

From: trish.fordyce@xtra.co.nz
To: [RPS](#)
Subject: Submission on the PRPS
Date: Friday, 3 September 2021 2:19:59 p.m.
Attachments: [Otago regional council submission.docx](#)
[ORPS Submission.docx](#)

Attached is the submission and its attached chart to the Proposed RPS.

Trish Fordyce

Mb 0274517253

Otago Regional Council Proposed Regional Policy Statement Submission

To: Otago Regional Council

1. Submitter details

Name: Rayonier Matarki Forests

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Contact Person:

Kelsey Tills-Environmental Coordinator

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Contact Person Contacts:

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2. Trade competition declaration

We would not gain an advantage in trade competition by this submission. Rayonier Matariki Forests is a forest company that owns and or manages plantation forests in the Otago region. The company and or its associates has operated in the Otago region since 1991.

3. Hearing options

We do wish to be heard in support of this submission and we would consider presenting a joint case with others that may make similar submissions.

4. Submission details

We attach a chart setting out the submission details.

Signed:

A handwritten signature in blue ink, appearing to read "Trish Fordyce". The signature is written in a cursive style with a large initial "T".

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Trish Fordyce on behalf of Kelsey Tills

Dated 3 September 2021

Provision	Support/Not	Reasons	Relief
The entire PRPS	Not support	Given the RMA reform process the timing of the PRPS is inappropriate as there will need to be major changes after the reform process.	Delay the processing of this PRPS until after the RMA reform process and the introduction of the National Policy Statement for Indigenous biodiversity. AN alternate is to only advance those areas that give effect to the NPSFW.
General		The PRPS makes some reference to the NESPF and use definitions included in the NESPF such as afforestation. However, the NESPF only deals with plantation forestry and not the planting of trees for carbon and or shelter belts and amenity plantings. Overall there really does not appear to be any recognition or evaluation that the NESPF has operated within Otago since May 2018. There needs to be clear direction on the alignment with the provisions of the NESPF.	The PRPS should include provisions to other tree plantings not just to plantation forests. Alignment with the NESPF to be undertaken
SRMR introduction and figure 2	Support in part	There is no reference to plantation forestry which is part of the primary production activities of the region	Include plantation forestry
SRMR-16, pg 77 4 th paragraph last sentence	Support in part	There is only reference to agriculture intensification as a contributor to sedimentation, pastureland contributes to the generation of sediment and this should be recognised.	Insert “pastureland or farming” before agriculture intensification.
SRMR-110 statement	Do not support	The first sentence appears to state that sediment effects on the marine area originates from development and forestry activities. This is contrary to other statements of the PRPS such as pg 77 4 th paragraph and pg 76 Context 2 nd paragraph. As well as wrongly identifying forestry there is the inference by the heading of this	Delete the reference to forestry activities and replace with “primary production activities”. Refer to note that the NESPF has introduced extensive regulation for plantation forestry.

		provision that plantation forestry does not properly account for its impacts on the environment. There is no recognition that the NESPF was introduced in 2018 and has extensive controls on the impacts of plantation forestry on the environment.	
SRMR-15 and 16	Support in part	In the context there is no recognition that the NESPF has introduced controls on plantation forestry. These controls need to be recognised as council plans may be more stringent in certain circumstances (regulation 6) as long as there is evidence to support changes to the national regulations Section 32 (4) RMA)	Insert new reference to the NESPF and the effect of its regulations and explain where plan provisions may be more stringent and refer to research which justifies any greater restrictions.
CE-M3 (d) (ii)	Do not support	While a regional plan rule may be more stringent it must be supported by justification pursuant to section 32 (4) RMA.	With regard to the generation of sediment and impacts on coastal waters, there has been no assessment as to the effectiveness of the provisions of the NESPF. The section 32 reports provide no justification for including such a provision. Delete the provision.
CE-M4 (3)	Do not support	While a district plan rule may be more stringent it must be supported by justification pursuant to section 32 (4) RMA. There is none.	Delete the provision with regard to activities controlled by the NESPF.
LF-VM-M3 (4)	support	Plantation forestry has various Forest Practice guides to assist in the implementation of the NESPF.	retain
LF-FW-P13	Support in part	It is not clear as to the alignment with the NESPF which controls various activities to occur in the margins of waterbodies. This provision should be subject to the NESPF.	Amend to note that the provisions are subject to the NESPF controls on activities in margins. In other words the provisions of the NESPF would prevail.

LF-FW-M6 (5) (d)	Do not support	There is no alignment with the NESPF and no assessments have been undertaken as to the effectiveness of the regulations of the NESPF	Amend to make subject to the regulations of the NESPF prevailing
LF-FW-M6 (7)	Support in part	There is no alignment with the NESPF	Add "and the NESPF"
LF-LS-P19	Support	Support retention of all these provisions as recognition for primary production	retain
LF-LS-M11 (1) (b) and (d)	Support in part	Again, there is no reference to the NESPF. Before a provision may be more stringent if giving effect to a freshwater objective there must be an assessment as the effectiveness of the NESPF regulations. There has been no such assessment .	Amend by adding the provisions of the NESPF apply to plantation forestry activities
LF-LS-M12 (1)	Do not support	There is no evidence, no section 32 justification as to why plantation forestry should be restricted. It is not clear what spatial extension means with regard to existing plantation forests. The NESPF already provides restrictions on afforestation of plantation forests in areas of high erosion risk and outstanding values.	delete
LF-LS-M13	Support in part	Again no alignment with the NESPF which regulates various activities in margins	Amend to note that the provisions are subject to the NESPF controls on activities in margins.
ECO-P2	Support in part	The policy must be clear that identification includes the process of mapping and ground truthing of the extent of the maps. Mapping and verification provides certainty for plantation forestry	Amend to include mapping and verification.
ECO-P3 and ECO-P5	Support in part	Again no alignment with the NESPF. There are extensive regulations with regard to existing forestry activities within SNAs and with regard to other indigenous vegetation	Provide that subject to the provisions of the NESPF. In other words the provisions of the NESPF would prevail.
ECO-P9	Support in part	Wilding confers occur from more than plantation forests.	Include the planting of any forests, shelter belts and amenity planting

ECO-M5 (2)	Support in part	Again no alignment with the NESPF.	Provide that subject to the provisions of the NESPF. In other words the provisions of the NESPF would prevail.
NFL-P5	Support in part	Wilding conifers occur from more than plantation forests	Include the planting of any forests, shelter belts and amenity planting
NFL	Not support	Do not support the identification and then the following provisions of areas of high values. While the provisions to identify and map areas of outstanding values are supported there is no RMA imperative to identify areas of High value. The provisions lead to too much uncertainty as to the operation of existing forestry activities.	Delete all references and provisions to high values. The RMA reform does not support regulation for high value areas of landscape.
This is the attached chart to the submission by Rayonier Matariki Forests	NESPF is National Environmental Standards for Plantation Forestry 2017	RMA is resource Management Act 1991	