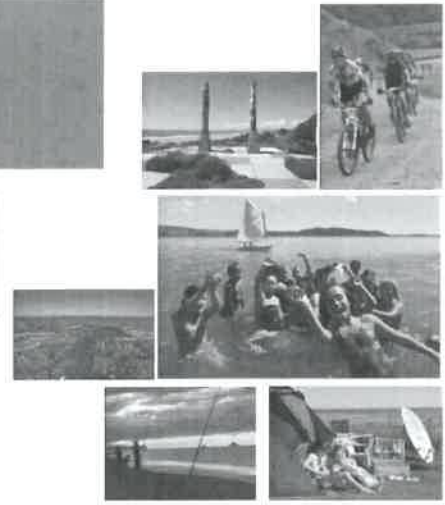


Proposed Ōpōtiki District Plan
Submission Form

SUBMISSIONS MUST BE RECEIVED NO LATER THAN
 4pm, Monday 18 November 2016



SUBMITTER DETAILS:

NAME: Steve Chandler

ORGANISATION: (if appropriate) Rayonier Matariki Forests

POSTAL ADDRESS: 200 King St Rangiora. P.O Box 745 DAYTIME PH: _____

EMAIL: steve.chandler@rayonier.com MOBILE PH: 0274 635 119

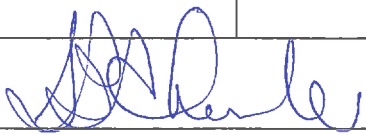
MY SUBMISSION:

Provision Number*	Provision Title	State whether you SUPPORT or OPPOSE the Provision	Relief sought (Specify the amendments you wish to be made to the Provision).	Reasons:
	Refer attached submission			

* Specify the Objective, Policy, Rule, Other method, or Map Number your submission relates to.
 If more space required please attach additional paper with your name and contact details on each sheet.

SEND YOUR SUBMISSION FORM TO:

The Chief Executive Ōpōtiki District Council PO Box 44 ŌPŌTIKI 3162	Physically deliver to Council offices: 108 St John Street, Ōpōtiki	email to: Districtplan@odc.govt.nz
		fax to: 07 315 7050

Signature  Date 16/11/2016

Person making the submission or authorised to sign on behalf of an organisation making the submission. (A signature is not required if submitting by electronic means).

Privacy Act 1993: Please be aware that submissions form part of the public consultation process and as such will be reproduced as an attachment to a publicly available Council agenda and remain on Council minute records.

Thank you for taking the time to provide your comments



17/11/ 2016

The Chief Executive
Opotiki District Council
PO Box 44
Opotiki 3162

Dear Sir/Madam

Opotiki Proposed District Plan Review – Submission by Rayonier Matariki Forests Limited.

Thank you for providing Rayonier Matariki Forests New Zealand Ltd (Rayonier) the opportunity to submit on the Proposed Opotiki District Plan review (ODP).

By way of background information, Rayonier is a wholly owned subsidiary of US based corporation Rayonier Inc. Matariki Forests (Matariki) is a joint venture company owned by Rayonier Inc and Phaunos Group. Rayonier New Zealand manages 173,000 hectares of plantation forest (128,000 hectares stocked) in New Zealand for Matariki. Matariki is New Zealand's third largest forestry company by area and currently operates in most regions of New Zealand. On a day to day basis Matariki manages the planning rules of 10 regional and 26 district councils. All of Matariki's forests are managed under the Forest Stewardship Council™ (FSC™) certification.

FSC is an international not for-profit, multi-stakeholder organization established in 1993 to promote responsible management of the world's forests. FSC promotes environmentally appropriate, socially beneficial and economically viable management of the world's forests.

Rayonier are the owners and or managers of 4,700 hectares of land in the Opotiki District, of which approximately half of that area is classed as productive forested land.

Please refer to our submission points attached to this letter for the detail of Rayonier's submission on the ODP.

Rayonier would like to be heard in regards to this submission.

Yours Sincerely



Steve Chandler
Environmental Manager
Rayonier Matariki Forests

Submitter: Rayonier Matariki Forests (Rayonier)

Contact: steve.chandler@rayonier.com)

Contact Person/ Steve Chandler Ph. 0274 635 119

Address For

Service: Rayonier Matariki Forests

200 King Street

Rangiora 7400

Trade Competition: Rayonier could not gain an advantage in trade competition through this submission.

Hearing: Rayonier does wish to be heard in support of its submission and is prepared to consider presenting their submission in a joint case with others making a similar submission at any hearing.

Our Submission

Provision Number: Whole of Plan

Provision Title: *References to 'forestry, plantation forestry', and production forestry.'*

Support/Oppose: Oppose

Relief Sought: Amend the PDP to ensure that all references to forestry and primary production related activities are consistent and relate to terms that are defined. Specific terms that should be included are 'plantation forestry', and 'ancillary forestry earthworks'. Production forestry should be replaced by 'plantation forestry' (suggested definitions for these are contained in the submission)

Reasons: The PDP currently uses various terms to refer to forestry related activities. To provide consistency and certainty for plan users, all references to 'plantation forestry', 'forestry' and 'production forestry' should be consistent throughout the PDP. (Note, submission points below request specific changes to existing definitions and terms and the inclusion of new definitions where it is considered these are required).

Provision Number: Chapter 1 Introduction

Provision Title: Section 1.16.2 (x) ...*harvesting plan to be submitted to council no less than 5 years prior to date of harvesting commencement.*

Support/Oppose: Oppose

Relief Sought: Align harvest plan notification to the proposed NES for plantation forestry which is 20 working day minimum notification for harvest plans or annually upon agreement.

Reasons: A harvest plan prepared 5years ahead of operational commencement has a high certainty of being out of date due to changes in harvesting technology, crew availability, or market requirements. The new NES for plantation forestry which is expected to be legislated in 2017 proposes a 20 working day minimum notification

for harvest plans or annually upon agreement, this will, when enacted, be the required time frame.

Provision Number: **Chapter 8 Rural Zone.**

Provision Title: Rule 8.3.1.1 *Production Forestry is a permitted activity.*

Support/Oppose: Support

Relief Sought: Retain as notified. Note there is an error in the first sentence of 8.3.1.1 as it states the following activities are permitted in the industrial zone, but this is the rural zone chapter.

Reasons: This is particularly important from Rayonier's perspective as this rule identifies the need to provide for primary production activities to be carried out in an efficient and effective manner. In Rayonier's view this should mean existing primary production activities can continue to operate without the need for unnecessary regulation.

Provision Number: **Chapter 9 Coastal Zone – 9.3.5 Discretionary Activities**

Provision Title: Rule 9.3.5.1.15 reads: *Production Forestry except the replanting within one calendar year of harvesting a forest existing at the time of notification of the District.*

Support/Oppose: Oppose

Relief Sought: Allow production forestry as a permitted activity with a minimum of 2 years for replanting following harvest completion

Reasons: This policy allows farming as a permitted activity in the coastal zone but places restrictions on production forestry with no stated rationale as to why this restriction is required.

Placing a one year time frame on replanting of existing forests can lead to substandard tree seedling re-establishment and consequently reduced economic returns, as often a period of up to 2 years is required to effect good weed control prior to replanting. This period is required for land preparation which is an essential part of the production forestry cycle.

Provision Number: **Chapter 13 Landscapes and vegetation.**

Provision Title: Policy 13.2.1.3

Support/Oppose: Support

Relief Sought: Retain as notified

Reasons: This is particularly important from Rayonier's perspective as this Policy identifies the need to provide for existing rural production activities. In Rayonier's view this should mean existing rural production activities can continue to operate without the need for unnecessary regulation.

Provision Number: **Chapter 13 Landscapes and vegetation.**

Provision Title: Rule 13.3.2.1.1 Permitted Activities - *Existing rural production activities including production forestry.*

Support/Oppose: Support in Part

Relief Sought: Amend as follows:

1. Within sites listed in 13.9.1 and 13.9.2 existing rural production activities including production forestry.

Reasons: This is particularly important from Rayonier's perspective as this rule identifies the need to provide for primary production activities to be carried out in an efficient and effective manner. In Rayonier's view this should mean existing primary production activities can continue to operate without the need for unnecessary regulation.

Provision Number: **Chapter 13 Landscapes and vegetation.**

Provision Title: Rule 13.3.2.1.7(d) Permitted Activities – *Indigenous vegetation clearance... under existing production forest.*

Support/Oppose: Support in Part

Relief Sought: Amend sub-section (d) as follows:

(d) It is indigenous vegetation under or on the edges of an existing production forest, including skid sites.

Reasons: This suggested change takes into account the occasional damage caused to indigenous vegetation that occurs at the edges of the production forest. Occasionally trees are required to be felled into adjacent vegetation to ensure a safe working environment. This damage is considered to be relatively minor in terms of its ecological effects, however, it has major benefits in terms of worker health and safety.

Provision Number: **Chapter 13 Landscapes and vegetation.**

Provision Title: Rule 13.3.4.1.6 Discretionary activities.

Support/Oppose: Oppose

Relief Sought: Existing production forestry (along with associated ancillary earthworks) located within sites listed in 13.9.1 or 13.9.2 should be a permitted activity to enable economic certainty for the forest investor.

Reasons: Discretionary activity status for existing production forests creates economic uncertainty for the land manager, a tree crop that has been established should not

be treated any differently to an agricultural crop in relation to controls which are exercised for the outstanding natural landscape sites.

Provision Number: **Chapter 19 Definitions**

Provision Title: Production Forestry Definition.

Support/Oppose: Support in part.

Relief Sought: Replace production forestry definition with plantation forestry definition and include a definition for ancillary forestry earthworks.

Reasons: The current definition of Production forestry reads as follows:

'means the activities that are undertaken for the purposes of managing planted production forestry for the production of a wide range of timber and other products, and included planting, silviculture and harvesting.'

Rayonier are concerned that this definition is too restrictive and does not take into account all the activities associated with a forest.

Rayonier considers that the term Production forestry should be replaced with the term Plantation Forestry which encompasses the following activities.

Plantation forestry means growing trees to produce timber, or where the land cover is principally timber tree species and Includes:

- accessory land preparation
- accessory tracking or roads, landings, or other ancillary forestry earthworks
- clearing understorey
- harvesting trees
- planting trees
- tree alteration
- replanting trees
- thinning trees
- accessory vegetation removal
- thinning trees
- accessory vegetation removal.

This definition provides consistency and certainty for plan users and makes it clear that ancillary forestry earthworks are included as part of forestry operational activities. This will also ensure that the terminology is consistent with the NES – Plantation Forestry when it is endorsed.

Suggested definition for ancillary forestry earthworks covers the following activities:

ANCILLARY FORESTRY EARTHWORKS means land disturbance associated with:

- land preparation for the establishment, planting and growing operations and harvesting of forestry; and (including establishment of erosion and sediment control measures),
- construction and maintenance of infrastructure typically associated with forestry activities including but not limited to tracks, roads and landings, and related erosion and sediment control measures.

Provision Number: **Chapter 19 Definitions**

Provision Title: Disturbance in relation to vegetation Definition.

Support/Oppose: Support in part.

Relief Sought: Amend as follows:

6. The removal of indigenous vegetation beneath **or on the edges** of a production forest

Reasons: This suggested change takes into account the occasional damage caused to indigenous vegetation that occurs at the edges of the production forest. Occasionally trees are required to be felled into adjacent vegetation to ensure a safe working environment. This damage is considered to be relatively minor in terms of its ecological effects, however, it has major benefits in terms of worker health and safety.