

To: Ministry for Cities, Environment, Regions and Transport

From: Wood Processors and Manufacturers Association of NZ
(WPMA)

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Subject: Illustrative National Policy Direction (NPD)

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1. Introduction

1.1 The Wood Processors and Manufacturers Association of NZ (WPMA) appreciates the opportunity to provide feedback on the proposed Illustrative National Policy Direction (NPD). The NPD is intended to translate the goals of the proposed Planning Act and Natural Environment Act into national priorities and directives for regional spatial plans, land use plans, natural environment plans and national standards. Given that central role, its directives must be clear, internally consistent and sufficiently precise to support predictable implementation across the planning system.

1.3 WPMA's primary interest is ensuring the planning framework supports a secure and sustainable wood fibre (log) supply, enables investment in wood processing and manufacturing, and recognises the importance of forestry to the wood manufacturing value chain.

1.3 WPMA submits in general support of the recommendations advanced by the New Zealand Forest Owners Association (NZFOA) within their submission. Specifically:

- apply consistent enabling, proportionality and operational-flexibility principles across the primary production sub-themes;
- clarify the respective roles of national standards, land use plans and natural environment plans, including the principal mechanism for managing the effects of commercial forestry;
- identify the supporting and ancillary activities that must be recognised and provided for as part of commercial forestry;
- avoid controls that duplicate or conflict with requirements imposed under other legislation; and
- provide an integrated regulatory pathway for activities that involve both land use and effects on natural resources, including associated discharges.

1.4 These changes would better align the NPD with the proposed Acts' procedural principles of timeliness, consistency, cost-effectiveness and proportionality (s16), and with CC-Directive 8's direction to avoid unnecessary duplication or inconsistent regulation. They would also improve certainty for councils and regulated parties while supporting productive land uses and ensuring environmental effects are managed through clear and coherent national direction.

WPMA's comments are set out as below.

WPMA - Key Submission Points

2. Discussion - Consents for Wood Processing and Manufacturing Activity

WPMA underlines that consistent consenting processes are critical to encouraging growth within the wood products industry.

Highlighted below (2.1 to 2.4) are the key parts of the NPD that WPMA see will make a difference to wood product industry investment decisions once they are enacted. As a general comment it will be essential to ensure that planning authorities follow the criteria set within the NPD.

2.1 Enabling Associated Processing Activities

The NPD explicitly states that productive rural areas must enable primary production and associated processing activities (such as wood processing) alongside a mix of compatible activities.

- Land use plans are required to provide for wood processing activities, ensuring they are not unduly restricted by planning rules.

2.2 Proportionate and Risk-Based Regulation

- Controls on wood processing (as an associated activity to forestry) must be proportionate to the level of environmental or human health risk.
- The planning system is designed to reduce the number of consents and permits required, making the process more predictable and efficient.

2.3 National Standards and Consistency

- National standards will set out consistent requirements for processing activities, including wood processing, to ensure clarity and reduce compliance burdens.
- It is important that these standards will guide councils on when and how to require consents, focusing on managing significant effects rather than imposing blanket restrictions.

2.4 Reverse Sensitivity and Compatibility

- Land use plans must use planning tools (such as zoning and buffers) to separate incompatible land uses and protect processing activities from unreasonable constraints caused by new, sensitive, or incompatible activities nearby.
- It is expected that this will help ensure that wood processing facilities can operate without being unduly affected by complaints from new residential or sensitive developments.

Additional Key Points related to the NPD

2.5 Enabling Commercial Forestry

WPMA supports a nationally consistent, proportionate and risk-based regulatory framework that enables commercial forestry throughout its lifecycle, including establishment, management, harvesting and replanting.

A productive forestry sector is essential to maintaining the wood fibre (logs) resource that underpins New Zealand's wood processing and manufacturing industry.

2.6 Support Fibre Security and Domestic Processing

Planning settings should recognise that productive forests are the foundation of New Zealand's wood processing, manufacturing, pulp and paper, engineered wood products, and other value-added activities.

Hence the NPD needs to support long-term investment in productive forestry and policies that strengthen domestic value-added manufacturing.

2.7 Recognise the Full Forest-to-Manufacturing Supply Chain

The NPD should explicitly recognise infrastructure and activities that have a direct functional relationship with forestry and wood product manufacturing, including:

- Forest roads and river crossings
- Forestry quarries and earthworks
- Log storage and marshalling facilities
- Freight and transport infrastructure
- Utilities and supporting infrastructure
- Debarking, processing and manufacturing facilities

These activities are critical to an efficient fibre supply and regional economic development.

2.8. Retain Nationally Consistent Standards

WPMA supports national standards as the primary mechanism for regulating forestry activities and associated environmental effects.

National consistency reduces compliance costs, improves investment certainty and avoids unnecessary regional variation across the forestry and manufacturing supply chain.

2.9. Streamline Consenting

WPMA supports integrated and efficient consenting pathways for forestry and wood processing activities.

Regulatory frameworks should:

- Avoid duplication between agencies and planning instruments.
- Clearly allocate responsibilities.
- Provide coordinated approval pathways.
- Focus regulation on significant risks and effects.

Efficient consenting is critical to encouraging investment in both forestry and manufacturing.

2.10. Protect Against Reverse Sensitivity

Commercial forestry, wood processing plants and manufacturing facilities should be recognised as legitimate and expected activities.

Planning tools such as zoning, setbacks and buffer areas need to be used to protect existing and future operations from reverse sensitivity effects arising from incompatible neighbouring land uses.

3. Conclusion

WPMA supports amendments that:

- Explicitly provide for wood processing and manufacturing activities.
- Recognise forestry and processing infrastructure.
- Retain nationally consistent standards.
- Avoid unnecessary regulatory duplication.
- Establish streamlined consenting pathways.
- Protect forestry and wood processing activities from reverse sensitivity effects.
- Enable commercial forestry throughout its full lifecycle.
- Recognise the importance of productive forestry in securing future fibre supply.

These changes will help support investment, regional employment, increased domestic processing, and a stronger forest to manufacturing value chain for New Zealand.

The Wood Processors and Manufacturers Association

About us:

The Wood Processors and Manufacturers Association of NZ (WPMA) is a voluntary funded industry association. Our members are leaders in the New Zealand wood industry converting harvested logs into a wide range of products including sawn lumber, pulp, paperboard, panels, laminated products, mouldings, and engineered wood, through to the development of forest bio-products. Total sales of industry products both domestically and globally in 2025 were approximately \$5.2 billion. The industry employs close to 30,000 staff, mostly in the New Zealand regions. For more details see <https://www.wpma.org.nz/>