



Submission to: The Proposed Far North District Plan

Submitter: Summit Forests New Zealand Limited

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Introductory Comments

Thank you for the opportunity to submit on the Proposed Far North District Plan. We would welcome any opportunity to discuss any of the points we raise in our submissions below and would also welcome the opportunity to work with Council to ensure any mapping of areas and boundaries associated with our forests is accurate.

About the submitter

Summit Forests New Zealand Limited (SFNZ) is a New Zealand registered subsidiary company of Sumitomo Corporation, Japan. In 2013, SFNZ purchased the former Juken New Zealand Ltd forest estate (36,000 ha) in Northland. All the existing local staff and contracts were transferred across to the new company. They brought with them more than 24 years of local experience in managing the estate, experience that is now supported by the Sumitomo Corporation’s international network.

Since that initial purchase, SFNZ has continued to expand its forest estate with purchases in the Whanganui and Tairāwhiti/Gisborne regions as well as in the Coromandel. These purchases have made SFNZ the seventh largest forest owner in New Zealand. The following table summarises SFNZ’s forest ownership by management type:

	Area (hectares)	Percentage
Total area under management	50,748	100%
SFNZ Freehold	4,697	9%
Crown Forest Licence	18,229	36%
Māori owned land	26,195	52%
Other	1,626	3%

Approximately 20% of our total estate are areas of indigenous vegetation and SFNZ is actively restoring high conservation value areas in its forests along with and supporting local community conservation projects.

Sumitomo has a 400-year history of conducting business. Underpinning that history is the philosophy that the business must not only benefit Sumitomo, but also bring benefit to the country and society in which it operates. This philosophy underpins SFNZ’s management of its estate and the value the company places on partnerships with local iwi. SFNZ is committed to protecting any resource and tenure rights of the tangata whenua of the lands on which we operate. SFNZ believes that open engagement with all stakeholders, embracing new technologies, cultivating local experience, and maintaining a team culture will enable us to manage our unique forest resource in a sustainable and economically successful manner.

SFNZ aims to be a leading forest company in New Zealand, and one that creates value by growing people, products, partners, and prosperity.

Part 1 – Introduction and general provisions

Submission 1: Definition of Earthworks

The definition of Earthworks captures the alteration or disturbance of land and lists some land disturbing activities along with exclusions for minor disturbance. The proposed definition could capture disturbance caused by vehicles and or machinery operating off a formed road. Such activity is typical of rural production activities and should be provided as an exclusion to the definition.

Relief sought: Amend the definition of Earthworks to provide an exclusion for disturbance of land caused by vehicles and/or machinery operating off a formed road. **S148.001**

Submission 2: Definition of Farm Quarry

Despite the term “Farm Quarry”, the definition allows for the extraction of aggregate for use on forestry tracks which appropriately implies that such quarries can be established as part of production forestry activities. SFNZ submits that the definition needs to be amended for provide greater clarity as to what is intended.

SFNZ supports the provision for the extraction and use of aggregates within the production unit.

Relief sought: Amend the definition to explicitly recognise that it includes Forestry buy:

- Changing the term being defined to “Farm/Forest Quarry” or words to like effect; **S148.002**
- Amending bullet 1 to read *“taken for use ancillary to farming, production forestry, and horticulture, including for farm and forestry tracks, access ways and hardstand areas, and”*

Submission 3: Definition of Farming

The definition of Farming excludes plantation forestry activities. This would appear to limit a farmer’s ability to optimise their land use including their carbon emissions which SFNZ notes is an objective of the proposed plan (SD-EPO-04). Rather than excluding production forestry activities, the definitions should be couched in terms of the primary purpose but, as with accessory buildings, allowing activities that are ancillary to that primary purpose.

Relief sought: Amend the definition of Farming to allow for plantation forestry activities that are ancillary to the primary purpose of agriculture, pastoral, horticulture, or apiculture activities. **S148.003**

Submission 4: Definition of Highly Productive Land

The proposed definition does not allow for the easy identification of Highly Productive Land and is inconsistent with the definition contained in the National Policy Statement for Highly Productive Land. While the definition contained in the NPS is primarily based on the requirement for Regional Council’s to map such land, the NPS does provide a definition that can be used in the absence of such mapping being land that is:

1. zoned general rural or rural production; and
2. LUC 1, 2, or 3 land; but is not
3. identified for future urban development; or
4. subject to a Council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle.

Relief sought: Amend the definition to Highly Productive Land to be consistent with the requirements of the National Policy Statement for Highly Productive Land. **S148.004**

Submission 5: Definitions of Plantation Forestry and Plantation Forestry Activity

The proposed Plan relies on the definitions of Plantation Forestry and Plantation Forestry Activity contained in section 3 of the National Environmental Standard for Plantation Forestry (NES-PF).

SFNZ supports the use of these definitions but notes that:

1. The proposed plan does not limit itself to those terms when making reference to “forestry” and “forestry activities”; and
2. As recognised in the Section 32 analysis for the Rural Environment, the NES-PF definitions do not apply to permanent exotic forestry/carbon farming.

Relief sought:

1. Retain the definitions of Plantation Forestry and Plantation Forestry Activity consistent with the definitions contained in the National Environmental Standard for Plantation Forestry;
2. Provide an explicit definition for “permanent exotic forestry / carbon farming”;
3. Amend the Plan to make it clear which type of forestry and forestry activity is being addressed; and
4. Amend to Plan to establish appropriate objectives and rules for “permanent exotic forestry / carbon farming”;

S148.005 & S148.006

Submission 6: Definition of Primary Production

SFNZ supports the broad definition of Primary Production but, as noted in our foregoing submission, the use of the term “forestry activities” is inconsistent with the terms defined in the proposed Plan.

Relief sought: Either:

1. Define the term “forestry activity” so that it is clear what that term includes; or
1. Amend the definition of Primary Production to read “ *any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or production forestry activities; and*” **S148.007**

Submission 7: Tangata Whenua

A significant proportion of the forests we own and manage are on Māori owned lands and we are committed to protecting any resource and tenure rights of the tangata whenua of the lands on which we operate. SFNZ supports the intent of the objectives and policies of this section of the Plan and, specifically, objective TW-05 and policy TW-P4.

Relief sought: Retain this section and, in particular, objective TW-05 and policy TW-P4 and ensure these translate into the ability to make productive use of Māori owned lands. **S148.008 to S148.011**

Part 2 – District Wide Matters

Submission 8: Economic and Social Wellbeing

SFNZ supports the objectives for economic and social prosperity and, in particular, objectives DS-SP-03, SD-EP-02, SD-EP-04, and SD-EP-05. The forest industry plays an important part in the social and economic prosperity of the Northland district. The Section 32 Rural Environment report estimates that *“the Forestry and Logging sector in the Far North comprises of some 280 businesses and 173 workers. The average number of workers per business is around 1 (2016) and the total turnover (gross output) of the sector is estimated at \$134m (from all sources of business income), which contributes \$42m to the district economy (value added)”*. Opportunities arising from the Government’s Forestry Industry Transformation Plan and the drive to move New Zealand to a biocircular economy have the potential to significantly increase the economic and social benefits to the District.

SFNZ submits that the proposed District Plan needs to provide for flexible and adaptive land use so that landowners can respond to economic, climate, and environmental challenges without the delays and uncertainty of a regulatory process.

Relief sought:

1. Retain Objectives DS-SP-03, SD-EP-02, SD-EP-04, and SD-EP-05. And
2. Remove any policies, objectives, and rules from the plan that seek to constrain primary production activities beyond the evidence of adverse environmental effects. And
3. Remove any policies, objectives, and rules from the plan that seek to “pick winners” between primary production activities.

\$148.012

Submission 9: Sites and areas of significance to Māori

Sites and areas of significance may exist in areas of established plantation forestry. There are well established protocols that cover discovery and or management of sites and areas of significance to Māori that include consultation with local Māori and obtaining the authorities necessary for the removal of any plantation trees and/or wildings on those sites. The Plan needs to provide for the removal of plantation forest trees from sites and areas of significance subject to the provisions of an authority issued by Heritage New Zealand Pouhere Taonga as a permitted activity.

Relief sought: Amend the rules under Sites and areas of significance to Māori to provide for the removal of plantation forest trees from a scheduled site and areas of significance to Māori under an authority issued by Heritage New Zealand Pouhere Taonga as a permitted activity.

\$148.013

Submission 10: Ecosystems and Indigenous Biodiversity

SFNZ acknowledges the statements made regarding the high proportion of the District that has potentially significant ecological values and the fact that over half of those lands are in private ownership. As noted, this creates potential tension between those seeking to protect those areas and those wishing to make reasonable economic use of their lands. It is essential that the Plan takes a pragmatic approach to protecting significant natural areas and allowing people to meet their social, economic, and cultural wellbeing by:

- Ensuring there is certainty about what is or is not an SNA including drawing clear boundaries between rural production areas and SNA and ensuring there is reliable mapping of SNA across the district.
- Supporting landowners with the costs of identifying and managing SNA on their lands
- Avoiding unnecessary compliance costs associated with potential SNA and rural production activities.

To this end, SFNZ supports IB-P5 and IB-P6 but, without significant support from the Council, opposes IB-P9 as potentially onerous. SFNZ is also of the view that IB-P1 should explicitly state that Council will work with landowners to accurately map all SNA across the district.

Relief sought:

1. Retain policies IB-P5 and IB-P6 and **S148.014 & S148.015**
2. Amend IB-P1 to clear state that Council will “*work with all landowners to accurately map and schedule all SNA within the district*” or words of like effect. And **S148.016**
3. Amend IB-P9 to read “*Support landowners to manage pets and pest species, including dogs, cats, possums, rats and mustelids, to avoid risks to threatened indigenous species, ...*” Or words of like effect. **S148.017**

Submission 11: Indigenous vegetation clearance – Rules IB-R1, IB-R5, and IB-R4

These rules refer to “indigenous vegetation” and “indigenous vegetation clearance” which are not defined in the Plan. These rules establish potentially onerous regimes that will add significant costs and uncertainty to rural landowners.

IB-R1 provides for “*the removal or clearance from land which was previously cleared and the indigenous vegetation to be cleared is less than 10 years old*”. This unreasonably discriminates against plantation forestry where, by virtue of rotation lengths in excess of 25 years combined with the requirements for riparian and other setbacks and ecological significance criteria that are so broad as to potentially capture the understory of plantation forests, will force plantation forestry activities into an unnecessary resource consent process to undertake a legitimate rural production activity.

IB-R4 requires a landowner needing to undertake any indigenous vegetation clearance in excess of 100m² to engage a suitable ecologist to confirm that the indigenous vegetation does not meet the criteria. These compliance costs are potentially onerous and pushes the costs of a public good onto private landowners. The section 32 analysis for Ecosystems and Indigenous Biodiversity acknowledges the downsides of this approach and it is certainly contrary to Policy IB-P5.

IB-R5 makes plantation forestry and plantation forestry activities within an SNA a discretionary activity. This is potentially onerous especially as the SNA criteria established in the exposure draft of the National Policy Statement for Indigenous Biodiversity could see plantation forests captured within the definition of an SNA. As noted above, this rule also fails to provide for plantation forestry activity around the indigenous vegetation that will grow in the riparian and other setbacks that forest owners are required to establish. The NES-PF already provides a permitted activity regime for indigenous vegetation clearance associated with plantation forestry and plantation forestry activities and Council has not provided any justification for a higher standard, as required under section 32(4) of the RMA, nor the need to ignore its own Policy (IB-P5).

Relief sought:

1. Work with the Forest Industry to map and schedule all SNA within the boundaries of plantation forests. S148.018
2. Provide for the clearance and incidental damage of indigenous vegetation, including indigenous vegetation that may meet the criteria for an SNA but excluding any scheduled SNA, within a plantation forest as a permitted activity in accordance with regulation 93 and 94 of the NES-PF. And S148.019
3. Amend IB-R1 to provide for plantation forestry activities and rotation lengths of 28 to 35 years. And S148.020
4. Amend IB-R5 to only apply to the clearance of indigenous vegetation within a scheduled SNA within a plantation forest as a discretionary activity that does not meet the requirements of regulation 93 of the NES-PF. And S148.021
5. Delete the requirement for a landowner to obtain an ecologist's report proving an area is not an SNA or, in the alternative, establish a process whereby Council fully funds such reports when associated with primary production activity. S148.022

Submission 12: Natural Character

This chapter establishes what is permitted on the margins of wetlands, lakes, and rivers and makes anything not permitted, non-complying or discretionary. The rules fail to provide for all primary production activity and, in relying on the RMA definitions of river, would capture dry valley bottoms that only become wet and/or flow during heavy rain. The rules also fail to provide for earthworks necessary water and sediment controls associated with existing roads, tracks, and accessways.

Relief sought:

- Amend the definition of River to read “ to *means a continually flowing body of fresh water; and includes a stream and.....* ” or words of like effect. And S148.023
- Retain NATC-R1 and the provision of river crossings under PER-2. And S148.024
- Amend NATC-R2 to replace “farming tracks” with “tracks for primary production”. And S148.025
- Amend NATC-R3 to provide for earthworks necessary to install, maintain, or upgrade water and sediment control within a wetland, lake, or river margin associated with existing roads, tracks, and accessways. S148.026

Submission 13: Natural Features and Landscapes

The chapter on Outstanding Natural Landscapes (ONL) and Outstanding Natural Features (ONF) fails to provide equitably for all primary production activities. In particular, it fails to recognise that, where plantation forestry already exists within an ONL or ONF, it should be considered as a legitimate part of the landscape and provided for as a permitted activity subject to the provisions of the NES-PF. While the notes to this chapter refer to the Plan's ability to establish more stringent rules that the NES-PF, no justification for this has been provided in the section 32 report and, doing so, would fail to meet the wider policies and objectives of the Plan for example PRROZ-01, RPROZ-03, RPROZ-04, and RPROZ-P1.

Policy NFL-P4 seeks to grandparent an existing land use that may be or could become unsustainable both in terms of economic and environmental effects. The Plan should allow for all primary production activities subject to managing any adverse effects.

Relief sought:

1. Amend NPFL-P4 to read “ *Provide for primary production activities within ONL and on ONF where:*
 - a. *the use forms part of the characteristics and qualities that established the landscape or feature; and*
 - b. *the use is consistent with, and does not compromise the characteristics and qualities of the landscape or feature.” and*S148.027
2. Delete NFL-R5. And S148.028
3. Provide for existing Plantation Forestry and Plantation Forestry Activities in an ONL and/or ONF as a permitted activity subject to the provisions of the NES-PF. Or, in the alternative S148.029
4. Remove any areas of existing plantation forestry for the ONL and/or ONF overlay mapping. S148.030 & S148.031

Submission 14: Coastal Environment

The chapter on the Coastal Environment fails to provide equitably for all primary production activities. In particular, it fails to recognise that, where plantation forestry already exists within the Coastal Environment, it should be considered as a legitimate part of the landscape and provided for as a permitted activity subject to the provisions of the NES-PF. While the notes to this chapter refer to the Plan’s ability to establish more stringent rules than the NES-PF, no justification for this has been provided in the section 32 report and, doing so, would fail to meet the wider policies and objectives of the Plan for example PRROZ-01, RPROZ-03, RPROZ-04, and RPROZ-P1.

Policy CE-P6 seeks to grandparent an existing land use that may be or could become unsustainable both in terms of economic and environmental effects. The Plan should allow for all primary production activities subject to managing any adverse effects.

Relief sought:

1. Amend CE-P6 to read “ *Provide for primary production activities within the coastal environment where:*
 - a. *the use forms part of the values that established natural character of the coastal environment; or*
 - b. *the use is consistent with, and does not compromise the characteristics and qualities.” and*S148.032
2. Delete CE-R6. And S148.033
3. Provide for existing Plantation Forestry and Plantation Forestry Activities in the coastal environment as a permitted activity subject to the provisions of the NES-PF. Or, in the alternative S148.034
4. Remove any areas of existing plantation forestry from the coastal environment overlay mapping. S148.035

Submission 15: Earthworks

While Note 4 to the rules states that “*Earthworks associated with plantation forestry are regulated under the National Environmental Standards for Plantation Forestry 2017 (NES-PF) and are not managed through the District Plan except where district plan rules may be more stringent under Regulation 6 of the NES-PF*”, the structure of the rules in this chapter does not appear to support this. Unlike farming, plantation forestry and plantation forestry activities are not explicitly provided for such that the general provisions of EW-R6 and R7 would apply.

No justification is provided for more stringent standards for earthworks associated with plantation forestry activities in the coastal environment or the ONL or ONF overlays, especially as those standards do not apply to other primary production activities.

The section 32 analysis states that “*Overall, the proposed Earthworks chapter has been drafted to recognise that Earthworks are managed to a greater degree by the regional council, and to avoid duplication and overlaps between territorial and regional plans.*” However, as drafted, the proposed standards exceed, duplicate, and overlap with the regional rules and, in the plantation forestry context, appear unworkable.

SFNZ also notes that the earthworks Matters of Discretion appear to exceed the scope of the District Council’s functions under section 31 of the Resource Management Act and, contrary to its section 32 analysis, stray into the functions of the Regional Council.

Relief sought:

1. Provide for earthworks associated with plantation forestry and plantation forestry activities as a permitted activity subject to the provisions of the NES-PF. And **S148.036**
2. Remove any requirement for plantation forestry activity to meet the requirements of the standards EW-S1, S2, S3, S4, s5, S6, S7, S8, and S9. These are provided for under the NES-PF and/or are beyond the scope of stringency provided for by section 6 of the NES-PF. And **S148.037**
3. Delete any Matters of Discretion that exceed the Council’s functions under the RMA. **S148.038, S148.039, S148.058 to S148.064**

Submission 16: Noise

While the chapter on noise states that the noise rules and effects standards do not apply to noise generated by “*...forestry planting and forestry harvesting in the Rural Production, Horticulture and Horticulture processing zones*” (point 5), the chapter fails to reference that noise and vibration associated with all plantation forestry activities is a permitted activity subject to the provisions of regulation 98 of the NES-PF.

Relief sought: Amend the chapter to make it clear that noise and vibration associated with all plantation forestry activities is a permitted activity subject to the provisions of regulation 98 of the NES-PF. **S148.040**

Submission 17: Treaty Settlement Land Overlay

The note 1 to the Rules states “Refer to Note 2 above”. There is no “note 2 above” in this section of the Plan. The notes to the rules of this section will be key to the reasonable interpretation of the rules and must be clear and unambiguous.

Relief sought:

1. Amend Note 1 by ensuring the reference to “note 2” either references the relevant section of the plan note 2 can be found or, if “note 2” is with this section, amend the wording to **S148.041** read “Refer to Note 2 below”. And
2. Retain note 3 as currently worded. **S148.042**

Submission 18: Mineral extraction overlay

Plantation forestry relies on establishing and maintain robust roading networks within a forest. The availability of suitable roading aggregate within a forest greatly improves the efficiency and economics of a forestry activity while reducing establishment effects on local roads. The Plan should provide explicit provision for quarrying within a Plantation Forest for use under the same ownership or management as set out in regulations 50 to 59 of the NES-PF. While note 2 to the rules refers to the NES-PF, it does not explicitly state that forestry quarrying in accordance with the regulations is permitted and it incorrectly references regulations 93 and 94 of the NES-PF.

Relief sought:

1. Correctly reference the relevant quarrying sections of the NES-PF. And **S148.043**
2. Provide explicit reference to forestry quarrying as permitted under the Plan subject to the provisions of the NES-PF and provide a rule to this effect. **S148.044**

Part 3 – Area-Specific Matters

Submission 19: Rural Production Zone

In general, SFNZ supports the objectives and policies of this zone except where they seek to grandparent existing land use in favour of one form of primary production over others. Land use in the rural production zone needs to be able to adapt to changing economic and climatic conditions to ensure long term sustainability.

RPROZ-R12; Consistent with SFNZ’s submission on the definition of “Farm Quarry”, the rule needs to provide for quarrying for use within the same management unit and include production forestry subject to the provisions of the NES-PF.

RPROZ-R15; SFNZ opposes the requirement that plantation forestry and plantation forestry activities do not occur on versatile soils. Notwithstanding the fact that plantation forestry is not an irreversible land use and will not compromise the soil for other primary production activities, there are no provisions within the NES-PF that would allow Council to apply a more stringent rule in this regard. Specifically, “An NES prevails over district or regional plan rules except where the NES-PF specifically allows more stringent plan rules” (mpi.govt.nz). SFNZ would also note that the National Policy Statement for Highly Productive Land does not support such an approach. Picking winners in this regard can lead to perverse outcomes such as fragmentation of land holdings, land locked into unsustainable use, and consequential adverse environmental and social effects.

RPROZ-S3 provides setbacks for buildings or structures from site boundaries. The proposed Plan does not appear to provide for set backs for building and structures along a plantation forest boundary. The minimum setback along a existing plantation forest boundary should be at least 30m to account for shading and the risk of wind throw.

Relief sought:

1. Amend any reference to “farming activities” in the Rural Production objectives and policies to “primary production activities” and any reference to “farming” to “primary production” and any other changes to like effect. And S148.045 &
S148.046
2. Amend RPROZ-R12 to refer to “Farm/Forestry Quarry” and include a further clause under PER-1 that reads “*subject to the provisions of the NES-PF*”. And S148.047
3. Amend RPROZ-R15 by deleting PER-1 “*It is not located on versatile soils*” and change “*Activity status where compliance not achieved*” to “Not Applicable”. And S148.048
4. Amend RPROZ-S3 to provide for setbacks of at least 30m from existing plantation forest boundaries and make any consequential amendments required at all other applicable standards. S148.049

Submission 20: Rural Lifestyle

RLZ-R10; As stated in our above submission on RPROZ-R15, SFNZ opposes the requirement that plantation forestry and plantation forestry activities do not occur on versatile soils. The reasons for our opposition to requirement in RPROZ-R15 equally apply to RLZ-R10.

Relief sought: Amend RLZ-R10 by deleting PER-1 “*It is not located on versatile soils*” and change “*Activity status where compliance not achieved*” to “Not Applicable”. S148.050

Submission 21: Horticulture

HZR11; As stated in our above submission on RPROZ-R15, SFNZ opposes the requirement that plantation forestry and plantation forestry activities do not occur on versatile soils. The reasons for our opposition to requirement in RPROZ-R15 equally apply to HZR11.

Relief sought: Amend HZR11 by deleting PER-1 *“It is not located on versatile soils”* and change *“Activity status where compliance not achieved”* to *“Not Applicable”*.

S148.051

Submission 22: Māori Purpose

SFNZ manages a number of plantation forests that have been zone Māori purpose. While farming is recognised and provided for as a permitted activity within this zone, other primary production activities are not. This both inequitable and contrary to the objectives and policies of this and other sections of the Plan that address Māori owned lands.

Relief sought:

1. Amend MPZ-R3 to refer to “Primary Production activity” instead of “farming activity” or, in the alternative;
2. Provide for other primary production activities, including plantation forestry, as permitted activities within the Māori Purpose zone.

S148.052

Part 4 – Appendices and Schedules

Submission 23: APP1 – Mapping methods and criteria

Without limiting SFNZ’s foregoing submissions, the Plan’s overlays for Outstanding Natural Landscapes, Outstanding, and High Natural Character, and Coastal Environment captures significant areas of SFNZ’s plantation forests. This could create uncertainty and open SFNZ to challenge over its legitimate plantation forestry activities in these areas. SFNZ is happy to work with the District Council to correct these overlays.

Relief sought: Remove any Outstanding Natural Landscape, Outstanding, and High Natural Character, and Coastal Environment overlay from plantation forest areas.

S148.053 to
S148.056

Submission 24: SCHED4 – Schedule of significant natural areas

The Section 32 Analysis for Ecosystems and Indigenous Biodiversity, in reference to the limitations of the operational District Plan, states *“Not mapping SNAs will also not give effect to the proposed NPSIB when this takes effect as SNA mapping is central to its implementation”*. While there is still uncertainty over the final form of the NPS-IB, there is little doubt that it will require SNA’s to be mapped. The Council’s decision to take a framework approach appears based on the negative feedback to a flawed mapping process that failed to consult adequately with landowners prior to presenting them with potentially inaccurate information. The resultant framework that is established under the proposed plan is neither efficient nor effective and, as recognised in the section 32 report, will shift a significant cost impost for a public good from Council to landowners and at a significant scale. This will adversely affect primary production activity in the District.

Relief sought:

1. Work with the Forest Industry to map and schedule all SNA within the boundaries of plantation forests. And
2. Establish a process whereby the costs of an ecologist's report on a potential SNA area is fully funded by Council when associated with primary production activity and the voluntary scheduling of SNA areas.

S148.057

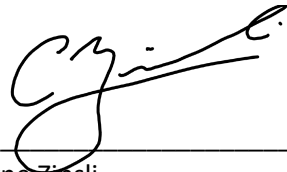
Summit Forests wishes to be heard in support of this submission and I am happy to answer any questions that may arise from this submission. We will endeavour to present our submission in person but, if circumstances do not allow, we may opt to present via Microsoft Teams.

If others make a similar submission, Summit Forests would consider presenting a joint case with them at the hearing.

Summit Forests will not gain an advantage in trade competition through this submission.

Dated this 18th day of October 2022.

Signature: Summit Forests New Zealand Limited

A handwritten signature in black ink, appearing to read "C Zinsli", written over a horizontal line.

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