



APICULTURE
NEW ZEALAND

SUBMISSION

TO: Climate Change Commission
FROM: Apiculture New Zealand
SUBMISSION ON: Climate action for Aotearoa - first package of advice to government

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Submission to Climate action for Aotearoa – draft advice

Introduction

Apiculture New Zealand (ApiNZ) welcomes the opportunity to make this submission to the Climate Change Commission's first package of advice to government.

Apiculture New Zealand is the national body representing the apiculture industry in New Zealand. Our purpose is to support a sustainable environment where all our industry participants can prosper.

The Apiculture industry has strong growth prospects based on both the international demand for high value mānuka honey and the potential for our non-mānuka honey varieties to be marketed more prominently with NZ Inc attributes. The industry now exceeds \$0.5 billion in export revenue. The industry has a strong alignment with the projected future of the New Zealand primary sector as documented in the '*Fit for a Better World*' roadmap developed by the Primary Sector Council, particularly relating to sustainable resource management and the shift in the focus of production from 'volume to value'.

Summary

ApiNZ supports the work that He Pou a Rangi, the Climate Change Commission has undertaken to date, and recognises the need for transformational and lasting change across society and the economy in order to reach net zero emissions of long-lived gases by 2050.

ApiNZ's submission is restricted comment on 'Big Issue 1' (Pace of change), Big Issue 4' (Role and types of forests, prioritising the growth of new native forests to provide a long-term store of carbon), and associated Consultation question 17 – Forestry; and question 16 – Agriculture.

Big Issue 1 – Pace of Change

5.4 How Aotearoa earns its way in the world

The majority of New Zealand's revenue from honey is generated from overseas consumers, and industry's exporters are aware that consumers of New Zealand honey are increasingly interested in the attributes associated with our honey beyond product quality. This will inevitably shift to the impact of its production on climate change.

More immediately, New Zealand exporters are aware that some of our key exporting markets are looking to establish rules that would see imported products have to demonstrate their carbon footprint.

A feature of the European Union's proposed Green Deal to decarbonise its wider economy is a carbon tax on imports. To minimise complexity, this could mean taxes on imported products are set according to the emissions of the product's country of origin, rather than the product itself.

While the apiculture industry can point to being a low contributor to greenhouse gas emissions, it could end up being reliant on New Zealand's wider effort to decarbonise to continue its current access to some markets.

ApiCulture NZ therefore encourages the government to maintain a pace of change that reflects the expectations of both consumers of New Zealand's high value food products, and the regulators in overseas markets.

Big Issue 4. Role and types of forests & Question 17. Forestry

'Do you support the package of recommendations and actions for the forestry sector?'

ApiNZ's is supportive of the new sequestration policy with a greater emphasis on the use of native forest for long-term sequestration and creating incentives to increase native vegetation planting within our landscapes to future-proof the contribution that sequestration makes to meeting New Zealand's longer-term targets.

ApiNZ agrees with the advice (3.8.7 Forestry) that recognises the benefits provided by smaller blocks of native vegetation integrated within our landscapes, and to support that, 16,000 hectares of new native forests will be needed per year by 2025, and 25,000 hectares per year by 2030 until at least 2050.

The Commission rightly notes (6.1.4 Forestry) there is currently limited incentives for landowners to change less-productive farmland to permanent native forests – either through planting or by letting it revert.

ApiNZ notes there does not appear to have been any work done yet on how the Government will incentivise landowners to deliver the afforestation of new permanent native forests to help meet the emissions budgets, but this will need to be in place by 31 December 2022.

As a policy tool to increase the incentive for landowners to develop permanent forests ApiNZ would like to see the Climate Change Commission consider mānuka plantations included within the new scope of native afforestation incentives.

Currently it is a requirement of registration in the New Zealand Emissions Trading Scheme ("ETS") that forests reach a minimum height of 5 metres. However, the minimum height reached by mānuka trees can vary from site to site.

ApiNZ understands there is an official registration process to be undertaken before plantations can be guaranteed to participate in the ETS, and the 5-metre rule for mānuka creates uncertainty for those considering investing in plantation.

If one of the objects of the ETS is to sequester carbon, then to include plantation mānuka in the ETS criteria would send a strong incentive.

Planting of mānuka will form an important part of the ongoing growth of the apiculture industry in New Zealand. While overseas demand continues to increase for the uniquely valuable mānuka

honey products, New Zealand is now reaching peak capacity for production and in danger of not being able to service the growing demand. There is a clear need to grow the base resource, however the cost of planting remains a key barrier to investment.

Revision of the policy would potential then have twin positive outcomes – increase the resource for the export of high value products backed by a credible sustainability story and creating greater incentives for landowners to retire marginal land to forestry for the purpose of long-term carbon sequestration.

As part of Time-critical necessary action-5(a) ApiNZ would welcome a review of the policy that determines forestation status as part of the considerations of incentives for planting native forests.

Question 16 – Agriculture

The apiculture industry has an interest in changes to farming systems that would reduce inputs as a means to reduce emissions.

Apiculture NZ agrees with the e Biological Emissions Reference Group on its belief that changes (among them being a reduction in inputs) could improve profitability – not just for those engaged in agricultural production, but others (such as beekeepers) who contribute (through pollination) and in turn benefit from the agriculture sector (access to clover/ pasture to produce honey).

Currently the production of clover and pasture honey as a bulk commodity is not economic. However, if New Zealand agricultural practices changed towards low input farm systems, and reduced, for example, the use of synthetic fertiliser (which has been identified in the advice as being a contributory emitter of carbon dioxide), there is the potential for New Zealand clover and pasture honey to become more economic, if internationally verified standards were introduced, traceable to properties that adopted low or zero inputs of synthetic fertilisers.

Apiculture NZ supports a commitment to changing on-farm management practices to reduce biological agricultural emissions, and recognises increasing technology use on farms will help to support efficiencies and reduce environmental impacts. Apiculture NZ suggests the government could do more to promote the benefits of reducing agricultural emissions to all food producers and the positive impact it will have on market access and international prices.