Proposed changes to forestry in the Emissions Trading Scheme (ETS) - Consultation

Submission E-Form

MPI is consulting on proposed changes to forestry in the Emissions Trading Scheme. The discussion document for this consultation is on the MPI website:

[mpi.govt.nz/consultations/proposed-changes-to-forestry-in-the-nz-ets](https://www.mpi.govt.nz/consultations/proposed-changes-to-forestry-in-the-nz-ets).

We encourage you to review these documents if you are intending to make a submission.

Consultation closes at **5pm on 23 May 2025.**

This form is to help you make a submission on the proposals outlined in the discussion document.

Or if you prefer, you can provide your submission using the online submission form: <https://survey.alchemer.com/s3/8247064/Consultation-Proposed-changes-to-forestry-in-the-Emissions-Trading-Scheme-ETS>.

You are welcome to submit on the whole discussion paper (and all the questions), or you can choose the areas (and questions) relevant to you. Please provide supporting evidence with your submission where possible.

**Contact**

If you have any questions, please email us at: [etsforestrychanges@mpi.govt.nz](mailto:etsforestrychanges@mpi.govt.nz).

**How to use this e-form**

This form has editable boxes for you to provide feedback. Once you have downloaded a copy of the e-form, be sure to regularly save your changes after you enter new comments and before you close the form.

Completed forms should be attached to an email and sent to us at: [etsforestrychanges@mpi.govt.nz](mailto:etsforestrychanges@mpi.govt.nz).

Our preference is for you to make a submission electronically – either by completing the online submission form or by emailing us the submission e-form. However, we will also accept written submissions sent by post to:

Maximising Forest Carbon Programme

Forestry System Directorate

Ministry for Primary Industries

PO Box 2526

Wellington 6140

**Submissions must be submitted before 5pm on 23 May 2025.**

**Privacy and confidentiality**

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| Your participation in this consultation is voluntary.  MPI collects and holds personal information in line with our privacy and security policies, including your rights to ask for access to and/or correction of information you have provided to us. You can view these here: [How MPI manages your privacy and security | NZ Government](https://www.mpi.govt.nz/about-this-site/privacy-and-security/).  Feedback may be the subject of requests for information under the Official Information Act 1982 (the OIA) and the Privacy Act 2020 (where it covers information about an identifiable individual). Under both Acts, information is to be made available to requesters unless there are sufficient grounds for withholding it according to the criteria prescribed in those Acts.  There is a space provided on the next page if you wish to indicate grounds for withholding specific information contained in your submission, such as where you consider information is commercially sensitive. We will consider these requests in accordance with the provisions of the applicable Act when we do our own review and will contact you if needed. MPI decisions on requests for information, including withholding of information, are reviewable by the Ombudsman and Privacy Commissioner.  **For more information, please visit:** [**Ombudsman - Kaitiaki Mana Tangata**](http://www.ombudsman.parliament.nz/resources-and-publications/guides/official-information-legislation-guides) **or** [**Office of the Privacy Commissioner -**](https://www.privacy.org.nz/your-rights/your-privacy-rights/) **Te Mana Matapono Matatapu.**  The submission form contains free text responses boxes.  Please be careful not to include personal information about yourself or others if that is not intended.  The submissions received will be used as explained in the discussion document, including the purpose of collection, and intended recipients.  Within the submission, you can indicate that you do not consent to your name, organisation, and/or parts or all your submission being made publicly available.  MPI will also take these comments into account when responding to a request for information, and prior to any proactive publication or use of the information provided. |

**Your details:**

*The information below is requested to enable us to maximise the insights we can gain from your submission, however, it is not compulsory to provide biographical information (e.g. your name or contact information).*

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| Name of submitter or contact person |
| Click or tap here to enter text. |

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| Organisation (if applicable) |
| Click or tap here to enter text. |

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| Are you providing feedback on behalf of your organisation? |
| Click or tap here to enter text. |

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| Which stakeholder group do you identify with?  Note: This question helps us understand if submissions represent different sector groups, and understand the different priorities of and impacts on different groups. |
| |  |  |  |  | | --- | --- | --- | --- | |  | Individual |  | Territorial Authority | |  | Forestry company or consultant |  | Māori and iwi organisation | |  | Forestry sector organisation |  | Environmental group | |  | Farmer/farming Entity |  | Other | |

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| Do you represent Māori land and forest owners (either solely, or as part of your membership)?  Note: This question helps us understand the impact of policy decisions on Māori. |
| Click or tap here to enter text. |

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| Email or contact address  Note: This is to enable us to contact you (this information will not be made public or released under the OIA). | |
| Email or address: | Click or tap here to enter text. |
| Phone: | Click or tap here to enter text. |

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| Do you consent to being contacted about your submission if we have further questions? |
| |  |  | | --- | --- | | **Yes** | **No** | |  |  | |

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| If you would like to have any or all your submission withheld under the [Official Information Act 1982](https://www.legislation.govt.nz/act/public/1982/0156/latest/DLM64785.html), please set out your reasons below |
| Click or tap here to enter text. |

# Contents

*If you are only interested in providing feedback on certain sections, please refer to the relevant consultation questions in the areas you are interested in*.

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# Part 1 - Overview of proposals

*These questions relate to pages 7-10 of the discussion document.*

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| 1. **Do you agree with our assessment framework? If not, what changes would you like to see and why?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you agree with our approach to updating the default tables, such as how we revised the carbon stock values? If not, what approach would you prefer to see and why?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you agree with our proposed package of new and updated default tables? If not, what changes to the forest types or default carbon tables would you like to see, and why would you like those changes?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you agree with our proposed technical amendments to improve the functionality of the Forestry Regulations? If not, what changes or additional improvements would you like to see and why?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

# Part 2 – Proposals for exotic softwoods

*These questions relate to pages 11-18 of the discussion document.*

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| 1. **Do our proposed updated carbon stock values for Exotic Softwoods reflect what you are seeing in cypresses or other softwood species you grow or manage? If not, what differences are you seeing?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you agree with our proposal to use a combination of cypresses (*C. lusitanica* in the North Island and *C. macrocarpa* in the South Island) as the basis for carbon stock values for the Exotic Softwoods default tables? If not, what species would you like the Exotic Softwoods default tables to be based on and why?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **What is your preferred approach for the number of default tables for Exotic Softwoods?**   Please select from the below options:   |  |  |  |  | | --- | --- | --- | --- | | **Option 1 – a single national table** | **Option 2 – two island tables** | **Option 3 – nine regional tables** | **Different approach** | |  |  |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **How would the proposed update to the Exotic Softwoods default tables impact you / your clients and any upcoming decisions (e.g. planting, harvest timing, etc.)? Are these impacts adequately reflected in our preliminary impact assessment? If not, what changes to our assessment, or what other impacts, do you think we should consider, and why?** |
| Click or tap here to enter text. |

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| 1. **Do you have other feedback on Exotic Softwoods?**   If yes, please provide reason/s for your answer |
| Click or tap here to enter text. |

# Part 3 – Proposals for redwoods

*These questions relate to pages 19-28 of the discussion document.*

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| 1. **Do you agree with our proposal to introduce a separate forest type for redwoods? Why or why not?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **If we were to introduce a Redwoods forest type, what age do you think we should set the typical clearing (i.e. harvest) age for averaging accounting?**   Please select from the below options:   |  |  |  |  | | --- | --- | --- | --- | | **Option 1 – 35 years** | **Option 2 – 40 years** | **Option 3 – 45 years** | **Another age** | |  |  |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **If you have a redwood forest, are considering planting one, or advise redwood forest owners, at what age is the intended harvest of the forest?** |
| Click or tap here to enter text. |

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| 1. **If we were to introduce a Redwoods forest type, do you agree with our approach to set the clear-fell penalty value for the permanent activity the same as it currently is for Exotic Softwoods ($12/tonne)? If not, what value would you suggest?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do our proposed carbon stock values for redwoods reflect what you are seeing in the redwoods forests that you grow or manage? If not, what differences are you seeing?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **If we were to introduce a Redwoods forest type, what is your preferred approach for Redwoods default tables?**   Please select from the below options:   |  |  |  |  | | --- | --- | --- | --- | | **Option 1 – a single national table** | **Option 2 – two island tables** | **Option 3 – nine regional tables** | **Different approach** | |  |  |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **How would the proposed new Redwoods forest type and default tables impact you / your clients and any upcoming decisions (e.g. planting, harvest timing, etc.)? Are these impacts adequately reflected in our preliminary impact assessment? If not, what changes to our assessment, or what other impacts, do you think we should consider, and why?**   Please include reason/s in your answer |
| Click or tap here to enter text. |

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| 1. **Do you have any other feedback on redwoods?**   If yes, please provide reason/s for your answer |
| Click or tap here to enter text. |

# Part 4 – Proposals for exotic hardwoods

*These questions relate to pages 29-36 of the discussion document.*

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| 1. **Do our proposed updated carbon stock values for Exotic Hardwoods reflect what you are seeing in eucalypts or other hardwood species you grow or manage? If not, what differences are you seeing?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   If yes, please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you agree with our proposal to use a combination of eucalypts (*E. nitens* in the South Island and *E. nitens*, *E. fastigata*, and *E. regnans* in the North Island) as the basis for the carbon stock values for the Exotic Hardwoods default tables? If not, what species would you like the Exotic Hardwoods defaults tables to be based on, and why?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   If yes, please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **What is you preferred approach for the number of default tables for Exotic Hardwoods?**   Please select from the below options:   |  |  |  |  | | --- | --- | --- | --- | | **Option 1 – a single national table** | **Option 2 – two island tables** | **Option 3 – nine regional tables** | **Different approach** | |  |  |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **How would the proposed update to the Exotic Hardwoods default tables impact you / your clients and any upcoming decisions (e.g. planting, harvest timing, etc.)? Are these impacts adequately reflected in our preliminary impact assessment? If not, what changes to our assessment, or what other impacts, do you think we should consider, and why?**   Please include reason/s in your answer |
| Click or tap here to enter text. |

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| 1. **Do you have any other feedback on Exotic Hardwoods?**   If yes, please provide reason/s for your answer |
| Click or tap here to enter text. |

# Part 5 – Proposals for *Pinus radiata*

*These questions relate to pages 37-44 of the discussion document.*

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| 1. **Do our proposed updated carbon stock values for *Pinus radiata* reflect what you are seeing in the forests you grow or manage? If not, what differences are you seeing?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   If yes, please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you agree with our proposal to update the carbon stocks for the *Pinus radiata* default tables? If not, what changes would you like to see to our proposal or to how we have estimated carbon stocks?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   If yes, please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **If we were to update the *Pinus radiata* default tables, which would be your preferred approach?**   Please select from the below options:   |  |  |  | | --- | --- | --- | | **Option 1 – update the nine regional tables** | **Option 2 – instead have a North Island and South Island table** | **Different approach** | |  |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **How would the proposed update to the Pinus radiata default tables impact you / your clients and any upcoming decisions (e.g. planting, harvest timing, etc.)? Are these impacts adequately reflected in our preliminary impact assessment? If not, what changes to our assessment, or what other impacts, do you think we should consider, and why?**   Please include reason/s in your answer |
| Click or tap here to enter text. |

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| 1. **Do you have any other feedback on proposals for the *Pinus radiata* forest type?**   If yes, please provide reason/s for your answer |
| Click or tap here to enter text. |

# Part 6 – Transitional provisions and potential future improvements

*These questions relate to pages 45-48 of the discussion document.*

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| 1. **Do you have any feedback on the transitional provisions and potential consequential amendments for new forest types and default tables?**   If yes, please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you think progressing an update to the Douglas fir default tables is a priority? Why or why not?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please include reason/s in your answer |
| Click or tap here to enter text. |

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| 1. **Do you think addressing the issue of averaging accounting settings for Exotic Hardwoods on timber regimes is a priority? Why or why not?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please include reason/s in your answer |
| Click or tap here to enter text. |

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| 1. **If we were to investigate different averaging accounting settings for timber-regime Exotic Hardwoods, what do you think we should consider when designing a separate forest type?** |
| Click or tap here to enter text. |

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| 1. **Do you think exploring the impacts of coppicing on carbon storage is a priority? Why or why not?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please include reason/s in your answer |
| Click or tap here to enter text. |

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| 1. **Do you have any other feedback for what forest type and / or default table changes we should prioritise next?**   If yes, please provide reason/s for your answer |
| Click or tap here to enter text. |

# Part 7 – Technical regulatory amendments

*These questions relate to pages 49-56 of the discussion document.*

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| 1. **Do you agree with our proposal to treat young forests under averaging accounting that fail to thrive while still having a nominal average carbon stock of zero as first rotation forest when reestablished? Why or why not?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you agree with our proposal to more closely align the input calculator deadlines with emissions return deadlines, or would you prefer a different timeframe? Why?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **If we change the deadline for the input calculator, what is your preferred approach?**   Please select from the below options:   |  |  |  | | --- | --- | --- | | **Option 1 – 1 hour before the deadline for emissions returns** | **Option 2 – 1 day before the deadline for emissions returns** | **Different timeframe** | |  |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you agree with our proposal to prescribe transferee holding account numbers on a transmission of interest notice? Why or why not?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you agree with the proposed approach for amalgamating small areas during the process of finalising sub-areas to simplify the mapping of small areas? Why or why not?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

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| 1. **Do you agree with the proposed approach to amend the definition of area in the regulations to reflect common industry practice and ensure more accurate technology is used? Why or why not?**   Please select from the below options:   |  |  | | --- | --- | | **Yes** | **No** | |  |  |   Please provide reason/s for your answer |
| Click or tap here to enter text. |

**Conclusion**

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| 1. **Please confirm that you agree that the contents of this submission may be considered for this initiative.  This assists us when incomplete forms are received.**   Please select from the below options:   |  |  | | --- | --- | | **Yes, I agree** | **No** | |  |  | |