

Submission on  
**Resource Consent Application**



Form 13  
Under Section 96 of the Resource Management Act 1991.

**i** A copy of your submission must also be given to the resource consent applicant as soon as possible.  
All information provided in your submission is available to the public (on request).

**1. Person making submission**

Name in full: Mackie Glen  
Surname: First Name(s)

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**2. Submission on**

Application No: CP-2022-111365-00 / CD-2022-111366-00 / CC-2022-111367-00 / CR-2022-111368-00 / CO-2022-111369-00 et all

Name of applicant: Eastland Port

Type of resource consent applied for: Coastal Permit, Discharge to water/Construction/Dredging/Occupy space NES Soil/Land use

Brief description of proposed activity: Upgrade and expand the port

I support the application  I oppose the application  I am neutral to the application (neither support or oppose)

Clearly state which parts of the application you support or oppose or wish to have amended:

FOA supports the full application

The reasons for making my submission are (briefly describe the reasons for your views, attach further pages if necessary):

Eastland Port is one of the most expensive ports for our members to use due to port related congestion.

**Office use only**

Received date:   Support  Oppose  W.T.B.H  N.B.H

I wish the Gisborne District Council to make the following decision (give details, including the nature of any conditions sought):

Approve the Twin Bert Resource application in full.

Please tick:

I wish to speak at the hearing in support of my submission

Would you consider presenting a joint case with others who have made a similar submission?

Yes  No

I do not wish to speak at the hearing in support of my submission

### 3. Signature

Signature of person making submission or person authorised to sign on behalf of submitter



Date: 20 October 2022

Postal address of person making submission (if different from previous page):

Name and phone number (if different from previous page):

Contact person:

Mobile:  Other phone:

Email:

# Submission

## Gisborne Port: Twin Berth Stage 2

Submission to:

Gisborne District Council

[notifiedre@gdc.govt.nz](mailto:notifiedre@gdc.govt.nz)

NOTE: This is a supplementary submission to the submission lodged by FOA on the 20<sup>th</sup> October.

27 October 2022

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**Name of applicant: Eastland Port**

**Type of resource consent applied for: Coastal Permit, Discharge to water/Construction/Dredging/Occupy space**

**NES Soil/Land use**

**Proposed activity: Upgrade and expand the port**

## Contact Details

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Forest Owners Association  
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Ph: 027 445 0116

## Submitter

### Forest Owners Association

1. The New Zealand Forest Owners Association Incorporated (FOA) is the representative membership body for the commercial plantation forest growing industry. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand's 1.74 m hectares of plantation forests and over 75% of the annual harvest.
2. NZ Forestry export revenue is forecast to reach \$6.2 billion in the year ending June 2022 and this is expected to increase steadily in the coming years. Harvest volumes reached 36 million cubic metres in the year ended March 2022. While 2022 saw a significant decrease in log export revenue due largely to the impacts of the Covid interventions in NZ and abroad, this is forecast to recover by 2024 and then see an increase (SOPI June 2022).
3. The forestry sector also supports employment, investment, and development across New Zealand throughout its supply chain in both urban and rural New Zealand.
4. The FOA members rely heavily on the effective functioning of all the layers of New Zealand's multilayered log export system.
5. We welcome the opportunity to provide a submission on the on the Resource Consent Application for the Twin Berth Proposal.

## Summary

Forest Owner Association (FOA) members are in support of the Twin Berth proposal on the following basis;

- There is an improvement in the capacity and efficiency of the port to move logs.
- That the development delivers increased throughput for forestry products in the face of projected



near term increases in available volume.

## Background

### Profitability:

Currently our members regularly incur demurrage charges when using East Land Port. One of the major causes is congestion and the port layout.

These charges can run around US\$30,000 per day and have a material effect on the profitability of forest operations. As costs rise the distance circle around the port that can be harvested economically shrinks. This is leaving stranded forest resources which can not be harvested under current cost levels. This affects forest growers / owners and the contractors that work in these forests. Port charges are very material – operational costs and demurrage.

### Demurrage

*A charge payable to the owner of a chartered ship on failure to load or discharge the ship within the time agreed.*

### Volume:

Figure 1 presents the findings of a wood availability study for the East Coast planted exotic forest estate. This is based on the Ministry for Primary Industries (MPI) National Exotic Forest Description (NEFD) as at 01 April 2020. The forecasts project annualised woodflows for 40 years thereafter.

The forecasts are presented in a range of scenarios. FOA considers Scenario 3 presents a forecast suitable for planning purposes and is most likely to resemble actual volumes.

**Figure 1:**  
**East Coast Radiata Pine Availability under Scenario 3**

Source: National Exotic Forest Description

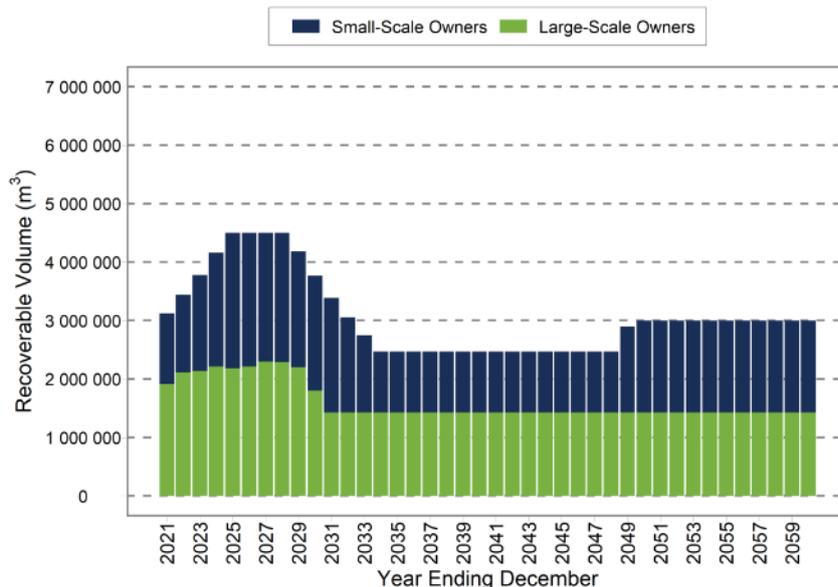


Figure 1 shows the radiata pine availability from all owners on the East Coast. The total volume increases to around 4.5 million m<sup>3</sup> per year for four years, then drops to around 2.5 million m<sup>3</sup> for a period of sixteen years. The volume then increases back up to a

sustainable annual cut of 3 million m3.

This data clearly shows over the next 10 years volume from the region can be expected to increase, then can be sustained at a very healthy 2.5 million m<sup>3</sup> per annum.

**Figure 2:**  
**Eastland Port Volumes for last 12 months (Sept Yr)**

Source: Forest Grower Levy Trust.

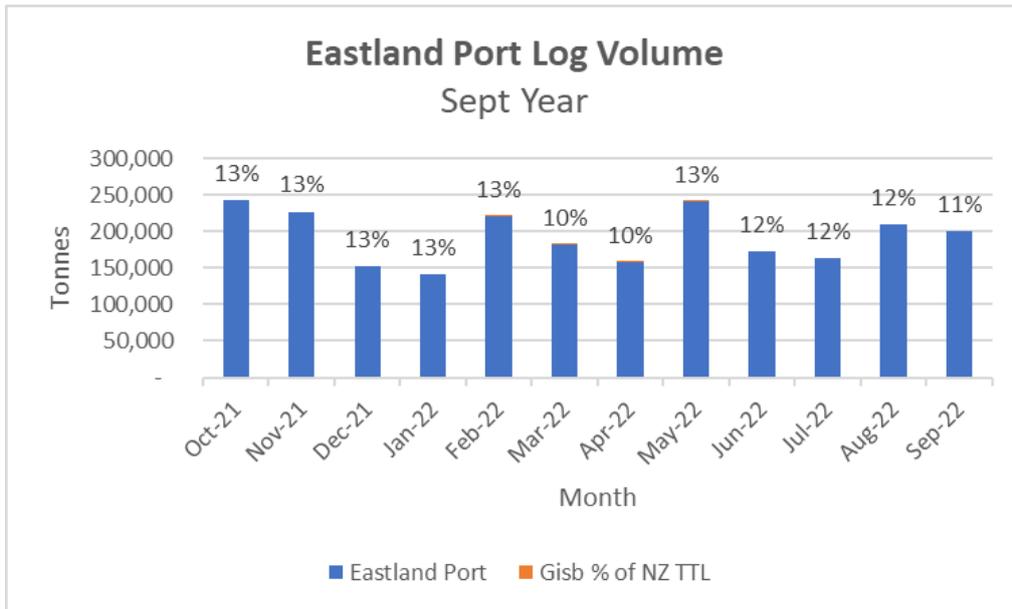


Figure 2 shows actual log volume for the last 12 months through Eastland Port, and the % that represents of the NZ total log export volume. Eastland Port carries between 10 and 13% of New Zealand's log exports showing how critical it is to the NZ Forest industry.

## Conclusion

FOA strongly supports this proposal to improve the efficiency of log operations at Eastland Port. Forecast volumes justify increased investment, particularly to address significant bottleneck issues.

Thank you for the opportunity to submit on this important issue.

**FOA request to speak to our submission at the public hearing in support of the resource application.**

**Glen Mackie**

Technical Manager

Forest Owners Association

027 445 0116

Glen.mackie@nzfoa.org.nz