

FoM comments on NCC FSC Management Plan

The Friends of the Maitai (FoM) is a group of residents who have been actively advocating for the health of the Maitai River for the past eight years. FoM has studied the Forest Stewardship Council (FSC) National Standard for Certification of Plantation Forest Management in New Zealand. FoM's comments on the Nelson City Council (NCC) plan to get FSC certification are listed below. In developing this submission, FoM has relied on the ten principles and 55 criteria that comprise the basis of the FSC certification.

We note our thinking is also informed by numerous scientific studies and reports relating to the health of the Maitai River. The "NCC17201 Sediment source tracing report_revised 20072017" clearly shows the connection between plantation forestry activity and sediment deposits in the Maitai Catchment. There are also reports showing the connections between sediment deposits in the river and adverse effects on biota (in particular, Crowe, A and Hay J; Sept 2004, "Effects of Fine Sediment on River Biota. Cawthron Report No. 951).

The overall challenge for the NCC forests is to give a higher priority on the downstream environmental impacts of its plantation forests. The lack of a focus on sediment and its negative impact on the river and Tasman Bay means the forest management plan does not include strategies that adequately reduce the impact of plantation forestry on the Maitai River.

We see an opportunity for the NCC to demonstrate leadership and vision with its forestry asset. FoM applauded the move NCC announced last year to "retire" 20% of its plantation forestry. We await more information on how that retirement is being actioned, but we see it as a move in the right direction, namely to reduce the pine plantation and change the forestry paradigm. Additionally, FoM is cognizant of the role NCC has in regulating pine plantation harvests to ensure the health of the Maitai River is maintained.

FoM noticed the bulk of the document was prepared in May 2018. We assume some of it was updated to reflect the May 2020 date on the first 15 pages, but it does appear that some of the maps and information may be slightly dated. FoM wonders why this document is only being shared now, two years later after most of it was produced.

One of our major criticisms is the lack of clarity on the terrain. On page 8, the topography of the four areas of planting is characterized as "predominantly steep rolling hill country." The terrain is actually steep, not rolling steep. However, below it is classified, for the purposes of the Erosion Susceptibility Classification (ESC) of the NES-PF, as of "moderate" risk. Based on past experience with these areas, the ESC assessment is, at best, a wish. The erosion risk for almost all of the forestry estate is more than "moderate".

On page 17, in discussing the forest history the plan says "The initial 640 ha of forest land that was purchased by Nelson City Council was a commercial investment and a means of protecting their water supply..." Our understanding, based on the book *The Maitai: a history of the valley and its people*, is the forest land was originally a recreational amenity (reserve), not a commercial one. Commercial interests came later when key forestry interests (including PF Olsen) pushed the Council to earn money from the "non-productive" land. It is ironic that this asset was originally set-up to protect the water supply, but the harvest of these pine plantations negatively impacts the river more than any other factor.

While we understand how NCC is defining “neighbours” in terms of its management plan, FoM believes that downstream residents should also be seen as neighbours in the context of this plan as those in Maitai/East Nelson, Brook, and Marsden Valley neighbourhoods are especially affected. We feel they should be included as neighbours in the context of NCC’s FSC management plan.

On page 27 of the plan, NCC introduces the concept of Erosion Risk in light of the NES-PF. Under the Erosion Susceptibility Classification (ESC) of the NES-PF, the formerly steep hill country becomes mostly a “moderate” risk instead of the “high” risk these same hills were classified up till 2017. We believe the ESC, central to the NES-PF, is highly flawed and an unreliable indicator of Erosion Risk. As a result, the maps on pages 30-33 are not an accurate representation of the erosion risk of the NCC forest lands. New slope stability software would provide a better assessment of erosion risk.

On the subject of erosion risk, the plan is silent on the size of clear-cuts being allowed during the harvest process. Given the clear evidence now assembled that points to plantation forestry as the main source of the excessive sediment in the Maitai River, it is now imperative the Council lead the way and impose a clear-cut limit of 20 hectares at one time to reduce the impact on the river. While it’s true there is no New Zealand regulation that limits the size of clear-cuts, implementing clearcut limits will help NCC comply with FSC Principle 6 to conserve biological diversity, water quality and aquatic habitat.

On page 29, the FSC plan mentions the National Policy Statement (NPS) on Freshwater as a work in progress. The draft of the new NPS Freshwater has been released. The management plan will need to be updated to reflect the changes in the NPS Freshwater released in May.

On page 34, the Emissions Trading Scheme (ETS) is mentioned along with the fact that NCC handed back its land that was in the ETS. We understand the Council is now looking at re-engaging with the ETS. If so, this should be reflected in the plan.

Page 39 includes Table 13 presenting an environmental risk assessment matrix. There is no explanation of how the values were calculated so it’s impossible to assess their accuracy. We believe they tend to understate the environmental risks associated with plantation forestry. It also isn’t clear how these risks are addressed within the plan especially those with “high” risk designations.

Page 44 presents the age distribution of NCC forestry in Figure 4. FoM was surprised to learn that NCC has planted close to 200 hectares in Radiata Pine during the past two years and more than 300 hectares in the past five years. FoM is concerned because the past five years has yielded significant research (some commissioned by NCC) that points to Radiata Pine as a high wilding risk, the source of the major proportion of sediment now found in the Maitai and other river catchments, and now known to worsen greenhouse gas emissions after 20 years of growth. This has locked NCC into another round of highly problematic forestry with a rather low rate of return given the environmental costs (externalities).

On page 47, the FSC plan lists as one of the forest management goals to “ensure that the productivity of the land does not decline.” We are not sure how productivity is being measured, but if it is only in the number of cubic metres harvested or money earned, then it is not sufficient. FoM would like to see clarity on how productivity is being measured.

On page 48, the FSC mentions “other species”, but fails to provide any discussion of the types of other higher-value species that could be planted in the future. Here is the opportunity for NCC to demonstrate leadership and vision in planting species that can provide longer rotations, higher value, and less erosion.

Also on Page 48, the issue of wilding spread avoidance is mentioned. The link to the calculator noted in the footnote is not currently active, but the most recent wilding calculator on the MPI site (<https://www.mpi.govt.nz/dmsdocument/19124-guidelines-for-the-use-of-the-decision-support-system-calculating-wilding-spread-risk-from-new-plantings>) was visited and studied. Using this calculator, *Pinus radiata* scores 12 or higher (depending on the assumptions used) indicating the tree should be avoided and its wilding risk is high. We find this at odds with the picture presented in the management plan as a “low risk” plant. Given how much is currently being spent by governmental units on removing wilding pine, it’s clear *radiata* pine is not a low-risk plant.

On page 49, the plan introduces the topic of “retirement” and table 19 indicates 294 hectares were recommended by Landvision to be retired in 2018. Why were only 120 hectares “retired” if 294 hectares were recommended? The whole notion of retirement is one that is critical to the health of the river catchments. FoM believes that retirement from Pine is a good idea, but it may be economic to convert most of these lands to a continuous canopy management system that would plant higher value trees on longer rotations using harvesting methods that have less impact on the environment.

Table 20 on page 56 indicates a harvest schedule for six years. Since it appears to have been developed in May 2018 and given the delays in harvesting due to the Covid-19 lockdown, this schedule is out of date and will need to be updated. We assume the same is true for Tables 21 and 22 on the following pages. We assume the proposed ford replacements will have substantial invertebrate protection programs incorporated into the design and building stages. Those are referenced with bullet points on page 70, but one aspect missing is the sequestration of invertebrates present where earthworks or other disturbances are planned. We feel this is an omission and not consistent with FSC Principle 6.

The presentation on riparian setbacks begins on page 66. While the plan was written a couple of years ago, it foreshadowed the NES-PF setback minimum limit of 10m on major rivers. The FSC Management Plan goes even further and sets a 10m minimum setback on all streams across the estate. FoM supports this commitment from the Council as we now know that most of the sediment in the Maitai River comes from the smaller order streams that feed into the river.

Table 31 on page 70 is also likely to be out-of-date given more recent fish surveys we know of in the Brook stream. As noted above, we assume invertebrate protection will be incorporated in any bridge works. This should be referenced in the Management Plan.

Table 34 on page 81 purports to show a rating of positivity/negativity of plantation forestry on different environmental or social summary “products.” The basis for these ratings is not clear and appears to be highly subjective. It also rates these “products” against “the most likely alternative primary production system, pastoral dry stock farming.” FoM has a few concerns here. First, it is highly unlikely the estate

would alternatively be placed into primary production. More likely, the estate would be, as originally intended up in the Maitai, a recreational reserve. The recreational values of the asset are highlighted on the succeeding pages. Second, the historical experience with pastoral dry stock farming in the region (and elsewhere) shows the rivers of the region were much better off with the pre-plantation forestry use of the land. As a result, the values presented in the table understate the negative impact of plantation forestry on “products” such as erosion and water quality. Finally, It is not clear how the information presented in Table 34 is to be used in terms of informing the management plan’s monitoring program.

Page 86 presents a short discussion on the visual landscapes overlapping with the forestry boundaries. FoM has not seen the Catalyst report referenced in footnote 33 that apparently indicates the potential impact is “no cause for alarm.” Having not read the report makes it impossible to understand how the report reaches that conclusion. FoM believes visual landscapes are increasingly important for residents of Nelson City. It is hard to find residents who feel clear cut hills are preferable to ones with native or longer lasting cover. While plantation forestry is an existing use, its history is not that long (and it was highly contested at the time). FoM has heard from many residents who aspire to a different visual landscape than the one presented by plantation forestry.

The monitoring framework presented on pages 87-88 is incomplete and appears to have been lifted wholly from another document. While the entire document is riddled with jargon and abbreviations only a forester would know, FoM is not clear on how BOPRC (which we assume stands for Bay of Plenty Regional Council) figures into this particular framework. FoM would also like to see at least one column added to the framework showing the key values to be measured in the monitoring system. The framework should show the key figures or targets that will indicate whether the monitored indicators are being met or not. The component column attempts to provide some of this information, but more specificity is needed on how the monitored indicators will be measured.

Having said that, Appendix 9 on page 108 addresses some of the concerns noted in the above paragraph. However, the targets mentioned in the Environment column are vague (i.e “protect water”, “minimise erosion”). Sediment is the number one problem for the rivers and erosion from pine plantations is the number one contributor. The Plan has to do better in addressing this issue, especially in the monitoring regime. FoM believes the Plan should make specific reference to the standards and limits required (by law) in the NES-PF. In particular, the limits on turbidity below harvesting operations, roading works or other activities which may compromise stream health are critical to any monitoring plan.

Finally, it is notable the document makes no mention of logging trucks and logging truck traffic through the Nelson CBD. This is a major issue for residents of Nelson. For many of the NCC forestry plots, log transport options are limited. However, there are areas FoM knows of within the Maitai where alternative routes for logging trucks are available. The plan should present a discussion on the log transport issue.

FoM assumes the NCC will hold public submissions on this Management Plan. We look forward to being able to present our opinions on this Plan directly to councillors during the coming months.