

18 November 2022

Agricultural emissions pricing consultation
Ministry for the Environment
PO Box 10362
Wellington 6143
Williams Consult As Emissions Pricing Conformation and the consultation

via email: AgEmissionsPricing@mfe.govt.nzexportlegislation@mpi.govt.nz

To whom it may concern,

Re: Submission on pricing agricultural emissions.

Thank you for the opportunity to submit on the proposal on pricing agricultural emissions.

Apiculture NZ (ApiNZ) is the national body representing the apiculture industry in New Zealand covering the full range of sectors, from hobbyist and commercial beekeepers to honey exporters, packers and suppliers. ApiNZ aims to support and deliver benefits to the New Zealand apiculture industry by supporting a thriving long-term future for New Zealand honeybee products and services, including having a strong bee health and biosecurity position.

While He Waka Eke Noa is geared towards farmers and growers, ApiNZ has been involved in the programme from the start, as a supporting partner, given our close relationship with the agriculture and horticulture sectors, and our desire to proactively respond to climate change.

We fully support the joint submission made by the HWEN partnership.

ApiNZ's key concerns lies with the Government's proposed changes around sequestration and its potential impact on New Zealand's bee population.

ApiNZ considers that the government's proposal is likely to lead to a large increase in exotic plantings, mostly pine trees. Biodiversity is important to healthy bee populations and consideration should be given to ways to increase plantings of native species. ApiNZ does not support a policy that encourages the conversion of pastureland to monoculture exotic trees, reducing access to important food sources for bees.

ApiNZ has been an active partner in supporting regenerative farming, working with its members and their landowners around strategic and riparian planting of trees and shrubs (bee feed), including natives, to maximise bee health and survival, and support pollination services.

We have done this largely through the *Trees for Bees* programme which researches the value of candidate bee forage plants and creates resources for beekeepers and landowners to use to design and install plantations of bee feed to maximise the health and survival of bees.



We would be concerned if the Government's proposals resulted in a decline in interest in riparian planting, undermining the invaluable progress made by The Trees for Bees team in conjunction with beekeepers and landowners to support bee health.

Bees are a crucial part of our ecosystem and consideration needs to be given to the impact on bees in relation to any agricultural emissions policy.

Yours sincerely

Karin Kos

Chief Executive

Apiculture New Zealand

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Nathan Guy

Chair

Apiculture New Zealand