

CLIMATE CHANGE: A Compendium of Submissions Received

On: Forest Sinks and the Kyoto Protocol
An Information Document



New Zealand
Climate Change
Programme

Te Hōtaka
Rerekētanga
Āhuarangi o
Aotearoa

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For general enquiries about climate change consultation,
e-mail consultation@climatechange.govt.nz
or see our website www.climatechange.govt.nz
or phone 0800 WARMING (0800 927 646)

If you want to discuss the information presented in this paper, please contact:

Roger Lincoln
Roger.lincoln@maf.govt.nz
Phone 474 4212
Ministry of Agriculture and Forestry

Mike Jebson
Mike.jebson@maf.govt.nz
Phone 498 9863
Ministry of Agriculture and Forestry

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Introduction

The information document “Forest Sinks and the Kyoto Protocol” was produced by the New Zealand Climate Change Programme and sent to approximately 500 interested stakeholders in July 2001.

The purpose of the Information Document is to raise awareness of sinks issues and to engage the forest sector before formal consultation of the Government’s policy options for climate change in October 2001.

Ten submissions were received on the document, ranging from farm forest interests to forest industry representative bodies and research and forestry consultancy organisations.¹ A list of submitters is attached as Annex 1.

This paper summarises and groups ‘like’ issues from the submissions received. It is intended as an aid for those seeking to know other submitters’ views on the Information Document.

¹ Readers should note that the submission received from the New Zealand Forest Owners’ Association is made on behalf of the New Zealand Forest Industries Council, the Federation of Maori Authorities, and the New Zealand Farm Forestry Association.

Ratification

1. “Should New Zealand prepare but not penalise itself until the United States moves?”
2. “Provisions in the Kyoto Protocol will have significant adverse impacts on the forest products industry.”

Sinks are a Temporary Answer to Climate Change Problems, Fossil Fuels are the Problem

3. “A key point not covered is that forest sinks can only ever be a temporary mitigation measure. Once all suitable land is planted or has reverted to scrub/forest, no further sinks are possible. Long before this there will probably be a societal backlash against further monocultural or even mixed forest plantings from an aesthetic perspective.”
4. “Fossil fuel use is the problem – oil should be deemed an emission as it leaves the ground.”

General Support for a Carbon Trading Scheme

5. “We generally support the creation of a carbon trading environment, but recognise that in the creation of what is effectively new property rights there could be much potential for the imposition of non-recoverable extra costs on the New Zealand forestry industry and individuals and organisations within it.”
6. “A trading system must be robust. Some of the necessary components include:

Auditing, record system, mapping, inventory, research into how much carbon is sequestered in different localities, regimes etc, modelling of the research data to provide accurate sequestration predictions, a “sludge” pool to account for errors in the above points.”
7. “We support the proposition that emissions trading be used in conjunction with emissions reductions to bring about a least cost approach to meeting this country’s commitments under the Kyoto Protocol.”

Opposition to a Carbon Trading Scheme

8. “We remain strenuously opposed to the forest carbon credit regime proposed within the Kyoto Protocol and reconfirmed at Bonn. We consider the “forest sinks” proposal outlined in your information document to be inconsistent with many of the Principles agreed to by Cabinet in respect of sink activities. Specifically we suggest:

- The proposal lacks environmental integrity and provides little positive incentive to protect and enhance existing sinks.
- It removes market incentive for efficient use of capital flows within the energy sector to reduce fossil fuel emissions.
- It has significant capacity to economically distort international competitiveness and investment in forest products.
- It precludes existing forest owners from participation on a fair and equal basis in sink accreditation schemes.
- It removes certainty and confidence from business, particularly the implication that privately acquired assets can be expropriated by the State, without compensation.
- Forest sink credits are allocated on an arbitrary and selective basis and create an unfair trade advantage to post 1990 forests.
- Expropriation without compensation of rights within forests would appear to be inconsistent with the Treaty of Waitangi and may as a consequence pose a risk of significant legal liability to the Crown.
- The public interest is favoured rather than balanced with the private interests of the forest owners.
- Forest sinks under the Kyoto Protocol lack environmental, economic, or social justification to the extent that they will delay more sustainable solutions to climate change, disrupt New Zealand's domestic and export potential, and selectively adversely impact on rural and Maori communities.”

Protection of Property Rights

9. “The property rights of landowners/forest owners in the carbon value of potential forest sinks however is uncertain in light of the contingent liability associated with harvesting and subsequent land-use change, and the intent by Government to retain a percentage of forest sink credits.
10. The contingent liability associated with the deforestation of forest sinks suggests the forest owner would incur obligations created by the permanent loss of carbon that was originally stored in the forest. Such obligations will preclude many small woodlot owners, whose efforts encompass the largest proportion of Kyoto forests, from exercising their property rights in the management of their lands.
11. We understand international concerns as to the permanence of forest sinks, but firmly oppose the violation of landowner/forest owner property rights to ensure production forest sinks exist beyond the first rotation.

12. We believe the protection of the property rights of landowners/forest owners is essential to encourage the creation and sustainable management of New Zealand's forest sinks."

Ownership of Sink Credits

13. "We believe that there are fundamental problems regarding who actually owns sequestered carbon and fairly allocating benefits and responsibilities of ownership."
14. "It would be immoral for the Government to seize a windfall gain from sink credits. Sink credits belong to the owner of the tree."
15. "The Cabinet has agreed that some proportion of the benefits from the sink credits will go to those undertaking the sink activities. Should not all the benefits go to those undertaking sink activities?"
16. "Sink credits should be returned to growers through tax credits – implying that the Government should assess the credits earned."
17. "If the Government received a portion of the benefits, it is likely to decrease the incentive for forest owners to trade their credits. It would also discourage the planting of new sinks, especially considering the costs of measuring, monitoring and reporting carbon sequestration."
18. "If the Government received a portion of the benefits it is likely to erode international perceptions of New Zealand. It is also likely to create legal inconsistencies around forest ownership and ownership of the carbon credit (given that carbon sink credits are expected to be separated from the trees or land and able to be sold or borrowed against)."
19. "If the Government received a portion of the benefits, how could it also expect to minimise the risk of legal liability to the Crown?"
20. "We are concerned that the Government will apportion some of the benefits of carbon sinks. What effect would this have on harvest – would the Government also be subject to harvesting obligations if foresters do not acquire the full credit?"
21. "We are concerned that the Government will expropriate the carbon in existing forests and devolve liabilities upon harvest. We do not support such action without compensation."
22. "The Government has in numerous statements made clear that New Zealand's greenhouse gas emitters will be held responsible for the full cost of their emissions. By this statement we understand the Government intends to make all sources of greenhouse gases responsible for emissions regardless of sink activities, thus encouraging action to reduce emissions.

23. We believe full responsibility for all sources and sinks should be allocated leaving Government with little more than a monitoring and auditing role.
24. Any intent by Government to retain a percentage of forest sink credits to cover potential national shortfalls in assigned amount will not allow forest sink owners to fully realise the economic benefit of their forest sinks. For example, retention of 15% of forest sinks credits will result in forest sink owners only realising 85% of the full economic benefit of their forest sinks. In the same way as emitters will face the full costs for their emissions, so too should forest sink owners realise the full economic benefit of their sinks.
25. We believe forest sink owners should be in a position to realise the full economic benefit of their forest sinks, and does not support any intent by Government to retain forest sink credits.”
26. “I oppose foreign ownership of New Zealand generated sink credits and in particular the right to emit upon holding sink credits.”

International Compliance Issues

27. “What recourse would New Zealand have if credits purchased internationally were not recognised?”

Carbon Methodological Issues

28. “I would like to see greater emphasis put on the difficulties of measuring and monitoring, not only for plantation forests (including how pruning and thinning are accounted for when they occur during the commitment period) but also for the more difficult measurement of carbon uptake by abandonment of marginal pastures.”
29. “Sequestered carbon is easily measured using an average basis derived from sample plots.”
30. “Aerial or satellite imagery should be sufficient by itself. The trade-off between accuracy and cost is accepted.”
31. “Annual assessment of carbon sequestered is a better way of measurement than a pre-sold rotation amount.”
32. “If credits/debits are to go to forest growers, it is important to know how much carbon is involved. This is less likely to be an issue for those claiming credits. The debit side involving deforestation to another land-use is another issue altogether.”
33. “How do you propose to estimate baseline carbon stocks so that you can determine management impacts? Does this mean that a farmer thinking about a 30 year rotation that then harvests on a price spike after 25 years, or leaves the

crop for 35 years has to lower/raise the credits available? In other words, is rotation age a key component of the 'management'?

34. "Forest mapping and record keeping will be important in measuring, monitoring and reporting forest carbon sinks, especially over the commitment period. Because forestry is of secondary importance to most farmers' main source of income, and because many will not have excellent (or verifiable) records, there looms a considerable cost to prove carbon sequestration rates on these landowners forests."

Compliance and Administrative Costs of a Carbon Trading Scheme

35. "Depending on the trading environment created, there would be administration costs associated with verification and reporting of sequestered carbon. Whether the Crown or Crown-nominated entities carry out this role needs careful consideration, with the preferred expectation that it sought solely to only cover its costs."
36. "Administrative issues introduce large cost implications for small forest owners."
37. "The likely bureaucracy and ongoing costs will outweigh the income receive from sink credits."
38. "If the Government decides to proceed with the current carbon sink and livestock tax proposals, we would request that consideration be given to methods of minimising the deadweight business costs associated with accounting for and monitoring the landuse type changes noted above."
39. "Transaction costs will hamper growers from participating in claiming credits. Land would be devalued, especially for syndicates (for retirement schemes) etc, when forests are harvested. Why take on the reporting hassles. I suggest that you identify land areas currently marginal for pastoral use. Swap with better forest land that in future could be more suitable for other uses."
40. "The impact of logging (even when subsequently replanting) requires detailed accounting to individual forest or woodlot level, and is not sensible, considering compliance costs and one-off nature of carbon gain (there is after all a maximum carbon density possible which sets the upper limit of credit that can be claimed, yet the accounting costs appear to be infinite. Suggestion - growers get no credit (best), or such a small credit (possibly all right - as long as credit is not going to be recouped). Responsibility for maintaining carbon stocks is then the responsibility of the Government entirely. The Government gets credits, and also debits. Overall, the Government, and New Zealand should be better off if land banks are available to serve as a buffer in the event of deforestation. Regeneration of indigenous forest could also play a role, if agreed. Profits to Govt would be awarded to energy use reduction schemes, improved public transport, etc."
41. "Of particular concern to landowners involved in multiple land uses are the costs associated with having to account for each land use activity separately. For example, if a landowner decided to plant trees on existing pasture land (afforest)

and increase his/her livestock intensity on the balance of the property, under the proposed climate change regime he/she would be involved in two accounting exercises with its attendant administrative and monitoring costs.”

42. “Provision should be made for accredited individuals/organisations to take responsibility for managing a collection of individually small forest lots, and reporting these as a unit of above the minimum size. This would minimise transaction costs.”
43. “Aerial or satellite imagery should be sufficient by itself. The trade-off between accuracy and cost is accepted.”

Treatment of Non-Kyoto Forests and Article 3.4 (additional sink activities)

44. “The assumption is that pre-1990 forests are carbon neutral if replanted - this may not always be the case. Carbon sequestration will change from rotation to rotation. In most cases due to genetic improvement and residual carbon in roots and waste remaining on site, a subsequent rotation will increase the net carbon sink of the forest. Any such increments should be considered for credits under Article 3.4 of the Protocol.”
45. “When new forests are established on agricultural land, livestock are permanently removed. Should methane be included as emissions under the Kyoto Protocol we believe the forester should be allocated the credit for reducing stock as a result of afforestation. This portion of credits may also be transferred to the Government so that foresters can receive the total forest generated carbon credit.”

Pre and Post 1990 Forest Distinction

46. “Restricting carbon credits to newly afforested areas will enable the owners of those forests to derive an income additional to or in place of the harvested wood value. The likely international price of carbon absorption could yield values equivalent or in excess of the harvested wood value with little or none of the costs incurred with traditional productive silviculture. A particular advantage available to “Kyoto” foresters will be the ability to derive a return for carbon stored progressively, recognising that the time cost of money makes such income a significant competitive advantage.
47. Kyoto foresters will be at a distinct competitive advantage in international forest products markets relative to non-Kyoto foresters. At some carbon price, the value of forestry will be determined by its carbon store value with traditional wood products possibly becoming a by-product.”
48. “Only recognising carbon sequestration in Kyoto forests will provide a disincentive for existing forest owners to replant on land currently used for forestry.”

Treatment of Harvested Wood Products

49. “A pre-1990 established forest sequesters carbon during the commitment period but is not eligible for carbon credits. Why does this forest attract a liability at harvest during the commitment period when carbon is not emitted? – it is converted to timber.”
50. “If the timber used remains largely as a wood product, effectively retaining its carbon sink abilities, should this not be considered in accounting/trading procedures? In that regard, it is unlikely that much of the carbon stored in New Zealand trees will be released after harvest.”
51. “How will exported biomass be treated where carbon is not re-emitted?”

Treatment of Reverting Scrub and Indigenous Forests

52. “We support the inclusion of regenerating scrubland and indigenous forest as providing tradable carbon credits.”
53. “Sinks other than forests also need consideration. Carbon sequestration also takes place under land allowed to revert to scrub, and eventually (hopefully) native forest. Should carbon trading be permissible under these circumstances?”
54. “It is probable that carbon credit and cash for allowing reversion to scrub/forest would be an extra incentive to remove land unsuitable for farming from the agricultural system.”
55. “Permanent setting aside of land should also be included under any sinks trading environment when considering managed forests. In the discussion document that is produced it is suggested that a separate section on allowing land to revert (along with its carbon credit attributes) be included.”
56. “Where is there any consideration of removing plantations (eg inaccessible, erodible sites) and replacing them with native vegetation. this is probably the best interpretation of reforestation, but appears to have been overlooked internationally, can we address this in the domestic system?”
57. “It is understood that upon the Kyoto Protocol entering into force so too will Article 3.3 of the Kyoto Protocol. The Government will then have created “forest sinks” from this country’s post-1990 production forests. It is further understood that for any forests to qualify as “forest sinks” they must first meet the definition of a “forest” under Article 3.3. In most cases the dimensional and direct human action requirements will result in production forests of exotic species of trees (predominantly pinus radiata) becoming the only qualified “forest sinks” in New Zealand.
58. This requirement under Article 3.3 fails to account for the carbon stock increase in the indigenous forestry and scrubland estate occupying a land area approximately five times that of production forests in New Zealand. Including such lands under

the definition of “forest sinks” under article 3.3 of the Kyoto Protocol should in no way impact on emitters facing the full costs of their emissions, assuming sources and sinks are addressed separately.

59. We consider the variables within Article 3.3’s definition of a “forest” should allow New Zealand to account for carbon sequestration in indigenous forestry and shrublands. Increasing the scope of forest sinks will not impact on emitters facing the full costs of their emissions.
60. Farmers have always considered biodiversity and indigenous forestry an issue of importance. Maintaining a diversity of species, ecosystems and gene pool is an integral part of achieving sustainable management of resources. Sustainable management is fundamental to the philosophy of the New Zealand farmer – their business and lifestyle requires that natural resources be sustained for the current and future generations. Including indigenous forestry and scrublands under the definition of “forest sinks” in Article 3.3 will create an incentive for landowners to sustainably manage their indigenous biodiversity.
61. We acknowledge that protecting and managing our biodiversity resource is necessary, not only environmentally, but also economically and socially. There is however a concern for the interface between biodiversity conservation and property rights as indigenous forest owners. Secure property rights are essential to achieving sustainable management of biodiversity on private land. Addressing such concerns will contribute to encouraging landowners to invest in increasing New Zealand’s forest sinks and also increase the sustainability of this country’s indigenous biodiversity.
62. Indigenous biodiversity is a resource, in its productive capacity (that is the timber value) and its conservation values (including genetic, ecological, and aesthetic values). Including indigenous forestry under the Article 3.3 definition of a “forest sink” will add to the resource capacity of New Zealand’s biodiversity estate.
63. There are 1.4 million hectares of privately owned indigenous forest in New Zealand. This is almost equivalent in area to exotic forests, which cover 1.7 million hectares. The 1.4 million hectares equate to 22 percent of all New Zealand’s indigenous forests or 5.2 percent of New Zealand’s land cover. It is a significant resource that is renewable and has potential to be a large contributor to many small rural communities if managed on a sustainable basis. The issue of permanence for forest sinks can easily be addressed in ensuring the sustainable management and harvest of indigenous forestry.
64. It is our opinion that the sustainable use of the productive capacity of indigenous biodiversity must be seen as a tool to achieve the sustainability of the conservation capacity and permanence in New Zealand’s forest sinks. Productive use and conservation can and do exist within the same area of forest.
65. Much of the indigenous biodiversity on private land is in isolated remnants. Article 3.3 relies on direct human action for forested areas to qualify as “forest sinks”. To maintain the resource requires positive management in the form of weed and pest management, fencing and restoration plantings. A key finding of

the Bio What? Report, released December 2000, is that where indigenous biodiversity remains on private land the goodwill and buy-in of the landowner is crucial to successful outcomes. Sink credits will aid in the recovery of costs for the direct human management and development of the indigenous biodiversity.

66. The sustainable harvesting of indigenous vegetation should be seen as an economic instrument to be used, both for the carbon value and timber value of the forest sink. This allows landowners to realise some of the economic value of the resource and be a means to fund the maintenance of the conservation and carbon sink values of the resource.
67. The current disincentives in regards to the sustainable harvesting of indigenous forestry also provide a disincentive to increase the total area of indigenous biodiversity and potential forest sinks in New Zealand. It is our opinion that if sustainable harvesting of indigenous forestry was encouraged or even promoted it is likely to encourage further plantings of indigenous forest sinks. The current regime acts as an incentive to displace and replace indigenous forest species with exotic species, or other land uses. Addressing the existing iniquities in landowners realising the full economic potential of their indigenous biodiversity will encourage an increase in sustainable, long-term forest sinks.”

Deforestation Pre 2008

68. “Given that Kyoto refers to activities "since 1990" and the need to consider how to account for deforestation between 1990 and 2008 (and any other time thereafter for that matter) it is very unlikely that the C involved will be known, especially for the ex-pasture blocks that may, with changing circumstances, be better under pasture. Legitimate and sensible conversion from forest to other landuses should not be penalised. Suggestion – a collection of forests, or even all plantation forest nationally, would be managed as a collection, with only a proportion of C available for sale.
69. The average C density for region be used to determine C debit in land that is deforested. Proportion for sale would be set at a suitable level aimed to buffer for possible deforestation.”

Environmentally Perverse Outcomes

70. “It is important that sustainably managed pre-1990 forests are not disadvantaged so as to make their management unsustainable.”
71. “The expropriation of carbon values in pre-1990 forests has the perverse effect of increasing the actual or nominal cost of wood by the amount of the carbon credit value. Fossil intensive wood substitutes such as steel, aluminium and concrete will derive a direct financial benefit from the use of carbon offset forestry by way of a relatively lower cost of production than if these products carried the full costs of their production including the environmental externality of climate change.

72. Note the environmentally beneficial incentive created through accurate targeting of the environmental costs of fossil fuel use. Steel, aluminium and concrete could be expected to increase in price relative to wood based alternatives. It is reasonable to presume that increasing the price differential between wood and its greenhouse gas intensive substitutes will lead to increased demand for wood and wood products and consequentially an increase in planting rates.”

Taxation

73. “If sink credits are taxable then harvesting obligations must also be tax deductible as a business expense.”
74. “Sink credits should be returned to growers through tax credits – implying that the Government should assess the credits earned.”
75. “I support a tax system that penalises the exacerbator and gives a tax credit for acceptable carbon sinks.”

Treaty of Waitangi Obligations

76. “A substantial area of New Zealand plantation forest estate is owned or under claim by Maori interests. Return of existing (pre 1990) production forest areas as partial recompense for historic grievances could be compromised if expropriation of the value of those forests by way of the mechanisms described above delayed the permanent resolution of claims under the Treaty of Waitangi. As a minimum, there should be acknowledgement that pre 1990 forest values are diminished by the value of the carbon storage liability and should be proportionately discounted in calculating the value of the return of forests in settling outstanding grievances. Recompense will be required by acquiring State forests.”
77. “The imposition of the contingent liability will impinge on the rights of Maori landowners/forest owners and potentially violate Article 2 of the Treaty of Waitangi. Article 2 of the Treaty suggests Maori are guaranteed the “full exclusive and undisturbed possession of their Lands and Estates Forests Fisheries and other properties” as subjects of the Crown. Efforts by Government to prevent Maori landowners/forest owners from exercising the rights to manage and develop their property is a clear violation of this country’s founding document.
78. Maori either own or have laid claim to a significant area of New Zealand’s plantation forest estate. The return of pre-1990 production forest areas will compromise efforts to resolve Treaty of Waitangi claims if the property rights associated with the settlement asset are compromised by the Kyoto Protocol. Pre-1990 forest assets will be devalued by the contingent liability and any returns from the harvesting of pre-1990 forests should be proportionately discounted. Claims settlement offers will require the provision of additional forests or a cash top-up to cover the shortfall in the devalued forested land.”

Landowner Education

79. “Most new forests planted since 1990 are small, privately owned, mostly farmer woodlots. Generally the larger corporate forest owners will be well aware of the implications of carbon trading. It is likely that an education programme would be required to alert these smaller woodlot owners to the obligations and opportunities which exist under the Kyoto Protocol.”

Use of Biofuels

80. “It needs to be stated that only when the biomass material from the forests (either residues after stemwood harvesting and processing or even whole trees in future) is used as an energy source to displace fossil fuels will a long term solution be found.”

Convention on Biological Diversity

81. “The Government is a signatory to the Convention on Biological Diversity, having entered into this agreement at the same time as the Framework Convention on Climate Change. Restricting forest carbon credits to protection forests may provide a means of funding the protection and restoration of forest biodiversity without distorting the existing forest industry or the relative position of wood products within it.”

Sink Credit Scenarios (pages 12-13 of Information Document)

82. “Under Scenario 1, if the forest owner receives a credit, but then has to immediately pay it back upon harvest, why would they bother?”
83. “Under scenario 1, from a carbon credits and trading point of view, doesn’t seem to have provision for an immediate replanting of the forest; which would effectively over time continue its carbon sink attributes.”

The Resource Management Act and Forest Amendment Act - Barriers to Planting and Harvesting

84. “The process of applying for a Sustainable Management Plan (SMP) or Permit is a positive process that encourages forest owners to consider all aspects of sustainable management in the spirit of the Resource Management Act (RMA) and Forest Amendment Act (FAA). The issues of costs, uncertainties and time delays however need to be addressed.
85. The processes for developing plans are extremely costly (some of our members paying in the order of \$20,000 plus) with high levels of uncertainty in regards to outcome. The criteria against which an indigenous forest is assessed, to establish whether a management plan is appropriate, can appear to an applicant ad hoc and

inconsistent. As a result a landowner is unable to establish whether a management plan is likely to be approved without actually going through the costly process.

86. Further the time and cost to obtain a plan mean that large amounts of timber must be available to make it economically viable. This both precludes many small woodlot owners from seeking SMPs, and encourages forest owners to harvest a greater amount of timber than would initially be necessary.
87. There is no clear association between the SMPs and the RMA. Whilst the FAA provides that any plan or permit is subject to the relevant planning provisions of the RMA, local authorities have not been consistent in their approach to SMPs. Some local authorities have adopted the requirements of a permitted activity under the RMA, while others require resource consent. This appears to suggest it is not clear whether a SMP fully meets the requirements of the RMA, and creates a duplication of unnecessary cost and uncertainty of outcome.
88. We believe that SMPs should be a permitted activity under local authority plans.
89. SMPs are subject to an extremely rigorous process that requires specialist knowledge. While the plan or permit is not subject to public input under the FAA it nevertheless is subject to scrutiny from DoC who may recommend areas for protection. The process must also take into account areas set aside by local authority plans for issues such as landscape, significant natural areas and riparian margins. Public input requirements create uncertainty for the SMP applicant and generate considerable financial risk for the applicant.
90. An assessment of an indigenous forest for a harvesting plan or permit should be inclusive of meeting all legislative requirements, including the RMA.
91. We advocate that MAF should continue to process, manage, audit and enforce the FAA provisions to ensure the sustainable management of indigenous forests and potential forest sinks in New Zealand. Increased staff resources and training will allow more efficient processing of applications and reduce time delays.
92. We support removing the barriers to the planting and harvesting of indigenous forestry to increase confidence for those who wish to harvest and those who have concerns regarding the protection of conservation values.”

Annex 1: List of Submitters

	NAME	ORGANISATION
1	Professor Ralph E. H. Sims	Director, Centre for Energy Research Massey University
2	PF Olsen and Company (supports NZFOA position)	Colin Maunder Environmental Manager PF Olsen and Company Ltd
3	Ted Loose	Private Submission
4	Wrightson Limited	c/o Peter Kerr Agriculture New Zealand
5	Justin Ford-Robertson	Forest Research Climate Change and Energy Programme
6	Jim Weston	Wairarapa Executive of Federated Farmers Provincial President
7	R. A. L. Anderson	Farm Forester
8	Lindsay Robertson	Senior Research Engineer Protein, Powder and Environment Technology Section New Zealand Dairy Research Institute
9	Rob MacLagan	Chief Executive New Zealand Forest Owners Association
		<i>Also made on behalf of:</i>
		New Zealand Forest Industries Council Federation of Maori Authorities New Zealand Farm Forestry Association
10	Jacob Haronga	Federated Farmers of New Zealand .