**Submission form on proposed changes to the Climate Change (Forestry Sector) Regulations 2008**

Use this form to make a submission.

The questions in this form are grouped by topic.

You can submit just on the topics relevant to you or on the full set of questions. The questions and page numbers referenced relate to the [Forestry regulations discussion paper](https://www.mpi.govt.nz/sorry-we-couldnt-find-what-you-wanted/).

# Contact details

Type

Organisation

Individual

Title

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Name

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Organisation

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Address

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# Averaging accounting: how it will work in practice (page 10)

## How wide should each rotation be?

1. Do you prefer:

Wide rotation bands

Narrow rotation bands

Mixed-width rotation bands

Why?

Click here to enter text.

2. Exactly how wide (in years) should rotation bands be? Why?

Click here to enter text.

3. Do you agree with applying the same rotation band width settings across all forest types?

Yes

No

Why or why not?

Click here to enter text.

## When should we assume a participant will harvest their forest (in order to allocate a default rotation band)?

4. Do you agree with the proposed assumed harvest ages?

Yes

No

Why or why not?

Click here to enter text.

5. Do you agree with the approach to setting a very high harvest age for indigenous forests?

Yes

No

Why or why not?

Click here to enter text.

6. What impacts are there from setting these harvest ages?

Click here to enter text.

7. Do you have an alternative assumed harvest age for indigenous forests, or alternative data sources we should use for other forest types? What are they?

Click here to enter text.

## Where should we set the assumed harvest age within each rotation ban?

8. Do you prefer:

Early in the band

In the middle of the band

Mixed, depending on age (our preferred option)

Why?

Click here to enter text.

## Rules for changing rotation bands

9. Do you agree with our proposed rules for changing between bands?

Yes

No

Why or why not?

Click here to enter text.

10. How will our proposed approach impact participants?

Click here to enter text.

## Rules for changing forest type

11. Do you agree with our proposed approach for accounting for changes in forest type?

Yes

No

Why or why not, and what alternative approach would you suggest?

Click here to enter text.

12. How will our proposed approach impact participants?

Click here to enter text.

## Rules for how to prevent second rotation forests joining as a first rotation

13. Do you agree with our preferred option?

Yes

No

Why or why not?

Click here to enter text.

14. How can we monitor this policy to make sure the length of the stand-down period is appropriate?

Click here to enter text.

15. Are there any other factors we should consider when setting the length of the stand-down period?

Click here to enter text.

## Rules to prevent over-crediting following an artificially low rotation band

16. Do you support the preferred option?

Yes

No

Why or why not?

Click here to enter text.

17. Do you have any other ways to prevent double crediting in this situation?

Click here to enter text.

18. What are the likely impacts of closing the long-short-long loophole?

Click here to enter text.

# Permanent post-1989 forests: a new way to earn NZUs for carbon stored in forests which will not be clear-felled for at least 50 years (page 29)

19. Are there any specific issues we should consider when applying existing regulations to permanent post-1989 forests?

Click here to enter text.

# Simple reporting: an option for simplified reporting for some forests under averaging accounting (pg 32)

20. Do you support the introduction of tick box reporting?

Yes

No

Why or why not?

Click here to enter text.

21. Are there any other ways we could make reporting easier to comply with?

Click here to enter text.

# Input returns: the option to send us your information so we can calculate your emissions and removals (page 34)

## Which forestry activities should be covered by the provision?

22. Do you support our preference to offer this to all forest activities?

Yes

No

Why or why not?

Click here to enter text.

23. Once the service is offered, which forestry activities would you like to see this service offered to?

Click here to enter text.

## What data or information must be supplied?

24. Would you be willing to provide us with information required to define sub-areas?

Yes

No

Why or why not?

Click here to enter text.

25. What other information do you think we would require other than hectares, forest type, year planted and year cleared?

Click here to enter text.

26. Are there other technological or software improvements we could introduce to make the ETS simpler to use and access?

Click here to enter text.

# Field Measurement Approach (FMA): applying the FMA to more post-1989 forest categories (page 37)

## Making FMA optional for the 2023-2025 mini-MERP

27. Do you agree with the proposal?

Yes

No

Why or why not?

Click here to enter text.

## Determining the 100 hectare threshold for FMA

28. Which option do you prefer?

We aggregate averaging, permanent post-1989, and stock change forests for the FMA

We treat averaging, permanent post-1989 forests, and stock change forests separately for the FMA

Why do you prefer this option?

Click here to enter text.

29. Would your choice of options change if the frequency of FMA information collection could be reduced for older forests – for example, if collection were reduced to 10 year intervals for exotic forests over 15-years, or for indigenous forest over 25-years.

Click here to enter text.

## How the FMA will apply to post-1989 forests under averaging accounting

30. Do you agree with the proposed approach to stop collecting FMA information from sample plots once a first rotation post-1989 forest under averaging accounting has been cleared?

Yes

No

Why or why not? Do you have an alternative approach?

Click here to enter text.

31. Do you agree with the proposed approaches for a second or subsequent rotation, to use first rotation FMA information to derive an appropriate carbon table specific to you?

Yes

No

Why or why not? Do you have an alternative approach?

Click here to enter text.

32. What do you suggest should be the threshold for requiring that a ‘significant change in final stocking rate’ between rotations must be taken into account?

Click here to enter text.

## Collection of FMA data from the two new post-1989 forest categories

33. Do you agree with the proposed approach to use the same provisions that are used for post-1989 forests under stock change for frequency of collection and number of plots when collecting and supplying FMA information?

Yes

No

Why or why not?

Click here to enter text.

## The future of the FMA

34. Are there other options for application of the FMA that you think could be readily accessed by all FMA participants in the near future and should be considered?

Click here to enter text.

# Grant funded forests: preventing credits being earned during a stand-down period (page 43)

35. Which option for calculating NZU entitlement for a grant funded forest do you prefer?

forest age

deducting option

Why?

Click here to enter text.

# Carbon equivalent forest land swaps: being able to relocate your post-1989 forest by planting elsewhere, so long as the new forest stores the same amount of carbon (page 48)

## When you can apply to establish a new forest via a forest swap

36. Do you agree with our proposed option to allow excess land from an old forest swap application to be used for a new application within 2 years of the old application finishing?

Yes

No

Why or why not?

Click here to enter text.

37. Are there any additional criteria we should prescribe for the new forest? If so, what are they?

Click here to enter text.

38. Is there additional information we should request from applicants? If so, why?

Click here to enter text.

## How we will calculate carbon ‘equivalence’

39. Do you agree with using default tables to calculate carbon equivalence between the old and new forests?

Yes

No

Why or why not?

Click here to enter text.

## How a new swap forest will be treated under averaging accounting

40. Do you agree with our approach to treating new forest as perpetually on the default tables once a forest swap has been completed?

Yes

No

Why or why not?

Click here to enter text.

# Temporary adverse events: an exemption from surrendering NZUs if a participant’s forest is affected by a temporary adverse event (page 55)

## The types of temporary adverse events which will qualify for an exemption

41. Do you support our preferred option (the exhaustive list)?

Yes

No

Why or why not?

Click here to enter text.

42. What adverse events would you add to the exhaustive list?

Click here to enter text.

43. What harvesting will usually occur during the response to, and following, an adverse event?

Click here to enter text.

## The minimum area affected before an event qualifies for an exemption

44. Do you agree with our preferred option of a minimum threshold of one hectare?

Yes

No

Why or why not?

Click here to enter text.

45. Approximately how many adverse events that clear over one hectare have you experienced over the last 10 years?

Click here to enter text.

46. Approximately how many adverse events clearing over five hectares have you experienced over the last 10 years?

Click here to enter text.

## The minimum amount of carbon stock lost before an event qualifies for an exemption

47. Do you agree with our proposal to have a minimum carbon stock loss of 1 t CO2-eqv, which is equivalent to 1 NZU?

Yes

No

Why or why not?

Click here to enter text.

## How to notify us

48. Which option do you prefer?

Notify us of event type, start date and description of event with geospatial information, before any harvest which is not part of best practice forest management, or next emissions return for the CAA (whichever is sooner)

Notify us of event type, start date and description of event without geospatial information, before any harvest which is not part of best practice forest management.

Why?

Click here to enter text.

49. Are there any other options for notification which we haven’t considered here?

Click here to enter text.

50. What areas do you consider need to be harvested following an adverse event for best practice forest management?

Click here to enter text.

## Carbon Stock Calculations once an adverse event has been separated into a CAA

51. Do you support our proposed approach?

Yes

No

Why or why not?

Click here to enter text.

# Tree weed (wilding pine) management: exemptions from surrendering NZUs for tree weed management on pre-1990 land (page 65)

## The tree weed exemption application process

52. Do you support our preferred option?

Yes

No

Why or why not?

Click here to enter text.

53. Are there any tree weed species, geographical areas, or landowners who should have fast-track application processes? Why?

Click here to enter text.

54. With mixed species forests, what proportion of the trees should be tree weeds before the forest can qualify for an exemption? Why?

Click here to enter text.

## Other criteria or priorities we must consider in deciding whether to grant an exemption

55. Do you support requiring a tree weed control plan as a criteria which we must consider?

Yes

No

Why or why not?

Click here to enter text.

56. What further evidence do you think we should consider when deciding to approve a deforestation liability exemption for clearing pre-1990 tree weeds?

Click here to enter text.

## How long should the exemption last?

57. Do you support extending the time a tree weed exemption lasts to five years, with a five year renewal option?

Yes

No

Why or why not?

Click here to enter text.

# Best practice forest management: establishing the requirements (pg 71)

58. What publications or practices do you think we should list as ‘best-practice forest management’? Why?

Click here to enter text.

59. Where are inconsistencies likely to occur when interpreting ‘best practice forest management’ between various documents or practices?

Click here to enter text.

# Penalties: introducing penalties for clear-felling permanent post-1989 forest registered in the ETS (page 73)

60. Which option (using the actual age of the trees, or assuming an age of 50) do you prefer to calculate the deemed value of timber?

the carbon stock at the age of the forest when it was cleared.

the carbon stock when the forest has reached 50 years of age.

Why?

Click here to enter text.

61. Do you think the deemed values are accurate? If not, what alternate data sources should we use?

Click here to enter text.

# Standards: making changes to Standards as a consequence of regulations (page 77)

62. Do you support us updating the Geospatial Mapping Information Standard to reflect changes in the Regulations?

Yes

No

Why or why not?

Click here to enter text.

63. Do you support us updating the FMA Standard and FMA Information Standard to reflect changes in the Regulations, or to make the suggested minor and technical changes?

Yes

No

Why or why not?

Click here to enter text.

# Are there any other comments you’d like to make?

Click here to enter text.