

Feedback from public meetings and hui

Feedback from public meetings and hui has been grouped under the questions for submitters that were provided in the Discussion Document. These questions are listed below:

1. Do you think section 2.1 and 2.2 accurately describe the problem facing plantation forestry? Please provide comments to support your views.
2. Do you consider that the conditions for permitted activities will manage the adverse environmental effects of plantation forestry? Please provide comments to support your views.
3. Are the conditions for permitted activities clear and enforceable (see appendix 3)? Can you suggest ways of making the rules clearer and more enforceable? Please provide comments to support your views.
4. Are the matters where local authorities can retain local decision-making appropriate (summarised in Table 2 and Table 4 and provided in detail in Appendix 3)? Please provide comments to support your views.
5. Will the environmental risk assessment tools (the Erosion Susceptibility Classification, the Wilding Spread Risk Calculator, and the Fish Spawning Indicator) appropriately manage environmental effects as intended (see section 3.5)? Please provide comments to support your views.
6. Do you have any comments about any particular activity or draft rule (see appendix 3)? Please include reference to the rule you are referring to.
7. Is the NES–PF the best option to meet the assessment criteria (in Box 13)? Please provide comments to support your views.
8. Have the expected costs and benefits of the NES-PF been adequately identified (see section 4.3)? Please provide comments to support your views.
9. Are there any issues that may affect the successful implementation of the NES-PF (such as decision-makers applying the permitted baseline test more frequently)? Please provide comments to support your views.
10. Please describe any risks or opportunities that you consider have not been identified or addressed in the proposal.
11. Will the proposed NES-PF support regional councils to implement the NPS-FM (see section 6.1)? Please provide comments to support your views.
12. What resources or other implementation activities would help you to prepare for and comply with the proposed NES-PF (see section 7)? How should these activities be delivered (for example, training, online modules, guidance material)?
13. Are there any other issues that you would like to raise?

Proposed National Environmental Standard for Plantation Forestry

Hui comments

Christchurch (Riccarton Race Course Function Facility) - 27 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 2	There should be a requirement to build in bottom lines for sediment and estuaries. [Political Party Representative]
	There should be a requirement for notification of afforestation consents to affected parties for water takes/allocations. [Political Party Representative]
	Notification of domestic water takes as affected parties. [Industry]
	What standards are required for an effective harvest plan (HP) and erosion and sediment control plan (ESCP)? [Industry]
	Council officers will need to upskill in order to determine what an effective HP and ESCP is, or outsource this work. [Council]
	Good engagement required between councils and operators to work through issues if plans are deficient. [Industry]
	Do HP and ESCP include farm forestry blocks? [Interested individual]
	Permitted activity rules lead to issues arising after the event, as opposed to being assessed and managed upfront. How do parties agree/assess against “significant adverse effects”? While this may be more achievable for individual effects, how will Councils deal with cumulative effects? [Political Party Representative]
Question 3	Concern about the ability to cost recover for permitted activities [Council]
Question 4	Why only apply the SNA provisions where they are mapped? Some landowners do not like historical sites to be mapped, but they are identified to the council. SNAs are managed via relationships with landowners. The same approach is taken for outstanding landscapes. [Council]
Question 5	The fish spawning tool does not account for some marine species which spawn in fresh water. [Political Party Representative]
Question 6	Seeking clarification of the definition of plantation forestry, in particular the rationale for the 1 ha rule. [Council]

Proposed National Environmental Standard for Plantation Forestry

Public Meeting Comments

Christchurch (Riccarton Race Course Function Facility) - 27 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 2	The reliance on company produced plans to assess (and mitigate) the risks in harvesting, quarrying and earthworks has the potential for variable environmental practices and outcomes. A higher level of council oversight (stringency) should be introduced, to support more consistent processes. [Political Party Representative]
	A number of community groups have assessed the ability of the proposals to manage adverse land use activities; and they believe that the conditions lack sufficient stringency to avoid or mitigate potential effects. [Political Party Representative]
Question 3	There is currently a degree of overlap in the functions and information requirements of regional and territorial authorities. In developing the NES there needs to be a clear division of responsibility, to reduce compliance and operational costs. [Industry]
	In assessing the afforestation provisions, there is a need for conditions (in the permitted activity section) to address the on-going management of wilding spread on properties that have a score of below 11 on the calculator. All properties have a risk of spread and the absence of conditions creates an unnecessary risk, which future generations will need to manage. [Environmental NGO]
	The Canterbury region has a history of wilding spread in the high country and the costs of management have been increasing. To avoid future biosecurity costs, it is important to have clear direction on plantings, particularly those species which have caused management issues to date (such as Larch). [Council]
	In setting out the technical requirements for crossings (such as the total height of the crossing crest), it would be appropriate to explain (potentially in guidance) what the objectives of the measure are intended to achieve. [Industry / University]
Question 4	District and regional planning documents reflect in-depth community consultation and negotiation (with the aim of reflecting local views and conditions). Introducing national standards reduces this interaction and the scope for local input. There is particular concern over the proposal for the Environmental Protection Authority (EPA) to assess, and approve, the release of genetically modified tree stocks, rather than allowing individual councils to work through this issue with their communities. The proposal to give the EPA this central role needs to be examined within the wider national debate on genetic modification (and not in isolation). [Environmental NGO]

	A recent Environment Court decision [Federated Farmers of New Zealand v Northland Regional Council [12 May 2015] concluded that there is an ability under the Resource Management Act (1991) for regional councils to make provision for the control and use of GMOs in their planning documents. The proposed National Environmental Standard would shift this responsibility solely to the EPA. [Environmental NGO / Council]
	The science on tree physiology is progressing rapidly, and there will be opportunities to develop sterile stock without genetic modification. From an industry perspective, it is important to have a full toolbox of options, particularly with climate change and the risks from biosecurity incursion. [Industry]
	The ability of the Environmental Protection Agency to adequately monitor the conditions for research trials (and follow-up potential breaches) was raised as an issue. [Political Party Representative]
	Communities place a high priority on the character of their landscapes, and wish to have input on landscape management issues. The current proposals may diminish the ability of communities to have input on these issues. [Political Party Representative]
Question 5	Was consideration given to including Forest Stewardship Council (FSC) certification into the regulations, as a tool for providing third party auditing of practices. [Environmental NGO]
	Consideration needs to be given to 'whole-of-catchment' issues when examining environmental risk, rather than erosion susceptibility (e.g. loss of habitat). [Political Party Representative]
	Concerns have been raised by a number of land owners that the Erosion Susceptibility Classification has identified areas as being moderate risk when they have traditionally been seen as high risk areas. [Political Party Representative]
	The current scale of the LUC polygons was seen as being too coarse for an accurate assessment of erosion susceptibility and there was a call for the inclusion of more recent data from sources such as Lidar [remote sensing] mapping. [Political Party Representative]
	New mapping tools and approaches are being employed by the research community, and more detailed (finer resolution) data will be available over time. As this data comes on stream, there will be opportunities to update the information that underlies the Erosion Susceptibility Classification. Until then, we will continue to use the best available information, which was developed by qualified assessors in the 1970s and 80s. [Research Organisation]
Question 6	Under the earthworks and harvesting sections of the proposal is there an ability for councils to determine the method of harvesting (other than clear-felling), or the density of roading activity, in risk prone areas. [Political Party Representative]
Question 8	Forestry companies which operate in regions with lower levels of regulatory compliance are likely to see some additional costs in the short term (with a move to a national standard). Looking at the medium to

	longer term however, the benefits of increased certainty and reduced litigation are likely to outweigh these costs. [Industry]
Question 9	Clarification was sought on how councils should proceed during the transition period (between the gazetting of the regulations and the date they are implemented). This question mainly related to councils that are part way through a plan or policy statement review (or where councils are looking to develop policies on matters where they can apply greater stringency). [Council]
Question 10	Afforestation can affect, and in some cases overwhelm, ecological remnants and corridors (through pollen spread, wildings and shading). This can lead to fauna shifting (or trying to shift) their movement patterns. This type of biodiversity cost is not currently monetarised in economic assessments, which prevents a full assessment of this type of issue. A stronger effort needs to be made to assess and value these impacts. [Environmental NGO]
Question 13	Thought needs to be given to the expertise that councils will require to introduce this policy and how monitoring costs will be covered. This issue particularly relates to smaller district councils with limited financial and staff resources. [Industry]

Proposed National Environmental Standard for Plantation Forestry

Hui Comments

Gisborne (Lawson Field Theatre) - 14 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 2	Why doesn't the NES just impose harvesting controls over 25 degree slopes? [Council]
	What can councils do about sub-standard harvest plans and erosion and sediment control plans? [Council]
	Councils will not be able to charge a bond for permitted activities [Council]
	Happy with red zone classification, concerned over orange zone permitted activity status for harvesting [Council]
	Section 43 of RMA states that NES cannot permit significant environmental effects [Council]
	Both red and orange zone should be controlled [Council]
	The standard requires a better definition of indigenous forest [Interested Individual]
	How do setbacks in the coastal marine areas work? [Interested Individual]
	How can the NES manage red and orange zone land that is immediately adjoining coastal marine areas? [Interested Individual]
	NES has raised the bar for fresh water quality [Industry]
	Replanting is permitted in both orange and red zones [Interested Individual]
Question 4	Can councils protect wetlands less than 2,500 m2 from installation of culverts? [Council]
	There is no ability to be more stringent where councils have identified more significant aquatic ecosystems [Council]
	Why can't councils be more stringent on erosion matters? [Council]
	Not all Wahi Tapu sites and SNA's are mapped under the GDC plan [Council]
	Currently GDC consults with DoC on a case by case basis [Council]
	How are cultural sites of significance protected under the NES [Iwi Representative]
Question 5	Concern over orange sites – worst erosion and slash issues. Are there going to be better controls for councils to manage these issues? [Council]
	Can see a need for greater subdivision of orange zone land [Council]
	Some critically endangered fish species are not on the list [Iwi Representative]
	The national fresh water fish database is not up-to-date [Iwi Representative]
	Need to clarify the role of 'fisheries managers' [Iwi Representative]
	NIWA data shows narrow spawning window and broad shoulder seasons. In some cases fish can migrate outside of the spawning windows [Interested Individual]

Question 7	Prefers an approach for government to make national level recommendations and let local authorities manage their own regions [Industry/Farm Forestry]
	The NES provides less, rather than more, certainty [Industry/Farm Forestry]
Question 11	How does the NES and NPS-FM interface? [Council]
Question 13	Earlier NES versions had provisions for sensitive receiving environments [Council]
	There should be a provision for consultation with Iwi during the consenting process – this should be a national requirement [Interested Individual]
	How to identify slash. The NES should require the tagging or spraying of logs and slash to make it identifiable/traceable to the forest owner [Council]

Proposed National Environmental Standard for Plantation Forestry

Public Meeting Comments

Gisborne (Lawson Field Theatre) - 14 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 2	Every consent issued has required some form of changes. Permitted activity status will not allow for these issues to be identified. Conditions are loosely worded and difficult to enforce. No opportunity to change consents to pro-actively manage environmental effects. NES is reactive and only allows for enforcement [Council]
	Would an NES still require a lot of consents? [Farm Forestry]
	Section 43 of RMA requires that an NES must not allow the activity to have significant adverse effects on the environment [Council]
	NES does not address coastal receiving environments. Coastal harvesting effects cannot be managed by NPS-FM [Council]
	How will the NES account for existing baselines of sedimentation where there is national sediment discharges? [Interested Individual]
	Liabilities of slash, and what responsibility do forest companies have to insure against impacts to downstream private property and infrastructure? [Interested Individual]
	Harvest plans and rules are a raising of the bar. NZ will benefit from an NES [Interested Individual]
	Supports riparian management, especially for sediment, slash and biodiversity. Can deliver on Iwi values and assist fresh water management [Environmental Consultant]
	Riparian strips will be very important to support rare indigenous tree species and create habitat for them [Interested Individual]
	Sediment has the greatest effect on fisheries and aquatic stream life. Cyclone Bola had massive impacts on fisheries and aquatic species. Sedimentation from forestry and farming is the key matter for consideration in the NES [Interested Individual]
Question 3	There is a need for legal drafting to be written in plain English [Interested Individual]
	Vague words around events that are unforeseen [Interested Individual]
Question 4	NES could make it harder for GDC to manage slash [Council]
	Overlay 3A allows for greater stringency, can GDC be more stringent on setbacks? [Environmental NGO]
	Overlay 3A rule is perverse because it allows afforestation as a permitted activity on the worst erosion prone land in NZ [Industry]
	NES should not detract from local relationships between GDC, forest companies, and other land users [Interested Individual]
Question 5	Some of the orange zone should be included in the consenting regime. A consenting process is proactive [Council]
	Replanting: How will planting next to water ways be monitored; and how will planting crews be educated about the new set back requirements [Council]
	Replanting: Will wilding pines fill up the un-planted set-backs around riparians? [Interested Individual]
	How will 'shades of orange' be shared to the wider group/public [Council]

	12 species of fish present in Gisborne are not included in FSI list [Council]
Question 6	Harvesting: Cost of abatement on harvest crew due to deficient harvest plan is a significant incentive for forest companies as they may incur costs of \$8,000-10,000 per day to stand down a hauler crew [Industry]
	Supports GDC plan/processes, has logged 90ha and had a great experience [Industry]
	Harvesting: Red zone class 8 restricted discretionary does not include slash as a condition, but 8e RD does include slash [Council]
	Page 62. Afforestation using GE stock is permitted. The EPA is politically sensitive. Objects to purposes of EPA. Objects to removal of local decision-making on GE [Interested Individual]
Question 8	Monitoring permitted activities places a cost across the regional rate payers [Council]
	Bees pick up pine pollen. Manuka honey production is neighbouring production forest. Costs of testing, and market access are costs borne by the bee/honey industry [Interested Individual]
Question 9	Will old consents still apply if varied after the NES comes into effect? Especially if the variations are only a minor or focused change [Interested Individual]
Question 12	NES could be taught in universities [Industry]
	Parallels with Health and Safety national standard in forest industry.
Question 13	What is the best use of land that has high environmental effects and cannot/should not be planted/replanted in plantation forestry? [Interested Individual]
	Existing use rights does not allow for a change in land use [Council]
	Existing use rights only applies under District rules, not regional rules [Council]
	One month to make submissions is a small amount of time, especially considering the amount of time and cost gone into preparing the material [Interested Individual]
	Farmers require insurance to manage risk/liability of fire from farms entering forests [Industry group (Federated Farmers)]
	Civil litigation is often required to instigate an insurance process and insurance companies would be likely to challenge/defend the charges [Industry]

Proposed National Environmental Standard for Plantation Forestry

Hui Comments

Gisborne - 5 August 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 2	Is there a requirement to wash down machinery before it enters a forest to prevent weed seed from spreading?
Question 4	Wahi tapu rules in permitted zones, or unknown: Can harvest plans be shared with local Iwi to seek input on Wāhi Tapu sites? This needs to tie in with the Historic Places Act. Need to provide for accidental discovery within the NES rules, not just the Historic Places Act
Question 5	The fish spawning tool needs to also identify fish spawning grounds
Question 9	The NES needs an effective penalties regime
Question 11	Targeting guidance/information to communities of interest including iwi.
	Use NPS-FM iwi reference group to work on NES-PF as well
	Promoting catchment plans under the NPS-FM, forestry industry will participate in discussions

Proposed National Environmental Standard for Plantation Forestry

Hui Comments

Hokitika (Beachfront Hotel) - 21 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 3	Guidance is needed on how the rules would apply to lifestyle blocks [Interested Individual]
Question 9	Clarity is needed on how consents will be notified under the NES
	Greater clarity is needed on how the NES would affect existing long term consents. Would these remain in force? This is something that may require guidance [Central Government (Crown Forestry)]
Question 10	A self-monitoring option should be provided. This may remove some of the financial burden that is placed on councils as a result of permitted activity monitoring costs. This type of monitoring is currently undertaken under FSC certification [Interested Individual]
	An approved operator scheme should be implemented for those who have a good track record. Removing the requirement for harvest plans may be one way to do this [Interested Individual]

Proposed National Environmental Standard for Plantation Forestry

Public Meeting Comments

Hokitika (Beachfront Hotel) - 21 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 1	Consistency across NZ is very important. The NES will provide a consistent set of rules [Interested Individual]
Question 5	Clarity is needed on whether there is a need to apply to councils for planting of new trees and how the council will be able to approve the wilding spread risk. Council and landowners may get different results with this tool [Interested Individual]
Question 6	More consideration should be given to the GE approach. Particularly how this tool will align with the councils regional policy statement [Interested Individual]
Question 12	Will MPI be providing templates for management plans that match different scale and intensity of land use. It would be useful to see guidance on how the standard is likely to apply to small woodlot owners [Interested Individual]
	Is the proposed standard likely to have a larger impact on small forest owners. How will MPI make sure small growers know what they need to do [Interested Individual]
	6-12 month implementation window may not be long enough for councils to update process [Interested Individual]

Proposed National Environmental Standard for Plantation Forestry

Hui Comments

Invercargill (Invercargill Working Men's Club) - 28 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 2	NES will be more onerous than current rules in Southland and Otago [Industry]
	Issues with establishing trees in high altitude environments. Supports GMO content in NES for sterile trees to manage risk of wilding spread in high altitude regions [Industry]
	Rules appear to shift responsibility from the operator onto the community. Local authorities will have to monitor and address any issues from the activities [Council]
	Costs not imposed on the operator, but picked up by the local rate payer, such as the cost of permitted activity monitoring [Council]
	Where do the costs fall if permitted activities go wrong; especially if outside the boundary of the forest?
Question 6	Has MPI undertaken an analysis of costings from GMO effects? [Interested Individual]
	GMO under NES does not allow for democratic decision making processes [Council]
Question 9	How does the accountability work from central government down to local government? Concerned that councils could take a different view to how the NES is implemented [Industry]
	Will MPI be monitoring Councils implementation? [Industry]
	How will an assessment of existing plan rules be undertaken to understand if they can still be applied under the NES if a controlled or restricted discretionary consent is required? [Council]
Question 12	Can MPI provide timelines for when guidance material will be provided? MfE guidance on NPS-FM has taken longer than expected [Council]
	Who will manage any conflict as to whether a resource consent is required? [Industry/Farm Forestry]
Question 13	Why is the government focusing an NES on particular industry; is this a sign of things to come, such as an NES for Dairying [Council]
	Regional Councils are investing considerable time and resources into addressing local problems; could these processes be overridden in the future? [Council]
	The cost benefit uses a discount rate of 8%, this is not appropriate for valuing intergenerational benefits and costs [Council]
	Why not have one standard for all land uses [Interested Individual]
	Are there any legal ramifications from having MPI lead this process rather than MfE? [Interested Individual]
	NES is focused on the activity but not the issue. Sends the message that forestry is 'good' because it has an NES [Interested Individual]
	Who did MPI consult with; was there any focus on religious consultation? [Interested Individual]

	Issue with New Zealand greenhouse gas emissions and loss of forestry. Planting more forests is important for meeting our greenhouse gas emissions. These forests may need to be planted where some indigenous vegetation clearance is required. Can the NES address this? [Interested Individual]
--	--

Proposed National Environmental Standard for Plantation Forestry

Hui Comments

Kawakawa (NuFlo Centre) - 7 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 4	Roading issue and dust as a result of logging – didn't agree that this should be out of scope [Interested Individual]
Question 5	ESC doesn't take into account a changing climate, this is an oversight, it should take into account the future climate. In Northland when clay land is exposed and sediment moves down the river and into the bay, it becomes a mud pit [Interested Individual]
Question 6	<p>GMO rule - A beekeeper and honey producer – required to print GMO on labels if exporting to countries that require GMO labelling. Potential market access impacts for the entire industry. Potential impacts for this and other industries need to be assessed. What engagement has there been with the organics industry. This has been a collaborative approach, but not around the GM provision. Thinks it is deceitful that the summary document doesn't mention the GMO issue.</p> <p>Local government in Northland has an additional tier of protection around GM. The proposed GM rule will divide the Northland community, profit driven vs. longevity</p> <p>NRC Polls showed 65 – 90% support GE free in Far North / Northland? This provision – is it designed to undermine what the community has been working towards. Suspicion behind the intent of this. [Industry/Interested Individual]</p> <p>GMO rule - Retaining local decisionmaking – this will override local decisionmaking, add GM into retaining local decisionmaking [Interested Individual]</p> <p>GMO rule - View that this is part of the TPPA / connected somehow [Interested Individual]</p> <p>GMO rule - Advantage is for large companies – locals will, at best, see no difference. Seems that lots of what is in the proposal is happening anyway – unsure how the proposal is better [Interested Individual]</p>
Question 7	Agree with the concept of a national standard [Interested Individual]
Question 8	<p>Great benefit for the environment. All harvest contractors have to notify council. Currently they don't have to do this [Industry]</p> <p>Industry for bureaucracy. Groundworkers are getting jipped. Whose science is this? Maori vs. Western. As a Maori forest owners have to make money for stakeholders who are Maori and keep money in Northland e.g. through the use of local contractors [Interested Individual]</p>
Question 10	<p>Remote control by Wellington, having local knowledge cut out. Clear advantage is only for very big companies. Thinks that their views will not be taken into account [Interested Individual]</p> <p>This is about partnership – concern because currently authority is delegated to councils and this will change this. Will raise with iwi leaders group [Interested Individual]</p>

Proposed National Environmental Standard for Plantation Forestry

Public Meeting Comments

Napier (Masonic Hotel) - 8 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 2	What are the chance that forest owners will not be able to harvest a forest in the red zone in the back of the Hawke's Bay? [Interested Individual]
Question 4	What is the impact on local rules – does it replace them? [Industry Group]
	Notes that freshwater concerns are highlighted, but what about coastal pollution dumping (from wood processing) [Iwi Representative]
	What is the strength of provisions around cultural values? [Iwi Representative]
	Scope – dusty roads are a local health issue of high priority, perhaps deserves a national standard. [Interested Individual]
	Also spraying of copper on pinus radiata – why not include this in the scope of a national standard? [Interested Individual]
	If a council want more stringent rules what process do they go through, and if rules are already more stringent what will happen? [Council]
	If a plan identifies a sensitive coastal area and existing rules in place around that area, what happens? E.g. rules around 1km setback from the CMA [Council]
	How will we ensure that councils don't abuse their ability to be more stringent? [Council]
Question 5	In freshwater environments, what about marine species that spawn in freshwater? Will the fish spawning indicator apply to the whole of the life cycle, not just spawning? [Iwi Representative]
	Are wetlands in scope? Concern that it is not all wetlands. [Interested Individual]
	Can we explain the mapping standard and can it get changed? [Industry]
Question 6	GMO - Representing > 80 food producers – great interest in developing a GM free region. This involves powers under the RMA. 1. There are no provisions under HSNO to allow regions to create a GM free zone, 2. What analysis has the Ministry commissioned and undertaken regarding the implications of this provision for forestry and other sectors. In terms of earlier consultation, she knows from two parties that there had been no earlier consultation on the GM provisions – why? Basically no analysis around opportunities and costs, the impact on GM free branding. Could there be an option for greater stringency here – e.g. where councils have GM provisions in their local plans, could there be the option for councils to be more stringent? [Industry Group]
	What is the timeframe for bringing in GM trees and what are the varieties? GM presents a critical financial risk for GM free producers [Industry Group]
	What is the impact on local rules – does it replace them?
Question 10	Diversity of Land use if important for the economic consequences of a permitted activity approach – e.g. the risk of plantation forestry monocultures. Bird predation – not keen for large areas of bird habitat to develop in viticulture areas [Council]

Question 13	What happens to existing consents? [Industry]
--------------------	--

Proposed National Environmental Standard for Plantation Forestry

Hui Comments

Nelson (Tahuna Conference Centre) - 20 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 1	Forestry is not the only industry that operates across boundaries – this makes things more inconsistent in some ways. [Council]
	Forest owners welcome the standard, will assist with training and capability building. But think councils can improve. [Industry]
Question 2	Numerous reports in Auckland and Nelson, including Cawthron report relating to the maitai, identify bad forest management as contributing to sediment. [Individual]
	Protections of riparian strips are important. [Industry]
	<ul style="list-style-type: none"> Concerned about the effect of pine forests on the health of soils. Need to provide for the life-supporting capacity of soils. We need to move beyond the two alternatives of clearfell and permanent protection. [Individual]
	<ul style="list-style-type: none"> Want to see greater focus on establishing forest in appropriate areas, suitability of access etc. There needs to be a place for prohibition. Wood is an environmentally friendly product We need to refocus on the definition of “environment” which is consistent with “quadruple bottom lines. State of Environment knowledge needs to be further developed, a precautionary approach should be taken where information is inadequate. [Individual]
	<ul style="list-style-type: none"> The externalities of forestry activities need to be accounted for. Canadian riparian setbacks use the height of local native tree species. [Political Party Representative]
Question 3	Concerned about how councils will fund monitoring of permitted activities. [Individual]
Question 5	<ul style="list-style-type: none"> I am a hydrologist (previously worked for council), I was involved in LUC mapping. Maitai had been down graded in recent ESC reclassification. Charlans Creek catchment is now moderate [Individual]
	The reclassification of the ESC has been inappropriate. [Political party Representative]
	<ul style="list-style-type: none"> There is a conflict of interest in the recent ESC reclassification While it can be improved in terms of its spatial resolution, it does provide a useful tool. Soil age and digital terrain modelling should be incorporated into the ESC. [Individual]
Question 6	GMO provision – The EPA is dysfunctional. The provision should be removed, at a minimum GMO use should be discretionary. [Political Party Representative]
Question 13	Not appropriate for MPI to propose an NES, should be MfE. [Individual]
	<ul style="list-style-type: none"> Want to see more robust social science

	<ul style="list-style-type: none"> • Involvement of Iwi in local industry. Forest owning/post-settlement iwi are different – should provide for them as treaty partners. • Traffic is a big concern in this region [Individual]
	<ul style="list-style-type: none"> • Iwi are receiving land in pine forests that are not economically viable. They are looking for alternatives but it is difficult. Mixed species native is expensive to establish but then low inputs/ongoing costs. Long-term benefits for soil quality. [Iwi]

Proposed National Environmental Standard for Plantation Forestry

Public Meeting Comments

Nelson (Tahuna Conference Centre) - 20 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 1	Forestry is not the only industry that operates across boundaries – this makes things more inconsistent in some ways. [Council]
Question 2	<p>Noted concern about the following matters:</p> <ul style="list-style-type: none"> • Setbacks • SNAs (not mapped) • Wilding Risk • Erosion • Climate Change • Comparison with pasture [Environmental NGO] <p>Queries how freshwater species other than fish protected.</p>
Question 3	<p>Permitted Activity monitoring, the burden of paying for this is shifted to the ratepayer. [Environmental NGO]</p> <p>Management Plans don't have to be approved by councils, they should be. [Industry]</p>
Question 4	<p>Coastal Marine Area setbacks and the ability to be more stringent. How would this work, it is unclear.</p> <p>Restrictions relating to Water Conservation Orders (WCOs) will take precedence over an NES. [Council]</p>
Question 5	<p>Concerned that many areas of Marlborough have been downgraded from very high as a result of the latest ESC reclassification. [Individual]</p> <p>Under the ESC, undertaking activities on 90% of land would be a permitted activity. This is too far. [Industry]</p>
Question 6	<p>Our understanding of GMOs is still very basic. I want to see this standard approve the “precautionary” approach. [Individual]</p> <p>Why not treat many of these activities as controlled activities. [Individual]</p> <p>How do the rules relating to GMOs align with third party certification requirements, such as Forest Stewardship Council (FSC) which prohibit the use of GMO trees. [Individual]</p>
Question 13	What has been the involvement of eNGOs in this process? [Environmental NGO]

Proposed National Environmental Standard for Plantation Forestry

Public Meeting Comments

Palmerston North (Convention Centre) - 16 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 2	Asked about targeted funding for afforestation. Don't want to prevent treatment of erosion prone land which requires closer management. In relation to this, mentioned role of guidance and information sharing. [Individual]
	Need to match appropriate species to the site. The rules are grand parenting an inappropriate species on steep erodible land. [Farm forestry]
	Need quantitative science and analysis on species and soils matches, and adverse events. [Individual]
Question 3	Questioned why there is no provision for approved operators [Farm forestry]
	Raised concern that NES-PF will result in a reduction in funding for monitoring due to a reduction in resource consents required. [Individual]
	Questioned who will do the monitoring. [Individual]
Question 4	Questioned why use of agrichemicals is out of scope. There are inconsistencies between regions with agri-chemical rules for forestry. [Individual]
	Disappointed that NES-PF would remove more stringent setbacks negotiated in her district after years. Disappointed NES-PF removes higher local standards. [Individual]
	Timing of implementation post NES coming into force. SNA mapping process can take 1-2 years, and costs/budgets unlikely to have been set aside in LTPs. Also a possible gap in capability for consultants doing this work. [Council]
	Questioned lack of water provisions for firefighting. [Individual]
Question 5	Asked who will pay for re-classification of land if NES-PF doesn't get it right. [Individual]
	Will regional councils be able to use the fish spawning and ESC maps for other land uses? [Individual]
	Queried how to identify new fish spawning sites [Council]
Question 6	NES-PF will prevent Councils from setting their own rules on GMOs. Questioned why GMO issue was not in previous drafts of the NES-PF. Also noted that previous Court cases have ruled that councils can set own rules on GMOs. Thought that the NES proposal in relation to GMOs was a "subversive" way of countering that. [Council]
	Riparian disturbance. Are the harvesting conditions designed to require a consent for hauler harvesting across a riparian margin? All soil, slash, debris must be placed in a manner where it cannot enter waterways. [Industry]
	Need boundary setback rule to state that it applies to the horizontal setback distance. [Industry]
	Consents will impact on the difficulty and cost for targeting afforestation on erosion prone land. [Industry]
	Questioned why definition of "forest" is limited to blocks > 1ha. [Council]
	Noted need to exclude regenerating bush (previously commercial forest) from definition of plantation forestry. [Individual]

	Questioned what environmental factors were considered in developing the setbacks. [Individual]
	Discussion about definition of slope categories and calculation methods. [Individual]
	Raised the issue that re-planting a 'red zone' is a permitted activity and it shouldn't be. Radiata has been planted in areas that are unsuitable for clear felling. [Individual]
	With regard to replanting in the red zone there is a mismatch in rules between afforestation versus replanting (RD vs P). [Farm forestry]
	Second rotation reversion to indigenous, does that remain under the definition of a plantation forest, until when? [Individual]
	Requirement under the RMA for consultation. If permitted activity, is consultation still required. [Individual]
	No logging crews can survive on 1 truck load per day. Permitted river crossings may equal a bridge not culvert. [Industry]
Question 9	Although PNCC has already done it, mentioned that many other District Councils will probably find implementation challenging (e.g. identify sites of significance, mapping, etc.) due to resource constraints. NES-PF work would not have been planned for in advance. Monitoring of permitted activity conditions also an issue. [Council]
	Need to ensure Regional Councils and Territorial Authorities apply the standard consistently. [Industry]
	Some TAs are less involved in forestry, can the NES ensure those TAs become more involved? If TAs are not involved what will happen? [Industry]
Question 10	Questioned degree of involvement of TLAs in development of proposal. [Individual]
	Mentioned that Councils have spent millions over the years working with their communities to come up with land management plans and now the NES-FP trumps all that. Why are these plans and processes not considered up to standard? [Individual]
Question 12	Questioned what resources will be made available for consistent implementation/guidance. [Individual]
	Questioned whether there will be guidelines for councils for implementing monitoring of permitted activities. [Individuals]
	Need for more guidance on good landuse, afforestation in red zone, ad pastoral landuse continuing with high environmental effects. [Individual]
Question 13	Questioned what is the appeal process should he disagree with the outcome of this process? [Farm forestry]

Proposed National Environmental Standard for Plantation Forestry

Hui Comments

Rotorua (Performing Arts Centre) - 13 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 1	Supports national consistency. [Individual]
Question 2	Issues with noxious weeds. [Individual]
Question 3	Query around whether regional councils will still be implementing the NES. [Individual]
Question 4	Favours stringent protection around sensitive receiving environments. [Individual]
	Pesticide under HSNO is out of scope, but GE isn't. [Political Party Representative]
	Regarding proposal part 4. NES replaces council processes, does this mean that the NES will be centrally administered and over-ride local decision-making. [Individual]
Question 6	Which forestry companies wanted GE permitted rules? [Environmental NGO]
	Does the NES undermine EPA/ERMA? [Individual]
Question 10	There are Treaty of Waitangi issue with the NES. [Individual]
Question 13	What further consultation/engagement will occur once MPI has done its analysis of submissions? Will there be an independent review of the summary of submissions? [Individual]
	Issue with bees spreading GE pollen. Has MPI consulted with the Bee Keepers Association? [Individual]

Proposed National Environmental Standard for Plantation Forestry

Public Meeting Comments

Rotorua (Performing Arts Centre) - 13 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 1	Supports efforts to raise standards for forestry, supports environmental risk issues, and supports more national standardisation. Interface between pasture and forestry land use and approaches for optimising land need to be explored. [Individual]
	Supports the NES. It has been difficult moving contractors across boundaries. The NES will improve environmental outcomes across the country, especially in the South Island. [Industry]
Question 2	NES will prevent councils from insisting on changes in species. [Political Party Representative]
	Slash problem has not been addressed properly in NZ. Not cost effective to manage slash. [Individual]
	Need to consider the effects of the NES on afforestation. [Industry]
	International corporate influence on the development of this standard. Forests owned by overseas investors, therefore they are less concerned with NZ environmental matters. [Individual]
Question 3	Cost recovery issues aligned to consents; i.e. council time taken to deal with only a few operators, but cost recovery mechanisms are broader. [Council]
Question 6	Why are harvest plans I permitted activity status and do not need to be approved? [Council]
	NZ is signatory to international protocols. EPA will not follow that approach. Why does NES allow for GE? [Individual]
	NZ is a key stone country for allowing GE into other countries around the world. Should NZ be involved in an industry that has such opposition internationally? And how will this affect NZs image internationally. [Individual]
	Supports GE because it makes forestry more profitable. [Industry]
	EPA field trials have all had breaches of their conditions. No confidence in ERMA/EPA processes. Communities must have fall-back position on GE. [Political Party Representative]
	Did eNGO's know that the GE rules were in the standard? Opposes GE. Opposes the whole proposal. [Individual]
	Believes that the GE issue should be handled outside of the NES, as it risks derailing the NES process, which has positive benefits. [Industry]
Question 10	Environmental NGO's didn't all support this document. [Political Party Representative]
	Can this process be used to improve forestry sector health and safety practices? [Individual]
	There has been a lack of consultation with Iwi on GE. Tikanga experts are required on the panels and being involved in developing the standard. How are Maori cultural sites to be managed if they are not identified/known by local councils? [Individual]

	We have 25-30 year rotations. The NES needs to encourage long-term planning of 100 years. [Individual]
--	---

Proposed National Environmental Standard for Plantation Forestry

Public Meeting Comments

South Otago (Telford Campus, Lincoln University) - 28 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 2	The regulations will need to clearly define what are extreme climatic events (i.e. Acts of God), where best practice mitigation measures cannot be expected to retain sediment or slash. [Industry / Council]
Question 3	<p>Councils and landowners require greater certainty as to who determines the assessment score for wilding spread (under the afforestation provisions). This could be achieved by adding a permitted activity condition, which provides for notification of the proposal and the lodgement of an assessment, which the council would have the ability to review. This is needed to provide all parties with a clearer understanding of the process and to avoid concerns that scores may be tweaked to bring them within the permitted activity category. [Council]</p> <p>Greater clarity is required on who determines when an Erosion & Sediment Control Plan, Harvest Plan or Quarry Management Plan is acceptable for lodging with a council. Following on from this point, if there is an environmental issue, councils require clearer direction on how they can enforce compliance with the conditions and the Plan. [Council]</p>
Question 4	The proposal would prevent local communities from deciding on the release of genetically modified material. Communities have strong views on this issue and the recent Environment Court case in Northland backed up the ability of regional councils to make provision for the control and use of GMOs. Passing this decision making authority to the EPA was not viewed as a sufficient safeguard, as it cannot adequately account for local views and opinions. The principal concerns related to the allocation of liability and the potential for allergic reactions from genetically modified organisms. Councils should continue to manage this issue. [Primary Sector Stakeholder]
Question 5	<p>The Erosion Susceptibility Classification has a strong focus on mass movement activity, under North Island geological conditions. The geology of the South Island differs significantly, and is characterised by extensive areas of loess soils. These soils are prone to wind erosion, and the fine sediments can affect water quality. This is particularly an issue when there is minimal vegetation cover. The classification system should more fully recognise the impact of wind erosion on these soils. [Forestry Consultant]</p> <p>The region has a number of non-migratory galaxiids, which spend their entire life in the stream or river in which they are hatched. There is a concern that the new Fish Spawning Indicator will not adequately protect the habitats of these species. [Council]</p>

	<p>In applying the wilding spread risk calculator, users need greater guidance in assessing:</p> <ul style="list-style-type: none"> i. Current and future downwind land use; and ii. The regional and climatic conditions which can affect the scoring of Douglas-fir. [Council]
Question 6	<p>The proposed conditions, and consent framework, should provide companies with greater certainty in undertaking land use activities and managing the plantation crop (in comparison to the status quo). [Industry]</p>
	<p>The conditions need to emphasise that the onus remains on the forest owner to mitigate or prevent sediment loss from land use activities, and that consents will only be given if the companies can demonstrate that their practices will meet the national standards. [Council]</p>
	<p>In hill country areas, a large proportion of waterways are ephemeral, and would be excluded from the setback provisions. Ephemeral waterways with active stream beds can generate significant volumes of sediment. It is inappropriate to plant on these active beds and a setback could intercept a proportion of this sediment. [Council]</p>
	<p>The inclusion of ephemeral streams in the conditions would need to be carefully assessed, particularly the implications for operational practices. [Industry]</p>
	<p>Proposals for further regulatory change need to be consistent across land use activities. Sectors should not face different conditions when they are addressing similar environmental effects. [Industry]</p>
	<p>The proposals are focused on the management of risk, whereas council plans tend to be directed more at the mitigation of effects. This would be a significant change of focus. [Council]</p>
Question 10	<p>While there are potentially benefits in introducing standard, national practices, there can also be a loss of flexibility, in terms of the tools that councils and communities can employ for managing environmental issues. With local flexibility there is potential for early interventions rather than having to have 'the ambulance at the bottom of the cliff'. [Primary Sector Stakeholder]</p>
	<p>The proposals incentivise companies and landowners to assess environmental issues at the commencement of the work, and to prepare detailed plans for the major land use activities associated with forestry management. Rather than taking control away from councils, it introduces a new preliminary step to assessing land use practices. [Industry]</p>
	<p>The characteristics of forestry production differ from other land uses, with the extended production horizons (30 to 60 years) and the geographical scale of large, plantation plantings. Having forestry specific regulations and conditions provides a degree of certainty that does not currently exist in council plans and strategies. [Industry]</p>

Question 12	<p>The introduction of Harvest, Quarry and Sediment Control Plans introduces a new assessment phase. Councils will need to review the Plans and investigate whether the management practices will meet the permitted conditions. This potentially transfers some liability across to councils, particularly as there is no clear sign off or approval point. This process will require additional council resources to undertake the assessments.</p> <p>[Council]</p>
Question 13	<p>As the NES is a major step change in how plantation forestry is managed across New Zealand, will there be a review process after a certain number of years (to consider its progress and where further amendment may be necessary).</p>
	<p>With the introduction of Harvest and Sediment Control Plans councils will, for the first time, know where all harvesting is occurring. [Industry]</p>

Proposed National Environmental Standard for Plantation Forestry

Public Meeting Comments

Wellington (Pastoral House) - 6 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 1	When submitting on the NES people should be clear that the aim of the NES is to provide consistency, not increase the level of environmental regulation. Equally MPI need to take this into account as submissions are analysed, the NES should not result in a large increase in environmental regulation. [Individual]
Question 2	Under climate change there is likely to be a higher frequency of high intensity rainfall events. What precautions are being taken through the MPI to mitigate the added risk of erosion and sedimentation from this. This should be considered at time of afforestation. [Political Party Representative]
	There is room in the NES to think about sediment differently. GW have used good sediment plans for the meridian wind farm. These plans be used as a starting point. [Individual]
Question 3	Greater clarity is needed around the interpretation of rules. As written, the rules are ambiguously worded and will potentially lead to litigation. [Council]
	The costs of monitoring permitted activities will be high for some councils. This is something that MPI needs to be aware of and have solutions for. The cost of monitoring activities shouldn't be absorbed by rate payers. [Council]
	The process that councils must follow under s44a(3) of the act to amend plans to reflect the NES is unclear. Councils will need guidance on this before the NES comes into force. [Council]
Question 4	The landscape stringency bar for this NES is higher than the bar for the Telecommunications NES. These should be aligned to make councils' jobs of implementation simpler. [Council]
	There are large areas of land in Kapiti that are mapped as SNA. This means council will be able to be more stringent than the NES in large parts of their district. This will likely have a large impact on foresters in the area. [Individual]
	The NES is meant to be about clarity and certainty. There are a whole lot of areas where councils can be more stringent, and this may undermine the consistency approach. [Individual]
	Agrichemical use should be within scope. [Individual]
	Forests provide a range of services including improved water quality over most of the 30 year growth cycle. How have MPI made a judgement call that forestry services are less important than freshwater quality, allowing stringency for freshwater will impose an unfair cost of foresters. [Individual]
Question 5	The resolution of the ESC will still allow activities to be undertaken as permitted where a high risk of erosion and slope failure is present. MPI should look to update mapping across the country before the standard is gazetted to better reflect actual erosion risk. Not updating the ESC may leave the standard open for judicial review as it is likely to allow an activity which has a high risk of adverse environmental effect to occur as permitted. [Political Party Representative]
	The update process for the ESC isn't clear. Specifically the costs of applying to have land updated. [Council]
	The fish spawning indicator doesn't recognise marine species that spawn in freshwater. [Individual]

<p>Question 6</p>	<p>The summary consultation document does not accurately summarise/reflect the full consultation document. MPI have attempted to hide the GE provisions and are therefore not undertaking meaningful consultation on the issue.</p> <p>GE Free NZ terms have not been met. We have previously asked for the HSNO and RMA to be changed. This NES changes legislation and will prevent communities from protecting local ecosystems and economies. This impacts on councils abilities to take account of local community livelihood when making plans.</p> <p>If HSNO assessment says there is no threat to communities from GMOs, communities still want to be able to place rules that prohibit the use of GMOs.</p> <p>Why is MPI changing legislation through regulation?</p> <p>The standard contradicts FSC standards that prohibit the use of GM organisms.</p> <p>Does the NES change RMA legislation. Prohibition through plans is a stronger position so the NES shouldn't be able to change this. [Environmental NGO]</p>
	<p>Requiring 3rd party approval for boundary setbacks and for notice of commencement may be ultra vires. MPI should look into this further. [Council]</p>
	<p>Where did the idea of GM trees come from?</p> <p>Pure Hawkes bay relies on GE free status and this will cut across their ability to regulate industry.</p> <p>EPA processes for approval have let communities down in the past. The NES (and EPA process) meets the requests of industry at the expense of communities and environmental outcomes. The NES should be a bottom line that allows councils and communities to set higher rule in addition. [Political Party Representative]</p>
	<p>Larger culverts are expensive and this is a larger burden for small growers than it will be for farm foresters. [Individual]</p>
	<p>Requiring larger culverts may in small ephemeral watercourses may end up having a larger environmental impact than the risk of small culvert blow out. For a large culvert a bigger trench is required. [Individual]</p>

Proposed National Environmental Standard for Plantation Forestry

Public Meeting Comments

Whangarei (Forum North) - 7 July 2015

Feedback has been grouped under the questions listed in the Discussion Document.

Question #	Comment
Question 1	Thinks the 'unwarranted' variation between local rules is not unwarranted – what is unwarranted about community concerns? [Individual]
	The consistency of rules across council boundaries is only relevant for large operations, who should be able to manage that. [Individual]
	<p>The proposal seems to be good for corporate foresters and gives an advantage to commercial interests and is bad for locals. Why can't forestry companies cope with two councils' rules? That doesn't seem to justify all of this.</p> <p>Areas are classified differently but then one national set of rules is laid over the top, taking out local decision making.</p> <p>Questions if it will be dairy farming next as lots of the activities in the proposed NES apply to dairy farming too.</p> <p>Has lost trust in MPI especially lately with kauri log extraction in Northland. Local authorities being undermined. What makes the variation 'unwarranted'? Environmental factors can be specific [to a region] and there are many more factors than have been mentioned in the proposal.</p> <p>[Interested Individual]</p>
Question 2	<p>Question on the shift to more permissive zoning – will people with water takes be notified of forestry consent applications? It is unfair if neighbouring people's water supplies are loaded with sedimentation without them being consulted with. Wants to ensure that forestry consents are notified so public can be engaged. [Political Party Representative]</p>
	<p>He is not up to speed with the language of this consultation or the technical terms – it shouldn't be so difficult to discern where one stands on the issue.</p> <p>Hapu at Whangaruru had objections to afforestation of their land but were convinced they'd be financially better off, which is not the case now. He wasn't allowed to set up a marine farm because of the hazard of sediment from forestry.</p> <p>Concerned by GE trees personally, and Maori and iwi generally agree. However it is premature for hapu to say they support the proposal. They need to do some homework but aren't scientists or lawyers.</p> <p>Unconvinced by consultation – are the public really taken into account? Previously argued at the Environment Court about land degradation. Believes land lives and breathes and GE is close to tampering with the heartbeat of nature. Philosophical ideas are close to their hearts.</p> <p>Concerned about what he is hearing – will take it back to the hapu for robust debate. [Interested Individual]</p>
	<p>Marine species also affected by sediment (MPI has its own research showing effect of sediment on estuaries) but no mention of this in proposal. Marine habitats need to be treated with the same importance as freshwater habitats. Wants to improve habitats not keep status quo. NPS-FM process dominated by industry (economically productive sectors). [Political Party Representative]</p>

Question 4	Queries how the NES would take into account rivers of significance in Northland that the council identifies, and how it would take catchment management plans into account. [Interested Individual]
	Coordinates a local landcare group. Landcare groups have been participating in hui with MfE who have send NES are baselines and would encourage councils to exceed these based on local values. Strange that MPI are leading this and undermining local councils. [Interested Individual/Environmental NGO]
Question 5	How can you justify more than 1 million hectares coming out of the high risk erosion category (since 2011) to make it more permissive for big companies (predominantly overseas companies)? It will be absolutely permissive unless MPI/MfE go back and do it properly. The classification will only be changed if the applicant request a review, which means that classifications are only likely to change to make it more permissive. [Political Party Representative]
	Questions from members of NZFFA: <ul style="list-style-type: none"> - Why is LRI used to produce the erosion classification at property level when it doesn't have high enough resolution? - The changes to the erosion susceptibility map between 2011 and 2015 mean that it now doesn't seem like a good representation – what other methods are there that could be used / what further work is being done? - You differentiate between slopes of over 25° and under 25°, so why doesn't the map show that? [Farm Forestry]
	If there is an issue with land classification, what's the process to get it changed? [Farm Forestry]
Question 6	He spoke about the moratorium on GM, and the regional council's consultation with the public, to which he contributed. At the time 90% of New Zealander's wanted to keep the moratorium. Most people's concern is containing GM risk – the concerns are environmental ('jumping the fence') and economic (losing GE free status). Is the GM rule in the summary document? (He was alerted to this rule by someone but didn't see it in the summary document) The fact that the environmental risk assessments haven't mentioned GE once is ignorant, shameful, and disrespectful [Interested Individual]
	Clarification sought about whether the NES replaces existing council provisions [Interested Individual]
	Disagrees with what is being presented (particularly in relation to GE) [Interested Individual]
	Appalled they would mislead the public about overriding council views. Proposal driven by National Party's nefarious agenda. The 11 th hour GE proposals override councils and force them to remove their good rules. Disingenuous to say that GE experiments need to be approved by EPA as there are deficiencies in the HSNO Act. [Interested Individual]
	Anything to do with GE can't be excluded from the powers of local government. Science around GE is in its infancy. Government playing Russian roulette with GE organisations. Experiments should be in closed laboratory conditions only, not in open, as we don't know the consequences and you can't get GE organisms back once they are out. Huge quantities of Round Up in the environment due to spraying, now there are fewer bees. Why were the people the last to be consulted? The government doesn't even know, or care, that we exist. GE is included because of profits and external pressure. Why is the government pushing GE? Wants an explanation. Land for agriculture in short supply. [Interested Individual]

	<p>Has MPI sought legal advice from Crown Law as to whether GMO provisions are ultra vires? Seems to be a legislative change by regulation rather than Parliament. [Council]</p> <p>People can still get FSC certification. Is MPI working with MfE on HSNO standards in relation to the potential for contamination from GE blocks? 2001 Royal Commission found in their favour. [Interested Individual]</p> <p>With GMO provisions, would you allow councils to retain wording in Regional Policy Statements on GMO (“of significantly concern” in Northland plan) but have the rule of GE trees being allowed as an addition? Does this replace District Plan rules? [Interested Individual]</p> <p>Made a point about the excellent prohibitive local rules on GE. [Interested Individual]</p> <p>A 20m riparian strip would be an easy solution. There is more work (on freshwater) that hasn’t been done than has been done. Concerned about the methodology – it is too generic, each waterway needs to be assessed separately. [Interested Individual]</p>
Question 10	<p>She was offended by how Forest & Bird were represented in the presentation. It is wrong that the organisation as a whole supports the proposal. Kevin Hackwell is disappointed that this is happening (especially GE trees). She would like the reference to Forest & Bird to be removed for the next presentation. She also asked if the Wellington presentation was the same as the Whangarei presentation, and if the Kawakawa one would be the same also. [Environmental NGO]</p> <p>The presentation made it sound like Forest and Bird supports the proposal. Also noted that the NZ Farm Forestry Association were excluded from the working group – corporate forest owners were included only. Good work has been done and he doesn’t disagree with 99% of the proposal. Thought it was sad that only the GE issue focussed on. Asked when the GE rule was added. Noted it was not discussed in roadshows. [Farm Forestry]</p> <p>Once consultation has been done, the Ministers will be informed and make the decisions. What if the public don’t like the final decision? Can it be taken to the Environment Court? [Interested Individual]</p> <p>Asked the following questions:</p> <ul style="list-style-type: none"> • Which Parliament is making this decision? • Why is the Treaty of Waitangi not mentioned? • Why are Ministers not present at the hui? [Interested Individual]
	<p>On behalf of the members of Forest & Bird Northern branch, opposes the proposal and believe the consultation is unsuccessful. Wants a round table as the proposal is serious. Are disappointed with the process and the time limit – we haven’t had time to absorb the information. [Environmental NGO]</p>
	<p>Government need to be respectful of our lives, not just big industry. Wellington is all about big business. Should be a co-operative. Her property was put in a mining zone with no consultation. Where was the EPA then? So can’t trust them now. Industry standards: can understand need for safety but we (and our livelihoods) are being ignored. Local council was working collaboratively with them which was good. [Interested Individual]</p>