

10 June 24

by email: joanna.Noble@gdc.govt.nz

Joanna Noble
Director Sustainable Futures
Gisborne District Council

Dear Jo,

INDUSTRY CONCERNS – LAND CLASSIFICATION AND CATCHMENT PLANNING

On the 7th September 2023, Eastland Wood Council forest owners and managers, met with Gisborne District Council officials to discuss a proposed Plan change involving changes to rules for plantation forestry.

At this meeting Eastland Wood Council members expressed concern that the proposed rule changes appeared poorly considered and were not based on sound science, Members committed to collaborate with GDC, other land users, mana whenua and stakeholders, in order to develop a sustainable pathway forward.

A commitment was made by GDC, on the 28th November 2023, in the Letter of Intent (LOI) – Catchment Forestry Plans.

While we don't agree with all the views and assumptions expressed in this letter, for example we object to the retirement of land without a similar and concurrent workstream on compensation, we remain absolutely committed to the collaboration and cooperation commitments made by Gisborne District Council.

In this letter a number of commitments are detailed, amongst these is "... an intention *to work collaboratively to build the wellbeing of whenua and whānau while exploring sustainable economic opportunities.*" And specifically, in relation to the land classification, the LOI indicated:

1. We will work together to complete the mapping and understanding of the land types in Tairāwhiti, so we can retire vulnerable land from plantation forestry.
2. We will work together to understand how this vulnerable land might be restored and managed in order to heal the whenua and the waterways, once the land is no longer used for plantation forestry.
3. We will collaborate with and the farming sector to explore how the changes in land classification will also affect whānau, communities and farms, so the full impacts can be understood and the right plans put in place, in the spirit of a just and equitable transition.
4. In order to inform this korero, we will work together to understand the economic, social, environmental and cultural costs and benefits of our current ways of working, and how the changes to land use and forestry management will alter these, both for the forestry sector and the communities of Te Tairāwhiti.
5. Given the national importance of the forestry sector, we will explore with central government the implications of the changes to land classification and how the whenua is used, particularly in relation to the Emissions Trading Scheme.

Specific to the Catchment Forestry Plans, the LOI made the following commitments:

6. We will collaboratively develop a Catchment Forestry Plan for each of the catchments of Tairāwhiti, commencing with Ūawa.
7. The Forestry Plans will be developed between Council, tangata whenua and Eastland Wood Council before consultation with wider community. This process will consider the National Environmental Standards for Commercial Forestry and the Eastland Wood Council's Best Practice Guidelines. The Forestry Plans will be given full authority through a Plan Change to the Tairāwhiti Resource Management Plan, in accordance with the relevant legislation.
8. In order to inform the Forestry Plans, we will work together to understand the impacts of land use and forestry management, covering important matters such as high-risk riparian land, the management of historic slash, and biodiversity improvement. We will incorporate matauranga Māori alongside the latest science and the insights of communities to inform this hui.

And finally, as the next steps, the LOI stated:

"We are jointly committed to taking action and wish to move forward together. As a starting point, we propose a preliminary meeting with tangata whenua and Eastland Wood Council to confirm scope for the two areas of work outlined above.

Once scope is confirmed, we suggest the formation of a joint Working Group composed of Council, tangata whenua, the Eastland Wood Council and key community representatives. The Working Group will focus on changes in land classification (Land Overlay 3B) and the Ūawa Catchment Forestry Plan in a series of collaborative working sessions."

This letter is to confirm that EWC members remain fully committed to collaborate with all stakeholders, but we need to make clear that we are concerned about the evolving process and specifically the following:

1. We have not been involved in any mapping to date, be it for proposed land use Plan Overlay 3B, Purple zoning as per the MILU report or otherwise as referred to in 1 above. Despite a number of requests to access the landslide/watercourse connectivity modelling work commissioned by GDC from Dr Hugh Smith of Landcare Research, we not been provided with any updated mapping or land information work. This is regrettable as none of this new information has been able to be used in current planting and replanting.
2. Despite making a request to establish a working group on land restoration/retirement/transition, we have not yet worked together on this key issue.
3. It is critical that when discussing Whole of Catchment management, especially as part of an integrated land use planning, that all land users are engaged in the development of plans. We believe that without the farming sector involved (indicated in 3 above), the development of an integrated land use plan, which should be the basis for developing catchment management plans, would not be comprehensive. For example, we cannot see how GDC can achieve acceptable E.coli levels in streams without farmers, foresters, and the department of Conservation in the room. (The LAWA web site indicates that pathogen levels in representative streams in Tairāwhiti are well above tolerable levels for contact recreation ie significantly above National bottom lines in the National Objectives Framework of the NPS-FM 2020)
4. We have not had the opportunity to work with you to understand the economic, social, environmental, and cultural costs and benefits of our current ways of working as committed to in 4 above. We believe that without undertaking this work it would be presumptuous and risky to embark on catchment or land use planning.

5. We have not been party to any exploratory work with central government to understand the implications of land classification changes including, but not limited to, rates relief or options for a Just Transition (including a Public Works Act buy-out offer).
6. In 7 above, council indicated that the Forestry Plans would be developed between council, tangata whenua, and the Eastland Wood Council before engaging with the public. Notwithstanding the lack of a common understanding of what these plans are would look like, our current understanding of the Uawa Catchment working group process is not consistent with this commitment.
7. The forestry industry in Tairāwhiti is experiencing significant uncertainty. This is having a range of debilitating impacts, including amongst others:
 - Severe service provider and experienced staff attrition.
 - Lack of investment capital for forestry.
 - Lack of investment capital for wood and/or wood waste processing for bioenergy or other markets.
 - Reduction in harvest volumes which are having dire financial and environmental consequences.
 - Value chain disruptions impacting viability of the very value chains we need to work our way towards a more sustainable position.
 - Significant reduction in export volumes impacting revenue and GDP for Gisborne and the Councils interest in the Eastland Port Company.

We respectfully request that Council put the formation of the Uawa Catchment working group on hold pending working through the processes set out in the LOI which need to be expedited to facilitate the next steps in the sustainability journey.

Further, we request that, in line with the next steps section of the "Letter of Intent", we hold a preliminary meeting with yourselves and tangata whenua to develop the scope. This would then inform the suggested Working group, formed of GDC, Eastland Wood Council, Tangata Whenua and key community representatives.

I suggest that a Teams meeting between yourselves, Jo Noble and Janic Slupski, and Eastland Wood Council representatives would provide some background to this letter and our concerns.

Regards



Julian Kohn

Chairman

Eastland Wood Council

cc:

Nedine Thatcher-Swann – Chief Executive, Gisborne District Council

Rehette Stoltz – Mayor, Gisborne District Council

Janic Slupski - Principal Policy Advisor, Gisborne District Council

Eastland Wood Council - Te Kaunihera Pororākau o Te Tairāwhiti

The Eastland Wood Council (EWC) is an incorporated society which provides a collective voice for the forestry industry in Tairāwhiti, for the benefit of Tairāwhiti.

Website <http://eastlandwood.co.nz/>