

# Submission

On

## PROPOSED CHANGES TO THE PHYTOSANITARY OFFICIAL ASSURANCE PROGRAMME FOR LOG EXPORTS.

Submission to:

**Plant Exports  
Biosecurity New Zealand**  
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[www.nzfoa.org.nz](http://www.nzfoa.org.nz)

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## Introductory Comments

1. The New Zealand Forest Owners Association (NZFOA) welcomes the opportunity to provide feedback on the proposed changes to the Phytosanitary Official Assurance Programme for log exports.
2. NZFOA supports the proposed changes and the introduction of the contingency for log salvage operations following adverse events.

## Summary

3. NZFOA supports the proposed approach.
4. The proposed changes provide a practical and balanced solution for managing log exports following significant adverse events affecting forests.
5. The proposal appropriately balances operational practicality with the need to maintain effective phytosanitary risk management and assurance.
6. NZFOA appreciates the proactive and collaborative approach taken by MPI in working with industry to identify a workable solution to this issue.
7. The proposed framework supports timely forest recovery and salvage operations following significant adverse events, while maintaining confidence in New Zealand's export systems and international market access.
8. The approach helps ensure New Zealand can continue to maintain its reputation as a producer and exporter of high-quality timber products.

## The Forest Owners Association (NZFOA)

9. NZFOA represents the commercial plantation forest growing industry. Its members manage approximately 1.2 million hectares of New Zealand's 1.8 million hectares of plantation forest and account for over 70% of the annual harvest.

## The Plantation Forestry Sector

10. In 2025, the forest growing sector generated \$6.7 billion in export value and contributed approximately \$9 billion to GDP across the wider supply chain.
11. Plantation forestry delivers significant public benefits, including soil conservation, improved air and water quality, erosion control, carbon sequestration, biodiversity enhancement, and recreational access. The sector also provides feedstocks for sustainable bioenergy and high-value wood products that substitute for fossil fuel-intensive materials.
12. The sector supports over 40,000 jobs across rural and urban New Zealand.
13. Forestry is an important user of, and contributor to the viability of, key national infrastructure, including regional rail networks and many international shipping ports.

14. The sector has long recognised the significant risk posed by fire, extreme weather, and biosecurity threats, and invests heavily in prevention, preparedness, and response capability to help protect forests, communities, and the broader economy.
15. The forestry sector faces a future where adverse events are expected to become more frequent and severe. Climate-driven increases in storm damage, fire risk, drought, flooding, and biosecurity threats are already affecting forest owners and are projected to intensify. In this environment, ensuring practical mechanisms are available to support recovery and utilisation of damaged forest resources following major events becomes increasingly important.
16. Plantation forests are long-term assets, with investment decisions often made decades in advance of harvest. As a result, forest owners are exposed to changing climatic, environmental, and biosecurity risks over extended timeframes. A single significant adverse event can affect many years of investment and have substantial consequences for forest recovery, wood supply, export revenues, regional economies, and associated infrastructure. Ensuring practical and effective mechanisms are available to support recovery and utilisation of damaged forest resources following such events is therefore increasingly important

## Feedback

17. NZFOA would like to acknowledge and thank MPI for working proactively with industry to develop a practical response to an issue that has the potential to become significant following major adverse events affecting forests.
18. The proposed approach recognises the operational realities associated with large-scale forest damage and extended salvage operations while maintaining appropriate controls and oversight.
19. NZFOA considers the proposal strikes an appropriate balance between supporting the recovery and utilisation of damaged forest resources and maintaining the integrity of New Zealand's phytosanitary certification system.
20. NZFOA recommends that MPI continue to work closely with forest owners, exporters, and the wider forest products sector during implementation to ensure the contingency arrangements are well understood and can be applied efficiently when required and are continually improved.
21. The proposed framework provides confidence that any associated risks can continue to be effectively managed while enabling forest owners and exporters to respond to, recover from, and make effective use of damaged forest resources following exceptional circumstances.
22. Importantly, the proposal also supports the maintenance of New Zealand's reputation as a reliable supplier of high-quality timber products to international markets. Maintaining market confidence in both the quality of New Zealand logs and the robustness of New Zealand's phytosanitary assurance systems is critically important to the long-term success of the sector.

## Conclusion

23. NZFOA supports the proposed amendments and the introduction of the contingency for log salvage operations following adverse events.

24. We appreciate MPI's proactive and collaborative approach in working with industry to develop a practical solution that supports recovery following significant forest damage while maintaining the integrity of New Zealand's phytosanitary assurance system.
25. The proposed approach appropriately balances phytosanitary risk management with operational practicality, helping to support forest recovery, maintain market access, and protect New Zealand's reputation as a producer and exporter of high-quality timber products.



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