

From: [Peter Oliver](#)
To: [RPS](#)
Subject: City Forests submission-on-proposed-otago-rps-2021
Date: Friday, 3 September 2021 2:44:57 p.m.
Attachments: [City Forests submission on proposed Otago RPS 2021.pdf](#)

Dear ORC, please find attached City Forests submission on the proposed Regional Policy Statement 2021.

Regards

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Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

1. **Name of submitter** *(full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)*

City Forests Limited

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.
3. I **could not** *(Select one)* gain an advantage in trade competition through this submission. *(See notes to person making submission)*
4. I **am** *(Select one)* directly affected by an effect of the subject matter of the submission that
- a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition *(See notes to person making submission)*
5. I **wish** *(Select one)* to be heard in support of my submission
6. If others make a similar submission, I **will** *(Select one)* consider presenting a joint case with them at a hearing
7. **Submitter Details :**
- a. **Signature of submitter** *(or person authorised to sign on behalf of submitter)*

A handwritten signature in blue ink, appearing to be "D. [unclear]", written on a light blue background.



b. Signatory name, position, and organisation (if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)

Name: Peter Oliver

Position: General Manager, Forest Assets

Organisation: City Forests Ltd

c. Date

3 September 2021

Address for service of submitter (This is where all correspondence will be directed)

d. Contact person (name and designation, if applicable)

Peter Oliver

e. Email:

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f. Telephone:

0272453377

g. Postal address (or alternative method of service under [section 352](#) of the Act):

PO Box 210, Dunedin 9054



8. My submission is:

General comments:

8.1 City Forests (CFL) is a major land and forest owner in the coastal Otago region. More than 24,000 hectares of company owned, and leased land, includes just over 19,300 hectares of productive plantation forest land, with the remainder in non-productive land-use, including nearly 600 km of internal roading, and over 2,300 hectares of designated and carefully protected ecological reserves. In 2006 the company celebrated 100 years since its first forests were planted – originally to help preserve water quality and prevent erosion in early Dunedin. Much of the company’s plantation forest area is now on its second or even third rotation as a commercial forest crop.

8.2 CFL has grown dramatically in its more than 100 years of forest plantation growing and management. This growth has come almost exclusively through land use change from less productive farmland to highly productive plantation forestry development and enhanced forestry economic activity. Despite this, the very large and growing areas of ecological reserves which CFL has set aside for careful protection have, without the need for outside enforcement or regulatory protections, flourished under CFL’s guardianship. CFL has extensive and longstanding monitoring records which clearly demonstrate the positive interaction of Plantation Forestry and natural ecological values, including rare, threatened, and endangered flora and fauna, many of which live and thrive in our intensively managed plantation areas. Plantation forestry in Otago is a natural ally of many biodiversity, water quality and general environmental values. As a general principle, CFL strongly contends that the natural environment does not need to be protected from plantation forests, and blanket and heavy-handed attempts to do so are destined to become a major disrupter to plantation forestry economic activity.

8.3 CFL has successfully held Forest Stewardship Council® (FSC®) certification since 2000. This is an international standard, audited annually, which verifies that CFL meets high international standards of environmental, social and economic practice.

8.4 An MPI study conducted in 2019 by PWC shows production forestry, including carbon, generates approximately twice the economic return per hectare and twice the employment per hectare compared to sheep and beef farming on equivalent land class.

8.5 CFL acknowledges the Otago Regional Council’s (ORC) objective to maintain Otago natural ecosystems quality or improve them where feasible and reasonable to do so, through the appropriate controls of activities. However, CFL can only conditionally support the Proposed Regional Policy Statement (PRPS) due to the chilling effect it will have on economic activity and future development in the region in general, and for Plantation Forestry in particular. CFL believes that the Section 32 report clearly shows this, and indeed acknowledges it (e.g., clause 170), yet largely fails to address these acknowledged shortcomings in its drafting.

8.6 CFL is concerned that the PRPS risks creating a massive coverage of legally defined significant natural areas (SNA) which could even include existing and future plantation forest areas because of the fact that certain indigenous species, particularly some mobile fauna, have found a ready and favourable habitat created by those



very plantation forest areas. Again, this will have a chilling effect on the economic activity and future development of Plantation Forestry in the region, and may actually lead to perverse outcomes for those very species that the PRPS seeks to protect and enhance.

8.7 The PRPS and associated appendices is a major and massive set of documents encompassing policy statements on a broad range of activities, not all of which will directly affect plantation forestry, and it is beyond the scope of our resources to provide a comprehensive submission on them all at this stage. The few specific comments below then, are by no means an exhaustive representation of CFL’s views on the document, but rather are representative or emblematic of concerns the company holds.

<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
<p><i>The specific provisions of the proposal that my submission relates to are:</i></p> <p><i>(Please enter the relevant objective, policy, method, or ‘other’ provision reference where possible. For example, ‘AIR-01’.)</i></p>	<p><i>I support or oppose the specific provisions or wish to have them amended.</i></p> <p><i>(Please indicate “support” or “oppose” or “amend”)</i></p>	<p><i>The reasons for my views are:</i></p>	<p><i>I seek the following decision from the local authority:</i></p> <p><i>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</i></p>
<p><i>SRMR-16 and SRMR-110</i></p>	<p><i>Amend</i></p>	<p><i>Repeatedly including plantation forestry in the list of activities that contribute to sedimentation in Otago without qualification is inaccurate and not supported by evidence. Overwhelming and repeated scientific evidence exists that plantation forestry contributes water quality close to that of undisturbed native forest throughout its long rotation spans. Occasional instances of poor harvesting or earthworks practice may create elevated</i></p>	<p><i>Provide more nuanced and conditional statements, e.g. that “poorly managed forestry harvesting or earthworks activity may contribute to sediment input”.</i></p>

		<i>sediment flows, but these are by far and away the exception.</i>	
<i>IM-P15, CE-M3(6), ECO-P3(3)</i>	<i>Oppose</i>	<i>Plantation forestry is a very long-term investment. It requires certainty of its ability to realise the substantial investment made in establishing and carrying the cost of forests for many years before harvesting. A precautionary approach which does not commit to permitting the future management and harvesting of forests will have a chilling effect on forestry as an economic land use in Otago. It is CFL's view that sufficient protections for uncertainties are already provided for under the NES-Plantation Forestry (NES-PF) regime.</i>	<i>Remove the precautionary approach with respect to Plantation Forestry and acknowledge the efficacy of the NES-PF for managing future uncertainties.</i>
<i>CE-M3(4)(d)(ii)</i>	<i>Oppose</i>	<i>This statement implies that harvesting plantation forestry, including harvesting existing forests, will now become a controlled activity anywhere near coastal waters. This is a major change which City Forests opposes. Our view is that forestry, being a very long term, and major investment, requires long-term certainty. This is currently provided for with the very robust and cooperatively developed rules within the NES-PF. Our view is that there is ample regulation within those rules to</i>	<i>Remove this statement and acknowledge the efficacy of the NES-PF to manage potential effects.</i>

		<i>protect water quality during harvesting activity.</i>	
<i>LF-VM</i>	<i>Amend</i>	<i>The equal importance of fibre production (including the outputs from Plantation Forestry) should be acknowledged in these statements alongside food production.</i>	<i>Remove the references to “food” and amend the various statements to, “support primary production in the area”.</i>
<i>LF-FW-P8</i>	<i>Amend</i>	<i>The 0.05 ha threshold is unreasonable and will not achieve the net improvements in protection sought for wetlands. At the scales at which CFL operates 0.05ha is simply unmanageable. CFL’s forests are exceptionally well mapped and described, yet the company does not even map to that tiny level of detail. Furthermore, it has been CFL’s long experience that wetlands in Otago in general are significantly enhanced when within and adjacent to Plantation Forests. Instead, the threshold worked out over the 8 years of development of the NES-PF should be adopted.</i>	<i>Amend to “0.25 hectares or greater” in alignment with the NES-PF.</i>
<i>LF-LS-M12</i>	<i>Oppose</i>	<i>Ample protection is already provided under the NES-PF for afforestation activity. It is entirely inappropriate to single out Plantation forestry expansion in this statement.</i>	<i>Remove this clause in its entirety.</i>

ECO-01	Amend	<p><i>This statement is not realistic. People live and work and carry out economic activity in the region too. There is a risk that this statement could be interpreted as applying to individual instances rather than the region as a whole and needs to be clarified to make it clear that the net extent of populations and representative habitats are retained, i.e., some will be enhanced, and some may be changed because of economic activity. A balance must be maintained.</i></p>	<p><i>Amend to “...any net decline...”.</i></p>
ECO-P6	Amend	<p><i>Many species that are important to Otago’s indigenous biodiversity, live and thrive in the region’s plantation forests. Mobile fauna in particular, such as the Karearea, are highly dependent on plantation forest activity for their habitat and feeding grounds in coastal Otago. South Island Robin are another species which have found a ready home in some plantation forests whereas they are largely excluded on adjoining rural and urban land uses. The series of statements is insufficiently nuanced to distinguish the important qualitative difference between flora and fauna which are well adapted to the periodic disruption of plantation</i></p>	<p><i>Make it clear that the statement is not intended to create a pathway for the future regulation of economic activity which has created the very environment within which indigenous species have found a home.</i></p>

		<p><i>forestry activity, and which <u>in net terms</u> are flourishing under a plantation forestry land use. It is important to acknowledge and support the ongoing role of plantation forests in supporting indigenous biodiversity without creating a pathway for unnecessary regulation which will achieve little except have a chilling effect on this economic activity.</i></p>	
<p><i>ECO-P9, ECO-M5(6), ECO-E1, NFL-P5 and APP5</i></p>	<p><i>Amend</i></p>	<p><i>The APP5 list of species includes a number of species which are not particularly prone to wilding spread. This includes the main production species planted, radiata pine. Wilding spread is not a significant issue from modern plantation forestry, and its affects and an obligation to mitigate have already been provided for under NES-PF. Legacy plantings of shelter belts and occasionally older forests planted with problematic species in vulnerable locations have and are causing issues. Furthermore, any provision for future rules around buffer zone size must be evidence based. CFL has long experience with managing plantation forests adjacent to many hundreds of hectares of wetland and other areas of indigenous biodiversity. CLF's experience has been</i></p>	<p><i>Amend APP5 to remove heavy seed species such as radiata pine. Acknowledge the existing provisions in the NES-PF and the obligations of the Wilding Calculator already in place to manage any wilding spread from plantations. Do not promote increased buffer zones around SNAs beyond those already enacted in the NES-PF without clear scientific evidence of their efficacy.</i></p>

		<p><i>that these areas flourish when afforded the natural protection from grazing, and the shelter that adjacent plantation forests provide, and furthermore, that wilding risks from modern plantation species are negligible and easily managed.</i></p> <p><i>CFL is particularly disturbed to note the advice of the “reference group” cited in the section 32 report (822) which “expressed a strong preference to extend this prohibition [of planting wilding risk species - presumably those designated in APP5] into buffer zones along the edges of significant natural areas”. This “advice” appears to have failed to include the advice of forestry experts, who would have been able to explain and to demonstrate that:</i></p> <ul style="list-style-type: none"> <i>a. this risk is massively overstated in modern plantations, and is not supported by the evidence</i> <i>b. is already provided for in any case by the provisions of the NES-PF, and so therefore in any plantings established since 2017.</i> <i>c. The increased buffer zones around SNAs and wetlands in particular,</i> 	
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		<p><i>will very often in Otago, simply provide an opportunity for the intensive infestation of invasive weeds such as broom and gorse both around and within SNAs from the increased buffer area.</i></p>	
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