

**From:** [Robinson, Zac](#)  
**To:** [RPS](#)  
**Subject:** Port Blakely Submission on Regional Policy Statement- Request for Time Waiver  
**Date:** Tuesday, 7 September 2021 10:18:46 a.m.  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[2021\\_09\\_ORC\\_Proposed\\_Regional\\_Policy\\_Statement\\_Submission\\_Signed.pdf](#)

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Morning,

As indicated on your website we would like to request a time waiver to submit the attached submission on the ORC Proposed Regional Policy Statement. Due to the complexities of level 4 lockdown we were unable to get this in on the due date- we wholeheartedly apologise for this.

Can you please let me you if this request for time waiver has been accepted and our submission successfully received.

Regards,

**Zac Robinson**

Health, Safety & Environmental Manager



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## **SUBMISSION ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT (ORPS) JUNE 2021**

TO: Otago Regional Council (ORC)

SUBMITTER: Port Blakely NZ Ltd

ADDRESS: PO Box 139, Timaru 7940

CONTACT: Zac Robinson- Health, Safety & Environmental Manager.

### **Introduction**

Port Blakely is a 5<sup>th</sup> generation family-owned business and also a member of the New Zealand Forest Owners Association. We own forests in the Otago, Canterbury and central North Island regions covering approximately 38,000Ha of which 14,025Ha is within the Otago Region.

Port Blakely has internationally recognised certification for responsible forestry practices across all of its forests since 2003. Port Blakely is committed to a strong Health & Safety culture across our staff and contractors along with responsible environmental management as per the company value of Stewardship<sup>2</sup>.

Port Blakely's commitment to positive environmental & operational practices in the Otago region is well known and proven through numerous positive engagements with Otago Regional Council, Waitaki District Council and many other stakeholders over the years. Port Blakely acknowledges its forests hold significant environmental, historic and recreational values in some areas and are privileged to be in a position to protect and where possible enhance those values with responsible forestry practices.

Forestry contributes significantly to the social, environmental, and economic well-being of the Otago Region. Increasingly, forestry is being recognised as a critical part of New Zealand's commitment to managing its international climate change reduction targets as enshrined in law by the Zero Carbon Act. The Climate Change Commission has recognised the critical role that forests, both exotic and native, will play in NZ achieving it's GHG targets of being nett zero by 2050.

Further, the government has signalled changes to the RMA and have recognised the critical requirement for Regional Councils to factor climate change impacts into their policy making decisions. In this context, it is critically important that the Regional

Council focus on the significant benefits that afforestation provides the region, not only economically and socially but also in mitigating climate change effects. It has an imperative to set a policy statement that facilitates, rather than restricts the use of forestry to mitigate climate change objectives. It is recognised of course that forestry needs to do this in a way that meets the environmental standards that the community expects.

Port Blakely appreciates the opportunity to submit on the ORC Proposed Regional Policy Statement 2021.

### **Statutory Framework, Purpose & Cross-Boundary Matters**

Port Blakely recognizes that this document is in response to the new statutory landscape which has a more national direction focus. We acknowledge this also includes tight timeframes for regional councils to produce plans. We appreciate the effort by ORC to produce the proposed ORPS which aligns with the new statutory landscape.

Port Blakely supports the cooperation and partnership approach as suggested and would be keen to collaborate with council, regulators and relevant stakeholders to help develop the regulatory framework within the Otago region, including the development of any rules intended to be more stringent to the NES-PF.

The NZ forestry industry works to standards and best practices such as the FOA Forest Practice Guides 2020 and FOA Forest Road Engineering Manual 2020. These guiding documents cover all forestry operations and would be a beneficial reference tool to be used during any collaboration processes and rule developments.

### **Proposed Regional Policy Statement & Alignment with the National Environmental Standard for Plantation Forestry (NES-PF) 2017.**

Port Blakely recognizes that ORC have made direct references to the NES-PF in the ORPS. However, we feel there needs to be more clarity regarding certain forestry references in this document. The NES-PF 2017 is the framework by which plantation forestry activities are regulated. Throughout the ORPS there is references to forestry sedimentation, afforestation, wilding conifer management and setbacks from Significant Natural Areas all of which are currently regulated within the NES-PF.

It is also not clear that the NES-PF takes precedence over the National Environmental Standard for Freshwater (NES-F) when referring to a forestry activity such as sedimentation from harvesting.

Although there is an option under regulation 6 to apply more stringency than the NES-PF rules regarding a National Policy Statement objective, there first needs to be supporting evidence and analysis that the current controls in the NES-PF are not

adequate to meet such objectives. To date, Port Blakely is not aware of the ORC undertaking any robust analysis that shows the current NES-PF rules (when adhered to) are not delivering on the NPS-FM objectives.

### **Summary & Key Points**

***SRMR-13 – Pest species pose an ongoing threat to indigenous biodiversity, economic activities and landscapes***

Change reference from 'Wilding Pines' to 'Wilding Conifers'.

Forestry is regularly referenced as a 'host' for pests however there seems to be a lack of reference to the impacts pests have on plantation forestry and the substantial pest control (flora & fauna) work forestry owners currently undertake. Pest control and management is an essential tool of production forestry and is vital to success. With the increase focus on afforestation (indigenous and exotics) to meet our Climate Change objectives recognition of the impacts of pests on establishing a successful forest should be referenced. For example, Otago forestry would be severely impacted if a wallaby population became well established. Port Blakely has large scale forests in the South Canterbury region and are very experienced in undertaking large-scale wallaby control operations to manage and protect both Production and Native Forests in the Waimate District. This operation is not part of a non-compliant notice but part of our risk management strategy and the economic success of the forest.

***SRMR-110 – Economic and domestic activities in Otago use natural resources but do not always properly account for the environmental stresses or the future impacts they cause***

Port Blakely oppose the opening statement '*Sediment from development and forestry activities flow into streams and builds up in the coastal environment, smothering kelp forests and affecting rich underwater habitats*' as it is in our view that this would only occur if forestry activities were non-compliant with the NES-PF.

We would also note that for most of the forest rotation, with the exception for a short period associated with harvesting and reestablishment, forests are by in large low contributors to sedimentation relative to other land uses. This point needs to be acknowledged in any policy wording.

We submit that this statement be amended to acknowledge this does not refer to compliant forestry activities nor to the majority of the forest rotation.

### ***ECO- Ecosystems & Indigenous Biodiversity***

Port Blakely supports the views of collaborative engagement for the management of eco-systems & biodiversity as proposed. Port Blakely, like many forest companies,

invest significantly in indigenous biodiversity projects, initiatives and surveys which could be valuable in ensuring practical and pragmatic SNA boundaries and management tools are established instead of a blanket-approach without ground-truthing.

We also believe that the ORPS doesn't recognize that forestry provides a long-term net-positive eco-system service including the sequestration of carbon and that afforestation within the region will bring multiple eco-system services and benefits if managed correctly.

It should also be acknowledged that the regulatory framework for meeting policy *ECO-P9- Wilding Conifers* already exists through the afforestation rule in the NES-PF and associated wilding risk calculator. Should councils have concerns with the current perimeters of this rule consultation with industry should be the first step with the aim to maintain the regulatory management within the NES-PF.

### **Conclusion**

- Port Blakely generally supports the intent and purpose of the ORPS 2021.
- Port Blakely requests the rewording of SRMR-110.
- Port Blakely submits that where policies and statements referring specifically to forestry activities already regulated under the National Environmental Standard for Plantation Forestry (NES-PF) remain regulated under the relevant NES-PF rule, unless substantial evidence and analysis is provided proving that the current rule is ineffective and more stringency is required.

Yours Respectfully,



Zac Robinson  
Health, Safety & Environmental Manager  
Port Blakely NZ