

OPEN

MINUTE ITEM

ATTACHMENTS

**Ordinary meeting of the
Forestry Advisory Group**

**Tuesday 29 September 2020
Commencing at 3.00p.m.
Rūma Waimārama**

Floor 2A, Civic House

110 Trafalgar Street, Nelson

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VERBAL SUBMISSION – FSC Stakeholder Consultation – NCC proposed Group Certification

Thank you for the opportunity to speak to my submission on the FSC Forest Management Plan

I need to ask Sam/Kit whether P F Olsen intend to have any further face-to-face consultation with stakeholders prior to certifying the NCC forests in the Group Scheme?

I do not intend to go through my submission in detail but wish to speak to key points.

These are:

1. The relationship between Radiata, clearfelling and sediment
2. Monitoring
3. Public participation
4. High Conservation Value Forests (HCVF)

There is now a substantial amount of scientific evidence to show that the majority of sediment entering the Maitai catchment is as a result of clearfelling plantations. While NCC plantations in the Maitai are not responsible for all of this (~20%) their contribution will be significant.

This pollution of the rivers has been happening for years, if not decades and is a direct result of planting Radiata which, for economic reasons, must be clearfelled. So while clearfelling continues and harvested areas replanted in Radiata, the sediment will keep moving into the rivers. Furthermore, over 200 ha have been replanted with Radiata in the last 5 years setting the scene for even more sediment to enter the rivers over the next 20 years or so.

Section 2 of the FSC Principles and Criteria clearly states ...

“The FSC Principles are the essential rules or elements of environmentally appropriate, socially beneficial and economically viable forest management, and the Criteria provide the means of judging whether or not a Principle has been fulfilled.”

Therefore it is not possible to consider a forest that is managed in a way that results in excessive soil loss and sedimentation of waterways to be eligible for certification without a change to the business model.

In Section 3 of the FSC Principles and Criteria it is clearly stated ...

“In terms of the law, FSC intends to complement, not supplant, other initiatives that support responsible forest management worldwide. The FSC Principles and Criteria are to be used in conjunction with international, national and local laws and regulations, though they may contain provisions that are more stringent or demanding than these laws and regulations.”

The monitoring sections of the FSC Forest Management Plan have serious deficiencies and would not comply with the FSC National Standard let alone the P&C. Schedules and methodologies for monitoring aquatic habitat including Macroinvertebrate Community Index needs to set up, implemented and reported. And the same needs to be done for monitoring suspended sediment.

There needs to be a greater commitment by the Council and the FAG to provide more information to the public on this publicly owned asset and to not only allow, but encourage meaningful public input

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into the direction of the management of these forests. Very rarely has the public had such a voice. This needs to change with a commitment reflected in the Management Plan.

FSC P&C defines forests in water supply catchments as being High Conservation Value Forests. Nowhere in the management plan is this explicitly mentioned or details of management within these areas explained. Again, these issues need to be covered in the Management Plan and made public prior to certification.

A new business model is needed and, to their credit, the FAG is slowly moving in that direction. But the options are more than just Radiata or Regen native. Productive Radiata forestry does need to be phased out but productivity based on higher value exotic species and continuous canopy management could be trialled and introduced. Furthermore, exotics hardwoods can also be underplanted with native species.

There are opportunities here that reduce environmental impacts, increase amenity, biodiversity, landscape values and maintain, if not increase forestry returns. And moving the business model in this direction is certainly within the capability of P F Olsen to manage and, most importantly, is a much better fit with the P&C of FSC.

What is also clear from the submissions on this Management Plan is that over 90% of submitters want a change in the direction in the management of these forests which are, after all, their asset.

QUESTIONS?

Roger May

Tomorrow's Forests Ltd

29th September 2020