

	Public consultation: Submission form
Issue	Should sustainable harvesting of native forest on Council owned land be allowed?
Closes	Friday 5 May 2017 at 5pm

NAME Mr / Mrs / Miss / Ms Peter Wilson (President)

ORGANISATION (IF ANY) Federated Mountain Clubs NZ

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Do you wish to be heard in support of your submission? YES NO

Do you support the sustainable harvesting of native forest on Council owned land?

YES NO NO STRONG FEELING EITHER WAY

Please provide comments in support of your choice above:

See attached letter

Federated Mountain Clubs of NZ
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4 May 2017

To: the Grey District Council

Submission on allowing sustainable harvesting of native forests

FMC strongly opposes the proposal by the Grey District Council to allow logging of large blocks of virgin native forest that it owns.

FMC represents 20,000 members of over 80 tramping, climbing and other outdoor recreation clubs throughout New Zealand, including the Buller Tramping Club and the West Coast Alpine Club, as well as the New Zealand Alpine Club with many of their members resident on the West Coast. We also represent the interests and concerns of the estimated 300,000 New Zealanders who enjoy backcountry recreation.

Our members believed that the remaining areas of native forest on the West Coast (and elsewhere) were protected in perpetuity by the Forest Accord signed in 1991 between forestry associations and environmental groups, including FMC, and by amendments to the Forests Act (1949). We were chastened recently by the West Coast Wind-blown Timber (Conservation Lands) Bill that became law in July 2014 without any opportunity for public submissions. Despite any flimsy legalities, FMC regards this legislation and the current GDC proposal as loopholes that go against all informed environmental thinking on the future of our native forests.

The low-impact recovery of high value timber that would otherwise go to waste and the short-term economic shot in the arm for a depressed West Coast economy are superficially attractive. However, the spin avoids mention of several serious concerns. These revolve around the term 'sustainable' which is bandied around without consideration of what it means in ecological, practical or economic terms for logging of native forest. The GDC proposal lacks any detail on how these factors would be managed and begs the question of what sort of logging activity could be sustainable in the longer term. The GDC may seek a complete exemption from the Forests Act's provisions relating to indigenous logging.

A small amount of helicopter recovery of high value rimu logs is likely to be uneconomic and lead to more damaging activities in the forest such as clear felling for access roads and skid sites, bulldozer earthworks, damage to streams and

discharges. The costs of getting timber out of native forests are often large, especially for low volumes scattered over areas with poor access. This means any logging company has an incentive to take as much as they can from an area, and to do it as cheaply as possible. Hence our concern over the terms 'mature' and 'end-of-life-cycle' that are wide open to misinterpretation. This has happened time and again with logging. The financial return drives what happens and it is often neither pretty nor environmentally sound.

DOC science advice speaks to the direct ecological effects of removing mature trees: *Scientific work ... has shown that dead standing and fallen logs are essential or favoured habitat and food source for many species, a normal part of nutrient cycling in forests, and beneficial to regeneration. At some scale their removal would have negative effects on overall ecology and forest regeneration.*

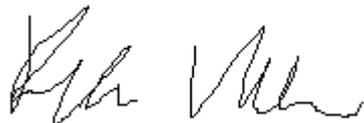
It is proposed that the Ministry for Primary Industries will supervise the selective logging of the GDC blocks. Overview information published by MPI in 2016 states:

New Zealand's indigenous forests are complex and unique. Many New Zealanders live, work and play in forests. Our forests make a major contribution to our quality of life.

MPI then lists 8 contributing factors. Achieving a 'sustainable' outcome for any forestry operation requires applying a weighting of the one economic factor against the seven environmental factors that is subject to very subjective interpretation and many political pressures.

There are plenty of examples on the West Coast of longer term damage to areas in native forest even where clear-felling was not carried out. A useful example is the Oparapara Basin which is recognised as an internationally significant ecological and scenic area with high tourism potential. Selective logging up to the late 1980's has removed most of the mature podocarps. The forest is regenerating and is now superficially attractive but it will be centuries before it regains its former majestic and ecologically sound status.

Logging of our remaining native forests should no longer be part of our landscape. The resource essential for a nature tourism industry and conservation is being picked away for short term gains that are likely to prove illusory. The West Coast and all New Zealanders are the losers in this.



Peter Wilson

President