Juken New Zealand Ltd Submission

Development of national direction under the resource management system.

26 July 2025

Submitter

This is a submission on behalf of Juken New Zealand Ltd (JNL)

JNL

Juken New Zealand Ltd ("JNL") are a fully integrated, Japanese owned, New Zealand based and registered company with a global outreach. We have been heavily involved with the NZ forestry and wood-processing industries for over 35 years – manufacturing advanced and innovative wood products from selectively planted, managed and harvested Radiata Pine for local and export markets. In that time, we have become important economic and cultural contributors to the local communities within which we operate.

We have sustainably managed and certified plantation forests in the East Coast and Wairarapa regions of NZ's North Island. In the Wairarapa and Kaitaia areas, we have three wood processing plants where we employ over 450 people and obtain goods and services from several hundred domestic suppliers.

In an age where wood is becoming increasingly recognised and re-established as a product of choice for many structural and non-structural applications, JNL offer high quality, fit-for-purpose products to meet a range of needs. We make a wide range of engineered wood (TriBoard, LVL, Plywood, Panels) and solid wood products – for structural and non-structural purposes, for external or internal uses, and for appearance or non-appearance finishes.

JNL's forests are intensively tended, certified and managed according to the internationally-recognised environmental standards of FSC®. They provide a high quality resource to our wood processing mills, which are also certified and managed according to international standards, including FSC®, ISO 9001 and EWP certified to Australian and /or NZ Standards, by JAS-ANZ Accredited Certification Schemes, or CodeMark. Through innovative processes and skilled staff, our mills transform our harvested trees into high quality products.

JNL Submission:

1. Introduction

JNL agrees with the intent of the National Direction package particularly with the changes to the NES-CF around slash management. JNL largely agrees with the proposed changes with the exception of a few items that have been noted. Also, we would like to voice our support for the submission by the New Zealand Forest Owners Association in this process.

2. Package 1 National Hazards

1.1 Part 3.3: National Policy Statement for Natural Hazards

Question 72 Should the NPS-NH apply to all new subdivision, land use and development, and not to infrastructure and primary production?

JNL strongly supports the proposal to exclude primary production from the scope of the NPS-NH and cautions against any future attempt to extend its provisions to cover production land uses.

3. Package 2 Primary Sector

3.1. Responses to Questions in Primary Sector Discussion Document, Part 2.2: National Environmental Standards for Commercial Forestry

Question 10 Does the proposed amendment to 6(1)(a) enable management of significant risks in your region?

In principle JNL agrees with the proposed amendment to regulation 6(1)(1) and see this as a more effective mechanism to manage risk. Currently regulation 6(1)(a) is very broad and allows greater stringency to be applied for any reason that could relate to the National Policy Statement for Freshwater Management.

JNL would like to see that all 3 conditions under which a rule that is more stringent than the NES-CF can be included in a council plan must be met. The three conditions being:

a) if it is required to manage the risk of severe erosion from commercial forestry from a defined area that will have significant adverse effects on receiving environments, including the coastal environment; downstream infrastructure; or property; and

b) the effect cannot be managed through the rules in the NES-CF; and

c) there is an underlying risk within the defined area that has been identified through mapping this area at a 1:10,000 scale or using a 1 m^2 Digital Elevation Model.

Any change to a council plan should be backed by rigorous scientific evidence.

Question 13 Do you support amendments to regulations 69(5-7) to improve their workability?

Yes. JNL supports the amendments to regulations 69(5-7) and agrees the amendments will improve the workability for forest owners.

JNL is currently completing risk assessments for harvest plans in the Gisborne and Hawke's Bay districts so this change will not create additional work. A risk assessment is used to identify areas where higher levels of slash can be left which mitigates the broad scale of the ESC mapping.

Question 14 Do you support a site-specific risk-based assessment approach or a standard that sets size and/or volume dimensions for slash removal?

JNL agrees with the FOA that both options have a place in the regulations. A site-specific risk assessment creates a sensible drafting gate to determine whether slash restrictions should apply. If as a result of that assessment, it is concluded there is a high risk of slash mobilisation, then the forest owner should be able to choose between achieving the permitted activity residual slash standard in 69(5-7), or applying for a resource consent.

Question 15 Is the draft slash mobilisation risk assessment template (provided in attachment 2.2.1 to this document) suitable for identifying and managing risks on a site-specific basis?

Yes, the draft slash mobilisation risk assessment does cover appropriate criteria for use in harvest planning to assess risk. JNL agrees with the suggestions made by the FOA to tweak the criteria in the risk assessment to make them more workable for forest companies while maintaining an appropriate level of risk management.

Question 16 Should a slash mobilisation risk assessment be required for green-zoned and yellow-zoned land? If so, please explain the risks you see of slash mobilisation from the forest cutover that need to be managed in those zones?

No, JNL disagrees with implementing a slash mobilisation risk assessment for green and yellow zoned land. This is a risk that is associated with orange and red zoned lands and is often one of the key reasons this land was classified as orange or red.

Question 17 If a risk-based approach is adopted which of the two proposed options for managing high-risk sites, do you prefer (i.e., requiring resource consent or allowing the removal of slash to a certain size threshold as a condition of a permitted activity)?

JNL agrees with the FOA in that both options should be available to forest owners on a site by site basis. JNL forests extend over multiple districts and include multiple tree species so both options will allow flexibility in managing its estate.

Question 18 For the alternative option of setting prescriptive regulations for slash management, is the suggested size and/or volume threshold appropriate?

JNL supports the proposed changes to the slash size thresholds.

- 3m is a more practical length for harvesting machinery to pick up, in particular when using a hauler grapple.
- Using the SED rather than LED aligns with the standard Wagner waste assessment process.

Question 19 Do you support the proposed definition of cutover to read "cutover means the area of land that has been harvested"?

Yes JNL supports the proposed definition of cutover. The proposed definition is clearer than the current definition and better reflects the meaning of the term cutover.

Question 20 Do you support the proposed removal of the requirement to prepare afforestation and replanting plans? (Regulations 10A and 77A)

JNL supports the proposed removal of the requirement to submit replanting plans to regional councils. Removal of this requirement removes unnecessary bureaucracy.

4. Package 3 Freshwater

General comment regarding relationship with NESCF - weirs

JNL recommends that weirs also be recognised as permitted activities within the NES-CF framework similar to culverts to ensure greater consistency and regulatory efficiency. There are multiple uses for weirs within in plantation forests including but not limited to permanent water monitoring and fire dams. There is potential to use weirs for fire dams that would also have ecological benefits by providing wetland habitat.