

22 April 2022

Managing Exotic Afforestation Consultation
Climate Change Policy
Ministry for Primary Industries
PO Box 2526
Wellington 6140
New Zealand

By Email MPI.Forestry@mpi.govt.nz

Kia Ora Koutou

The purpose of this document is to file a submission, per "**Managing exotic afforestation incentives**"

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On behalf and in conjunction with Members of the Submitter

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Planted forestry makes up just 20% of total area in Tairawhiti.

Most recent land use reported by Lewis Wright Valuation and Consultancy Ltd (Gisborne District Councils Valuation Service Provider). The date of the District revaluation was 1 September 2020.

- Total Area? Approx. **819,000** hectares in the District Valuation Roll.
- Planted Forest? Approx. **163,156** hectares classed as **planted forestry** in the District Valuation Roll. Includes farms or **140,000 ha excluding farms.**
- Area in native? Approx. **237,509** hectares classed as **ineffective area in mostly bush and scrub -lots reversion** in the District Valuation Roll.

Erosion in Tairawhiti is a present and actual reality

The frequent extreme weather events are increasing erosion events throughout the region.

Tairawhiti needs MORE trees not less to prevent the most vulnerable lands from ending up in the sea - a mixture of tree species (right tree right place).

Land care estimate the value of 1 tonne of erosion to be \$1.8 million. The estimated volume of erosion in the Tairawhiti region is 40 million tonnes per year. Using these estimates the value of soil loss from Tairawhiti alone is \$72 million per year. Given the recent flooding events, this calculation likely needs to be increased.

The idea 'what we cannot see cannot hurt us' could not be more wrong in the context of our soils from our whenua.

Initial Feedback

We are mindful every primary industry must contribute equitably to reducing emissions.

We agree it is appropriate to employ instruments that will inform afforestation, so there is the 'right balance' of land use and this enables NZ to meet its Climate Change Commission (CCC) targets.

We agree more land needs to be planted in permanent tree cover, however we do NOT support policy that encourages landowners to choose permanent carbon farming on land blocks suited to production forestry.

Hence, it is important the ETS does NOT provide an incentive for what could be production forestry to be non-production forestry.

Feedback / Recommendations

EWC members have concerns the government is seeking a pre-determined outcome that is not supported sufficiently by evidence.

We support consideration of a long rotation option for post-1989 forestry, but caution that targeting or confining this to where production options are genuinely poor is difficult. There are a number of species suited to longer term rotation, including radiata, redwoods, douglas fir.

We share the concern there is a risk of exotic forestry currently managed for production, under either stock change or averaging, being switched to permanent forestry which could adversely effect the forestry and wood processing industry.

We agree permanent exotic forests do not fall within the scope of the National Environmental Standards for Plantation Forestry (NES-PF). We too agree there is an opportunity for this risk to be managed in other ways, for example by GDC (Gisborne District Council) introducing controls on permanent forestry.

The difference between permanent exotic forestry and production forestry has not been acknowledged sufficiently in the discussion document. For example, the long-term risks for pests, fire and biosecurity are NOT the same. While such risks are actively managed by production forestry, these are less likely with permanent, unless regulated.

EWC acknowledges that Māori land (ancestral land) is very different to general title land. A sizeable ratio of Maori land is well suited to production forestry, and some too is suitable for permanent cover.

Māori land owners should not be restricted by some of the proposed changes to the ETS, because they would be disadvantaged. Hence, the criteria should enable and support Māori to realise the aspirations for their whenua.

Kaitiakitanga per biodiversity; we support policy settings by ETS that would discourage land-owners from displacing indigenous forest and native vegetation, for the purpose of planting exotic species.

EWC members support policy that encourages more indigenous planting at scale because we consider native planting will fall well short of the CCC proposals. We too encourage policies that encourage maximising land use, per integrated land use that is guided by the philosophy of right tree in the right place.

Nga manaakitanga



Philip Hope
Eastland Wood Council

Our Kaupapa / Our Mission

Eastland Wood Council - Te Kaunihera Pororākau Te Tairāwhiti is an incorporated society which provides a collective voice for the forestry industry in Tairāwhiti.

Our philosophy

Forestry is a vibrant, respected industry in Tairāwhiti

Our Strategic Goals

Kaitiakitanga Care for the Environment - Improving biodiversity by employing the highest standards of sustainable silviculture and environmental practice

Haumarutanga Health And Safety - Increasing wellbeing with better leadership of health and safety

Te Huarahi Roads to Market - Continue to improve efficiencies throughout the supply chain

Whakawhanake Growing Our People - Our kaimahi are safe, they are valued and training is ongoing

Taunakitanga Advocacy - Raising awareness, building relationships based on trust, improving social license and informing policy on behalf of the forestry industry

“ Kotahi te kakano, he nu inga hua o te rakau. A tree comes from one seed but bears many fruit “

The Forestry Industry is a Key Driver of the Economy in Tairāwhiti

Further analysis of Facts & Figures 2019/2020 has enabled EWC to obtain a report specific to Tairāwhiti / East Coast.

- Forestry represents the largest GDP by industry for our region (\$253 million) for year ending March 2019.
- Forestry export revenues through Eastland Port totals \$438,808,547 for year ending March 2020.
- East Coast and Hawkes Bay together supply and manufacture the second largest volume of sawn timber in New Zealand (493,436 cubic metres)
- The forestry industry in Gisborne employed 1072 FTE's for the year ending March 2019 (the fourth largest employer by industry in Gisborne)

We also need to acknowledge the significant contribution the forestry industry makes to Trust Tairāwhiti and in turn the many community groups operating right across our region that exist the result of this philanthropic income.

In the 12 months to March 2021; Eastland Port's share of 2021's dividend to Trust Tairāwhiti was \$4.4 million. This was 50% of the dividend distribution of \$8.8 million. There is another \$1.2 million distribution which is Eastland Ports capital note interest that is paid at Group level.

<https://www.gisborneherald.co.nz/business/20210805/eastland-group-rebounds/>