

**From:** [trish.fordyce@xtra.co.nz](mailto:trish.fordyce@xtra.co.nz)  
**To:** [RPS](#)  
**Cc:** [andy.fleming@rayonier.com](mailto:andy.fleming@rayonier.com)  
**Subject:** Further Submission on Proposed Otago Regional Policy Statement  
**Date:** Friday, 12 November 2021 10:35:29 a.m.  
**Attachments:** [Schedule of further submissions.docx](#)

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Attached please find the further submission lodged on behalf of Rayonier Matariki Forests

Regards

Trish Fordyce

Mb 0274517253

## Form 6

### Further submission in support of, or in opposition to, submission on notified proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 5pm on Friday 12 November 2021, and by original submitters within 5 working days of service on ORC)

To: Otago Regional Council

1. Name of person making further submission

Rayonier Matariki Forests

2. This is a further submission in support of (or in opposition to) submission on the **Proposed Otago Regional Policy Statement 2021**.

3. I am (tick whichever applies and add grounds if required):

	A person representing a relevant aspect of the public interest. In this case, also specify the grounds for saying that you come within this category; or
<input checked="" type="checkbox"/>	<b>Rayonier Matariki Forests is a person who has an interest in the proposal that is greater than the interest the general public has. In this case, also explain the grounds for saying that you come within this category; or</b>
Grounds:	Rayonier Matariki Forests lodged submissions on the PORPS and has and or manages plantation forests within the Otago Region.
	the local authority for the relevant area.


4. We **wish** (Select one) to be heard in support of my further submission.

5. If others make a similar submission, **we will** (*Select one*) consider presenting a joint case with them at a hearing.

**6. Further Submitter Details**

**a. Signature of person making further submission**

*(or person authorised to sign on behalf of submitter. A signature is NOT required if you make your submission by electronic means).*



**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* Patricia Fordyce

*Position* Consultant

*Organisation*

**c. Date**

12 November 2021

**Address for service of person making further submission** (*This is where all correspondence will be directed*)

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

Andy Fleming, Environmental Planner

**e. Email:** (*this is our preferred means of contact*)

andy.fleming@rayonier.com

**f. Telephone:**

06974 1282, Mb 0272489004

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

Rayonier Matariki Forests, PO Box 12134, Ahuriri, Napier 4144

Ground Floor 6B Ossian Street, Ahuriri, Napier 4144

**7. My further submission is:**

I support and or oppose the submissions of:

*Beef and Sheep, Federated Farmers New Zealand, Forest and Bird, Sanford Limited, City Forests Limited, Greenpeace Aotearoa*

Schedule of further submissions

Submitter/number	Point number	Support/oppose	reasons	relief
<b>Beef and Sheep 00237</b>	00237.004	oppose	Forestry relies on /land soil to produce trees. Plantation Forestry can be for harvest and carbon sequestration Indigenous plantings can be for both purposes	Disallow and retain the definition or ensure that plantation forestry is included.
	00237.007	support	For the reasons of the submitter	Allow relief of the submitter
	00237.030	support	For the reasons of the submitter	Allow relief of the submitter
	00237.035	support	For the reasons of the submitter	Allow relief of the submitter
	00237.038	support	For the reasons of the submitter	Allow relief of the submitter

	00237.039	oppose	There is no direct correlation between land use and natural character of land and effects on adjacent water. If a land use activity has an adverse effect on water quality then it should be controlled rather than by using an indirect and unrelated route of natural character.	Disallow and Retain provisions of PRPS
	00237.042	support	For the reasons of the submitter	Allow relief of the submitter
	00237.049	support	For the reasons of the submitter	Allow relief of the submitter
	00237.053	support	For the reasons of the submitter	Allow relief of the submitter
	00237.067	support	For the reasons of the submitter	Allow relief of the submitter
	00237.068	support	For the reasons of the submitter	Allow relief of the submitter
	00237.069	support	For the reasons of the submitter	Allow relief of the submitter
<b>Federated Farmers New Zealand 00239</b>	00239.007a	oppose	It may be that the submitter has concerns re tree plantings just for carbon forests but the relief would restrict afforestation for indigenous plantings	Disallow and Retain PRPS provision
	00239.010	support	For the reasons of the submitter	Allow relief of the submitter
	00239.021	oppose	Drought causing dry vegetation including tussock, grass, indigenous vegetation increases wildfire risk and to state that wildfire risk increases from increased afforestation is not factual. The Pigeon valley fire in Nelson is a reminder of this. Afforestation for carbon offsetting may include plantation forestry and to suggest that such afforestation may affect small rural communities is not	Disallow the first and fourth amendments.

			based on fact and research in Otago region.	
	00239.072	support	Primary production including plantation forestry should be supported in the rural environments	Allow relief of the submitter
	00239.077	support	For the reasons of the submitter	Allow relief of the submitter
	00239.078	support	For the reasons of the submitter	Allow relief of the submitter
	00239.079	support	For the reasons of the submitter	Allow relief of the submitter
	00239.080	support	For the reasons of the submitter	Allow relief of the submitter
	00239.081	support	For the reasons of the submitter	Allow relief of the submitter
	00239.084	support	For the reasons of the submitter	Allow relief of the submitter
	00239.099	support	For the reasons of the submitter	Allow relief of the submitter
	00239.101	support	For the reasons of the submitter	Allow relief of the submitter
	00239.102	support	For the reasons of the submitter	Allow relief of the submitter
	00239.104	support	For the reasons of the submitter	Allow relief of the submitter
	00239.105	support	For the reasons of the submitter	Allow relief of the submitter
	00239.108	support	For the reasons of the submitter	Allow relief of the submitter
	00239.111	Support in part	Agree that there is a gap with reference to carbon forestry	Allow the reference to carbon forestry but disallow the insertion of “inappropriate plantation forestry” as the NESPF already restricts afforestation of plantation forestry within an SNA.
	00239.130	support	For the reasons of the submitter	Allow relief of the submitter
<b>Forest and Bird 00230</b>	00230.001	support	For the reasons of the submitter	Allow relief of the submitter
	00230.051	Oppose in part	The addition of item (4) is so broad that it does not provide specific provision to be able to evaluate the impact on activities outside the CE	Disallow the addition of item (4)
	00230.053	oppose	The submitter has not provided any new policy and therefore the relief is not able to be evaluated	Disallow the relief

	00230.078	oppose	Visions are aspirational but the proposal is written as absolute requirements. The use of the word “protection” may ensure that no discharges to water could occur and the economic impacts of such a requirement may prevent primary production. It is very unclear at what point of time in history a river’s natural behaviour can be evaluated.	Disallow the relief
	00230.091	oppose	Outstanding water bodies, for the purposes of certainty should be identified in a plan process and not be part of a consenting process	Disallow adding “during the consenting process”
	00230.104	support	Maintenance and operation of activities that exist in an SNA is a practical way to provide for such activities	Allow relief of the submitter
	00230.108	oppose	Plantation forestry should not be mapped as a SNA and if it is then it should be allowed to be replanted and an existing land use Restrictions on replanting existing plantation forestry is controlled by the NESPF. Restrictions on replanting could lead to ETS liabilities for land/tree owners. The proposal is not effects based as planting of confers for other purposes such as shelter belts, carbon forests can lead to spread.	Disallow the entire relief

<b>Sanford Limited 00122</b>	00122.007	Oppose in part	The proposal is not in line with the NZCPS and is so broadly worded that the impacts on land uses is not able to be evaluated	Disallow the insertion of “the potential to protect, use and develop natural and physical resources in the coastal marine area should not be compromised by activities on land”
<b>City Forests Limited 00024</b>	00024.016	support	For the reasons of the submitter	Allow the relief of the submitter
<b>Greenpeace Aotearoa 00407</b>	00407.016	oppose	Forestry can apply synthetic fertiliser which is based on the need of the trees. Forestry can not run stock to provide natural fertiliser. This proposal has the potential to create adverse effects for forestry being able to protect and sustain their trees.	Disallow the relief
	00407.019	oppose	ditto	Disallow the relief
	00407.002	oppose	ditto	Disallow the relief
	00407.006	oppose	ditto	Disallow the relief
	00407.034	oppose	ditto	Disallow the relief
	00407.041	oppose	ditto	Disallow the relief