NZIER
NEW ZEALAND INSTITUTE OF ECONOMIC RESEARCH

Forestry: cost of compliance

Plan advocacy, consents, monitoring consents, training and other costs

NZIER report to the Forest Growers Levy Trust

February 2026

About NZIER

New Zealand Institute of Economic Research (NZIER) is an independent, not-for-profit economic consultancy that has been informing and encouraging debate on issues affecting Aotearoa New Zealand, for more than 65 years.

Our core values of independence and promoting better outcomes for all New Zealanders are the driving force behind why we exist and how we work today. We aim to help our clients and members make better business and policy decisions and provide valuable insights and leadership on important public issues affecting our future.

We are unique in that we reinvest our returns into public good research for the betterment of Aotearoa New Zealand.

Our expert team is based in Auckland and Wellington and operates across all sectors of the New Zealand economy. They combine their sector knowledge with the application of robust economic logic, models and data and understanding of the linkages between government and business to help our clients and tackle complex issues.

Authorship

This paper was prepared at NZIER by Chris Nixon.

It was quality approved by Peter Clough.

The assistance of Sarah Spring is gratefully acknowledged.

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Registered office: Level 13, Public Trust Tower, 22–28 Willeston St Wellington
Auckland office: Level 4, 70 Shortland St, Auckland
Postal address: PO Box 3479, Wellington 6140
Tel 0800 220 090 or +64 4 472 1880 | econ@nzier.org.nz | www.nzier.org.nz

Key points

Objective

This report provides an indicative estimate of the scale and distribution of regulatory compliance costs facing New Zealand's commercial forestry sector. It assesses how these costs have changed since the introduction of the National Environmental Standards for Commercial Forestry (NES-CF), how they differ across regions and forest sizes, and how they interact with wider regulatory and environmental pressures.

Main findings

Regulatory compliance costs for forestry are material, unevenly distributed, and scale poorly, particularly for small growers. While the NES-CF has improved national consistency, compliance costs have increased across several major categories.

- Plan advocacy:
  - Large companies: Advocacy effort has fallen significantly compared with the pre-NES era but remains episodic. Large spikes occur when regional plans diverge from national direction or when councils adopt precautionary or bespoke interpretations.
  - Small growers: Face rising, time-intensive and often defensive advocacy demands, partly due to inconsistent council interpretations and the need to correct misunderstandings of NES-CF rules.
- Consents and monitoring:
  - Consent costs have increased nationwide, driven by the introduction of the NES-CF, more complex applications, greater information requirements, and growth in consultant involvement.
  - Monitoring charges now represent a significant and unpredictable share of total compliance costs. In some regions, monitoring costs are 20 percent to 50 percent of the original consent fee and sometimes bear little relationship to actual environmental risk.
- Training and 'shadow' compliance costs:
  - Large firms have systematised training and integrated regulatory requirements into operational practice, benefiting from scale.
  - Small growers face disproportionately high time and learning costs, often without access to in-house technical capability.
- Other quasi-regulatory and policy-driven costs:
  - Costs associated with wilding pine control, science levies, and differential council rating add materially to the compliance burden, particularly in regions where these charges are applied independently of demonstrated risk.

Overall assessment

Compliance costs have increased across most categories, and small growers bear a disproportionate share of them. Regional variability, regulatory churn, and inconsistent council capability amplify cost pressures.

Although some compliance costs arise from the legitimate need to manage environmental and social risks, the current system delivers uneven and sometimes inefficient outcomes, reducing confidence and creating investment uncertainty.

While this report does not model specific regulatory reform packages, interview evidence suggests that decision-makers broadly face trade-offs between:

- National consistency vs regional discretion
- Risk-based vs blanket regulatory approaches
- Equity for small growers vs administrative simplicity.

These trade-offs should not all be decided by District and Regional councils since they are unlikely to be in the best position to determine the national interest. Some consideration should be given to the following:

- Strengthening national direction to reduce regional variability and prevent the re-emergence of fragmented rules.
- Developing a risk-based compliance framework that explicitly recognises scale and site-specific risk for both consents and monitoring.
- Improving council capability, including consistent interpretation of NES-CF rules and improved technical understanding of forestry operations.

The following table sets out the relevant costs.

Table 1 Summary of regulatory costs

Per annum spend

	Estimated plan advocacy spend per annum	Comment
Plan advocacy (nationally)		
Large companies	$988,000	Significantly lower for most companies nationally
Small companies	$300,000	Significantly higher than prior to the NES-CF, nationally
Consent spending (nationally)		
Consent spending (includes council charges and company compliance costs)	Between $2,198,000 and $5,097,600	Highly variable. Based on the average costs of servicing consents over 5 years
Council charges on consents regionally (average per region)		
Tairāwhiti	$19,000–$35,000	These have doubled since the report into Cyclone Gabrielle
Hawke's Bay	$5,000–$7,000	Proactive council and willing to engage
Northland	$6,000–$7,000	Minimal consent activity and modest costs
Bay of Plenty/Waikato	$3,000–$12,000	Predictable processes

	Estimated plan advocacy spend per annum	Comment
Canterbury	$6,000–$7,000	Focused on water monitoring, given competing land uses
Nelson, Marlborough and Tasman	$4,000–$6,000	Consent costs stable, increases come through monitoring
Southland and Otago	$6,000–$8,000	Relatively predictable, but interviewees consider that there have been overreactions to weather events
Wellington/Lower North Island	$9,000–$10,000	Small foresters have to contend with a council that does not have a lot of forestry experience
Training costs		
Large foresters	Varies between companies but similar to pre-NES	The NES has made training more straightforward.
Small foresters	Small foresters struggle to keep up	They spend a lot more time examining how new regulatory changes impact them, relative to bigger companies, on a per hectare basis
Monitoring costs		
Large foresters		Can be unpredictable, particularly when Councils hire consultants to provide them with reports on monitoring
Small foresters		Small foresters struggle with monitoring costs, given they have less capability and capacity
Total monitoring costs per annum	$372,000 and $744,000 per annum	Unpredictable and variable across New Zealand
Wilding conifers	Up to $1.2 million per annum	Variable, highly dependent on the location. Many of these forests dealing with wilding conifers are in the South Island.
Science levies	$2,000 – $3,000	Selected councils have imposed these levies
Differential rates	Rate differentials of up to four times those of other competing land uses	District councils such as Wairoa and Ruapehu District Councils have imposed large rate increases on forest owners.

Source: NZIER estimate based on industry response

Caveats

The results here should be regarded as order-of-magnitude estimates, subject to several constraints:

- Most data come from interviews and self-reported estimates, not administrative records.
- Regional contexts differ markedly, including terrain, climate, exposure to extreme weather, and council practice.
- Several important categories of cost (e.g. internal management time, investment delays, quasi-regulatory burdens) are only partially quantified.

- The analysis does not quantify the environmental and social benefits of forestry or the avoided costs of poor practice or weak regulation.
- Establishing a robust counterfactual is challenging, given the lack of historic baseline data and uncertainty about how regulation would have evolved without the NES-CF.

Contents

1 Background and context 1
1.1 Purpose of this report 1
1.2 Views of forestry wax and wane 3

2 Approach to analysis 4
2.1 Forestry company interviews 4

3 Counterfactual 5
3.1 Assumed counterfactual (No NES-CF) 5

4 The current situation 6

5 Specific forestry costs and their impact 10
5.1 Plan advocacy costs 10
5.2 Smaller foresters 12
5.3 Consents 13
5.4 Monitoring consent costs 16
5.5 Training 18
5.6 Other costs 19
5.7 Summary of regulatory compliance costs 20

6 Conclusion 23

7 References 24

Appendices

Appendix A Pre-NES and post-NES costs 25

Tables

Table 1 Summary of regulatory costs v
Table 2 Plan advocacy (large companies) 11
Table 3 Plan advocacy (small companies) 12
Table 4 Consent spending nationally 14
Table 5 Selected consent costs regionally 16
Table 6 Monitoring costs 17
Table 7 Training costs associated with regulatory reform 19
Table 8 Other costs and quasi-regulatory costs (examples) 20
Table 9 Summary of regulatory costs 21
Table 10 Pre-NES and post-NES costs 25

1 Background and context

1.1 Purpose of this report

Compliance costs are all the costs a firm incurs to comply with regulations. Compliance costs include salaries for compliance staff, time and money spent on reporting, new systems required to meet retention requirements, and a raft of other costs.

Why are we interested in forestry compliance costs? Compliance costs are, to a large extent, currently subject to the resource management plan development, consenting, and compliance processes administered by all district, city, and regional councils and unitary authorities. This situation can create variation in resource management practice across the different authorities, despite a largely successful effort to remove these variations under the National Policy Statement Commercial Forestry (NES-CF).

Compliance costs typically increase as regulatory oversight of an industry intensifies. Compliance costs can be incurred because of local, national, and international regulations. They are particularly important for land and sea-based industries.

NZIER has a long history of estimating the compliance costs across various industries, including exotic forestry. This association has mainly been through the cost-benefit analyses (CBAs) done for National Policy Statements (NPS) and National Environmental Standards (NES). Three CBAs have been done for forestry to support the NES process, the last in 2014.

While these estimates are dated, the data-collection methodology will be relatively similar. To assist the NZIER in identifying costs, we have interviewed a range of stakeholders to understand:

- The categories of compliance costs (regional, national and international). This assists in itemising each cost
- The dollar amount of each compliance cost and whether they are different in different parts of New Zealand
- The overall impact of the costs, including the layering effect, since costs can come from multiple sources.

Interviews have been conducted with a range of stakeholders to help identify international, national and regional compliance costs. The focus will be on:

- Forestry owners, managers, consultants and industry organisations. These include representatives of larger and smaller forestry interests, as well as those with interests in a range of locations within New Zealand.

We also reviewed any available current literature.

As in previous analyses, the interviews have been conducted in a structured format. A set of interview questions or topics was developed to help identify and quantify compliance costs.

As part of this process, we have broken down the compliance costs by cost area. These could include:

- National costs and associated in-house costs.
- Regional costs, including:

- Plan advocacy
- Consents and council annual charges
- In-house compliance by forestry companies.

- Other compliance areas.

There will also have to be consideration of the different costs between small and large forestry companies.

To improve credibility amongst the report's potential readership in both government and the industry, it will be necessary to refine the estimation of compliance costs, or at least qualify their interpretation by:

- Distinguishing between the unambiguous additional regulatory costs and those associated with activities that businesses may continue if regulation ceased (e.g. some types of measurement or recording).
- Recognising that regulations are aimed at providing wider external benefit (e.g. reduced environmental impact or lower risks to people's safety), so that from a nationwide perspective, the ending regulation would not only provide savings for the regulated industry but also cause some offsetting reduction in wellbeing.

Regulation reduction is not a 'free win' but comes at a cost of some loss of wellbeing, albeit often hidden and not expressed in market values.

1.2 The National Environmental Standard changed from Production Forestry (NES PF) to Commercial Forestry (NES CF)

The NES PF established in 2018 became the NES CF in 2023, following amendments to improve slash management and environmental protection.[1] These changes, driven by extreme weather events and 2022 consultations, expanded regulations to cover a broader range of forestry activities, including permanent carbon forests. The changes included:

- Scope Expansion: The update broadened the focus from solely "plantation forestry" to "commercial forestry," allowing better management of environmental effects from different types of forestry, including carbon farming.
- Slash Management: New regulations (69(5-7)) were introduced to manage forestry slash, creating stricter rules for slash disposal, particularly in high-risk, erosion-susceptible areas.
- Regulatory Changes: The amendments allowed local authorities more power to manage the location and scale of new forests, including tougher rules for afforestation.
- Operational Updates: The 2023 changes updated terminology to "commercial forestry" across definitions, including in, earthworks, and harvesting.

The development of the NES PF was significant because it meant that foresters reduced their dealings with individual councils significantly.

[1] See for example: https://www.mpi.govt.nz/forestry/national-environmental-standards-commercial-forestry/nes-pf-guidance/guidance-transitioning-nes-pf

1.3 Views of forestry wax and wane

The public perception of forestry has shifted significantly in the wake of cyclones Hale and Gabrielle. The extensive damage has become closely associated with forestry operations. In particular, the large volumes of slash carried down rivers and deposited on beaches. Images of debris-covered coastlines have had a tangible impact on the sector's reputation, and this shift in sentiment is now an important consideration for policymakers at local, regional, and national levels.

This represents a notable change from the 2000–2010 period, when public and environmental group attitudes toward forestry were generally neutral or implicitly positive. At that time, forestry was often viewed as a comparatively low-impact land use, particularly when contrasted with the highly negative publicity surrounding 'dirty dairying', which dominated environmental debates.

Several factors underpinned forestry's more favourable standing during that earlier period:

- Environmental benefits: Forestry was recognised for reducing soil erosion – especially on steep land – and for its contribution to carbon sequestration. These attributes gained prominence as New Zealand engaged with the Kyoto Protocol and broader climate policy.
- Credible land-use alternative: Amid growing scrutiny of dairy farming's environmental impacts, forestry was sometimes seen as a more publicly acceptable and potentially more financially stable option, mainly when the external environmental costs of dairying were accounted for.
- Comparative perception: Although the forestry sector faced its own challenges (such as worker safety and market volatility), it did not attract the intense public and media criticism directed at dairy. In the public eye, the environmental performance of the two sectors contrasted sharply: dairy was widely viewed as a major polluter, while forestry was generally regarded as a sustainable and responsible alternative.

2 Approach to analysis

The approach for this analysis involved the following key tasks:

- Canvassing as many forestry companies as possible to gain an insight into the costs
- Evaluating the cost impacts.

2.1 Forestry company interviews

The cost of the compliance survey was aimed at further understanding the costs associated with forestry and making a comment on their reasonableness. We were less interested in costs that were the costs of doing business (such as health and safety) and costs that were part of an entity's strategy (such as the emissions trading scheme (ETS)). We were more concerned about costs escalating quickly and the unevenness across regions.

The approach taken here was to survey forestry companies represented on the Environment Committee organised by the New Zealand Forest Owners' Association (NZFOA) and New Zealand Farm Forestry Association to ask a series of questions about costs associated with plan advocacy, consents, training, and other costs. Forestry entities were contacted as follows:

- Introductory meeting with the Environment Committee
- Email questionnaires to contact
- Follow-up phone calls and texts
- Microsoft Teams interviews based on the questionnaire.

The individual Microsoft Teams contact yielded more information and context than written questionnaire responses alone. The responses were supplemented with information from other documents.

The approach and survey sample reflect the resources available. The survey sample was not designed with any statistical method in mind. Instead, the aim was to talk to as many people involved in the forestry business as possible.

The sample contained many of the major forestry companies in New Zealand operating in almost all provinces. We contacted 13 entities. We thus believe we interviewed the majority of forestry environmental managers in New Zealand.

Respondents could not, or did not, answer all questions. We report answers for those who choose to respond to each question.

3 Counterfactual

A counterfactual scenario is required to estimate costs relative to a baseline. This begins with a clear description of the current state of play—what exists on the ground now. Since the NES-CF came into force in 2018, we have an identifiable regulatory framework and associated cost structures that provide a useful benchmark. These include:

- Plan advocacy costs related to regulation
- Consent acquisition
- Consent monitoring
- Training
- Other compliance-related costs.

However, defining a robust counterfactual is challenging due to:

- Limited baseline data from which to measure changes accurately
- Uncertainty about what regulatory or operational approaches would have emerged in the absence of the NES-CF
- Sector-specific complexity, where the costs of compliance vary significantly by circumstance, for example, whether harvesting requires stream crossings, can materially affect compliance costs.

As a result, multiple credible counterfactuals could be constructed. The version presented here should therefore be treated as provisional – a pragmatic 'peg in the ground' rather than a definitive view.

3.1 Assumed counterfactual (No NES-CF)

In the absence of the NES-CF, we assume:

- Regional divergence would persist or intensify, with some councils continuing to refine and evolve their existing systems.
- Processes would likely be ad hoc and fragmented, characterised by:
  - One-off regulatory or procedural solutions tailored to specific industries or local circumstances
  - Highly variable practices driven by individuals within councils or agencies who may exceed typical expectations or apply inconsistent thresholds

Under this scenario, regulatory practice would differ markedly across regions and sectors. Larger employers or industries may be better placed to negotiate bespoke arrangements or compliance pathways, given their scale and bargaining power. However, this advantage is not guaranteed, as regional councils' perspectives, capacities, and priorities will differ, potentially resulting in uneven outcomes for medium and small enterprises.

4 The current situation

A number of factors have dominated the current situation:

- The NES-CF, which came into force in 2018
- Weather events such as Cyclone Gabrielle and the implications for forestry, particularly in Tairāwhiti
- Escalating costs, as new costs have been introduced, and established costs have increased.

4.1.1 The NES-CF and its purpose

Plantation forestry is a nationally significant land use that operates across multiple regional and district boundaries. Prior to the introduction of the NES-CF,[2] forestry activities were regulated solely through regional and district plans under the Resource Management Act (RMA). This resulted in substantial variation in rules, activity classifications, and consent triggers for the same activities occurring in different parts of the country.

While some level of local tailoring was appropriate to reflect specific biophysical risks, the degree of variation observed created unnecessary compliance costs, regulatory uncertainty, and inconsistent environmental management.

Prior to the NES-CF, forestry operators were repeatedly required to engage in plan processes in multiple councils to address the same technical matters (e.g. sediment control, earthworks thresholds, riparian setbacks).

This resulted in:

- High plan-advocacy costs for industry and councils
- Delays in decision-making
- No clear evidence of materially improved environmental outcomes.

The forestry evidence indicated that some companies employed full-time RMA specialists to manage the volume of plan variation across 10–15 districts.

Operational planning was complicated by neighbouring councils applying different rules to identical activities. In some cases, individual forests spanned several districts and two regional council areas.

This created:

- Confusion among field staff and contractors
- Inadvertent non-compliance where thresholds differed between jurisdictions
- Inefficient sequencing of harvest and earthworks activities, and
- Increased on-the-ground compliance and monitoring burdens.

Since the NES-CF was introduced, operators report significantly fewer mistakes and smoother operational planning due to a single, stable set of rules.

[2] It has had a name change. Previously it was called the National Environmental Standard for Plantation Forestry.

Interestingly, other issues were on the NES radar but have failed to adequately be addressed.

These issues are:

- Disproportionate impact on small foresters

Fixed compliance costs, such as technical assessments, planning, engineering input, and consent fees, fall disproportionately on small woodlots and farm-forestry operations. Interview evidence confirms that some small blocks incurred almost the same compliance effort as 90,000-hectare estates. Activities that were previously straightforward, such as replanting, now require specialist input to demonstrate compliance with more complex rules.

It is an established economic reality that fixed costs are, by nature, more burdensome for small entities than for large ones. The issue here is not simply the presence of fixed costs. Instead, interviewees highlighted that the scale and complexity of the compliance effort appear misaligned with the risks posed by small-scale operations, raising concerns about whether the cost burden is proportionate to the benefits delivered.

Given that one of the objectives of the NES-CF was to support small foresters and enable ongoing participation in forestry as a viable land-use option, there is a case for considering how compliance requirements affect smaller players. Without such consideration, the cumulative cost pressure may unintentionally undermine the policy intent of maintaining a diverse and resilient forestry sector.

- High-risk areas are subject to inefficient approaches

Some regions, particularly Tairāwhiti, apply very stringent and administratively heavy rules, resulting in:

  - Long, condition-heavy consents
  - High consent-processing costs
  - Limited monitoring to ensure the conditions were effective.

4.1.2 Weather events have had a major impact on policy

Weather events impact policy by creating a need for increased public and private sector preparedness and response, driving the creation of resilient infrastructure, influencing economic recovery efforts, and increasing pressure to address climate change through long-term strategies. This includes immediate measures like insurance claim management, financial system adjustments, and disaster relief, as well as long-term policies focused on climate adaptation, resilient infrastructure, and economic sustainability.

Forestry has experienced major storm-related disruption over the past few years. In particular, cyclones Hale and Gabrielle caused extensive damage in Tairāwhiti and Wairoa, prompting a Ministerial Inquiry into land use. The panel assessed storm impacts from woody debris and sediment and proposed ways to lessen future risks.

Ministry for Primary Industries (MPI) set out the main reasons for the widespread destruction in Tairāwhiti:

- Steep terrain
- High rates of tectonic activity (for example, frequent earthquakes and uplift)

- Weak geology dominated by fractured and crushed mudstone
- A mixed climate with warm-dry periods, heavy rainfall, and cyclones
- Large areas where native forest cover has been cleared.

The Ministerial Inquiry was given eight weeks to complete its report, during which it interviewed many affected individuals, iwi, social entities, and forestry companies. The recommendations from that report included:

- Clearing woody debris
- Support for the Gisborne District Council on land use management
- Improved national guidance on forestry management, including on forestry slash
- Work to strengthen regional partnerships.

4.1.3 Layering of costs is causing investment uncertainty

While regulatory consistency is improving, the new costs are causing uncertainty about future compliance requirements and potential capital investment in new forests.

This uncertainty has manifested through:

- Differences in council interpretation and staff practice
- Occasional extreme regulatory anomalies—such as the Port of Tauranga "polluted airshed" interpretation, which temporarily implied no new consents could be issued for port-related activities. Although rare (approximately once every 5–10 years), such anomalies can cost the industry hundreds of thousands of dollars and undermine confidence in the regulatory system
- The difference in costs between councils that use consultants and those that provide in-house services for setting up consents and monitoring.

4.1.4 Wider system pressures exacerbate the problem

Rapid regulatory change ('regulatory pendulum')

Frequent shifts between more stringent and less stringent national settings (e.g. freshwater planning, indigenous biodiversity, land-use controls) have created uncertainty for councils and industry.

This 'pendulum' effect imposes:

- Repeated adjustment costs
- Reduced confidence in long-term settings
- Greater risk of councils interpreting new obligations inconsistently.

Emerging quasi-regulatory burdens

Differential rating policies in some rural districts where forestry faces targeted rates set at 4×–12× the standard multiplier have introduced cost pressures that are not consistently applied to other heavy road users (e.g. farms that use milk tankers and fertiliser trucks). Industry stakeholders also noted cases where foresters contribute directly to upgrading multiple local roads, including roads that provide wider community benefits beyond

forestry operations. This raises equity concerns and adds to the sense of a fragmented and uneven regulatory burden.

The underlying reasons help explain why these pressures arise. Forest land generally has a low rateable value, and standing trees are excluded from valuation, prompting councils to use high multipliers to recover anticipated road wear. At the same time, forestry's impact on local roads is highly concentrated around harvest, often decades after planting. This creates a mismatch between when councils receive revenue and when they face costs, contributing to variable approaches across districts. Interviewees pointed to considerable inconsistency in how councils apply multipliers, structure targeted rates, and negotiate contributions for road upgrades. This heightens uncertainty for forest owners, particularly those with small or mid-sized estates.

Together, these factors reinforce the broader theme that forestry is exposed to a patchwork of local funding practices that are difficult to predict and may not align with the timing or distribution of road-use impacts.

5 Specific forestry costs and their impact

Complexity and scale are two issues that the forestry industry is dealing with:

- When it comes to compliance costs, scale matters; fixed costs can weigh as heavily on a 60-hectare block as on a 90,000-hectare forest, which argues for a risk-based approach that doesn't disadvantage smaller growers.
- Some processes that were once straightforward, such as replanting, now require specialist help, adding cost and complexity. Ideas such as planting trees on 10 percent of the least-productive farmland overlook that these areas can be the highest risk and most expensive to harvest and consent.

Not only is there complexity, but there is also unevenness in the costs. Below, we look at the major cost areas to understand how they have moved since the NES-CF came into force.

5.1 Plan advocacy costs

5.1.1 Bigger players

The interviews reveal a clear and consistent picture: plan advocacy costs have fallen substantially since the introduction of the NES-CF, but they remain a material and sometimes unpredictable part of forestry companies' compliance burden.

Before the NES, large owners and forest managers routinely spent weeks at a time responding to district and regional plan processes, often re-litigating the same rules across several jurisdictions.

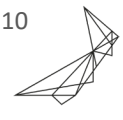
In the North Island in particular, companies were dealing with multiple regional councils and numerous district councils, each with its own thresholds, setbacks, and interpretations. As several interviewees observed, major firms once employed full-time planning or RMA specialists simply to keep up with this workload.

With the NES now providing a consistent national framework, those repeating cycles of advocacy have largely disappeared, and once costly (and constant) district plan issues have become far less significant. Today, plan advocacy is more targeted and far less time-intensive, with internal environmental teams handling most of it rather than lawyers and consultants.

Even so, plan advocacy has not vanished; instead, it has shifted in nature. Companies now focus on monitoring and responding to regional plan changes, including proposed departures from the NES, and supporting forestry-specific working groups or forums created by councils. Internal staff time remains the backbone of this work.

Several forestry managers reported spending only a small share of their time, often around 5 percent of an FTE, on advocacy today, compared with four to six weeks of hands-on work for a single plan before the NES.

Others estimated total internal advocacy expenditure at $400,000–$425,000 per year for larger organisations, once staff time is valued appropriately, while some maintain annual budgets of $120,000–$180,000 for specialist planning support. These ranges reflect differences in scale, geographic spread, and the degree to which companies rely on industry



bodies such as NZFOA, and regional wood councils, who now carry a significant share of the submission and coordination workload.

Across all interviews, a major theme is that advocacy costs today are episodic rather than continuous. Most years are relatively light, but specific regional issues can generate large spikes in activity and expense. We have already mentioned the Port of Tauranga "polluted airshed" provisions. Similarly, in Canterbury, forestry companies were required to challenge aspects of Plan Change 7 in court, with one firm spending around $180,000 to resolve issues created by an overly precautionary local interpretation of freshwater rules. These kinds of major interventions are rare but impactful, occurring perhaps once every five to ten years, and they dominate the advocacy cost profile when they arise.

Another consistent theme is that regional variation is driven more by personalities than by policy. Interviewees described wide differences in how individual planners interpret national rules, how risk-averse councils are, and how willing they are to override the NES. Tairāwhiti was repeatedly identified as the most demanding region, with increasingly complex rule-making and stringent expectations around certification, risk assessment, and erosion-prone land.

By contrast, many other regions "accept the NES and sit on it," applying it consistently and focusing their effort on monitoring rather than rewriting the national standards. These contrasts create uneven demands on forestry companies, who must engage deeply where councils push beyond the NES, but can take a lighter approach where councils rely on it as intended.

Looking ahead, companies expect plan advocacy costs to rise again in the short term, driven by RMA reform, transitional arrangements, and new national policy settings on freshwater and indigenous biodiversity. Although costs today remain lower than in the pre-NES era, the regulatory pendulum continues to swing, and each significant policy shift prompts a new cycle of submissions, hearings, and mediation.

Companies emphasised that stable and evidence-based national direction remains essential to preventing the re-emergence of fragmented regional rule-making.

Interviewees portray a sector where the NES has delivered real and enduring reductions in plan advocacy effort, but where costs have not disappeared and may rise again without careful national stewardship. Advocacy today is more strategic, more internally managed, and more efficient than in the past, but remains vulnerable to regional overreach, regulatory churn, and the occasional high-stakes dispute. These findings highlight the importance of consistent national direction and a risk-based approach to planning to ensure that compliance remains proportionate, predictable, and equitable across forest sizes and regions.

Table 2 Plan advocacy (large companies)

Per annum spend

	Estimated plan advocacy spend	Comment
Plan advocacy spend	$988,000	Significantly lower than prior to the NES-CF for most big players

Source: NZIER estimate based on industry response

5.2 Smaller foresters

The experience of small forestry growers differs sharply from that of larger companies. While the NES-CF reduced plan advocacy workloads for major operators, small growers have faced rising costs as compliance has become more technical.

Planting or replanting where once manageable inhouse, but new requirements such as detailed management plans and GIS shapefiles now force small growers to hire external specialists. In one case, the need to produce NES-compliant shapefiles increased replanting costs by $1,000 per hectare for a 20-hectare block, reflecting how fixed technical requirements scale poorly for small operations.

Plan advocacy itself imposes a significant time burden. One grower reported spending around 600 hours per year preparing submissions and responding to plan changes, particularly those proposing tighter forestry controls in the Wellington region. Valued at $125 per hour, this represents a cost typically absorbed by environmental or planning staff in larger firms. Across regional Farm Forestry Association branches, small growers may collectively contribute 2,000–2,500 hours annually to advocacy work, highlighting that regulatory processes disproportionately draw on volunteer time rather than professional capacity.

Small growers also experience substantial 'hidden' advocacy costs when councils misinterpret or incorrectly apply rules. In one case, council staff unfamiliar with the NES issued an abatement notice for a permitted ford crossing and wrongly challenged riparian planting. These episodes required lengthy correspondence and, in one instance, forced the grower to source metal off-site at a cost of $10,000 to avoid further enforcement risk.

Such interactions illustrate how small growers must often advocate defensively, that is, explaining regulations back to councils because they lack the institutional presence of large companies and because enforcement staff may have limited forestry expertise.

Overall, plan advocacy costs for small foresters are higher per hectare, less predictable, and more dependent on local council capability than for large operators. Fixed compliance requirements, council knowledge gaps, and the need to purchase professional services combine to create a disproportionate burden. For many small growers, the regulatory environment now demands a level of technical skill, time, and expense that significantly exceeds what their scale can reasonably support.

Table 3 Plan advocacy (small companies)

Per annum spend

	Estimated plan advocacy spend	Comment
Plan advocacy spend	$300,000	Significantly higher than prior to the NES-CF

Source: NZIER estimate based on industry response

5.3 Consents

5.3.1 National impact

Across the interviews, a consistent national picture emerges: resource consent costs for forestry have risen over the past five to seven years, driven by the NES-CF and by how regional councils interpret, implement, and monitor it.

It was expected that the NES would increase the number of consents; however, it was not expected that those consents would become more complex or more expensive.

Nationally, simple consents (such as afforestation setbacks or minor earthworks) now commonly cost $2,800–$3,500 to process, with forestry company preparation taking one to two days for a large company, and longer for smaller operators. More complex consents, particularly those involving slash management, sediment discharge risk, stream crossings, or high-risk erosion zones, can take weeks to months to prepare, with costs rising to $7,000–$15,000 for council charges alone, and $10,000–$25,000 in internal or consultant time. Some companies report internal preparation costs now exceeding external charges, reflecting increasingly detailed information requests and complex assessment requirements.

Larger firms often handle the bulk of consent preparation in-house, keeping costs lower. Smaller companies or woodlot owners, by contrast, must rely almost entirely on consultants, giving them less control over both cost and quality. Several interviewees emphasised that the fixed-cost nature of consents falls heavily on small growers, as the cost of preparing a consent is similar whether a block is 20 hectares or 2,000 hectares.

A national issue that crosses all regions is the marked rise in compliance and monitoring fees after consents are granted. These ‘after-approval costs’ now form a material part of the total burden, with invoices issued for site visits, monitoring reports, and follow-up investigations – sometimes amounting to dozens of billable hours for short site inspections. Companies consistently describe monitoring costs as unpredictable, uneven across councils, and increasingly separated from actual environmental risk.

It is also clear that other costs associated with consents are appearing. These include:

- Science levies, for unspecific work done by councils
- Levies that apply just for having a consent
- Consultant using equipment that provides only a marginal benefit and substantially increases consent costs

Small forest owners estimate typical consent charges for small growers nationwide at $9,000 for the simplest applications, with higher fees increasingly common.

Table 4 Consent spending nationally

Per annum spend

	Average cost of servicing consents (per year)	Total consent costs (nationally)	Comment
Larger forests			
Consent costs (council charges)	Between $6,500 and $11,000	Between $1,250,000 and $2,581,000	Approximate 30% increase in consents before the NES, with further increases due to issues such as slash
Compliance costs (by forestry companies)	Between 20% and 100% of the council charge	Between $383,000 and $1,916,000	More information is required by councils. Uses the mid- point of council charges to proxy compliance costs
Smaller forests (less than 500 hectares)			
Consent costs (council charges)	Between $6,500 and $11,000	Between $565,000 and $600,000	Approximate 30% increase in consents prior to the NES, with further increases due to issues such as slash
Compliance costs (by forestry companies)[1]	Between 20% and 100% of council charges	Between $116,500 and $582,500	More information required by councils. Uses the mid-point of council charges to proxy compliance costs

Note: (1) What companies have to do to meet council consent requirements. (2) Numbers are rounded.

Source: NZIER estimate based on industry response

5.3.2 Regional impact

Tairāwhiti

Tairāwhiti stands out as the most expensive, time-consuming, and unpredictable region for forestry consents. Multiple interviewees – both large and small operators – described the region as an 'outlier' in terms of bureaucracy, difficulty, and inconsistency.

One interviewee explained that the council's requirement for an SQEP (Suitably Qualified and Experienced Professional) to certify both planned and completed works adds substantial cost and administrative load, with no comparable requirement elsewhere. Tairāwhiti is also the only region where companies reported taking up to a year to obtain relatively simple consents, including a culvert installation that dragged on for 12 months, with an additional 6 months passing before an invoice was issued.

Respondents expect consent costs in Tairāwhiti to double relative to other regions, rising well above historic averages of $10,000–$11,000 per consent. Frequent and repeated requests for further information (RFIs) are a major cost driver, as are long administrative delays. The requirement for discharge permits for sediment and slash under section 15 RMA is unique to the region and significantly expands the consenting footprint.

Tairāwhiti also shows the strongest link between consents and regional policy direction, including land overlay transitions that may force thousands of hectares out of production. This creates a situation where companies feel compelled to over-prepare applications, adding cost but not necessarily improving environmental outcomes.

Hawke's Bay

Hawke's Bay generally presents mid-range and relatively stable consent costs. Companies report typical consent charges in the $3,000–$7,000 range, with preparation effort similar to that in Northland or the Bay of Plenty. The council tends to be pragmatic, risk-focused, and receptive to industry engagement.

Forestry companies working across both Tairāwhiti and Hawke's Bay emphasise the sharp contrast between the two regions. Some interviewees, whose forests straddle the boundary, face differing costs. A consent may cost thousands more on the Tairāwhiti side despite identical terrain, risk profile, and operational approach. This makes Hawke's Bay an important benchmark for assessing what 'normal' process, cost, and timeframes should look like.

Northland

Northland sits at the lower end of the cost spectrum. Several companies reported very few recent consents, partly because more activities qualify as permitted under the NES, and partly because the council engages constructively with forestry operators. When consents are required, charges are modest and timelines are short.

An interviewee reported minimal consent activity and modest costs in Northland in recent years, in contrast to Tairāwhiti. Other respondents also noted that Northland consents tend to be straightforward and have manageable monitoring requirements.

Bay of Plenty

The Bay of Plenty shows moderate consent costs and relatively predictable processes. One interviewee obtained three consents recently: one cost around $3,000 using a consultant, while others handled in-house were less costly. The region is viewed as stable, with clear expectations and reasonable timeframes.

Marlborough, Nelson, and Tasman

The Marlborough–Tasman–Nelson region generally presents lower-to-mid-range consent costs, but companies report a growing administrative burden and increasing uncertainty, largely driven by council capability and variable monitoring expectations. Operators working in this region manage sizable estates (up to 80,000 hectares) and hold a large suite of consents, many of them long-standing and predating the NES-CF.

While typical consent preparation costs are estimated at around $5,000 per consent, the overall workload fluctuates significantly, particularly following major weather events that trigger additional consents for slash tracks or land disturbance.

One interviewee noted they were currently spending around half of their work time on consent-related matters due to recent windthrow, though in a normal year, they may apply for only a small number of consents.

Canterbury

Canterbury is notable not for consent fees but for expensive, protracted disputes. Post-NES, one interviewee's forest in Canterbury was burdened by strict water-monitoring requirements (see plan advocacy).

Southland and Otago

Consent costs in the southern regions tend to be lower and more predictable, with some operators using long-lasting 'global consents' that cover multiple forests or activities. One regional consent in Southland costs $6,000–$7,000 per year to maintain, but monitoring costs are reportedly declining as systems mature.

Nonetheless, the drafting of new setbacks and overly precautionary rules has occasionally prompted costly advocacy or re-consenting, although not on the scale seen in Canterbury or Tairāwhiti.

Lower North Island

For small growers in particular, the Lower North Island is becoming a regional grouping of concern. While consent numbers remain low, the policy direction signals a potential shift toward restricted discretionary status for many forestry activities. Small growers expect future consent costs to rise significantly if these changes proceed, with fixed costs hitting them hardest.

Average costs regionally

Estimating average costs is difficult because the terrain and council approaches differ. Below, we have taken the soundings from companies to illustrate the costs that they face. We do not have complete coverage, but we do have a good range of regions.

Table 5 Selected consent costs regionally

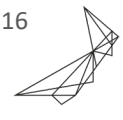
Per annum spend

Selected regions	Estimated consent costs (average)	Comment
Tairāwhiti	$19,000–$35,000	These have doubled since the report into Cyclone Gabrielle
Hawke's Bay	$5,000–$7,000	Proactive council and willing to engage
Northland	$5,000–$8,000	Minimal consent activity and modest costs
Bay of Plenty/Waikato	$3,000–$12,000	Predictable processes
Tasman/Marlborough/Nelson	$4,000–$6000	Consents tend to be at the lower end; however, monitoring costs are increasing.
Canterbury	$6,000–$7,000	Focused on water monitoring, given competing land uses
Southland and Otago	$7,000–$12,000	Relatively predictable, but interviewees consider that there have been overreactions to weather events
Wellington	$7,000–$12,000	Small foresters have to contend with a council that does not have a lot of forestry

Source: NZIER estimate based on industry responses

5.4 Monitoring consent costs

One of the most frequently mentioned costs is the compliance burden associated with council monitoring and site visits. Several companies reported receiving invoices for large blocks of billable time following short inspections, with one forest manager charged 80 hours of council time for a two-hour site visit on a minor road segment.



Small growers experience this even more acutely. Their costs have gone up in line with larger foresters, with little regard for their size. The fixed costs of being a small forester have increased dramatically, squeezing their margins.

Companies also highlighted monitoring and compliance charges tied to consent conditions, which can extend well beyond the initial application cost. These include sediment monitoring, water sampling, ecological assessments, and land stability checks, which are sometimes required annually throughout the life of the forest.

Monitoring pressures are a growing concern. Interviewees described some councils as increasingly demanding and difficult to work with, citing inconsistent interpretations of NES-CF requirements and council staff turnover as key drivers of unpredictability.

A loss of institutional knowledge within councils contributes to confusion over what constitutes compliance, prompting the need for joint field days to clarify basic regulatory expectations. Operators expressed frustration at being labelled non-compliant for routine sediment management practices, reflecting a lack of applied understanding among council officers.

While consent fees themselves remain moderate, the administrative and relational overhead required to ensure compliance is becoming more material. With the introduction of the NES, monitoring costs were expected to rise. However, the rise in monitoring costs has been significant. On average, monitoring costs are almost double and triple what they were pre-NES, nationally.

Regionally, the monitoring costs on average are approximately 20 percent to 50 percent of the council consent charges per annum (see Table 6).

Table 6 Monitoring costs

	Cost type	Comment
Large foresters	Average of between $2,000 and $4,000 annually	Can be unpredictable, particularly when councils hire consultants to provide them with reports on monitoring
Small foresters	Between 10 cents and 20 cents per hectare annually	Small foresters struggle with monitoring costs, given their limited ability to absorb fixed costs
Total cost	$372,000 and $744,000 per annum	Estimated number of consents (161) multiplied by average cost between $2,000 and $4,000 and an increase in small foresters monitoring costs of between $50,000 and $100,00 nationally per annum. Unpredictable and variable across New Zealand
Regional impact	Between 20 percent and 50 percent of council consent costs per annum	The higher the consent charges, the higher the monitoring costs tend to be (with some exceptions).

Source: Based on industry response

5.5 Training

5.5.1 Large foresters

Across the forestry sector, training related to regulatory compliance has always been a component of operational cost. While not always captured in financial accounts, interviewees consistently emphasised that the time spent training staff, contractors, and managers to meet evolving regulatory requirements is important, particularly as rules become more complex.

For larger companies, regulatory training is increasingly woven into routine operational practices. Firms build monthly contractor briefings and pre-season workshops into their work programmes, covering NES-CF requirements, environmental protection standards, erosion and sediment control, slash management obligations, consent conditions, and health and safety rules.

Some interviewees hold around 10 training sessions a year, each covering consent and environmental compliance, as well as operational matters. These firms tend to absorb the cost internally: managers deliver training themselves, contractors carry their own time costs, and external specialists are required only occasionally. Even so, internal preparation and delivery represent significant managerial time, especially when councils modify rules or issue new guidance, and when staff must be brought up to speed rapidly on a region's expectations.

In regions where councils adopt stricter or more inconsistent approaches, Tairāwhiti being the starkest example, training requirements intensify. Companies must coach crews on additional inspection regimes, the use of SQEPs, tighter slash controls, or complex sediment-management expectations.

Contractors and supervisors frequently need refreshers on what is permitted versus what triggers consents, as the cost of misunderstanding is high. Several interviewees noted that because some consent conditions are unique to a region or even a single forest, training must be customised rather than standardised, thereby increasing time and administrative costs.

5.5.2 Small foresters

Training is a major challenge for small foresters. Without in-house capability, they face steep learning curves.

Even technically competent growers struggled to use the mapping and modelling tools embedded in NES-CF requirements, including GIS software and MPI's upcoming new wilding risk calculator, which interviewees found practically unusable for small forests due to a minimum mapping resolution of 900 hectares.

Small growers, therefore, spend significant time self-training, interpreting guidance, or attending workshops. These time costs effectively substitute for financial costs that large firms absorb through salaried staff.

5.5.3 Overall impacts

A consistent theme across interviews is that regulatory training is no longer optional – it is integral to maintaining compliance, avoiding enforcement action, and managing operational risk. Yet the burden is unevenly distributed. Large companies can spread

training overhead across dozens of crews and thousands of hectares, whereas small growers must either train themselves, pay consultants, or risk non-compliance. As councils introduce new rules, update freshwater plans, or reinterpret NES-CF provisions, the training load grows correspondingly.

Overall, regulatory training now functions as a shadow compliance cost: not always visible, not always invoiced, but deeply felt in staff time, contractor coordination, and the need to update internal systems continually. It is one of the clearest examples of how compliance costs scale poorly for small operators while accumulating steadily, though more manageably, for larger forestry companies.

Table 7 Training costs associated with regulatory reform

	Training costs	Comment
Large foresters	Varies between companies but similar to pre-NES	The NES has made training more straightforward. Company management has been able to systematise and standardise training, given the certainty of the NES from district to district. The exception has been Tairāwhiti, where rules have been less predictable.
Small foresters	Small foresters struggle to keep up	They spend a lot more time examining how new regulatory changes impact them, relative to bigger companies, on a per-hectare basis

Source: Based on industry responses

5.6 Other costs

Beyond plan advocacy, consent preparation, monitoring and regulatory training, forestry companies face a range of costs that, while individually smaller, collectively form a significant and growing burden. A recurring theme across interviews is that these costs often arise indirectly, such as enforcement interactions, data requirements, or policy-driven obligations. They are not always captured in financial reporting systems.

5.6.1 Wilding conifers

Wilding pine control also emerged as an additional, often under-recognised cost for forestry companies. While effects are highly region-specific, interviewees noted that wilding conifers are primarily a South Island and central North Island issue, with limited impact in areas where plantation forests are surrounded by farmland or other commercial forests.

Operators managing radiata-only estates in the North Island reported relatively modest contributions – typically small annual payments to collaborative control programmes, such as $10,000–$15,000 per year around Lake Taupō – reflecting a responsibility to maintain landscape values even where production forests are not the source of the incursion.

However, wilding conifers in regions such as the Mackenzie Basin, central plateau, and Naseby are frequently conflated with plantation forestry despite often originating from historic Crown plantings or non-production species such as contorta or Douglas fir. Some companies have spent up to $800,000 per annum over the last four years controlling wilding conifers.

5.6.2 Differential rates

Companies also pointed to other policy-driven or quasi-regulatory costs, including the science levies in regions such as Tairāwhiti, and in some cases, targeted forestry rates, where councils have sought to impose substantially higher rates on forest land relative to pastoral farming. Examples include Ruapehu District Council's 400 percent rate increase, phased in over four years, and attempts in Upper Hutt to introduce differential rates specifically targeting forestry landowners. Wairoa District Council was another council imposing large rate increases on forestry owners.

Taken together, these 'other costs' reveal a compliance environment where obligations extend well beyond consents and rules. They reflect a system where monitoring, certification, data requirements, and council capability each shape the true cost of operating a forest – often in ways that fall most heavily on smaller growers with limited capacity to absorb or contest these burdens.

Table 8 Other costs and quasi-regulatory costs (examples)

	Cost type	Comment
Wilding conifers	Up to $1.2 million per annum	Variable, highly dependent on the location of the forest. Many of these forests dealing with wilding conifers are in the South Island, but not all
Science levies	$2,000–$4,000 per annum	Selected councils have imposed these levies
Differential rates	Rate differentials of up to four times those of other competing land uses	District councils such as Wairoa and Ruapehu District Councils have imposed large rate increases on forest owners.

Source: Based on industry responses

5.7 Summary of regulatory compliance costs

Current forestry regulatory compliance costs have become more complex, more uneven, and scale poorly. Fixed and technical requirements that are manageable for large forests fall disproportionately on small growers, especially where replanting, mapping and consent processes now require specialist input.

While the NES-CF has reduced duplicated plan advocacy work for most big players by providing a more consistent national framework, advocacy has not disappeared. It appears that costs have shifted to monitoring regional plan changes, addressing local departures from the NES, and handling occasional high-stakes disputes. For small growers, advocacy and compliance work is more ad hoc, more time-intensive, and often involves 'defensive' engagement with councils.

Consent-related costs have risen sharply nationwide, driven as much by the way councils interpret and monitor consents. Simple activities now entail more preparation and scrutiny, complex consents can be highly demanding, and post-approval monitoring and reporting have become a major, unpredictable burden. Regional variation is stark, with some councils pragmatic and risk-focused, while others add layers of requirements, delays, and uncertainty that significantly widen the consenting footprint.

Alongside this sit 'shadow' compliance costs. Larger companies have systematised regulatory training and can spread this overhead across many crews, but still face growing demands as rules and guidance change. Small growers must self-train, buy in expertise, or risk non-compliance.

Monitoring charges, science levies, wilding control obligations, and differential rating all add further pressure, particularly when councils use them in ways only loosely connected to actual environmental risk.

Overall, the system has delivered some national consistency benefits, but compliance remains highly sensitive to regional practices and continues to weigh most heavily on smaller operators.

Table 9 Summary of regulatory costs

Per annum spend

	Estimated plan advocacy spend per annum	Comment
Plan advocacy (nationally)		
Large companies	$988,000	Significantly lower for most companies nationally
Small companies	$300,000	Significantly higher than prior to the NES- CF, nationally
Consent spending (nationally)		
Consent spending (includes council charges and company compliance costs)	Between $2,198,000 and $5,097,600	Highly variable. Based on the average costs of servicing consents over 5 years
Council charges for consents regionally		
Tairāwhiti	$19,000–$35,000	These have doubled since the report into Cyclone Gabrielle
Hawke's Bay	$5,000–$7,000	Proactive council and willing to engage
Northland	$6,000–$7,000	Minimal consent activity and modest costs
Bay of Plenty/Waikato	$3,000–$12,000	Predictable processes
Canterbury	$6,000–$7,000	Focused on water monitoring, given competing land uses
Nelson, Marlborough and Tasman	$4,000–$6,000	Consent costs are stable, and increases come through monitoring
Southland and Otago	$6,000–$8,000	Relatively predictable, but interviewees consider that there have been overreactions to weather events
Wellington/Lower North Island	$9,000–$10,000	Small foresters have to contend with a council that does not have a lot of forestry
Training costs		
Large foresters	Varies between companies but similar to pre-NES	The NES has made training more straightforward
Small foresters	Small foresters struggle to keep up	They spend a lot more time examining how new regulatory changes impact them, relative to bigger companies, on a per-hectare basis
Monitoring costs		

	Estimated plan advocacy spend per annum	Comment
Large foresters		Can be unpredictable, particularly when councils hire consultants to provide them with reports on monitoring
Small foresters		Small foresters struggle with monitoring costs, given that they have less capability and capacity
Total monitoring costs per annum	$372,000 and $744,000 per annum	Unpredictable and variable across New Zealand
Wilding conifers	Up to $1.2 million per annum	Variable, highly dependent on the location. Many of these forests dealing with wilding conifers are in the South Island
Science levies	$2,000–$3,000	Selected councils have imposed these levies
Differential rates	Rate differentials of up to four times those of other competing land uses	District councils such as Wairoa and Ruapehu District Councils have imposed large rate increases on forest owners.

Source: NZIER estimate based on industry responses

6 Conclusion

Of the components that could be plausibly quantified, results suggest that regulatory compliance costs for commercial forestry are material, unevenly distributed, and scale poorly, particularly for smaller growers.

The principal compliance cost impacts captured in the quantified analysis are:

- Plan advocacy costs:
  - For large companies, these have fallen relative to the pre-NES-CF period, but remain episodic and can spike sharply when regional plans depart from national direction
  - For small growers, plan advocacy is more ad hoc, time-intensive, and often defensive, with higher per-hectare costs than for larger operators.
- Consent and monitoring costs:
  - Consent costs have risen substantially nationwide, driven by more complex applications, greater information requirements, and increased reliance on external specialists, especially for small foresters.
  - Post-approval monitoring charges: site visits, reporting, sampling and follow-up – now form a significant and often unpredictable share of total compliance costs, with regional practices varying widely.
- Training and "shadow" compliance costs:
  - Larger firms have been able to systematise training and embed regulatory requirements into routine operations, spreading costs across large estates.
  - Small growers bear disproportionate time and learning costs in understanding and implementing NES-CF and related requirements, often without in-house capability.
- Other quasi-regulatory and policy-driven costs. Wilding pine control, science levies, differential rating and similar measures add to the overall burden, particularly where they are only loosely tied to the actual risk posed by a specific forest or operation.

We must stress that there are limitations in the quantified analysis, largely reflecting the availability and quality of information:

- Most data are based on interviews and self-reported estimates from a sample of forestry companies and growers, rather than comprehensive administrative records.
- Regional practices, terrain and exposure to extreme events differ markedly, so national estimates inevitably mask local variation.
- Some important cost categories, such as internal management time, opportunity costs of delayed investment, or the full extent of quasi-regulatory burdens, are only partially captured.

The figures presented in this report should be regarded as order-of-magnitude estimates of forestry compliance costs rather than definitive measures. They provide a structured indication of where costs are concentrated, how they differ between large and small operators, and how they have shifted since the NES-CF came into force.

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Appendix A Pre-NES and post-NES costs

Table 10 Pre-NES and post-NES costs

Per annum spend

	Pre-NES costs	Post-NES costs	Comment
Plan advocacy (nationally)			
Large companies	$958,000	$988,000	Mostly down for forestry companies
Small companies	Not known	$300,000	Up for most small entities
Consent spending (nationally)			
Consent (council charges + forestry compliance costs). Large companies	1,241,000	Between $1,633,000 and $4,497,000	Highly variable between companies. Increase volume of consents (30%), but prices are similar in most regions
Consent (council charges + forestry compliance costs). Small companies	Not known	Between $565.000 and $600,000	Similar consent and compliance profile to large companies
Council charges on consents regionally (average)			
Tairāwhiti	$19,000–$35,000	Increased number of consents and double pre-NES	
Hawke's Bay	$5,000–$7,000	Increased number of consents, consent prices similar to pre-NES	
Northland	$6,000–$7,000	Increased number of consents, consent prices similar to pre-NES	
Bay of Plenty/Waikato	$3,000–$12,000	Increased number of consents, consent prices similar to pre-NES	
Tasman/Marlborough/Nelson	$4,000–$6000	Increased number of consents, consent prices similar to pre-NES	
Canterbury	$6,000–$8,000	Increased number of consents, consent prices similar to pre-NES	
Southland and Otago	$6,000–$8,000	Increased number of consents, consent prices similar to pre-NES	
Wellington	$9,000–$10,000	Increased number of consents, consent prices similar to pre-NES	
Monitoring costs			
Large forests		Between 20% and 100% of council consent charges	Variable. Has increased substantially in some regions
Small forests		Between 20% and 100% of council consent charges	Has increased substantially for all small foresters
Total monitoring costs	$140,000	$372,000 and $744,000 per annum	Unpredictable and variable across New Zealand
Training costs			

	Pre-NES costs	Post-NES costs	Comment
	Not recorded	$500,000	Varies between companies but similar to pre-NES
	Not recorded		Increased training
Wilding conifers	Not recorded	$1.2 million per annum	Variable, highly dependent on the location
Other charges associated with consents	Nil	$2,000–$4,000 per annum	Variable. Science levies, consent levies
Differential rates	Nil	Rate differentials of up to four times those of other competing land uses	District councils such as Wairoa and Ruapehu District Councils have imposed large rate increases on forest owners

Source: NZIER estimate based on industry responses