

Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE	
Mailed to	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
Faxed to	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i>
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS		
Full name: Jackie Egan – NZ Forest Managers Ltd		
Full address: Atirau Road, PO Box 304, TURANGI		
Email: jackie@nzfm.co.nz	Phone: 07 386 8757	Fax: 07 377 7020

ADDRESS FOR SERVICE OF SUBMITTER		
Full name: NZ Forest Managers Ltd		
Address for service of person making submission: As above		
Email: as above	Phone: as above	Fax: as above

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

*Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1
(continue on separate sheet(s) if necessary.)*

This submission relates to:

1. General comment to Plan Change 1
2. 5.1.5 Conditions for PA Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rule.

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(select as appropriate and continue on separate sheet(s) if necessary.)

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

MY SUBMISSION IS THAT

*Tell us the reasons why you support or oppose or wish to have the specific provisions amended.
(Please continue on separate sheet(s) if necessary.)*

Please see attached submission.

I SEEK THE FOLLOWING DECISION BY COUNCIL

(select as appropriate and continue on separate sheet(s) if necessary.)

- Accept the above provision
- Accept the above provision with amendments as outlined below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

Amend as follows:

Amend 5.1.5 as outlined in attached submission.

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

I wish to speak at the hearing in support of my submissions.

I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

Yes, I have attached extra sheets.

No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature

Date 08/03/17

Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

Additional sheet to assist in making a submission

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	State in summary the nature of your submission and the reasons for it.	State clearly the decision and/or suggested changes you want Council to make on the provision.

A Submission on: Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments

To: Chief Executive
401 Grey Street
Private Bag 3038
Waikato Mail Centre
Hamilton 3240

From: NZ Forest Managers Ltd
P.O. Box 304
TURANGI 3334

Address/Contact: Jackie Egan
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P.O. Box 304
TURANGI

Tel: 07 386 8757
Fax: 07 386 7020
Email: jackie@nzfm.co.nz

NZFM would like to be heard in support of this submission

INTRODUCTION:

New Zealand Forest Managers Ltd (NZFM) is a privately owned company established in 1989. The company is a specialised contract forest management organisation that provides commercial forest owners with a comprehensive management service covering the full range of operations from forest development, protection and investment through to harvesting and marketing. Within the Waikato and Waipa River Catchments, NZFM manage Te Waihou and Waonui Forests on behalf of Global Forest Partners as well as a number of smaller forests on behalf of the forest owners.

SUBMISSION TO PROPOSED PLAN CHANGE 1:

General Comment

NZFM recognises the responsibility that Council has to meet the requirements of the Vision and Strategy for the Waikato River, particularly:

'The restoration of water quality within the Waikato River so that it is safe for people to swim in and take food from over its entire length.'

Proposed Plan Change 1 (PC 1) will, in general terms, meet Council's objective of addressing the restoration of water quality. However NZFM has serious concerns regarding the rules within PC1, in particular those that will have an effect on plantation forestry.

NZFM strongly opposes land use rules that include a grand parent approach for allocation. A grand parenting penalises those who have low leaching levels (early adopters and low leaching sectors) and rewards those with high leaching levels. It also provides no incentive to improve, as those with high leaching levels will not reduce their leaching rate for fear of losing future property rights and options for future land use. A grand parent type approach to allocation effectively results in one sector bearing the cost of externalities created by another.

Forestry as a land use provides greater protection to water quality than other primary productive land uses. Scientific information demonstrates that over a rotation length (30 years) the nitrogen inputs to water from an exotic plantation forest are far less than other primary productive land uses. In the Taupo District, Lake Taupo and Rotoaira Forest were planted with the express objectives of protecting soil and water quality values as forestry was deemed the best productive use of the land that met these stated objectives.

Management of Forestry - 5.1.5 Conditions for Permitted Activity Rule 5.1.4.11 and Standards and Terms for Controlled Activity Rule.

An additional criteria q) has been added to 5.1.5 Conditions for Permitted Activity Rule 5.1.4.11, which requires Waikato Regional Council to be notified at least 20 working days prior to commencement of harvesting operations. Notification also requires the submission of a harvest plan.

Producing harvest plans is best practice for any responsible forest manager/owner and NZFM all large forest companies and the majority of small forest owners will already be producing harvest plans prior to harvesting operations in the Region. NZFM makes that assumption that the aim of introducing criteria q) to PC1 is to capture the few small forest/woodlot owners who are contributing the majority of forestry non-compliance issues in the Region. If so, this is a very blunt instrument. The requirement of notification and provision of a harvest plan will result in a substantial increase in the amount of paperwork being submitted to Council.

NZFM submits along with the introduction of criteria q) to 5.1.5, Council will require additional staff with appropriate experience/training to receive and assess the harvest plans, such as qualified Forestry Harvest Planners or Forest Engineers who are familiar with the Waikato Region.

Criteria q) does not require that harvest plans are approved by Council staff, so the intention of this criteria is somewhat uncertain other than providing information on harvesting operations within the Region, which can be met by notification alone. If there are particular location or operations that are of concern to Council, amending the notification provision to be 'on request from Council' would ensure that Council has the ability to request harvest plans for locations/activities of concern while avoiding an unnecessary amount of paperwork being submitted.

NZFM also submits that 20 working days notification of future harvesting activity is too long and that a 10 day notification period would be more appropriate. There are instances where market conditions and/or customer requests require harvesting operations to commence in forests with less than 20 days notice. In these instances harvest plans are still completed and the harvesting is managed as per any other harvesting operation and to the same standards and conditions. Some forests and locations will not be suitable to these situations, but some are and in these cases a 10 day notification would be preferable while meeting all the same requirements.

Relief sought:

That Council reduce the notification period from 'at least 20 working days' to 'at least 10 working days' and that the harvest plan provision is removed from the notification requirement, or amended to be provided 'on request from Council'.

Thank you for the opportunity to provide comment to Proposed Plan Change 1 – Waikato and Waipa River Catchments. If you have any questions regarding this submission, please don't hesitate to contact me.

Regards,

Jackie Egan
Environmental Planner