

1: Who are you?

	Response
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2: Please indicate your sector(s)/interest(s)/type(s) of organisation:

Response
Registered Forestry Consultant

3: Threshold area and time at which the FMA becomes mandatory - Proposal 1: Participants below the 100 hectare threshold use the default look-up tables only. - Proposal 2: Participants at or above the 100 hectare threshold use the FMA only. Is the proposed 100 hectare mandatory threshold reasonable? Are there issues about the 100 hectare threshold and rules about when to apply the participant-specific look-up tables that you wish MAF to consider? What are your views on the manner and extent to which legal and beneficial ownership changes (such as those in trusts, partnerships and bodies corporate) should be relevant in determining a participant's total forest land ownership?

Response
The mandatory threshold is at 100ha is fine for exotic species. Native particularly (regenerating) forests should be higher at 250ha. Field measurement is more expensive in native regenerating blocks, as show on page 14 of the consultation document, an sequestration rates are lower. Having the same mandatory area for both types places indigenous at another disadvantage against exotic species. If you are going to have mandatory areas, i.e. 100ha for exotic and 250ha for native, participants should also have the ability to choose if they want to adopt the FMA or look up tables if below these thresholds. One way to combat the "playing" of one method against the other to the forest owners perceived advantage (I my opinion this would be a very low risk to the crown) would be to reduce the look up tables across the board by 10%. This would encourage landowners to adopt the FMA in most cases unless it was uneconomic to do so.

4: Frequency and timing of forest measurement Proposal 3: Field measurements at least once in every mandatory emissions return period. Proposal 4: Confirm or update silvicultural information. Do you agree with the proposed frequency and timing of forest measurement? Are there issues about this that you would like to raise?

Response
Agree

5: Establishment of permanent sample plots – location and number Proposal 5: Participants obtain sample plot locations from MAF. Proposal 6: The minimum number of plots is based on forest land area. Proposal 7: Half the sample plots are required for indigenous, compared with exotic forest land. Proposal 8: Ability to identify forest areas as indigenous or exotic (Forest Class). Proposal 9: Ability to have more than the minimum number of sample plots. Proposal 10: Sample plots will be located on a grid with a random start-point. Proposal 11: Sample plots must be located in the field using a GPS unit and according to rules. Proposal 12: Ability to request a new set of sample plots. What are your views on the proposed minimum numbers of sample plots? Are there issues with the proposed methodology that you would like to raise? Has MAF estimated compliance costs correctly, for exotic and indigenous forests?

Response
Methodology seems fine. Costs of measuring indigenous forests could be much higher per plot. I have completed a large number of inventory plots in mature native forest (which would be easier going) and there can be significant costs in getting to the forest area.

6: Forest data to be collected at sample plots Proposal 13: The forest data FMA participants will be required to collect at each sample plot. Proposal 14: Measure trees over 2.5cm diameter. Sub-sampling is possible for areas with a high-stocking of young trees. Proposal 15: Specific procedures for recording and supplying data. Do you agree with the proposed information requirements? Are there issues with collecting the proposed information? What are your views on mandatory or optional provision of shrub data? Are there any other issues regarding the information requirements that you would like to raise?

Response
Info requirements are fine. Shrub data is important in my view, I would be measuring it but as long as I have the option that would be fine. No other comments

7: Calculating forest carbon stocks Proposal 16: Collecting and processing data, and use of participant-specific look-up tables. Proposal 17: Declarations. Proposal 18: Use of the data for other purposes (e.g., development of enhanced look-up tables). What are your views on the proposed methodology, and the proposed mandatory use of a MAF-specified Carbon Calculator on your behalf? Do you agree MAF should be able to use submitted sample plot data for other purposes (e.g., development of enhanced default look-up tables)?

Response
Methodology for preparing look up tables is fine as long as there are good systems in place to process the data efficiently and quickly. Yes use the data for other purposes.

8: Dealing with changes to carbon accounting areas (CAAs) Proposals 19 and 20:

Rules that determine required numbers of sample plots, and approaches to carbon accounting, when the area of a participant's forest landholding changes. What are your views on the proposed rules for when the size of a participant's forest landholding changes?

Response
Fine

9: Waiver of requirement to use the FMA Proposal 21: Specific waivers for one or more specific sample plots. Proposal 22: General waiver from the requirement to use the FMA for a given emissions return. What are your views on the proposed waivers and the criteria that could warrant specific or general waivers?

Response
Fine no comments

10: Fees and charges Proposal 23: No fees for MAF's processing of participants' use of the FMA. Comments?

Response
Happy with no fees if all ETS processing doesn't suffer as a result of an increased work load. If a \$100 fee would help resourcing then that wouldn't be too much of a burden to the land owner.

11: Compliance and audit Proposal 24: Ability for MAF to recover costs if the FMA must be used on behalf of a participant. Proposal 25: Voluntary list of skilled forest inventory/FMA providers. What are your views on MAF recovering actual and reasonable costs incurred in carrying out field measurement if a participant fails to do so for a required emissions return? Would a list of skilled providers of services for the FMA be useful, or can you suggest another approach that would be better?

Response
24 - If the FMA was optional this would not be needed - revert to the discounted/reduced look up tables. 25 - List is good as long as it is backed by adequate training by MAF which could be cost recoverable. Suggest that Registered Members of the NZ Institute of Forestry would be a good place to start. Have a complaints process and code of ethics.

12: Timing of introduction of Regulations and mitigating delays Proposal 26: Option of a mandatory 200 hectare threshold for the first compliance period only. What are your views on the option of increasing the threshold at which the FMA becomes mandatory to 200 hectares for the first mandatory emissions return period only? Can you suggest any other options, should FMA Regulations be delayed?

Response
Make the FMA completely optional in the first commitment period.

13: Minor and technical amendments – definitions and default look-up tables Proposal 27: Minor and technical amendments: - for definitions of area and sub-

area; · to introduce a pre-1990 indigenous forest deforestation default look-up table;
· to introduce a post-1989 indigenous forests harvest residues default look-up table.
What are your views on these proposals?

Response

Fine no comments

14: Minor and technical amendments – other Proposal 28: Minor and technical amendments for: · proposed fee schedule for reconfiguring a carbon accounting area; · ability to grant an exemption, waiver or refund for part or all of fees. What do you think about the proposed fee schedule for reconfiguring CAAs? Do you have any comments about the Chief Executive of MAF being able to grant an exemption, waiver or refund for part or all of fees payable under the forestry sector Regulations?

Response

No comments

15: Other comments Are there any other comments you would like to make on the proposed FMA? Are there any other comments you would like to make on the proposed minor and technical amendments? Are there any other relevant problems, alternatives, or impacts (both costs and benefits) from the proposed Regulations that should be considered?

Response

No Comments