

IN THE MATTER OF the Resource Management Act 1991

AND

IN THE MATTER OF the Proposed Far North District Plan

**EVIDENCE OF PAUL QUINLAN
FOR TANE'S TREE TRUST, AND THE NORTHLAND TŌTARA WORKING**

22 July 2024

INTRODUCTION

Qualifications

1. My name is Paul David Quinlan. I hold a bachelor degree with honours in Landscape Architecture from Lincoln University. I am a registered member of the New Zealand Institute of Landscape Architecture and have been practising since 1994. I am also a register member of the New Zealand Institute of Forestry.

Professional practice and relevant experience

2. While based in the Far North District for the past 28 years, my work has involved two areas of professional practice. The first is landscape assessments, and the second, is sustainable indigenous forest management.
3. Regarding landscape practice, I frequently provided advice to the Far North and Whangārei District Councils and the Department of Conservation (DOC) on matters to do with outstanding landscape character, natural character and rural amenity values. Typically, this work involved the consideration of proposed mapping notations and proposed plan provisions. Potential for adverse effects on the natural and outstanding character of coastal and rural landscapes were important parts of the evaluations. And I have provided expert evidence on these matters in council hearings and in the Environment Court¹.
4. In relation to forestry, I have extensive expertise and experience in the establishment and management of indigenous forests. This includes the preparation of Sustainable Forest Management Permits and Plans (SFMPs), under the provisions of Part 3A of the Forests Act, including managing sustainable harvest operations in native forests in Northland. I am the owner of a small indigenous forest that, in 2002, was the first registered SFMP in Northland. I was a cofounder of the Northland Tōtara Working Group (NTWG)², started in 2005, and which now I convene. For over ten years I have been a trustee of Tāne's Tree Trust. This has involved the delivery of native forestry research projects, mostly funded by Te Uru Rakau (MPI), and mostly related to the sustainable management of naturally regenerating tōtara forests in Northland³. It

¹ [JB Harrison v Whangarei District Council W34/2005](#);

[Director-General of Conservation v Whangarei District Council A 24/2006](#);

[Whale Watch Kaikoura Ltd v Kaikoura District Council C 112/2006](#). & [Mangawhai Harbour Restoration Society INC. v NRC & Others NZEnvC. 232](#); [Kaupokonui Beach Society & Ors v D-G, Sth Taranaki DC & Wallis \(2008\)](#).

² <https://www.tanestrees.org.nz/about-us/northland-totara-working-group-ntwg/>

³ E.g.,: <https://www.tanestrees.org.nz/projects/totara-industry-pilot-project-tip/>

<https://www.tanestrees.org.nz/projects/northland-totara-riparian-project/>

<https://www.tanestrees.org.nz/projects/review-of-existing-uses-and-market-opportunities-for-farm-grown-totara-in-northland/>

<https://www.tanestrees.org.nz/projects/pathways-to-code-compliance-for-farm-totara-timber/>

<https://www.tanestrees.org.nz/projects/landscape-concept-plan-for-afforestation-of-lowland-waikato-hill-country-reserve/>

<https://www.tanestrees.org.nz/projects/re-measurement-of-farm-t-tara-project/>

has also involved speaking at field days and conferences⁴, and the authoring of a book on tōtara, titled: *A Practical Guide to Managing Tōtara on Private Land*⁵. I have been a workstream manager involved in the design and delivery of programmes, such as Our Forest Our Future⁶ and our present programme: Normalising Native Forestry⁷. I am also involved with an MPI funded projects on Close-to-nature/Continuous Cover Forestry⁸, and a 5-year research project on transitioning exotic forest to native forest⁹. In my roles with Tāne's Tree Trust, we have often prepared submissions and advice to government agencies¹⁰ on matters to do with indigenous afforestation and forestry.

5. In addition, since 2018, I have had the role of Technical Advisor¹¹, with Trees That Count, an organisation that funds native trees for planting projects. Over the last decade or more, I have been full-time on native forestry work, which spans the planning of new native forests, research projects, and practical trials, through to the sustainable management – including harvesting, from within existing regenerated native forest on private land.

Code of conduct

6. The evidence presented here is within the field of my expertise and in line with professional practice for expert witnesses. I declare that I own a small indigenous forest with a registered Sustainable Forest Management Plan (SFMP) and therefore, I am also potentially personally affected by the provisions in the District Plan on which I am providing evidence on. Furthermore, I am a member of organisations that promote sustainable indigenous forestry, as provided for by the Forests Act. Where I am relying upon the evidence of other people, this is stated and/or referenced within the footnotes.
7. I present this evidence for Tāne's Tree Trust, and the Northland Tōtara Working Group. For background on who these organisations are and what they do, please refer to the original submission, and the Tāne's Tree Trust website:

<https://www.tanestrees.org.nz/>

⁴ <https://www.tanestrees.org.nz/projects/o-t-tou-ngahere-our-forest/>

⁵ <https://www.tanestrees.org.nz/projects/a-practical-guide-to-managing-t-tara-on-private-land/>

⁶ <https://www.tanestrees.org.nz/projects/our-forests-our-future/>

⁷ <https://www.tanestrees.org.nz/projects/normalising-native-forestry/>

⁸ <https://www.tanestrees.org.nz/projects/close-to-nature-continuous-cover-forestry-project/>

⁹ <https://www.tanestrees.org.nz/projects/transitioning-exotic-forest-to-native/>

¹⁰ E.g., He Pou a Rangi Climate Change Commission, and the Ministerial inquiry into land use in Te Tai Rawhiti.

¹¹ <https://treesthatcount.co.nz/about-us>

Scope of evidence

8. My evidence relates to original submission S-157, and further submissions FS-46.1-5. These relate to encouraging native forestry as a land use, and objectives, policies, and rules potentially affecting the harvesting of indigenous timber on private land throughout the district, with sustainable forest management plans or permits, approved by the Ministry for Primary Industries, under Part 3A of the Forests Act 1949.
9. More specifically this evidence addresses rules on clearance and/or removals of indigenous vegetation throughout the district, irrespective of existing or any present or future mapping notions such as Outstanding Natural Landscapes/Features, areas of high Natural Character, or Significant Natural Areas etc. It also addresses Key Issue 20 NFL- R5 in the officer's Section 42A report.
10. My evidence is divided up into the following sections:
 - A. Executive Summary
 - B. Effecting appropriate land-use change and increasing native forest cover
 - C. SFMP compatibility with biodiversity and natural character values
 - D. Avoiding duplication and unreasonable costs
 - E. Recommendations

Section: A

Executive Summary

11. This evidence supports the submissions made by Tāne's Tree Trust and Northland Tōtara Working Group. Key points include:
 - a) Significantly increasing the amount of native forest cover across the landscape is a vital part of our country's climate change strategy and response to the indigenous biodiversity and freshwater crises that we face. Local authorities are required to promote this under the National Policy Statement for Indigenous Biodiversity (NPSIB).
 - b) Landscape-scale increase in native forest cover and its sustainable management on private land, is a land-use issue. Making the management of native forest an economically viable land use option for landowners will be essential to achieve this at scale. This will take many different forms.
 - c) Sustainable native forest management – including selective timber harvests, can and will have a useful role to play, as a 'nature-based solution' and effecting more appropriate land use.

- d) Sustainable harvests are provided for under Part 3A of the Forests Act, via Sustainable Forest Management Permits & Plans (SFMPs) and administered by Te Uru Rākau – the Ministry for Primary Industries (MPI). These are strictly controlled to ensure the maintenance of the forest’s *natural values* in perpetuity.
- e) Controls and protection via MPI approved SFMPs, effect a greater level of management and protection than is required of SNAs under the NPSIB. Consequently, The NPSIB specifically acknowledges such harvests under the Forests Act, recognising they can be compatible with the maintenance of indigenous biodiversity values – within and outside SNAs.
- f) Requiring an additional Resource Consent process to permit sustainable harvests under MPI approved SFMPs, would be an unnecessary duplication, and an unreasonable extra cost, for no extra benefit. Moreover, it would result in significant perverse outcomes, such as disincentivising the sustainable management of regenerating native forests and native afforestation.
- g) Te Uru Rākau have expert advisors, competent and experienced in assessing the potential effects of low-impact, close-to-nature, sustainable harvests. The Department of Conservation have input into every SFMP, which brings the opportunity to highlight forest/area specific biodiversity and/or natural character values.
- h) Only single-stem, or selections of small groups of trees (3-5) are allowed under SFMPs in Northland’s forest types. This form of low-intensity, low-impact harvests, is considered close-to-nature continuous-cover-forestry (CCF), and does not result in ‘clearance’ of vegetation. The effects of such land-use activities, are compatible with the maintenance of indigenous biodiversity values and Outstanding Natural Landscape and high Natural Character values.
- i) My evidence supports the submission of Tane’s Tree Trust and the Northland Tōtara Working Group, that harvests under MPI approved SFMPs, should be a Permitted Activity throughout the district, even in areas of Outstanding Natural Landscape, high Natural Character, or in SNAs. This needs to be made explicit and unambiguous in the policies and rules of all relevant chapters of the Proposed District Plan.
- j) Indigenous forests can be commercial forests, and therefore it is important that indigenous forestry is not captured by the term “commercial forestry” in situations where only *exotic* commercial forestry is meant to be implicated.

Section: B

Effecting appropriate land-use change and increasing native forest cover

Landscape scale land-use change

12. The recent publication, *Going with the grain* (May 2024), by the Parliamentary Commissioner for the Environment, reiterates the need for significant changes in land-use, to address the environmental crises that our planet faces. That document calls for more “Nature-based Solutions”, and native [indigenous] afforestation is specifically used as an example in this respect. This continues a theme from previous recommendations made by the Climate Change Commission, for another 300,000ha of new native forestry by 2035. Recognising that that would be an ambitious target to achieve, it clearly envisaged native forest in a wide range of different forms, from reverting shrublands, to continuous cover forestry involving some timber production.

13. The National Policy Statement for Indigenous Biodiversity (NPSIB), clause 3.22 (4) states:

*“Local authorities must promote the increase of indigenous vegetation cover in their regions and districts through objectives, policies, and methods in their policy statements and plans: ...
(b) giving priority to all the following: ...
(iii) restoration at a landscape scale across the region”*

14. Discussion documents put out by the Climate Change Commission¹² stated that we are not on-track to meet our commitments. And, the following was used as an example of the type of changes required to meet our emission scenario pathway:

“Afforestation of sheep and beef land on land use classes (LUC) 7 and 8, all land classed as LUC 8 and erosion prone LUC 7 retired to natives.”¹³

15. The above signals the significant scale of landscape change needed, mostly involving privately owned sheep and beef farms. However, the need for land-use to both improve environmental outcomes, and yet still have an income is reflected in the statement: *“Facilitating planting on agricultural land to support more diverse or ‘mosaic’ landscapes can provide greater biodiversity, and more diverse income, as*

¹² Review of the 2050 emissions reduction targets, April 2024, and; Draft advice on Aotearoa New Zealand’s fourth emissions budget.

¹³ Tables 3.1, & 4.2, respectively in: Review of the 2050 emissions reduction targets, April 2024, and; Draft advice on Aotearoa New Zealand’s fourth emissions budget

*well as improve soil and water quality.*¹⁴ I support that statement and contend that native forest is an ideal land cover to maintain or enhance multiple environmental and landscape values. However, for this landscape transition to occur at any significant scale on private rural land, native forest cover must become a viable land-use option. A former Parliamentary Commissioner for the Environment, Dr Morgan Williams, (in his 2002 publication: *Growing for Good*), highlighted how markets are the biggest drivers and shapers of rural land-use changes. This has been my observation too. Therefore, in my opinion, a critical factor required to support native forest cover on private land is making it a commercially viable land-use option.

16. Multiple potential income streams are likely to be required to support native forest cover and its sustainable management on private land. These could variously involve carbon-farming, some sustainable timber production, and possibly some form of biodiversity credit or payment for eco-system services. However, no system for the latter has yet been developed – and it may simply prove too problematic. While new native forests may be eligible to enter the Emissions Trading Scheme (ETS), forests that started regenerating before 1990, are not. Furthermore, returns from exotic forestry in the NZ ETS far outstrip those from native forests, incentivising exotic forestry over native. Some sustainable timber production is a potential income, but only for some areas of native forest, and its economic viability is presently still a challenge.
17. Nevertheless, native forests on private land are still potentially ‘commercial forests’ with multiple potential income streams – and in some cases that might involve some sustainable timber production along with other values/products¹⁵. Indeed, groups such as Te Taitokerau Maori Forestry Inc. (via the Tōtara Industry Pilot project), and the Northland Tōtara Working Group, are working on the development of a regional industry to support such land-use and to promote more indigenous forest establishment and sustainable management, for multiple values. Such initiatives will have a role to play in achieving native afforestation targets and creating the much needed ‘nature-based’ land use solutions. That ‘Tōtara forestry’ was specifically modelled as a future land use in a Northland case study by the PCE’s team¹⁶ shows that this potential deserves serious consideration.

¹⁴ Draft advice on Aotearoa New Zealand’s fourth emissions budget. (See page 112)

¹⁵ For example, see this video of a new planted native forest for CCF in the Waikato: <https://youtu.be/0vrmeVqoEP4>

¹⁶ Parliamentary Commissioner for the Environment, Land use modelling report: Wairoa catchment in Northland / Te Tai Tokerau: <https://pce.parliament.nz/media/cszbzb5f/wsp-land-use-modelling-report-wairoa-catchment-in-northland-te-tai-tokerau.pdf>

18. The key points of this section are that:

- Significant increase in native afforestation and effective sustainable management of existing native forest cover on private land is required for the country to meet its climate change obligations and targets.
- Native forestry is arguably the ultimate opportunity for a ‘nature-based’ land-use solution.
- Making native forest cover a viable land-use option is essential to bring about the scale of landscape change required by the NPSIB 3.22 (4) (b) (iii), and other national targets.
- Native forests, and native afforestation, even when managed as continuous cover forests, can and will need to be considered ‘commercial forestry’. **N.B.** – This may have implications for the use of the term “commercial forestry” in the Proposed District Plan.

19. Therefore, in order for the Far North District Plan to be supporting appropriate, nature-based, land uses and land-use changes, its objectives, policies, and rules need to be encouraging native forest establishment, and sustainable management of new and existing forest areas, as a viable land-use option. The corollary of this is that it must also ensure that this direction is not hamstrung by unintended disincentives or impediments. This means recognising native forest cover on private land can have commercial income-generating aspects to it, and that this is not just okay, but indeed necessary to effect appropriate land-use change at a landscape scale.

Section: C

SFMP compatibility with biodiversity and natural character values

Harvest does not constitute clearance

20. Sustainable, low-impact, selective harvesting under the Forests Act, is prescribed and tightly controlled and audited by specialist forestry advisors from Te Uru Rākau. Harvesting under SFMPs requires low impact harvesting of single stems or small groups of trees (3-5) and does not *clear* the forest. The forest remains. Close to nature, continuous cover forestry is the practice. This has been demonstrated in Northland, for example see these videos:

<https://www.youtube.com/watch?v=SLZcefHxk58&t=9s>

<https://www.youtube.com/watch?v=Xgx1bGmWc0o&t=1s>

Requirements of the Forests Act

21. The Forests Act defines sustainable forest management as:

“the management of an area of indigenous forest land in a way that maintains the ability of the forest growing on that land to continue to provide a full range of products and amenities in perpetuity while retaining the forest’s natural values.”

22. Moreover, Schedule 2, (8) & (10) of the Forests Act requires the following protection and management of the forest areas involved.

Schedule 2

8 Protection

The [SFMP] plan shall specify—

any necessary measures to be taken to protect the forest, and, in particular, to protect the regenerating forest from pest, stock, fire, and other threats; and

(b) any necessary measures to retain and enhance flora and fauna and soil and water quality.

23. Schedule 2, Section 10, (1) limits harvest rates to a level where the forest can supply a “*non-diminishing yield in perpetuity*”. And, going further, Section 10, (2), (a), requires “*...the character and structure of all parts of the forest shall be maintained.*” And clauses (e) and (f) require planting where regeneration is lacking.

24. The above stipulations under the Forests Act require far better formal protection and management of indigenous biodiversity for existing native forest areas than the NPSIB – which does not require landowners to actively manage native forest areas (even if mapped as an SNA). The level of protection required for forests under MPI approved SFMPs ensures the avoidance of all the potential adverse effects set out in 3.10 (2) (a-e) in the NPSIB.

25. Moreover, the Department of Conservation is consulted on all SFM Permit and SFM Plan applications. This provides the opportunity to include any site-specific conditions in response to relevant biodiversity matters – including highly mobile fauna. Likewise, any notations in respective district and regional plans (e.g., Outstanding landscape values, Natural features, or areas of high natural character, SNAs, etc.). These can all be considered and monitored by Te Uru Rākau’s specialist indigenous forestry advisors, who are both more qualified and better resourced to assess the potential adverse effects than council planning staff or ecologists who are unlikely to have any experience with SFMPs.

SFM provided for in the NPSIB

26. The National Policy Statement on Indigenous Biodiversity (NPSIB) specifically addresses harvests under MPI approved Sustainable Forest Management Permits and Plans (SFMPs). Clause 3.10 (6) (e) in the NPSIB reads:

3.10 Managing adverse effects on SNAs of new subdivision, use, and development

(6) Nothing in this clause applies to adverse effects on an SNA from any of the following:

(e) the harvest of indigenous tree species from an SNA that is carried out in accordance with a forest management plan or permit under Part 3A of the Forests Act 1949.

27. The summary document on the NPSIB for the Forestry Sector¹⁷ stated that: “*SFMPs can restore or enhance indigenous biodiversity, and require the active management of stock, weeds and pests to encourage regeneration.*” Furthermore, it states that “*They can assist local authorities and landowners to restore degraded SNAs. In this way an SFMP can complement the objectives of the NPSIB.*” This is a clear confirmation that the effects of such harvests can be compatible with the maintenance of indigenous biodiversity values, and that this matter is sufficiently controlled through MPI’s administration of the Forest Act.

28. The following clause NPSIB 3.10 (7) reads: “*Every local authority must make or change its policy statements and plans to be consistent with the requirements of this clause.*” In my opinion, this implies that harvests under MPI approved SFMPs should be treated as Permitted Activities in Regional and District Plans. I support the similar recommendations by the reporting officers and authors of the Proposed District Plan. And I note that the Operative District Plan has provided for such harvesting – even in Outstanding Landscapes (See 12.1.6.1.2 (o)). I have not observed any adverse effects on outstanding natural landscape values resulting from this existing provision.

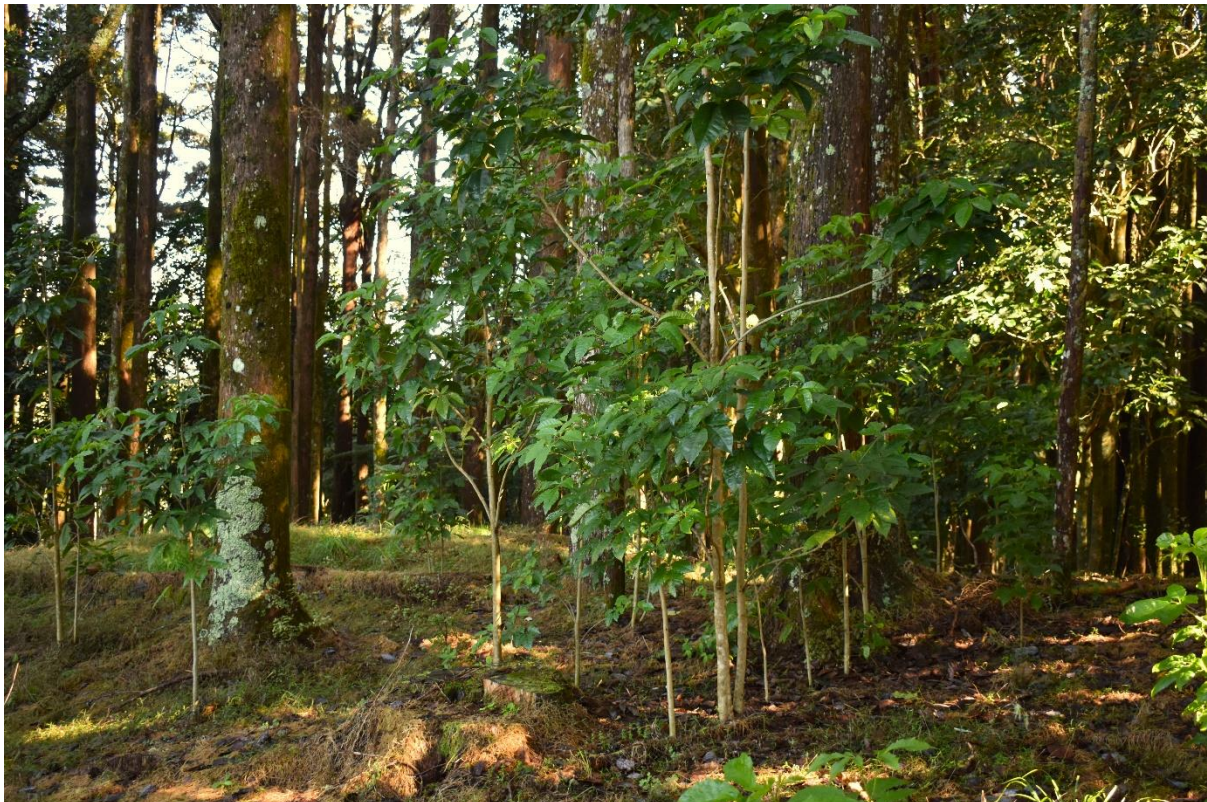
Compatibility with Outstanding Natural Landscape and Natural Character values

29. Although harvests under MPI approved SFMPs, involve the removal of parts of some trees (logs), it should not constitute vegetation clearance. This should be executed with low-impact extraction techniques and only small canopy gaps may be created in the types of natural forests found in this region. The regeneration capacity of the forest should be adequate to respond to such small-scale, and low-intensity disturbances. Moreover, such disturbances mimic natural processes within natural

¹⁷ Publication number: INFO 1062, published by Ministry for the Environment, June 2022.

forests. The SFMP provisions of Part 3A of the Forests Act, prescribe what is often termed: *Close-to-nature forestry*, or *Near-natural forestry*, where the emphasis is on ecological forest management rather than timber production.

30. Many second-growth or naturally regenerated forest stands in Northland are dominated by tōtara. This is usually the result of human disturbance and the prolonged influence of livestock grazing. The resulting almost mono-cultural character of these forests has a modified and arguably 'unnatural' character, (although they are usually included in mapping notations such as Significant Natural Areas and Outstanding Natural Landscapes). And, ironically, selective harvests and active management, could accelerate the processes of forest succession back to a more natural mixed podocarp/broadleaf forest type. Therefore, selective harvesting and active management of native forests should be not considered incompatible with the maintenance of natural landscape values – in some cases, it can and will even enhance them over the long-term.



The photo above shows strong regeneration of native hardwoods such as puriri, taraire, and karaka, 5 years after a selective in a harvest in a tōtara dominant stand. Note the stump lower centre-left in view. This created a small light gap in the canopy which has enabled the regeneration of native hardwoods. Ironically, such harvests will help change this tōtara dominant stand into a more species diverse forest with a more natural species composition and character.

31. In my opinion, this form of sustainable forest management is highly unlikely to result in adverse effects on Outstanding Natural Landscapes or Natural Character values in the rural or coastal environments. For a start, very few coastal forests are likely to be suitable for such harvests. And any adverse visual effects would likely be of minor

scale and remedied in time by the natural regeneration and growth of the residual forest canopy. Similarly for forests on the margins of wetlands, lakes and rivers. This activity poses a relatively low risk of creating adverse visual effects. As a land-use, it is generally far more compatible with maintaining and enhancing natural character values than other land-uses such as subdivision, plantation forestry, or pastoral farming.

Section: D

Avoiding duplication and unreasonable costs

32. Obtaining SFM Permits and Plans under the Forests Act is extremely costly and time consuming. It is itself a significant disincentive and impediment to most landowners. Adding another potential consenting process under the RMA (e.g., via District Plan rules etc.), would add further significant cost, and time - also significant insecurity to sustainable indigenous forestry activities.
33. The NPSIB Section 3.24 (1) (a) requires any resource consent application to include a detailed report prepared by a suitably qualified ecologist. I do not know any ecologists in Northland that have practical experience assessing the potential effects of harvests under the provisions of Part 3A of the Forests Act. And, if there are, it would only be duplicating the assessment carried out by experienced experts in Te Uru Rākau (MPI). Moreover, in my opinion, the extra process would not provide any more effective control or management of indigenous biodiversity and forest management.
34. Furthermore, the additional cost on top of the SFMP process would make most SFMP activities unviable, particularly for the smaller forest areas. This would have the perverse effect of removing one of the few appropriate revenue opportunities from pre-1990 indigenous forests on private and Maori land. This would further disincentivise SFMPs and prevent the development of an appropriate new industry (e.g., a regional tōtara Industry) that would effectively encourage and fund the management of indigenous biodiversity on private and Maori land.
35. Therefore, it is important that no additional resource consent process under the RMA for harvesting under MPI-approved Sustainable Forest Management Plans or Permits (SFMPs), is required. That would be an unnecessary double-up of regulatory control mechanisms. That would add significant associated costs without any substantive gain. It would also fail to accept the integrity of Te Uru Rākau in their administration of Part 3A of the Forests Act.

36. Requiring a resource consent for harvests under MPI approved SFMPs would result in the perverse effect of significantly disincentivising sustainable indigenous forestry as a land use activity – to the extent that it will make it untenable. This would scupper efforts of many decades of research, promotion, and government funded projects (e.g., The Tōtara Industry Pilot project), to develop and encourage appropriate and sustainable, nature-based, land management options and practices on private and Maori owned land.
37. That would be a perverse outcome especially given that indigenous forestry so strongly aligns with government objectives promoted through the Emissions Reduction Plan, Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy, recent freshwater objectives, and the NPSIB 3.22 (4) (b) (iii), requiring local authorities to promote the increase of indigenous vegetation cover in their regions and districts.

Perverse outcomes

38. In my opinion requiring a resource consent would not only be unnecessary regulatory duplication, but it would also result in the following perverse effects:
- Prevent the realisation of an appropriate primary industry and land use option based on the sustainable management of indigenous forests on private and Maori land (e.g., the Tōtara Industry Pilot project).
 - Disincentivise sustainable management of indigenous forest on private and Maori land.
 - Make existing native vegetation even less valuable to the landowner, putting it more at risk of neglect or destruction.
 - Discourage the planting of new native forest areas in the rural production landscape – undermining afforestation goals that are an essential part of the country’s climate-change response strategy and other policy objectives.

Section: E

Recommendations

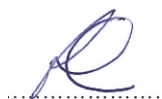
39. I support the relief sought by the Tāne's Tree Trust and the Northland Tōtara Working Group's original submission.

40. To give effect to that I recommend the following:

1. To retain the rule: **IB R-1, PER 1, Clause 12** – *“The harvesting of indigenous timber approved under the Forests Act 1949 via either a registered sustainable forest management plan, a registered sustainable forest management permit or a personal use approval for the harvesting and milling of indigenous timber from the Ministry of Primary Industries;”*
2. And, for consistency, and to avoid ambiguity, I recommend this is replicated where appropriate in the chapters on Natural Features & Landscapes, Natural Character, and the Coastal Environment.
3. In addition, I recommend adding a clause (f) to **NATC P3**, to read: *“it is for the harvesting of indigenous timber approved under the Forests Act 1949 via either a registered sustainable forest management plan, a registered sustainable forest management permit or a personal use approval for the harvesting and milling of indigenous timber from the Ministry of Primary Industries”*
4. Wherever the term “**commercial forestry**” is used in relation to controlling the effects of exotic forests or afforestation with exotic species, then the term should be qualified with the addition of the word “**exotic** commercial forestry”, so that indigenous forests, or afforestation with indigenous species, that may also have a commercial aspect, are not unintentionally captured by the term commercial forestry.

41. I am happy to provide further information, clarification, and/or help refine wording suggestions to effect the above.

Paul Quinlan



22 July 2024