



# National consistency for the management of Plantation Forestry under the Resource Management Act (RMA)

This is the third in a series of bulletins to keep stakeholders informed of the progress of the Ministry for Primary Industries (MPI)-led work programme that is seeking to address the issue of inconsistent treatment of forestry activities under the RMA. The previous bulletins can be found on the MPI website: <http://www.mpi.govt.nz/forestry/resource-planning>.

Since our last bulletin we have made significant progress developing a nationally consistent rule set. We have been working closely with the Working Group and substantive agreement has been reached on the Activity Status Cascades (the 'Cascades') for all eight activities that make up the plantation forestry cycle. MPI has shared the Cascades with a number of District Council representatives, Forest Owners' Association members, members of the New Zealand Institute of Forestry and other special interest groups. We have received valuable feedback from these groups and we are working with the Working Group to review and, where appropriate, adjust the Cascades.

This bulletin will provide an update on:

- » Our stakeholder engagement programme
- » Progress on the plantation forestry Activity Status Cascades.
- » The cost benefit analysis
- » The Erosion Susceptibility Classification (ESC)
- » Fish Spawning and Migration times
- » Alignment with the National Policy Statement for Freshwater Management.

If you require any further information about this bulletin or the wider work programme, please contact Aoife Martin:

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- » An email address has also been setup for the National Consistency for Plantation Forestry project should you want to contact the team on any general matters:

- [ncpf@mpi.govt.nz](mailto:ncpf@mpi.govt.nz).

## Stakeholder Engagement

One of MPI's key aims has been to work collaboratively with subject matter experts to develop solutions to achieve greater national consistency to address the issues facing the plantation forestry sector. The main engagement forum has been a stakeholder Working Group (the 'Working Group') made up of representatives from local government, environmental non-governmental organisations and the forestry sector. MPI and the Working Group recently reached a significant milestone; agreement on a draft set of Activity Status Cascades that include rules for each of the eight activities in the plantation forestry lifecycle. These Cascades have been the basis for engaging with a broader group of impacted stakeholders in the sector.

## Local Authority Engagement

### District Councils

In June 2014, we convened two District Council workshops to share the Cascades: one in Rotorua and one in Christchurch. The Cascades were presented to Council representatives and we received valuable feedback on the practical implications of the rules. This feedback was presented to the Working Group and several recommendations were agreed and the Cascades were updated.

### Regional Councils

MPI and members of the Working Group have continued to engage with Regional Councils through the network of Special Interest Groups (SIGs) that connect regional council representatives across the country. These SIGs provide Council staff, working in similar fields, with valuable opportunities to network, share good practice and to learn about the latest trends and developments. Our engagement with the SIGs has focused on providing regular updates on our approach to develop the rule set through the Activity Status Cascades. The Land Managers SIG has also provided expert guidance and review to assist with the project to update the ESC.

This engagement provides an opportunity to better understand the operational implications of the Cascades and to identify implementation challenges.

## Forest Owners' Association and NZ Institute of Forestry

A workshop was held in August 2014 in Wellington for the Forest Owners' Association and New Zealand Institute of Forestry members. Our workshop

covered a range of topics including sharing, and capturing feedback on the Cascades. We also outlined the work to analyse the costs and benefits of introducing the Cascades and the attendees shared their views on the impacts of the proposed rules on their forestry operations. The workshop also provided an opportunity to present on the progress that has been made to update the three key information inputs that inform the rule set, namely: erosion susceptibility classification; the wilding risk calculator; and fish spawning and migration periods.

Finally the workshop included a joint MfE/MPI session on the freshwater reforms, the implications of these reforms on the forestry sector, and how these reforms could be expected to align with a National Environmental Standard for plantation forestry.

The feedback and specific recommendations from the workshop were shared with the Working Group and the Cascades have been further refined to reflect the endorsed recommendations.

### Farm Forestry Association

MPI is scheduling four workshops across the country during late November 2014 to engage with Farm Foresters and small growers. At these workshops, MPI plan to share the Cascades and seek feedback on the work to date focusing specifically on impacts on small growers. Workshops will be held at:

- » Telford Rural Polytechnic, Balclutha – Monday 24 November
- » Bulls Town Hall, Bulls – Wednesday 26 November
- » Hawkswood, North Canterbury – Thursday 27 November
- » Tangiteroria Hall, Northland – Saturday 20 November.

For more information on these events please check out:

<http://www.nzffa.org.nz/members/farm-forestry-newsletters/newsletter-75/>



## Next Steps for Activity Cascades

Feedback from our engagements with stakeholders will allow us to further improve the Cascades. Stakeholder views will continue to be gathered and, where appropriate, incorporated so that the Cascades are aligned with good forestry practices and are both pragmatic and easy to implement.

Our focus over the next few months is to have the Cascades independently peer reviewed so that we can ensure they are fit for purpose and so that we can test how the rules will be applied within council planning and compliance environments. We expect to use insights from this review to assist us to develop guidance material, training packages and the wider implementation plan so greater national consistency can be achieved.

## Cost Benefit Analysis

In the previous bulletin we signalled that the New Zealand Institute of Economic Research (NZIER) had been contracted to undertake a review of the Cost Benefit Analysis (CBA). We worked with NZIER to ensure that the best and most up-to-date information was available to support their analysis. This included providing the latest versions of the Cascades and information about erosion susceptibility. NZIER, in partnership with Harrison Grierson, completed a series of face-to-face and telephone based stakeholder interviews during September and October that informed their modelling work. NZIER has presented their draft report and we're aiming to have this finalised within the next month.

It is clear that the CBA will only be able to provide part of the story around the costs and benefits associated with greater levels of national consistency. One of the ongoing challenges with CBAs of this nature is how to effectively quantify environmental benefits. It is unlikely that these environmental benefits can be captured quantitatively but we will be undertaking additional qualitative analysis building on the CBA to ensure that environmental benefits associated with the rule set are reflected. We believe this combined approach will provide a more comprehensive assessment of both the costs and benefits associated with a forestry NES.

## Information Inputs

### Erosion Susceptibility Classification

Bulletin 2 provided an update on the Erosion Susceptibility Classification (ESC) including an overview of the tasks underway and the indicative timeframes. This work has proved to be more complex and time consuming than originally thought but the outcome remains the same: *an updated ESC using robust and defensible methods and the best available information.*

The two immediate areas of focus, with adjusted timeframes, are:

- » A process for updating erosion susceptibility classification and a methodology for sub-classifying the orange category, complete by November/December 2014.



- » Reclassification of units clearly misclassified and, sub-classification of land categorised as orange, complete February/ March 2015.

The application of the rules within the Cascades, and the level of control applied to forestry operations, is influenced by the erosion risk (Green, Orange, Yellow, Red) associated with the activity. Therefore, the correct classification of land is seen as critical to ensure rules are applied consistently and fairly across the country.



## Fish Spawning and Migration Times

One of the key aims when developing the Cascades has been to identify good forestry practices that improve environmental outcomes. To contribute to this aim, MPI contracted NIWA to develop fish spawning and migration calendars to be used by forestry management and council staff to help minimise potential effects of forestry operations on freshwater fish. The calendars will provide information on the best time to undertake work in or around waterways in order to minimise harm to fish species. Although the calendars are being produced for forestry operations, the information could be used by anyone wanting to do work near freshwaters in New Zealand (i.e. farmers, contractors, developers).

NIWA completed a draft report in September 2014 which is being reviewed by the Working Group.

The second phase of this work will be to develop an online tool to make the data publicly available. This is expected to be via an interactive web service and we aim to have this available in early 2015.

## Water Reforms

MfE and MPI are leading the development of a suite of changes to strengthen and reform the freshwater management system. The National Policy Statement for Freshwater Management (NPS-FM) directs regional councils on how to manage freshwater and will

introduce a process for setting freshwater objectives in regional plans. The process requires councils to manage water bodies to meet community and tāngata whenua values, including two compulsory values (ecosystem health and human health for recreation).

An area of increasing focus for freshwater is the impact of sedimentation on water quality. It is expected that a national bottom line will be developed to address sediment contamination which will be incorporated into the NPS-FM over time. Where limits are set for particular contaminants, the sources of contaminant will be allocated within that limit, and the generators of the contaminant will be accountable for their own contribution.

Plantation forestry harvesting and earthwork activities can result in sediment discharges to water bodies. Outside of these activities plantation forestry provides a range of freshwater ecosystem services and acts to reduce erosion and sediment discharges to water bodies compared with pastoral land use.

An NES for plantation forestry will support the delivery of freshwater outcomes and assist those in the forestry sector to meet NPS-FM objectives by ensuring that the forestry sector is collectively operating to good practice requirements. However, while the primary objective of the planning consistency project is to achieve greater national consistency in the planning rules that affect forestry, it is acknowledged that this will not always be appropriate. In some cases local decision-making will be more appropriate. One of these areas may be the management of local water quality objectives. For that reason the requirements of the NPS-FM may drive a need for greater stringency in the management of plantation forestry than the rules proposed in the Activity Status Cascades.

Work is underway to assess where greater stringency should be provided for and what form(s) it should take in order to ensure that the uncertainty that arises as a result of greater discretion at a local level is minimised wherever possible.

