



Environment Institute
of Australia and
New Zealand Inc.

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Stuart Miller
Spatial, Forestry and Land Management
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

By email to NES-PFconsultation@mpi.govt.nz

SUBMISSION ON THE PROPOSED NATIONAL ENVIRONMENTAL STANDARD FOR PLANTATION FORESTRY

Contact details for this submission are:

Submitter: New Zealand Chapter, EIANZ
Submitted by: Ian Boothroyd, President EIANZ New Zealand
Contact address: Ian.Boothroyd@boffamiskell.co.nz
Ph: 027 836 4290

Submitter's Position

The New Zealand Chapter of the Environment Institute of Australia and New Zealand (EIANZ / the Institute) supports the need for a National Environmental Standard for Plantation Forestry (NES-PF) and the approach to manage the risk that is in line with good forest management practice. We support the aim of consistency in forest management practice and the opportunity to apply these rules nationwide rather than a raft of forest-specific rules in each region. We see some effort from Councils in implementing the NES-PF, especially removing duplication in rules or conflicts between the NES-PF and existing or proposed plans. We are hopeful that this can be carried out efficiently without the need for further conflicts.

However EIANZ are concerned that the successful implementation of the NES-PF will require a sound and comprehensive information base upon which standards can be based and monitoring undertaken and these are not currently available. Most local and regional councils do not have adequate data to undertake the responsibilities set out for them in the NES-PF. The NPS on Freshwater Management (NPS-FW) will be a significant driver in achieving databases for environmental monitoring, although it is uncertain how much will actually occur in association with forestry landuse. It is the view of the EIANZ that the NES-PF should clearly demonstrate how the NES-PF will integrate with the NPS-FW and guide how Councils are expected to reconcile the associations between them.

GPO BOX 211 MELBOURNE VIC 3001

Tel: 03 8803 6150

Email: office@eianz.org

www.eianz.org

ABN 39 364 288 752 | NZBN 9429041314777

About the EIANZ

The EIANZ is a non-profit, politically independent professional association. Founded in 1987, the Institute is multi-disciplinary in membership and provides scope and opportunity for professional and academic interchanges across all sectors of the diverse environmental industry. The Institute acts as a major contributor to the formulation of effective and responsible policies in the broad field of environmental management in Australia and New Zealand. Our vision is the sustainable and equitable management of the environment through excellence in environmental practice through environmental practitioner leadership, setting standards for best available environmental practices, and through supporting and enabling practitioners to promote and achieve a sustainable and equitable management of the environment.

As environmental practitioners, members of EIANZ include experts in local government, biological, physical and social sciences, planning, resource management, legal representation and many are experienced at the decision-making processes of resource consent hearings, Environment Court and Board of Inquiry. Most of the membership is employed by councils, private consultancies, universities or government departments and are actively involved in day-to-day management and decision-making on environmental management and protection. A number of members are accredited as independent hearings commissioners through the 'Making Good Decisions' programme.

EIANZ Submission

In order to assess the effects of land-use activities there needs to be a clear understanding of

- What is being affected,
- The values attached to what is being affected,
- The types and scale of the effects, and
- Some estimate of the resilience of the particular resource that is affected.

This requires comprehensive and accurate information at a national and local level, and competence and consistency in effects assessments.

In spite of the length of time the Resource Management Act has been in force, many regions and districts continue to manage resources on the basis of inadequate data. The process of granting of consent can become fraught when the information provided by an applicant is contested on the grounds of a lack of objectivity and neutrality. For example indigenous biodiversity resources, and the values attached to such resources, can be contentious as can landscape, social, and cultural and historic heritage resources.

The NZ Land Resource Inventory (LRI) data does not have sufficient resolution or reliability as the primary framework for the regulations. Furthermore, the revised (2015) version of the Erosion Susceptibility Classes does not accurately reflect erosion risk. Without a national overview to ensure consistency, together with inadequate resourcing of local councils to undertake this work, the outcome has inevitably been inadequate data and inconsistency of application.

The EIANZ is concerned that, given the number of other pressures on local councils to provide more and improved facilities and services while reducing costs to ratepayers, Councils will not allocate the priority needed to filling major gaps in resource information which will be needed for

the sound decision-making and environmental monitoring envisaged in the proposed NES-PF. And even if a Council has the will, the Institute is concerned about their ability to obtain the skills required for this work. In terms of the skills required, EIANZ submits that the NES-PF should require qualified and certified individuals to be responsible for the implementation of the more specific-skill areas of the NES-PF (e.g., ecological and water quality monitoring and its interpretation).

The proposal acknowledges the requirements of the NPS-FW and the need for forestry activities to comply with that NPS. At this stage the implications of the NPS-FW for information gathering and forestry activities are unclear. As stated in the NES-PF - *“As most of the quality objectives have yet to be set, however, this (the positive contribution forestry might make) is not certain.”*

It is the view of the Institute that the NPS-FW will be a significant driver in achieving consistency, certainty and cost-effectiveness of the resource management system which the forestry industry is seeking. The NES-PF should clearly demonstrate how the NES-PF will integrate with the NPS-FW and guide how Councils are expected to reconcile the associations between them.