



Parliamentary Commissioner  
for the **Environment**  
Te Kaitiaki Taiao a Te Whare Pāremata

**Advice to the  
Emissions Trading Scheme Review Select Committee:  
Impact of the ETS on Indigenous Land Cover - Recommendations  
Dr Jan Wright**

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### **Carbon stock tables**

The ideal long term balance between exotic production forests and natural indigenous forests must be considered, and not just in terms of carbon storage potential. If vast exotic plantations are not wanted, New Zealand needs to do something different now.

The ETS strengthens existing incentives for exotic plantations, at the expense of indigenous forests. A particular problem relates to the current carbon look-up tables, contained in the Climate Change Response Act Forestry Regulations. These define how many credits a particular forest can earn. Indigenous forest carbon sequestration is rewarded at a simple flat rate of three tonnes CO<sub>2</sub>/hectare/year. This is low; Landcare have shown rates that are two or three times greater than this for regenerating manuka/kanuka.

Indigenous forest will never sequester carbon as fast as exotic forest in the short term. However, current regulations unjustifiably discourage planting of, or reversion to, indigenous forests. MAF are reportedly working on better carbon look-up tables, but they have given no timeline for completion. In the interim, owners of indigenous forests are being disadvantaged.

#### **Recommendations 1 & 2**

I recommend the committee endorses amending the indigenous carbon look-up tables in the forestry regulations as soon as possible, to make them consistent with the best available scientific information.

I recommend the committee establish when the amended carbon look-up tables will be available.

## Wilding Pines

Conifer seeds can travel up to 30km and these seeds grow into wilding pines. If uncontrolled, these wilding pines can colonise grassland and scrubland, preventing grazing and radically changing the ecology and landscape. Wilding pines are an increasing problem in the South Island high country and parts of the North Island.

Tree weed forests are eligible for carbon credits under the current ETS. This creates a disincentive to control wildings. The suggestion has been made that “letting wildings go” could provide significant carbon sequestration. However, given the other negative economic and environment impacts of wilding pines, the Government needs to decide if using wilding pines for carbon sequestration is appropriate.

### **Recommendation 3**

I recommend that it is established in which circumstances, if any, wilding pines might be appropriate for carbon sequestration.