking to exercise power under the proposed changes to the NES-PF would be required to become 'registered' under the Forests (Log Traders and Forestry Advisers) Amendment Act, requiring the registration of all those exercising professional judgement in forest management.

## **Part B Controlling the location of plantation and exotic afforestation to manage social, cultural and economic effects**

[Q B1 Do you agree with the problem statement set out above? Y/N Are there other things we should consider?](#)

WPMA's submission to MPI's Discussion Document on the Proposals to change forestry settings within the NZ ETS expressed our concerns that the escalating price of NZUs will see increased levels of harvestable forests being locked up to sequester carbon rather than grow trees for added value production forestry. As such, it precludes the opportunity for future generations to consider 'sustainable' land use options in the context of prevailing social, cultural and economic priorities, which may include conversion to sustainable sheep and beef farming.

The ability for large emitters to offset their CO<sub>2</sub> emissions through acquiring relatively low-cost NZUs has arguably delayed their decisions to invest in new technologies and practices to reduce emissions and/or directly pass these emission costs onto their consumers. In effect, the ETS settings can be seen as a means for large fossil fuel users to continue to emit unsustainable levels of CO<sub>2</sub> emissions, the cost of which falls in part to future generations in

the form of a reduced ability to consider and manage different land use options without first paying the 'emissions debt' associated with the emissions created today.

Access to a consistent and reliable source of logs is a key consideration in WPMA's members' decisions to invest in new equipment and technology to maintain or expand their production capacity. WPMA's members' willingness to invest in wood processing plant is an obvious means by which the Government can commit to a low emissions bio-circular economy. In many respects, MPI's Discussion Document on the Proposals to change forestry settings within the NZ ETS represented a missed opportunity to address concerns about the adverse effects of exotic carbon forests on developing the primary processing capacity and growing employment opportunities within the regions.

The Discussion Paper claims a shortfall under the RMA in councils' ability 'to manage the social, cultural and economic effects on their communities of changing land use.' It does present this 'problem' in the context of the section 5 'environmental bottom lines' that are required to be achieved and which serve to prescribe some level of social and economic change in an emissions-constrained world. The Discussion Paper does not comment on the social and economic effects that have resulted from the much delayed introduction of meaningful liability for the greenhouse gas emissions from agriculture and, following that, whether existing patterns of land use are in fact environmentally and economically sustainable. Nor does the Discussion Paper discuss other statutory and policy commitments that will have a bearing on optimal patterns of land use, including Treaty settlement agreements requiring the restoration of natural water quality in some developed catchments.

The problem statement should be expanded further to consider other policy instruments, such as those relevant to the ETS, to more comprehensively describe the adverse effects of increasing levels of productive land going into exotic carbon forests.

[Q B2 Have we accurately described the social, cultural, and economic effects of plantation and exotic carbon afforestation at a community level \(Appendix D refers\)? Y/N What other social, cultural or economic effects should we be aware of? Please provide evidence of the impact of these effects.](#)

Appendix D overlooks the economic impact of exotic carbon forestry on wood processors operating in the regions and by extension the beneficial social and cultural effects of that investment on regional communities. Should exotic carbon forestry continue to expand on the back of the escalating price of NZUs, this will potentially diminish the future supply of logs to wood processors and a future bioenergy sector. Afforestation in locations from which harvest is economically and environmentally unsustainable will undermine future investment decisions by wood processors in new advanced manufacturing equipment, at a time when the Government and industry are actively investigating growing the value of wood products under the Forestry and Wood Processing Industry Transformation Plan.

We find the business case [p. 88] in diversifying the local economy to supply indigenous seedlings to exotic carbon forestry unrealistic as there is currently no requirement or compulsion for landowners to undertake this planting activity. Unless there is a supporting regulatory/planning requirement for landowners to actively plant and manage a transition to indigenous vegetation this idea is improbable.

Under 'Employment opportunities' [p. 89], we believe the adverse impact on regional communities has been overstated within Appendix D, assuming there is an understanding that investment and New Zealand's market-focused economy are not static and unchanging. In optimising the productive value of land, this is usually supported by innovators and the ever-adaptive expansion of service offerings to landowners and primary processors. Where large swathes of exotic carbon forestry are seen as a 'one-off' return followed by an unknown period of net economic cost without the generation of additional economic returns, we are

likely to see a talent drain from the regions as innovators and forestry advisors/rural professionals apply their skills elsewhere.

During the NES-PF General Webinar held on 10 November, I questioned MPI officials on what economic analysis had they undertaken to support claims of the potential for future employment opportunities under exotic carbon forestry. The official made it clear that permanent exotic carbon forestry offers minimal opportunity for ongoing employment in regional catchments once these forests are established. WPMA appreciates the candour of the official in acknowledging the longer term social and economic effects of exotic carbon forestry through fewer employment opportunities within the regions.

Exotic forests locked up for 'carbon farming' reduces reliable access to logs for the wood processing and manufacturing sector, and is likely to undermine future investment in new advance technology and in expanding their production capacity. This is likely to impact on economic growth and expanding employment opportunities within the regions. This has not been considered to the depth warranted within the Discussion Paper.

To allow for informed debate on the NES-PF on the long-term effects of exotic carbon afforestation, a robust and independent economic analysis should have been undertaken before the launch of the NES-PF and made available to submitters to enable them to provide better informed feedback on the social, cultural and economic effects of exotic carbon afforestation. It is unfortunate that much of the assumptions made around these effects are predicated on political or popular assumptions rather than being led by high quality and credible economic analysis that is essential in making sound policy decisions required for a thriving economy.

[Q B3 Do you agree that the social, cultural and economic effects of plantation and exotic carbon forests should be managed through the resource management system? Y/N Why?](#)

No. Past practice suggests councils are unable or unwilling to manage for the medium and long-term interests of the wider community. We doubt that the application by councils to manage the social, cultural and economic effects of land use, whether production and exotic carbon forests, will be effective.

Past practice has been to enact policy and regulation that seeks to 'maintain' the status quo, including where that detracts from the delivery of statutory expectations of change, such as those requiring the restoration of water quality in the Waikato and other ecologically-impacted catchments. Notwithstanding our concern at councils' past practice being less than ideal, their management of afforestation is likely to be mired in resource consent planning processes that will be costly and cause time delays to all concerned.

[Q B4 What is your preferred option for managing the social, cultural and economic effects of plantation and exotic carbon afforestation? Select from list: Option 1 \(a local control approach\); Option 2 \(a consent requirement through national direction\); No preference; I do not support either of these options. Why?](#)

Option 1.

WPMA recommends against any change to the NES-PF and no return to the control of afforestation by local councils. To the extent that permanent exotic carbon forestry has a real social, cultural and economic effect, it can and should be managed through selective changes to the ETS, so that NZUs are restricted to those planting the right tree in the right place.

[Q B5 How effective would option 1 \(a local control approach to managing the location of plantation and exotic carbon afforestation\) be in managing the social, cultural and economic effects of plantation and exotic carbon afforestation? \[select from a range/scale not effective – highly effective\] Why?](#)

Not effective. Of direct relevance to local government's regulation of forestry, the NES-PF was being gazetted after years of selective regulation of forestry, including constraints on conversion to agriculture. The argument advanced at that time was preventing 'conversion' – by limiting rights to diffuse nitrate discharges on the basis of existing patterns of land use ('grandfathering') – was needed to improve water quality.

In effect, local government determined that continuing with existing patterns of land use would result in a different environmental outcome. The need to maintain or improve on 'existing' patterns of social, cultural and economic activity by increasing the area of land used for farming was not discussed, nor was any regulatory measure contemplated to maintain 'existing' investment in patterns of primary sector processing in some optimal form. The assumption has been that markets, products and the location of processing facilities are a matter for private investment and acceptable levels of risk, and not something usefully fixed in an arbitrary manner.

[Q B6 What impact would option 1 \(a local control approach to managing the location of plantation and exotic carbon afforestation\) have on the rate and pattern of plantation and exotic carbon afforestation?](#)

The rate and pattern of plantation and exotic carbon afforestation will ultimately be determined by landowners and/or investors on the basis of an acceptable rate of financial return on assets employed within the parameters of consented activities. Should the price of NZUs continue to climb, we are likely to see an increased demand for land for exotic carbon afforestation.

Should councils designate exotic carbon afforestation in specified zones within district plans, this will inevitably influence land values within these zones based on the expected future returns for NZUs. There is also a risk that at some point the price of NZUs will drop, and quite sharply. If this were to occur landowners and/or investors may simply abandon the land or paydown their ETS liability and look at other land use options that maximise their return.

[Q B7 What are the benefits of option 1 \(a local control approach to managing the location of plantation and exotic carbon afforestation\)?](#)

Local control is predicted to see a continuation of existing patterns of land use and associated costs and impacts, including ruminant greenhouse gases and diffuse water discharges. The benefits of such control are therefore primarily short term and political. At some point, patterns of land use and/or activity management must change if the Government is to achieve its policy goals, including a shift to a low emission bio-circular economy and improved water quality outcomes.

[Q B8 What are the costs or limitations of option 1 \(a local control approach to managing the location of plantation and exotic carbon afforestation\)?](#)

As noted in the Discussion Paper, a lot depends on the capability and capacity of councils (reportedly as limited) to assess the location of plantation and exotic carbon afforestation commensurate with their existing statutory obligations. The alternative 'cost and limitation' is that Central Government amends its social, environmental and economic goals to reflect local councils' tolerance for change.

[Q B9 If option 1 \(a local control approach to managing the location of plantation and exotic carbon afforestation\) is progressed, would making plan rules to manage the social, cultural and economic effects of plantation and exotic carbon afforestation by controlling its location be a priority for your community or district? Choose from a range not a priority to high priority. Why?](#)

WPMA is concerned to see productive land locked up to sequester carbon rather than growing trees for production forestry. Controlling the location of plantation afforestation to land areas suitable for economic harvest and processing would be a high priority. In assessing the location for plantation afforestation, opportunities exist for wood processors and councils to better manage the location of plantations for harvest, including distance from wood processing sites, access to labour supply, efficient transport routes, etc.

Where land is extremely difficult to access and uneconomic for tree harvest and log removal to transport, this could form the basis of designated locations for permanent carbon afforestation, whether exotic or indigenous. This would also require a risk assessment of physical land resources to sustain exotic carbon forest and minimise the risk of environmental and ecological damage occurring by leaving land in permanent exotic forest over a long time period.

[Q B10 What implementation support would be needed for option 1 \(a local control approach to managing the location of plantation and exotic carbon afforestation\)?](#)

WPMA does not accept the premise in the question that councils' management of forestry will be effective given more resources. To the extent that a limited number of specialist and skilled people are required to manage forests, that resource is most efficiently applied nationally via the NES-PF and any revisions. Forestry is a long-term game and a comparatively ubiquitous activity, albeit with variation required to reflect geology and climate.

WPMA's submission is that those limited skills are more efficiently developed and deployed on a national basis, recognising the challenges for smaller councils to attract and retain sufficiently skilled employees.

[If option 2 \(a consent requirement through national direction, to control the location of plantation and exotic carbon afforestation\) is further developed:](#)

Q B11-B20. WPMA's preference is for investment in permanent exotic forestry to be controlled by amending the value attributable to such investment under the CCRA. The Government attributing zero value to carbon stored in forests of whatever prescription it chooses will eliminate all risk of such forest prescriptions and any undesired social, economic and cultural effects attributed to them.

## **Part C Improving wildfire risk management in all forests**

[Q C1 Do you agree that wildfire risk management plans \(WRMPs\) should be included in the NES-PF? Y/N Why?](#)

No. The Government has invested significant time and cost in creating FENZ as a centre of excellence and control in the prevention and management of wildfire. Clouding that control by way of local authority control is not recommended and is difficult to rationalise. Assessment of wildfire risk should be provided by suitably experienced experts, such as FENZ.

[Q C2 Do you agree that the role of councils in monitoring the WRMP should be limited to ensuring that a plan has been developed? Y/N If not, what should the role of councils be?](#)

No, for the reasons stated above.

[Q C3 Do you agree that a five-year review requirement is appropriate for WRMPs? Y/N Why?](#)

Yes. A review requirement would be appropriate assuming changes to the NES-PF of the sort contemplated are implemented.

[Q C4 Do you agree that a module for a WRMP that is consistent with farm plan templates could be used for farmers with forests to plan for managing wildfire risk? Y/N If no, please provide reasons.](#)

No. FENZ's management is intended to effectively and efficiently minimise the impact of wildfires to neighbouring properties and the wider environment.

[Q C5 What implementation support would be needed for this proposal?](#)

None, for the reasons discussed above.

## **Part D Enabling foresters and councils to better manage the environmental effects of forestry**

### **Wilding conifer risk management**

[Q D1 Do you agree with Proposal 1 for managing wilding risk \(update the Wilding Tree Risk Calculator and guidance, and require the submission of a standardised worksheet assessment to councils at least six months prior to planting\)? Y/N If not, please explain why.](#)

Wilding tree risk will continue to be a problem to the wider natural environment, particularly in light of shifting weather patterns such as the increased incidence of severe storms as a result of climate change and recognising extreme weather is associated with disproportionate wilding spread. On that basis we would question the selective focus on wilding control as a risk from larger-scale afforestation where that scale actually serves to reduce the effective area of boundary from which wilding tree spread can occur.

We believe that a bolder approach is required through a concerted research effort into plant breeding and genetic modification to produce sterile exotic trees for use at any scale wherever spread is considered a problem. This would be transformational in reducing the future spread of wilding exotic trees from newly established forests and could become an important tool in reducing competition in successfully transitioning forests to indigenous plantations.

[Q D2 Do you agree that extending the notification period for wilding conifer scores to no sooner than six months and no later than eight months before afforestation begins is an appropriate length of time? Y/N If not, what timeframe would you suggest and why?](#)

No. For the reasons discussed above with respect to D1.

[Q D3 Do you agree with Proposal 2 for managing wilding risk \(require all forests to assess wilding tree risk at replanting\)? Y/N If not, please explain why.](#)

No. For the reasons discussed above with respect to D1.

[Q D4 Do you agree that changes to regulation 79\(6\) will clarify the intent and avoid confusion over property access rights? Y/N Why?](#)

No. For the reasons discussed above with respect to D1.

## Slash management

[Q D5 Do you agree with each of the proposed amendments to the NES-PF in relation to the slash regulations set out in Table 4? Y/N If not, please identify any you disagree with by referencing the number in the left-hand column of Table 4 and explain why you disagree.](#)

WPMA is aware that other submitters with a more in-depth knowledge of the management of forests will be commenting on the following questions. In the interests of time and efficiency we have therefore restricted this submission to those issues and questions discussed above.

## For more information

Should you wish to discuss any aspect of this submission, please call me on 027 226 3331.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Macaulay', written in a cursive style.

Stephen Macaulay  
CEO – Wood Processors & Manufacturers Association