



SUBMISSION ON

Te Koiroa o Te Koioroa (Proposal for New Zealand's next biodiversity strategy)

22 September 2019

TO: Department of Conservation

NAME OF SUBMITTER: Horticulture New Zealand



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Introduction

Horticulture New Zealand (HortNZ) thanks Department of Conservation (DOC) for the opportunity to submit on the proposal for New Zealand's next biodiversity strategy, Te Koiroa o Te Koira, and welcomes any opportunity to work with DOC and to discuss our submission.

HortNZ could not gain an advantage in trade competition through this submission.

This submission is supported by Katikati Fruitgrowers Association.

Background to HortNZ

HortNZ was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.

HortNZ advocates for and represents the interests of 5000 commercial fruit and vegetable growers in New Zealand, who grow around 100 different crop types and employ over 60,000 workers. Land under horticultural crop cultivation in New Zealand is calculated to be approximately 120,000 hectares.

The horticulture industry value is \$5.7 billion and is broken down as follows:

Industry value	\$5.7bn
Fruit exports	\$2.82bn
Vegetable exports	\$0.62bn
Total exports	\$3.44bn
Fruit domestic	\$0.97bn
Vegetable domestic	\$1.27bn
Total domestic	\$2.24bn

For the first time New Zealand's total horticultural produce exports in 2017 exceeded \$3.44bn Free On Board value, 83% higher than a decade before.

It should also be acknowledged that it is not just the economic benefits associated with horticultural production that are important. The rural economy supports rural communities and rural production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

HortNZ's mission is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand to achieve the industry goal (a \$10 billion industry by 2020).

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Overall Comments

For the horticultural industry, both as a result of where growing tends to occur (typically peri-urban areas) and the nature of these operations, the key area of focus in terms of biodiversity is the health and diversity of the soil as well as the interaction between growing and potential impacts on water quality. Biosecurity is also crucially important to the horticultural industry. In general, HortNZ is supportive of the discussion document and its positive focus.

HortNZ is active in promoting good management practices, the horticulture industry also has NZGAP, a good agricultural practice scheme which many growers are certified under primarily to provide market access. Recently an Environment Management System Add-on has been developed, which primarily focuses on nutrient management, soil management, irrigation management, and water body management.

Q1: How well does Part 1 of the discussion document set out the problem and consider the challenges and opportunities facing nature now and in the future?

It is important to recognise the value that non-indigenous and indigenous biodiversity provide in terms of producing healthy food that sustains our communities. The value of food and the risks to food security with biodiversity decline is supported. The discussion document recognises that nature is important inherently but also provides benefits that are crucial to our economy and that there needs to be a balance between non-indigenous and indigenous biodiversity.

It is positive that the discussion document also recognises the value that nature (and biodiversity) brings to New Zealand on a global stage; this has particular importance for export industries.

The pests, weeds and diseases that can threaten indigenous flora and fauna can also threaten commercial plan species, and biosecurity is important to protect both.

It is also important to recognise the different scales at which biodiversity can be protected e.g. for horticulture, soil health.

Q 3: What do you think of the proposed vision for Aotearoa New Zealand and its timeframe?

HortNZ generally support the overall vision, that nature is healthy, abundant and thriving and that current and future generations connect with nature, restore it and are restored by it.

With regard to the soil resource in particular, the inter-generational aspect is important to recognise as this is a finite resource, with an ongoing role feeding New Zealand.

Q4: What do you think of the proposed values and principles? Is there anything you would add or change? Which of the values and principles do you think is most important?

HortNZ supports management decisions being evidence-based and transparent.

We also support the 'Tools' principle which recognises that both regulatory and non-regulatory tools are important, and that a range of tools needs to be considered.

HortNZ supports the recognition of promoting collaborative relationships (under 'Respect for Property Rights').

Q5: What do you think of the proposed long-term outcomes? Is there anything you would add or change?

For consistency and readability, it's suggested that the headings that preface the long-term outcomes (as referred to below) are also carried through in the body of the strategy.

- Connect + Value – we agree that connection to the natural environment will be important in achieving outcomes sought by the strategy. This concept of nature and what we are seeking to protect should also include the recognition of soil - a finite resource which provides many values.
- Threats – We support the recognition that biosecurity efforts are a key aspect.
- Economic Activity – We support the acknowledgement that economic activity can (and will need to) have a role to play in protecting biodiversity.
- Non-Indigenous species - it is important to recognise the value that some non-indigenous species provide us. This value does not necessarily relate only to maintaining or enhancing indigenous biodiversity e.g. horticultural crops for food production.

Q6: What do you think of the proposed set of goals? What are the most important things to track to measure our progress? What else should be included?

In general, HortNZ supports the goals which seek to prevent further loss of, and increase biodiversity over the 2025, 2030 and 2050 timeframe. Some of the goals could be strengthened by being more measurable and clear in regard to which aspects will be measured and what the 'baseline' is e.g. in regard to extent of wetlands, significant biodiversity and clarification of 'priority biodiversity hotspots'.

A goal of specific relevance to the horticultural industry is the goal of by 2030 "Achieving biodiversity outcomes is part of a standard farming practice". This goal is framed quite broadly and could be clearer on what outcomes are sought and across which industries. It is also important that this is supported by clear actions, investment and support in order to achieve this. Care needs to be taken so growers can prioritise the environmental management actions that will be most effective, without becoming overwhelmed with additional requirements.

Similarly, the 2050 goal "Every business is helping to restore nature" is very high level and could be more meaningful if it was more specific.

Q7: What do you think about the proposed plan for implementation planning? What do you think are the requirements for a governance structure to oversee implementation planning and delivery?

The implementation plan will be a crucial part of the success of the strategy. How the strategy is translated to a community and industry-specific level will be important for increasing engagement in this area.

Q9: What do you think about the five system shifts? Are they the right areas to focus on in the near term? Are there any areas that should be included?

Shift 1: Getting the system right

This shift will be critical to enable the success of the other four system shifts; defining clear roles and responsibilities with regard to biodiversity is supported.

With regard to legislation (and the RMA specifically), getting the system right will need to include clear and certain planning frameworks for biodiversity that are consistent across the country – we anticipate that the National Policy Statement for Indigenous Biodiversity which we understand is due for release for consultation soon will enable this.

We also support the focus on ensuring it is clear where information can be sourced, and where people who have a strong interest in getting involved in biodiversity initiatives can go to find information; the capability to provide this expertise will also be important.

We support the acknowledgement that there needs to be recognition of the relationship of biodiversity to other policy, such as climate change, freshwater and highly productive land. The strategy could be more specific in this regard, to ensure that duplication of effort is avoided and that there is consistent regulation. For example, it is unclear how the priority action “Delivery of freshwater policy reform that will provide benefits to freshwater biodiversity” aligns with the Ministry for the Environment’s Essential Freshwater programme.

HortNZ supports the strengthening of the biosecurity system as part of the priority action.

Shift 2: Empowering kaitiakitanga and mātauranga Maori

We support this system shift which builds on existing regional council objectives to protect and enhance Mahinga kai values.

Shift 3: Communities are empowered to take action

This is one of the most crucial shifts, promoting biodiversity at a community level. From an industry perspective, it is important to express the “why” and how nature can be good for business with regard to the ecosystem services as well as New Zealand’s international brand (specifically for export industries). This will help to promote practices that support biodiversity being integrated into ‘business as usual’.

Empowering the community needs to also recognise the role of the primary sector in the community and economy.

We support that the recognition of economic incentives as a tool that can be used to support biodiversity initiatives on private land; alongside this it is also important that regulation enables positive action (e.g. wetland maintenance) without unnecessary red tape (while also balancing the need for safeguards).

We support the establishment of resources for advice, rural advisors in particular, as a priority action.

Implementation should aim to leverage off existing environmental initiatives such as Farm Environment Plans and industry assurance schemes with environmental modules such NZGAP and GLOBALG.A.P. (Good Agricultural Practice). Communities and land owners would also need access to tools and resources to help complete their biodiversity assessment and take appropriate actions. An example of this is the Biodiversity assessment

tool prototype developed by Landcare Research and the NZ Sustainability Dashboard (e.g. <https://landcare.shinyapps.io/BiodivPrototype/>).

The communication strategy and advocacy priority action will also be important in the success of the strategy.

Shift 4: Connecting ecosystems from the mountain tops to the ocean depths

Integration of biodiversity management into farm management plans (or farm environments plan) is noted as a priority medium term action; this will need to be supported by expertise and resource to support this. To achieve this effectively, there is a need to determine how this will align with other initiatives and national priorities, including industry specific programmes e.g. NZ GAP. However, this could be a useful way of recognising biodiversity to be at a property level.

Landscape scale biodiversity planning, needs to recognise primary production as part of the landscape, and recognise the value of these industries.

Shift 5: Innovating for the future

This is a key area of opportunity where investment will be important, alongside responses to other challenges such as climate change and responding to water quality issues. Defining clear roles and responsibilities with regard to biodiversity is supported.

Investment priorities, alongside other key issues such as climate change, could include primary industry focused research goal.

