



**New Zealand Institute of Forestry**

Te Pūtahi Ngāherehere o Aotearoa Incorporated

## **Submission on Packages 2 and 3 of the National Direction Consultation**

National direction consultation,  
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## Introductory Comments

Thank you for the opportunity to submit a response to the National Direction consultation.

If deemed appropriate, the New Zealand Institute of Forestry (NZIF) would like to express its support for its submission.

## About the Submitter

The New Zealand Institute of Forestry (NZIF) was established in 1927 and incorporated in 1929. It comprises approximately 900 individual professionals in the forestry industry. The NZIF's primary objectives are to advance the profession of forestry in New Zealand and to serve as an independent advocate for all forests and forestry interests.

The NZIF is committed to fulfilling its responsibilities within New Zealand forestry and the broader community through education, accountability, and adherence to its code of ethics and performance standards. It assumes a quality assurance role, establishing the benchmark for professionalism and the quality of advice and practice that is measured by members and other professionals in the field.

NZIF members are concerned with the professional management of all types of forests, including plantations, natural forests, urban forests, conservation areas, protection zones, and commercial forests. They are found in various organisations, such as forest-owning companies, consulting businesses, research institutes, educational institutions, government departments, and providers of specialised services.

The qualifications and areas of expertise of NZIF members reflect the diverse disciplines involved in managing all types of the New Zealand forest resource. These disciplines encompass traditional forestry degrees, as well as science, economics, law, microbiology, hydrology, engineering, and resource management.

The NZIF operates a regulated registration scheme that governs the registration and conduct of forestry professionals, whether they are consultants providing forestry advice to both public and private entities or acting in other roles.

## General Support for the Proposed Changes

NZIF generally supports the proposed changes as they reflect a more integrated, risk-based, and outcomes-focused approach to managing the interface between

forestry operations and the freshwater environment. The recognition of the diversity of forestry landscapes and operational circumstances, along with the shift to regionally responsive planning frameworks, is welcomed.

## Specific Comments

### Package 2 - NES-CF Proposed Amendments

#### **Permitted Activity Standards and Risk-Based Approach:**

The New Zealand Institute of Forests (NZIF) strongly supports the proposed transition from overly prescriptive activity-based standards to a risk-based framework that incorporates catchment-specific environmental pressures. This shift will enhance the relevance and effectiveness of controls while minimising unnecessary regulatory burdens.

NZIF supports the removal of afforestation plans for land in ESC low and medium erosion risk classes. However, it believes these plans should be retained for Orange and Red afforestation or listed geologies, with landscape scale planning is prioritised.

For replanting in orange, red, or any “listed geology” zones, NZIF advocates for a simplified replanting plan which focusses on adjustments to original planting boundaries, as outlined in the four key points mentioned above.

The objective and MPI advisory should be while the Council lacks the capacity to refuse replanting on orange zones, the plan provides an opportunity for Council land management teams and forest owners to engage constructively in determining the most effective methods to adjust the future forest for foreseeable risks. In the case of red zone afforestation, the plan would be a part of the required resource consent application in any instance.

#### **Slash Mobilisation Risk Assessment (SMRA):**

NZIF supports the introduction of a structured Slash Mobilisation Risk Assessment framework. We believe this tool provides a robust, evidence based method for evaluating risk and ensuring mitigation measures are proportionate and targeted. The proposed assessment process should reflect best practice in environmental risk management and avoids one size fits all regulations which may not be suitable in all contexts. We believe there is no justification for the risk assessment applying to low risk green and yellow zone ESC areas. We encourage the Ministry to ensure the

SMRA is operationally practical, aligns with terrain and forest type, and avoids duplication with other plan requirements.

### **Forestry Earthworks and Harvesting Provisions:**

The clearer thresholds for earthworks and better alignment with real-world practices (e.g., slope thresholds, setback requirements, sediment controls) are welcomed. Improved clarity will support both compliance and enforcement.

### **Slope and Setback Revisions:**

The revised slope classifications and setback requirements provide a more pragmatic framework which better balances environmental risk with operational feasibility.

### **Alignment with the National Planning Framework:**

We support the better integration of NES-CF with the National Planning Framework and the acknowledgment plantation forestry is a legitimate and essential land use contributing to national environmental, economic, and climate outcomes.

### **Restricting Unnecessary Council Stringency:**

NZIF strongly supports the retention of national consistency as a core principle of the NES-CF. While local context is important, we have been, and continue to be, concerned enabling regional councils to impose more stringent rules, without clear environmental justification, risks undermining national certainty, increasing compliance costs, and discouraging investment in afforestation. We welcome provisions allowing increased council stringency amended and in the future be carefully scoped, clearly justified through risk assessment, and subject to Ministerial oversight or independent review.

## **Package 3 - Freshwater Regulations**

### **Culverts and Fish Passage:**

NZIF supports the revised requirements for fish passage which incorporate better clarity and alignment with the NZ Fish Passage Guidelines. The move to require fish passage assessments at specific trigger points (rather than blanket application) is practical and risk-based. Clarifying expectations around culvert and ford design will improve compliance and consistency.

### **Wetlands:**

NZIF welcomes the proposed improvements to the definition and treatment of wetlands, which now better distinguish between constructed and natural wetlands, and between forestry infrastructure and permanent wetland features. These changes improve clarity, reduce unintended compliance risk for low-impact infrastructure (e.g. tracks and culverts), and better enable native afforestation in areas with marginal wetland characteristics.

### **Dams and Sediment Management:**

The introduction of specific controls on sediment retention structures is supported. These measures better reflect the nature of sediment dynamics during forestry operations, especially during harvesting and road construction. Recognition that small, temporary structures used in forestry differ from large-scale dams is an important distinction.

### **Biosecurity and Invasive Species:**

The proposals to manage aquatic pests, including washdown requirements and movement controls for machinery, are supported in principle. We encourage further alignment with existing biosecurity protocols used by forestry contractors and managers.

### **Farm Plans and Freshwater Farm Plan Integration:**

NZIF supports the alignment of forestry management plans with freshwater farm plans where forestry is a dominant land use on farms. This will promote integrated catchment management and consistency across land uses.

### **National Objectives Framework (NOF):**

NZIF supports the proposed refinements to the NOF, particularly the improved guidance for setting freshwater outcomes and the better recognition of land use diversity, including commercial forestry. Clearer expectations and the ability to tailor environmental objectives at a catchment level will lead to more effective and practical freshwater outcomes.

## **Treatment of Native Forests and Indigenous Afforestation**

NZIF notes the current and proposed regulatory frameworks, while improving clarity and consistency for plantation forestry, still lack adequate recognition and tailored provisions for the establishment and management of indigenous forests.

We encourage the Ministry to:

- Provide clearer regulatory pathways for the afforestation of native species, including for erosion control, carbon sequestration, and biodiversity outcomes.
- Ensure native forest establishment is not inadvertently disadvantaged by overly stringent or unclear sediment and earthworks controls which were originally designed for exotic plantation forestry.
- Recognise low-intensity native forest establishment typically carries lower sedimentation and hydrological risk compared to clearfell systems, and should be regulated accordingly.

NZIF members are increasingly involved in native forest establishment and restoration, and we would welcome the opportunity to contribute to the development of fit-for-purpose standards and planning frameworks to support this important land use.

## Conclusion

NZIF commends the Ministry for taking a thoughtful, collaborative approach to revising the freshwater and forestry regulatory frameworks. The proposed changes will help ensure forestry remains a sustainable and socially supported land use while improving environmental performance.

We welcome continued engagement and offer the technical expertise of our members to assist in implementation and guidance development.

If you have any queries, please contact the undersigned.

Yours sincerely,



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**President**

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