

The Māori Trustee submission on Gisborne District Council Draft Forestry Conditions

January 2024

31 January 2024

Gisborne District Council Draft Forestry Conditions
Gisborne District Council
ForestryConditions@gdc.govt.nz

Tēnā koe,

Submission on the Draft Forestry Conditions

1. The Māori Trustee administers, as trustee or agent, approximately 82,000 hectares of Māori freehold land on behalf of about 100,000 individual Māori landowners and is the single largest trustee and agent of Māori land. Te Tumu Paeroa is the organisation that supports the Māori Trustee to carry out her functions, roles and responsibilities. Additional information regarding the Māori Trustee and Te Tumu Paeroa can be found on Te Tumu Paeroa's website, www.tetumupaeroa.co.nz.
2. Within Te Tairāwhiti, the Māori Trustee administers, as responsible trustee, 283 blocks (16,674 hectares) of Māori freehold land, representing 44,741 beneficial ownership interests in this whenua. Given this very large number, the Māori Trustee acknowledges that the views expressed in this submission may not necessarily be shared by all owners of the land administered by the Māori Trustee in this rohe impacted by the Draft Forestry Conditions. Further, the Māori Trustee does not speak for or otherwise represent iwi, hapū or other holders of Māori land, some of whom may submit on the Draft Forestry Conditions.

Challenges with whenua Māori

3. The Māori Trustee broadly supports the thrust of what the Draft Conditions are trying to address and achieve and agrees that they are necessary to improve the management of forestry activities in Te Tairāwhiti. However, they fail to recognise the existing challenges that whenua Māori and small Māori forester's encounter within the forestry industry and Māori landowners are likely to be disproportionately negatively affected by the Draft Conditions. These challenges include:
 - a. Māori land being historically underdeveloped;
 - b. Māori land is generally not economically viable in its own right; on average is less than 50 ha, often has marginal land classes¹ and approximately half² is within the Erosion Susceptibility Classifications (ESC)³;
 - c. access to third party capital is highly constrained, therefore joint ventures or the like are the only viable avenue for development; and

¹ NZ LUC classes 6,7 and 8 make up 13,523 ha or 83% of the Māori Trustee's Gisborne District Council portfolio.

² Refer to graphs in point 10.

³ [MPI NES-PF \(eaglelegis.co.nz\)](http://MPI.NES-PF(eaglelegis.co.nz))



- d. given the size of the blocks, where forestry is viable the entire block would be developed leaving no alternative income stream, or revenue to pay for unexpected or additional costs until harvest date.

Impact of additional compliance costs on small Māori foresters

4. The impact of additional compliance costs on small Māori foresters have not adequately been considered and may result in any new or existing forestry venture on whenua Māori becoming uneconomic. If these costs render forestry ventures uneconomic, it would significantly impact the community, resulting in a reduction in employment opportunities and diminish the number of experienced contractors within the region ultimately reducing the region economy.
5. Examples in the Draft Conditions where the Māori Trustee is concerned that additional costs negatively impact small Māori foresters include:
 - a. The requirement for all management plans and maps to be prepared by a suitably qualified and experienced person is understandable. As each individual management plan potentially requires a different technical skill set, forestry production costs will increase significantly in relation to revenue for small forest owners.
 - b. The requirements for regular reviews of the consent and bonds. This may make assessing production costs in a small forest very difficult.
6. To ensure these costs and/or required actions are equitable for small forest owners, they should be quantified relative to the perceived impact of the activities.

Regenerative land

7. The Māori Trustee considers it is currently unclear what the implications of the Draft Conditions will have on land that has been harvested and has naturally regenerated with exotics in an area where planting of exotic species is no longer permitted, particularly on land that has a staged harvest regime. The following issues need further analysis and guidance provided:
 - a. If the regenerative crop is exotic, in an area where they are no longer permitted, will there be a requirement to remove and replant/remediate the forest?
 - b. What are landowners expected consent requirements on regenerated exotics?
 - c. Would landowners be expected to enter a transitional forestry plan and who would fund this?
8. The Māori Trustee considers that if there are restrictions on the ability to plant with a profitable species, then long-term revenue implications on whenua Māori will need to be addressed.

Erosion susceptibility and Land Use Capability

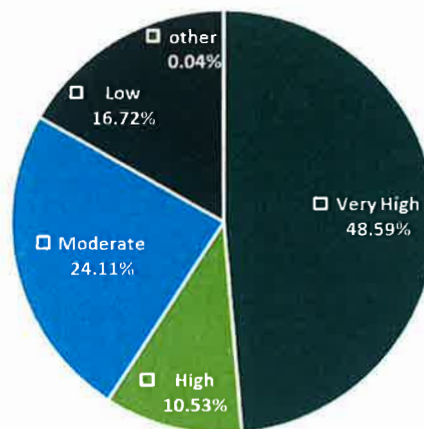
9. The graphs below show that approximately 48.6% of the whenua the Māori Trustee administers within Te Tairāwhiti district has very high erosion susceptibility, the majority of which is marginal land use classes 6,7 and 8.

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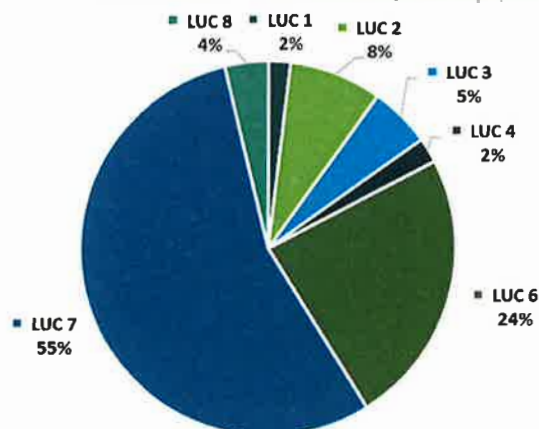
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Percentage of the Māori Trustee's Tairāwhiti portfolio within each Erosion Susceptibility Classification (ESC)



Percentage of of the Māori Trustee's Tairāwhiti portfolio within each Land Use Capability (LUC)



10. The new requirements and additional limitations placed on highly erodible and marginal lands within the Draft Conditions will further restrict land use options and/or the ability to pivot land use. This will have a significant effect on the whenua the Māori Trustee administers and its long-term ability to provide for future generations.
11. The Māori Trustee believes that the unintended consequences of the Draft Conditions may further alienate whenua Māori not only from forestry but other development, in many cases leaving no other option than for the land revert and remain unproductive.

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12. The Māori Trustee would welcome the opportunity to discuss her submission with staff from the Gisborne District Council.

13. My Executive Assistant, Tere Brown can be contacted on [REDACTED] or by email at [REDACTED]

Ngā manaakitanga,

Dr Charlotte Severne
Māori Trustee

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