

# HURUNUI DISTRICT COUNCIL

P.O. Box 13 | Amberley | 7441 | 66 Carters Road | Amberley | 7410  
Phone 03 314-8816 | Fax 03 314-9181 | Email [info@hurunui.govt.nz](mailto:info@hurunui.govt.nz)  
Web [hurunui.govt.nz](http://hurunui.govt.nz) | [facebook.com/HurunuiDistrictCouncil](https://facebook.com/HurunuiDistrictCouncil)  
Skype [hdc\\_customer\\_services](https://skype.com/hdc_customer_services) | [twitter.com/hurunuidc](https://twitter.com/hurunuidc)



18 November 2022

Forestry and Bioeconomy Policy  
Ministry for Primary Industries  
PO Box 2526  
Wellington 6140

By email: [mpi.forestry@mpi.govt.nz](mailto:mpi.forestry@mpi.govt.nz)

## **Hurunui District Council's submission on the National direction for plantation and exotic carbon afforestation**

### **Introduction**

1. Hurunui District Council (HDC) thanks the Ministry for Primary Industries for the opportunity to provide comment on the National direction for plantation and exotic carbon afforestation.
2. The Hurunui District is located in North Canterbury. We have approximately 12,558 residents and cover an area of 8,646 km<sup>2</sup> spanning from the east coast across to the Main Divide. The Hurunui District is predominantly rural land interspaced with small service towns. Our economy is primarily reliant on primary production and tourism.
3. HDC fully supports the Canterbury Mayoral Forum submission and agrees that the key areas of interest include:
  - ongoing management and compliance for exotic carbon forestry, including fire risk.
  - effective management of the socio-economic effects of entire pastoral farm conversions to exotic carbon forestry including the cumulative effects of marginal and remote hill country areas where there is active management.
  - management of indigenous plantings for exotic carbon farming.
  - management of vegetation clearance associated with the establishment of forestry including exotic carbon forestry.
4. HDC also fully supports the submission prepared by Lawrence Yule on behalf of 17 Councils, including HDC, and Beef+LambNZ, and Local Government New Zealand.
5. HDC's submission provides further specific comment in relation to the views of HDC in relation to wilding conifer risk management (Part D).
6. HDC agrees with Proposal 1 for managing wilding risk (update the Wilding Tree Risk Calculator and guidance and require the submission of a standardised worksheet assessment to council's at least six months prior to planting). Council's experience with the current Wilding Tree Risk Calculator's submitted to Council with the notice of permitted activities under the NES-PF, is that the calculators have not been completed in accordance with the wilding tree risk guidelines. Specifically, most of the proposed afforestation sites in the district do not have uniform characteristics and as such it is our interpretation of the guidelines, that multiple calculations need to be undertaken. In all permitted activity notices to Council, this has not been provided and when foresters have been asked to provide additional calculations or have been queried on how their calculations were made, Council has been met with resistance. HDC agrees that the Wilding Tree Risk Calculator can lead to subjective

assessments and does not take into consideration that land use in the surrounding environment can change over time.

7. HDC agrees with the requirement to submit a standardised worksheet assessment to Council's at least 6 months prior to planting, however this will depend to some degree on what information is to be included in the worksheet assessment. Will these still be required to be completed by someone suitably qualified and if so, how is this to be determined?
8. HDC agrees with the proposal to remove the land use criteria and replace this with land cover class. We consider that if there is more than one downwind land cover class, that calculations should be provided for each downwind land cover class and evidence provided of the downwind land cover classes and how these have been determined.
9. It is considered that criteria scores for *Pinus radiata x attenuata* hybrid should be identified and that this species be included in the calculator.
10. The Council fully supports extending the notification period for wilding conifer scores to no sooner than six months and no later than eight months before afforestation begins. As noted above, in most instances, Council has questioned the Wilding Tree Risk Calculator score and how these have been calculated. This inevitably leads to delays in processing permitted activity notices and often the planting has already commenced or been completed before Council is satisfied that the proposed afforestation is a permitted activity under the NES-PF.
11. HDC notes that given the time spent reviewing permitted activity notices under the NES-PF, particularly given the discrepancies in the Wilding Tree Risk Calculations and the time spent following up on these, that provision should be made in the NES-PF to be able to charge applicants for this service.
12. In relation to sources of information HDC has relied on the provisions in the *Resource Management (National Environmental Standards for Plantation Forestry) Regulations User Guide* (May 2018) and the *Guidelines for the use of the Decision Support System "Calculating Wilding Spread Risk from New Plantings"*. With respect to training, HDC is a small Council covering a large land area and as such there are limited resources and knowledge in house to inform our decisions for forestry. We consider that training would be useful for employees, particularly in terms of how to accurately assess permitted activity applications and how to apply the criteria in the Wilding Tree Risk Calculator. This will be particularly so if the criteria in the Calculator are to change. The best form of delivery for training would be through attendance to a seminar. This would allow for networking opportunities with other councils and stakeholders.

### Conclusion

13. Thank you for the opportunity to provide this submission.
14. For any clarification on points within this submission, please contact Helga Bennett at 027 1800 1025 or [helga.bennett@hurunui.govt.nz](mailto:helga.bennett@hurunui.govt.nz).

Yours sincerely



Marie Black  
Mayor (on behalf of the Hurunui District Council)