Submission on

Resource Consent Application

Form 13

Under Section 96 of the Resource Management Act 1991.



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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 m	aking submission			
Name in full: Address:	Surname:		First Name(s)	
No.	Street/Road			Suburb
Town/City				Postcode
Mobile:			Other phone:	
Email:				
2. Submissi	on on			
Application No):			
Name of applic	cant:			
Type of resour	ce consent applied fo	r:		
Brief description	on of proposed activity	y :		
I support t	he application	I oppose the application	I am neutral to the application	n (neither support or oppose)
Clearly state w	which parts of the app	lication you support or oppos	se or wish to have amended:	
The reasons fo	or making my submiss	sion are (briefly describe the	reasons for your views, attach f	urther pages if necessary):

Office use only

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

· · · · · · · · · · · · · · · · · · ·	ure of any conditions sought):
Please tick:	
I wish to speak at the hearing in support of my submission) Van Na
Would you consider presenting a joint case with others who have made a similar submission? I do not wish to speak at the hearing in support of my submission	Yes No
3. Signature	
Signature of person making submission or person authorised to sign on behalf of submitter	
	Date:
Postal address of person making submission (if different from previous page):	
Name and phone number (if different from previous page):	
Name and phone number (if different from previous page): Contact person:	
Contact person:	
Contact person: Mobile: Other phone:	



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Resource Consent Team Gisborne District Council PO Box 747 GISBORNE 4040 10 October 2022

To whom it may concern,

Submission in Support of Eastland Port's Twin Berth Stage Two Resource Consent Application

- This letter accompanies our Submission on Resource Consent Application by Eastland Port (CP-2022-111365-00 / CD-2022-111366-00 / CC-2022-111367-00 / CR-2022-111368-00 / CO-2022-111369-00 et al).
- Forest Enterprises is one of New Zealand's leading forestry investment managers. We manage 20,000 hectares of sustainable production radiata forestry, half of which is located in the Gisborne region, on behalf of 6,500 individual retail investors.
- 3. We began the significant harvest programme of our 10,000ha Gisborne estate in 2016. Our current annual harvest volume is approx. 300,000 tonnes per annum, managed locally from our regional office in Gisborne city (4 full time staff).
- 4. Our projected future woodflow from Gisborne is 6 million tonnes, averaging over 500,000t/p.a. for the next 12 years. Approx. 83% of our managed harvest is exported, after first having satisfied the demand of our domestic log customers.
- 5. Eastland Port is essential infrastructure to log producers like Forest Enterprises. The port must be fit for purpose in providing for export sector needs today and into the future. However, in its current state and configuration, the port is an operational constraint to log export trade, not an enabler. The long-term viability of our business, and that of our supply chain partners (e.g. logging and cartage contractors), relies on the efficiency and effectiveness of export port infrastructure.
- 6. Forest Enterprises will benefit from the supply chain redundancy a second log ship berth and upgraded portside infrastructure can provide. When we began harvesting in Gisborne in 2016, we had been anticipating port expansion and planned ahead accordingly. The port reached its capacity limit for log export in 2018. We have had to reforecast our strategic harvest plan each year the port capacity remains unchanged and while operating under increased competition for access.
- 7. Our log export business has been disrupted by ongoing capacity constraints and periodic closures caused by aged and damaged port assets which cannot withstand more frequent and intense weather events. We have had to respond by reducing harvest log volume overall, as there is limited additional demand/capacity from domestic customers to take export log grades/volume. This reduced productivity negatively affects the profitability and viability of our contractors, and on investment returns to the thousands of retail investors we serve.

- 8. With Stage One well underway (redevelopment of Wharves 6 and 7 and the former slipway), Forest Enterprises supports the completion of Eastland Port's two-stage expansion plan. We support the key objectives of Eastland Port's Twin Berth Stage Two project:
 - a. Provide necessary upgrades to ageing port infrastructure that will allow for the port to be suitably resilient to natural hazards
 - b. Increase the export capacity to cater to forecast export wood resource volumes
 - c. Provide future opportunities for regional exports and other activities from Eastland Port
- 9. We look forward to the opportunity to be heard in person at the hearing.

Yours faithfully,

Bert Hughes

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