



26th July 2023

[Contact information for official redacted]

Response to Ministerial Inquiry into Land Use (MILU - Wairoa District content) Recommendations from Hawkes Bay Forestry Group

Kia Ora,

Thank you for your time to receive and review this position from the Hawkes Bay Forestry Group, in conjunction with member forestry companies.

Acknowledgement

We acknowledge the Government's commitment to working with all stakeholders in our community, including; iwi, mana whenua, land owners, Gisborne District Council and Hawkes Bay Regional Council and the forestry sector on this important inquiry, which offers some constructive potential.

We support Eastland Wood Council (EWC) in acknowledging the professional integrity demonstrated by the Inquiry Panel Members and their support staff for producing such an extensive report within the timeframe provided.

The Hawkes Bay Forestry Group and its members, are collectively meeting the challenges to the environment, community, infrastructure and forest investments, posed by this severe event.

Since the release of the MILU report 'Outrage to Optimism' we want to acknowledge the frequent contact Hawkes Bay Forestry Group (HBFG) and sector leaders have had with advisors from Ministry for Primary Industries Te Uru Rākau - New Zealand Forest Service (MPI-TUR) and Ministry for the Environment - Manatū Mō Te Taiao (MfE).

The purpose of this letter is to inform the Minister's office about some key distinctions we see applying to the Wairoa District in relation to the cyclone and the MILU Report, and the most significant changes that forestry companies are implementing to reduce the occurrence of the outcomes of Cyclone Gabrielle.

The overarching goal is to ensure that Hawkes Bay catchment areas, infrastructure, waterways and beaches are not unduly impacted by forestry activities.

The Landscape

The Wairoa District has suffered relatively little damage compared to that seen in the Gisborne District. We note that the MILU report makes the same point, and that the Wairoa district was initially not included in the MILU for this reason.

Post Gabrielle, the HB Forestry Group commissioned an independent, evidence based survey using satellite imagery, drone photography and ground surveys, based on defensible forest waste assessment methods, to distinguish woody debris species and source, and this work is continuing in the district, using aligned methodology, by SCION.

Results showed that woody debris showing evidence of harvest activity was only 4.6% of the total by volume. For context, note that fence post material from pastoral farms or orchards made up 1.8%.



The issues we face today with regards to land use in the Hawkes Bay Region and the Wairoa District are complex. Responses to this event should build on the mature relationship and science based methods that HB Forestry Group members have fostered with HBRC over the past 3 decades. Formal and collaborative environmental process improvement was first pursued at pace, between forest companies and council in Hawkes Bay in the early 1990s.

The forestry industry is an important part of the regional economy, and the community. HBFG and its member forestry companies remain committed to improving social license, locally and for the wider industry.

HB Forestry Group members have accepted the need for change, and it has been encouraging to witness members' commitments to contribute to a better future for production forestry and our community.

Coordinated removal of woody debris by industry members, has extended to multiple zones across affected Hawkes Bay floodplains and foreshore. The clean up work led by the forestry sector commenced immediately after cyclone Gabrielle and continues today, in consultation with affected land owners, HBRC and other key stakeholders.

HBFG is working in conjunction with other land users on woody debris protocols to guide future remedial work subsequent to weather events.

While the forest industry can implement a range of industry specific measures in isolation, a collaborative approach with; mana whenua, iwi, land users, local and central government, and community, will be required to implement sustainable long-term mitigation.

Industry Led Actions

There is no silver bullet that will immediately solve the issue of woody debris and sediment in Wairoa District.

However, if we are to achieve a sustainable transition that supports land use that is resilient to the increasingly severe weather, as well as achieving good community and social outcomes, then costs and losses incurred by landowners, being private, corporate and iwi, will need careful consideration and government intervention.

Distinctions relating to Wairoa District and Voluntary Actions by HB Forestry Group and members

- Member companies are reviewing the staging of harvest events through time (this practise was already underway in a number of forests prior to Gabrielle).
- Upgrading environmental activity between industry and council (The HB Forestry Group Environmental Working Group is gathering new pace around a range of projects).
- Collectively reviewing resilience of infrastructure in forests (culvert, bridge and crossing design, fish passage and protection measures, including engineered slash traps and live debris traps).
- Further local work toward mature relationships with councils, planned hosting of training events and educational visits for council staff and officials.
- New alignment of Wood Councils toward national actions in Environment and Social License.
- Existing Transition forestry PhD and Biomass energy research in HB is being elevated.
- Bringing industry education and collaboration and national initiatives to the fore in Wood Council activity.
- SCION, Interpine, Industry and MfE are working with HBFG on woody debris research and protocols around origin and makeup.
- Hawke's Bay has a pulp mill to process poorer quality logswoody debris and other material in the region, and a wood fired power facility. This plant processes forest residues, removing them from the forests and reducing risk.



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Further key signals from HB Forestry Group re Wairoa District/MILU:

- Mature, collaborative, pragmatic relationships with regulators are essential.
- Regulation and land use will require very high skill levels, for accurate advice and support of good practise from councils and government in future.
- A steady/guiding hand from government is essential re infrastructure, power and roads.
- Harvest debris lost to water was at low levels in formal surveys of HB catchments and beaches post storm.
- Woody debris that entered waterways matches the vegetation that was in the waterway catchment e.g., the Wairoa river catchment contains a high proportion of native bush, and its waterway received more native woody debris than other vegetation types. Further collaborative spatial work is underway to accurately determine sources of woody debris.
- Infrastructure design and placement, and geology, underpin our regional vulnerability, this is often regardless of land cover and tree type.
- To function effectively, industry and local and central government each require more mature relationships to progress, rather than a reactive enforcement mindset.
- Elevated capability around land use and forest environmental discipline are required within industry and agencies.
- Pragmatic, science driven decisions are required more than before, rather than hasty/inaccurate imposition or enactment of rules.
- Industry Social License impacts both regional and national economics and community wellbeing.
- On shore processing of both higher value products and waste streams as per the ITP, are required. And so a steady/guiding hand from government, is necessary, so that investment/private equity can see stable investment pathways.
- Development of specific forest environmental and forest engineering capability is an area of need given the scale of our geological challenges. Government support for Forestry Science, Forest Engineering qualifications and short courses such as Forest Engineering Institute courses would enable this.
- Infrastructure project management and design capability require upgrade to eliminate waste and loss.
- No silver bullet exists. The next storm is coming, so level headed preparedness will be needed.
- Improved infrastructure resilience is essential due to geology and weather, regardless of upstream vegetation type (all vegetation types failed into water in this event).
- Sincere analysis is needed of; people/community issues, infrastructure, and government roles.
- Accurate support from local and central government requires upgraded skills, governance and relationships.
- In Hawkes Bay, protection of floodplain assets depends on appropriate afforestation in the catchments, and production forestry needs to be recognised as a successful component of best land use.
- Hawkes Bay has key differences in geology, industry approaches and a pragmatic and operable industry relationship with HBRC as regulator.

Site Specific Risk Assessment

HBFG support the proposal that a fulsome review of land use needs to be carried out as a matter of priority. Such review also needs to incorporate the views of all land users.

This should be based on scientific fact, at appropriate resolution and with appropriate application of spatial data, geological understanding and forest ecology and life cycles.



Coupe harvest methodology

HBFG members do not support coupe and adjacency constraints without essential, nuanced attention to conditions, and pragmatism, at fine scale. This is because tree stands remaining in the ground significantly longer, would likely result in a range of unintended economic and environmental impacts.

Specifically, smaller coupes are mathematically bound to result in more wind-exposed perimeter per area of forest, which is then subject to windthrow, and resulting loss of wood and sediment to water. This would be a potentially severe perverse outcome.

Additionally, trees remaining in the ground (even marginally beyond normal rotation length) may increase the risk of wide scale slope failure on highly erodible sites due to increased total mass on slopes.

To reduce the risk of slopes eroding at scale, and for the forestry industry to remain viable, we recommend catchment constraints are NOT prescriptive, but rather are informed by 'site specific risk assessment' and detailed operational planning that reflects the unique characteristics of individual conditions within forestry blocks/estates.

Specific and Relevant Land Use Research.

The Pakuratahi Land Use Study is being repeated in Hawkes Bay, commencing in 2023. This study will compare the impacts of second rotation plantation forest, with a farmed subcatchment, and a native restoration reserve, using imagery, LIDAR, eDNA and field methodologies. This study will also provide for a wider spatial analysis of catchment pairs, and a potential study site for research and educational opportunities at primary, secondary and tertiary levels.

This study is intended to be conducted with collaboration from New Zealand Forest Owners Association, Iwi, HBRC, MPI, HB Forestry Group, MfE, SCION, and other partners yet to be determined. It will enable our wider community to collectively understand and refine land use on the East Coast of New Zealand.

Conclusion

Acknowledgement of inherent risks of the land, the essential value of tree cover to mitigate erosion, and in turn, the applicability of commercial forestry for the mitigation of risks to soil and water, are essential to achieving any effective, durable and coordinated strategy for improvement. There is work ahead.

Mitigating land use risks will require coordinated efforts with iwi, mana whenua, other landowners, Hawkes Bay Regional Council, government agencies and stakeholders.

Specific and relevant land use research is critical to all of this.

The HB Forestry Group and members are committed to collaborating with local and central government, and stakeholders, to ensure better days for production forestry, environment and community in our region. And regional prosperity, founded in better land use.

Nāku noa, nā

A handwritten signature in black ink, appearing to read "James Powrie".

James Powrie - Acting CEO - HB Forestry Group