

28 February 2025

Via email: [RFI@mpi.govt.nz](mailto:RFI@mpi.govt.nz)

## SUBMISSION TO THE MINISTRY FOR PRIMARY INDUSTRIES ON PARTNERING TO PLANT TREES ON CROWN-OWNED LAND: REQUEST FOR INFORMATION

Thank you for the opportunity to respond to the Request for Information (RFI) on Partnering to Plant Trees on Crown-Owned Land.

The Queenstown Lakes District Council (QLDC) supports the government encouraging permanent native tree planting and reforestation on low-value conservation and farmland that is consistent with the purpose of conservation land and retains biodiversity and recreation outcomes. QLDC does not consider that the proposal as outlined can meet the stated objectives for biodiversity, the environment, climate change, and the economy.

QLDC has an interest in this RFI for several reasons, including:

- QLDC-managed land either borders or is an access point for potential planting areas. Many of these areas are well used recreational areas, and/or land that is in QEII covenant. The provided maps give a preliminary indication of what has been deemed low-value conservation land suitable for planting, but many of these areas are considered to have high value to communities in the district as natural landscapes and for recreation.
- Conservation land and the natural landscapes in the district are one of the main reasons that visitors from New Zealand and abroad visit the region. Tourism forms a large part of the local economy, accounting for 39% of GDP and 52% of all employment in the district in 2020. The benefits extend beyond the district. Pre COVID-19, international visitors who came to New Zealand because of the Queenstown-Lakes District contributed \$1.3 to \$1.6 billion to Aotearoa New Zealand's economy<sup>1</sup>.
- Planting of exotic forestry in areas of low conservation value but high landscape value would be inappropriate. Approximately 97% of the Queenstown-Lakes District (the district) is classified as either Outstanding Natural Landscape (ONL) or Outstanding Natural Feature (ONF). The indicative mapping indicates that these are likely to be located within either ONLs or ONFs. Further, the mapping also appears to show that some of these areas may be close to Significant Natural Areas identified in the Proposed District Plan. It is important that these areas are protected to ensure consistency with the objectives, policies and rules of the Queenstown Lakes Proposed District Plan.
- The district has a significant issue with wilding tree species and eradication efforts are ongoing, including in potential planting areas. The wilding eradication efforts have required extensive funding from central, regional and local government, alongside strong community involvement and volunteer efforts clearing wilding species and subsequent native reforestation. The challenge of the task is exacerbated by mountainous and alpine terrain and the geographic scale, being the sixth largest district in the motu.
- In 2023, the district experienced the adverse effects of a landslide that was compounded by forestry slash on the Ben Lomond Reserve, damaging public and private property. This event reinforced that the district is generally not suited to monoculture production forestry due to the nature of the terrain, as well as a lack of wood processing facilities and protection of local ecological values. The terrain means harvesting of

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<sup>1</sup> <https://www.infometrics.co.nz>

production forestry is likely to cause significant environmental damage, and planting monocultures of exotic species will impact on water quality and river systems, introduce maintenance requirements, increase wildfire risk, and reduce biodiversity.

QLDC has experience in production forestry where the wrong tree was planted in the wrong place. Council has been through the costly process of early harvest of its own forest of Douglas Fir, planted in the 1980s to 1990s using central government incentives, as it was a major wilding seed source. QLDC would like to ensure the same mistakes are not repeated. The forestry area is now being replanted in native trees in one of the largest native reforestation projects undertaken in Aotearoa, in partnership with Te Tapu o Tāne. The area is being turned into a community recreation hub, and its reforestation is a key goal in QLDC's Climate and Biodiversity Plan. Over 500,000 indigenous species of grasses, scrubs and trees will be planted across 200 hectares.

QLDC recommends that if regulatory barriers to planting on conservation land are altered, strong protection for biodiversity, conservation and recreation outcomes are ensured. There are a number of aspects of the RFI that QLDC considers incentivise planting of fast-growing exotic species (with wilding potential) or production forestry that is not appropriate for any type of conservation land in the district:

- There is no funding attached to the proposal, which means the likely applicants will be forestry companies looking for economic gain through production forests or the Emissions Trading Scheme.
- Iwi, non-government organisations, community groups and philanthropists are already making significant contributions to native reforestation efforts in the district and do not have capacity to do more unless funding is provided. The main barrier for community groups to plant on conservation land is funding, and the requirements and capacity of DOC to enter into community planting agreements. Community groups can be part of the solution, but funding is needed to enable this.
- One of the intentions of the proposal is to help contribute to New Zealand's 2050 emissions target. While planting will create a carbon sink, only exotic tree species such as radiata pine are likely to grow fast enough to make a significant contribution to the 2050 target.
- There is a lack of clarity on what 'low-value' conservation land is, as all conservation land has value. Much of the land in the district that is preliminarily identified as having low conservation value has high recreational value or is already a site of active native reforestation.

QLDC recommends the best way to achieve the desired outcomes for biodiversity, the environment, climate change, and the economy is to support planting on low value conservation land with permanent native tree species that are appropriate to the area and can become long-term carbon sinks while creating rich biodiversity. QLDC hopes that the Ministry for Primary Industries will design and develop a programme that achieves these outcomes.

Thank you again for the opportunity to comment.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kenneth Bailey', with a large, stylized flourish at the end.

Kenneth Bailey  
**General Manager – Community Services**