

28 March 2023

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Tēnā koe

Thank you for your Official Information Act request to the Department of Conservation (DOC), received on 27 January 2023 in which you asked for information relating to the carbon stocks in Native forests, and DOC's decision to reduce the frequency of Tier 1 forest plot remeasurement. Your request was for:

1. *How carbon stocks are changing over time in New Zealand native forests on DOC land.*
2. *The potential (or not) for established forests to contribute to New Zealand's international climate obligations by sequestering more carbon.*

And also

3. *Any documents including emails recording the reasons and analysis behind DOC's decision in 2020/21 to reduce the budget for its native forest remeasurement programme, which resulted in vegetation monitoring of Tier 1 forest plots being cut to a 10-year-cycle.*
4. *Any correspondence, reports or other records including emails discussing the impact of that decision on the quality of data about forest health.*

This request covers the period from January 2020 until now."

On 21 February 2023 I extended your request to 17 March 2023. This was due to the quantity of information sought, and consultations that were necessary. On 17 March 2023 we subsequently issued a decision letter on your request, as more time was needed to finalise the response.

To provide some context around the department's work, we've had to make difficult financial decision over the last couple of years, as have many other government departments. Due to these budget constraints, a decision was made in 2020 to reduce Tier 1 monitoring.

We are committed and continuing to monitor carbon stocks in forest and shrublands on behalf of the Ministry for the Environment, which contributes to carbon accounting in the National Greenhouse Gas inventory as required under the Kyoto Protocol and the UN Framework Convention on Climate Change.

Your questions and our responses are listed in turn below.

Question 1: Changes in native forest carbon stocks on public conservation land (PCL)

The Ministry for the Environment (MfE) produces New Zealand's national greenhouse gas inventory, which includes the official calculation of carbon stocks.

I am providing you with document 8a in the Document Schedule, which is a draft report (unpublished) commissioned by us from MfE. It shows that carbon stocks in New Zealand's native forests on PCL are not conclusively increasing or decreasing. This report, with other correspondence (documents 7-9), reflect the high level of uncertainty in this assessment.

Question 2: The potential for additional carbon sequestration in native forests on public conservation land

The advice/reports show the case for established forests to contribute to New Zealand's international climate obligations by sequestering more carbon is not simple. Both the science about sequestration and the policy/process for reporting make this uncertain. These documents are 1-6 in the Document Schedule.

Carbon accounting is a complex area of policy development, led by MfE and the Ministry for Primary Industries (MPI). Carbon on Crown land is accounted for in the New Zealand Greenhouse Gas Inventory and supports the government in achieving the 2030 Nationally Determined Contribution (NDC) under the Paris Agreement (for example, native restoration and afforestation). Management interventions such as pest control are not accounted for in the Greenhouse Gas Inventory at present.

Research would be required to better understand and measure the carbon storage contribution of native ecosystems and how these change with different management activities. The Maximising Carbon joint agency programme has been designed to fill some of the related research and modelling gaps. MPI is currently leading the research work in this space.

Question 3: Reasons and analysis behind DOC's reduced 2020/21 budget for native forest remeasurement

I am providing memos, formal advice, and emails reflecting the reasons for, and analysis of different investment decisions (including impacts on quality of data about forest health) provided to Directors and Deputy Directors General. These documents are 16-40 in the Document Schedule, noting that many also address the impacts in question 4.

I am including an earlier piece of previously unpublished advice commissioned by DOC from Manaaki Whenua Landcare Research (MWLCR) in 2017/18 on the feasibility of moving to a 10-year cycle, as it is referred to in some of the documentation.

The investment decision to reduce the funds for the Tier 1 Monitoring Programme was part of an overall reduction in budgets across DOC to manage its delivery within available funding. The drop in revenue for the department was mainly because of the COVID-19 pandemic and the lack of international tourists. This was in addition to the usual cost pressures that all government departments face.

There is no decision document or email describing the rationale for the particular budget decrease applied to the Tier 1 programme, or the assessment of impacts informing the decision.

No active decision was made in 2020 to change to a 10-year cycle for forest plot measurement. The budgetary decision was for a reduction in funding in the 2020/21 year, and planning followed this direction. That it was applied to forest plots came after the decision to reduce the Tier 1 programme funding. As a result, the number of vegetation plots measured was reduced for the 2020/21 year.

In 2021/22 the budget was not reinstated and represented a sustained change to resourcing. The resulting deferment of forest plot measurements by two seasons moved the programme to a 10-year forest plot measurement cycle by default.

I have included the memo provided to MfE in April 2021 outlining the reasons for, and impacts of, the decision.

Question 4: The impacts of the decision on data quality on forest health

I am providing the research, papers and technical advice that contain assessments of the impacts of this decision. The documents directly informing this are 22-24 (earlier advice on 10-year cycle), 17-20, 27-32, 35 -36, 37- 40 in the Document Schedule.

Regarding the impacts on data quality, I am providing a note from the Tier 1 programme to DOCs Senior Leadership team in March 2021. It describes the impacts on sample bias, quality of outputs, loss of precision, and timely access to data for reporting on trends in vegetation impacts across relevant New Zealand-wide scale. As a result, the programme reduced its outputs to account for the change in available data and data quality.

Remaining components of the Tier 1 programme (animal monitoring, and parts of the vegetation measures in non-forest plots) have been retained on the 5-year cycle.

I am also providing correspondence from externals that cover other impacts on data quality and data use. These include three letters: one from MfE in May 2021, one from Greater Wellington Regional Council in December 2021, and one from the New Zealand Conservation Authority. I have decided to release the relevant parts of the documents listed below, subject to information being withheld under section 9(2)(a), to protect the privacy of natural persons, including deceased people.

In making my decision, I have considered the public interest considerations in section 9(1) of the Official Information Act and determined there are no public interests which outweigh the grounds for withholding.

You are entitled to seek an investigation and review of my decision by writing to an Ombudsman as provided by section 28(3) of the Official Information Act.

Please note that this letter (with your personal details removed) and enclosed documents may be published on the Department's website.

Nāku noa, nā



Sharon Alderson
Director Monitoring and Evaluation
Department of Conservation
Te Papa Atawhai

Table 1 - Schedule of documents

Item	Date	Title	Decision
Questions 1-2			
1 Briefing	14 Dec 2020	Responding to Climate change in Te Papa Atawhai	Released in part, redactions under section 9(2)(a) and 9(2)(g)(i)
2 Memo	20 Jan 2022	Further advice on Forest & Bird recommendations on browsing pest control	Released in part, redactions under section 9(2)(a)
3 Memo	16 Feb 2022	Forest & Bird meeting	Released in part, redactions under section 9(2)(a)
4 Document	2021	Aotearoa indigenous ecosystems and climate change	Full
5 Document	Jul 2022	Climate benefits of wild animal management	Full
6 Document	2021	Conservation land potentially suitable for adding carbon sequestration	Full
7 Email	26 July 2021	Net emissions and removals from woody vegetation on PCL	Released in part, redactions under section 9(2)(a)
8a Report	26 July 2021	Net emissions and removals from woody vegetation on PCL land - DOC-7271549	Full
8b Spreadsheet	26 July 2021	PCL - pre-1990 natural forest plot data - DOC-7271548	Full
9 Email	21 June 2021	RE: Pre-1990 reports: a potential way forward	Released in part, redactions under section 9(2)(a)
10 Email	18 June 2021	21-B-0456 - Advice - FW: Forest and Bird claims re pest eradication and forests	Released in part, redactions under section 9(2)(a)
11 Document	18 Jan 2023	Climate Change Oversight Group	Released in part, redactions under section 9(2)(f)(iv)
12 Memo	19 July 2021	Forest and Bird carbon sinks report analysis	Released in part, redactions under section 9(2)(a) and 9(2)(g)(i)

13 Report	TBC	Te Mana o te Taiao Objective 13.1.1 Carbon Storage Gap analysis	Released in part, redactions under section 9(2)(ba)(i) and 9(2)(g)(i)
14 Email	20 March 2020	Except from Media log – Friday 20 March 2020 - DOC-6174847	Released in part, redactions under section 9(2)(a)
15 Report	8 August 2022	Context briefing for the DOC Investment Brief for Maximising Native Carbon, August	Released in part, redactions under section 9(2)(g)(i)
Questions 3-4			
16 Email	7 August 2020	Email – Tier 1 Monitoring Programme budget changes	Released in part, redactions under section 9(2)(a)
17 Email	4 August 2021	Confirming Tier 1 programme costs and options for confirmation of programme	Released in part, redactions under section 9(2)(a)
18 Document	4 August 2021	Report – Budget and Options Tier 1	Released in full
19 Notes	4 August 2021	Notes and Decision for Directors	Released in part, redactions under section 9(2)(a) and 9(2)(g)(i)
20 Document	4 August 2021	Key messages	Released in part, redactions under section 9(2)(g)(i)
21 Email	29 May 2020	Email – Scenarios for implementation of Tier 1 and LUCAS 2020 2021	Released in part, redactions under section 9(2)(a)
22 Report	26 June 2017	NLM task assignment report - draft for governance group 26 June 2017	Released in part, redactions under 9(2)(g)(i)
23 Report	n.d	Evaluating optimum measurement of biodiversity indicators report DOC-5534478	Release in full
24 Memo	25 January 2019	The optimum plot measurement cycle - Memo for DDG	Released in part, redactions under 9(2)(g)(i)
25 Email	6 August 2020	Email:FW: Monitoring	Released in part, redactions under section 9(2)(a)
26 Document	n.d	High level Scenarios for 2020-2021 Tier 1 and LUCAS Programme - DOC-6272466	Released in full

27 Document	20 May 2021	Letter of support for the Natural Forest Plot Measurement Programme DOC 7271565	Released in part, redactions under section 9(2)(a)
28 Document [+26 +37]	20 December 2021	Letter to DOC from GWRC 6908831	Released in part, redactions under section 9(2)(a)
29 Memo	8 February 2022	Response to request from GWRC regarding investment and measurement of Tier 1 monitoring sites	Released in full
30 Memo	6 April 2022	UPDATED Memo Response to request from GWRC regarding investment and measurement of Tier 1 monitoring sites	Release in full
31 Presentation	n.d	Department of Conservations Tier 1 Monitoring Programme funding change DOC-6622424	Released in part, redactions under 9(2)(g)(i)
32 Document	22 April 2020	Letter to DOC regarding MFE support of MOUDOC-7268722	Released in part, redactions under section 9(2)(a)
33 Email	19 July 2020	Pre meeting notes – Tier 1 Monitoring programme	Released in part, redactions under section 9(2)(a) and 9(2)(g)(i)
34 Presentation	n.d	Tier 1 Monitoring Programme Powerpoint presentation	Released in part, redactions under 9(2)(g)(i)
35 Memo	24 March 2021	NBMRS Tier 1 Monitoring Programme Business planning preparation Memo	Released in part, redactions under 9(2)(g)(i)
36 Memo	August 2020	NBMRS Tier 1 Monitoring Programme Change - DOC-6394441	Released in full
Agenda		NZCA agenda papers Tier 1 2020 - DOC-6202140	Refused under section 18(d) as the information is publicly available at https://ftp.doc.govt.nz/public/folder/mlawv0pcMkWvExCkUCOkg/nzca/public-papers/2020/2020-02-nzca-public-papers.pdf
37 Email	13 May 2020	Email – Scenarios for implementation of Tier 1 and LUCAS	Released in part, redactions under section 9(2)(a)



38 Presentation	n.d	Business planning for LUCAS and Tier One Programme 20/21 DOC-6289314	Released in part, redactions under 9(2)(g)(i)
39 Email	16 June 2020	Email – Simplified Scenarios	Release in full
40 Presentation	n.d	Draft Simplified Scenario Presentation (powerpoint)	Released in part, redactions under 9(2)(g)(i)