



# Nāti Growth

## Submission of Proposed Amendments to the National Environmental Standards for Commercial Forestry (NES-CF)

**Submitted by: Nāti Growth Limited**  
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To: Ministry for Primary Industries

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### 1. Introduction

Nāti Growth Limited (Nāti Growth) welcomes the opportunity to comment on the proposed changes to the National Environmental Standards for Commercial Forestry (NES-CF). We fully support the submission made by the New Zealand Forest Owners Association (NZFOA) and strongly endorse the positions taken by Ernslaw One Limited and Summit Forests New Zealand Limited, particularly as they relate to the regulatory challenges experienced in the Tairāwhiti/Gisborne District.

The proposed changes to the NES-CF represent a necessary and overdue course correction to ensure national consistency, regulatory workability, and alignment with the operational realities of forestry on steep and erosion-prone land.

### 2. About Nāti Growth

Nāti Growth (previously Ngāti Porou Holding Company) is the commercial investment arm of Ngāti Porou, formed as part of our iwi's Treaty of Waitangi settlement strategy. Our purpose is to grow and manage intergenerational wealth for the iwi through responsible, future-focused investments that align economic gain with environmental and cultural values.

Forestry is one of our most significant asset classes. Our estate includes commercial forests situated on Crown Forest Licensed (CFL) land across the East Coast, including within the Gisborne District. These forests play a vital role in erosion mitigation, carbon sequestration under the Emissions Trading Scheme (ETS), regional employment, and sustainable land management on terrain otherwise unsuitable for alternative land uses.

Nāti Growth is committed to high standards of environmental stewardship and works proactively with industry, iwi partners, and regulators to ensure our operations reflect best practice.

### 3. Support for the FOA, Ernslaw, and Summit Submissions

We support the NZFOA's position in full. We also strongly support Ernslaw One's and Summit Forests' submissions, which outline critical issues experienced under the current regulatory regime—particularly:

**1 Rutene Rd, Kaiti Gisborne 4010**  
**The B:Hive, 72 Taharoto Road, Takapuna, Auckland 0622**

- Gisborne District Council's (GDC) use of Regulation 6(4AA) to introduce disproportionate stringency without environmental justification or robust policy analysis;
- Delays, uncertainty, and cost escalation associated with the consenting of forestry activities, especially on Red-zoned land;
- The unworkable nature of current slash management regulations (Regulations 69(5)–(7)), particularly in steep terrain and areas like the East Coast;
- The need to establish realistic, risk-based thresholds and clear national guidance to ensure slash rules are enforceable and fair;
- GDC's inconsistent application of NES-CF rules that have created operational unpredictability and unnecessary compliance burden for commercial forest owners.

Although Nāti Growth has not directly experienced the same consenting barriers as Ernslaw or Summit, we acknowledge that many of our forests exist on similarly classified and geologically sensitive land. The experiences of other Crown Forest license holders in the region are highly relevant and reflective of structural issues within local implementation of national direction.

#### **4. Comments on Specific Regulatory Matters**

##### **a. Regulation 6 – Local Stringency**

We support the proposed removal or tightening of Regulation 6(4AA) to prevent councils like GDC from using loosely defined provisions to impose redundant, inconsistent, and often costly regulatory burdens on forestry. As Summit has noted, councils have failed to carry out the necessary policy impact assessments under section 32 of the RMA and instead introduced complexity with questionable environmental value.

##### **b. Regulations 69(5–7) – Slash Management**

We support the proposed changes to Regulations 69(5–7), particularly:

- Shifting to a risk-based assessment framework (noting risk-based management requires further definition so there is a consistent approach nationally to this concept).
- Recognising variation in erosion processes and allowing for flexibility in managing slash based on actual risk of mobilisation;
- Avoiding the current “one-size-fits-all” approach that creates unmanageable expectations for cable harvesting in orange and red zones.
- Adopting an achievable permitted activity threshold (as Ernslaw recommends, 30–40 m<sup>3</sup>/ha), rather than the current 15 m<sup>3</sup>/ha standard, which is effectively unachievable.

Summit's observations, including the inability to meet current standards even on low-risk Red-zoned sand forests, reinforce the case for immediate reform.

##### **c. Discharge Regulations (Regulation 97)**

We support the FOA and Summit recommendations to amend Regulation 97(1) to explicitly include slash alongside sediment as a permitted discharge under certain conditions. Without this clarity, some councils (including GDC) have treated slash discharges—even when compliant with Regulation 69—as requiring separate consents, further increasing compliance cost and uncertainty.

##### **d. Erosion Susceptibility Classification (ESC) Corrections**

We support the recommendation by Summit and FOA that the NES-CF includes a practical process for revising ESC mapping. Inaccurate zoning, particularly where red or orange classification is not supported by site-specific data—has introduced unnecessary barriers to otherwise low-risk activities.

#### **e. Storm Event Design Thresholds**

We support the proposal to define a clear and consistent storm return period (e.g. the 5% AEP, or 1-in-20-year storm) for regulatory purposes, including harvesting and slash management. This aligns with other parts of the NES-CF (e.g. river crossings) and avoids the unrealistic expectation that forestry must mitigate all damage from rare and extreme weather events (e.g. the 1% AEP, or 1-100 year storm), regardless of intensity or antecedent soil conditions.

#### **5. Conclusion**

Nāti Growth supports the proposed NES-CF amendments and urges officials to implement the full suite of changes recommended by NZFOA, Ernslaw One, and Summit Forests. These amendments will restore the intent of the NES-CF: to provide national consistency, reduce regulatory overreach, and support the sustainable development of the forestry sector.

We stress that forestry—especially on steep, erosion-prone whenua—remains one of the most effective long-term land uses for delivering climate, erosion control, and economic outcomes. It must be enabled by a regulatory framework that is fair, consistent, and based on science and practicality. Where well regarded experts are utilised accordingly to ensure the processes are robust and transparent.

We thank MPI for the opportunity to submit and welcome the chance to speak to this submission if hearings are held.

#### **Prepared by:**

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Health, Safety and Environmental Manager

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