

19 February 2023

Natural and Built Environments Bill and Spatial Planning Bill
Environment Committee
Parliament Buildings
Wellington

via website: https://www.parliament.nz/en/pb/sc/make-a-submission/document/53SCEN_SCF_BILL_129831/natural-and-built-environment-bill

To whom it may concern,

Re: Submission on Natural and Built Environment Bill and Spatial Planning Bill

Thank you for the opportunity to submit on the Natural and Built Environment Bill and the Spatial Planning Bill.

Apiculture New Zealand (ApiNZ) is the national body representing the apiculture industry in New Zealand. It covers 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.

New Zealand currently has 9,795 registered beekeepers and 726,298 registered beehives. New Zealand produced 22,000 tonnes of honey in the year to 30 June 2023. Exports of pure honey for the year to 30 June 2022 were 11,320 tonnes, valued at \$455 million. New Zealand's apiculture industry is valued at over \$5 billion. This industry contributes more than just honey and bee products as bees play critical role in pollination for our agricultural and horticultural sectors. Bees pollinate berries, stone fruit, specialised seed crops and pastoral clover for nitrogen regeneration.

1. Introduction

ApiNZ agrees that reform of New Zealand's resource management system is needed as the processes introduced under the Resource Management Act 1991 (RMA) take too long and cost too much. Development has also been restricted and the environment has not been adequately protected.

These Bills are the first time in over thirty years that New Zealand is considering in depth the way that our environment is managed. Given this significance, the Select Committee has not allowed enough time for submitters to properly consider these Bills. A consultation period of 51 working days over

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the Christmas period to consider over 800 pages in each Bill is not enough time if the Government is committed to carrying out a robust process. This lack of time has also been exacerbated by recent weather events (cyclones Hale and Gabrielle).

ApiNZ's key concerns lie with beekeepers' ability to continue to operate their businesses effectively. This includes access to areas to locate their hives, access to adequate pollen sources, being able to continue to manufacture bee products and provide critical pollination services

ApiNZ will only offer high level comments in this submission and will focus on the main points that are relevant to apiculture. While we agree with the overall outcome that the Bills are trying to achieve, the Bills as they stand have problems that may prevent these outcomes from being achieved. We also refer to specific parts of Horticulture New Zealand (HortNZ) submission as outlined below

2. Proposed Natural and Built Environment Bill

2.1. Interpretation

A large number of terms in the Natural and Built Environments (NBE) Bill are not clearly defined. For example, Part 1 subpart 1.5(a) of the NBE Bill requires all plans to provide for several systems outcomes including 'the protection or, if degraded, restoration of' natural resources. There is however, no definition of 'restoration' included in the definitions section of the Bill so it is difficult to determine what restoration means. Other terms that do not have definitions in the NBE Bill, as detailed in the HortNZ submission include human health, sustainability, equity, efficiency and national significance. ApiNZ supports the definitions of these terms suggested by HortNZ's submission.

If these terms are not defined in legislation, it is likely that court cases will be needed to determine the meaning of these new terms. The time and cost of these court cases will further reduce the efficiency of the system that would be created by these Bills if they were enacted.

2.2. Purpose and preliminary matters

2.2.1. Purpose

We support the HortNZ submission comments on the purpose of the NBE Bill. The HortNZ submission states that they support the concept of integrated management and the positive focus on system outcomes.

2.2.2. System outcomes

The Bills would benefit from a more balanced approach to urban and rural areas. Once again, we support the points raised in the HortNZ submission on this issue. Specifically, Part 1.5(c) is overly focussed on urban outcomes at the expense of rural outcomes¹. Part 1.5(d) should be amended to

use the same language as the National Policy Statement on Highly Productive Land (NHS-HPL) by 'protecting' land for primary production rather than just ensuring availability.

Part 1.5(c) also does not take into account the Environment Court recommendation that an outcome should specifically provide for food production. We support HortNZ's recommendation to add a rural outcome for food production to balance the primarily urban outcomes listed under this section. The use of rural land for food production activities, including beekeeping and manuka plantations, is important to meet the nutritional needs of New Zealanders. Pollination of many fruit, vegetable and seed crops by bees is critical to the effectiveness of many of these businesses. Domestic food supply and food security are essential human health needs, as are water, air and shelter. Specific planning is necessary to ensure the ongoing provision of a resilient domestic food system.

Outcome (c) should be explicit about the importance of a resilient food supply to support the health of New Zealanders, and (d) should protect HPL as a natural resource to be used for primary production for future generations.

2.3. Cost of current consenting processes

We do not believe that the framework that the two Bills will create will be 'cheaper, faster, better' as stated by the Government. In order to make the new system cheaper it either has to have more activities permitted, and therefore not require as many resource consents, or reduce the cost of the resource consenting process. It is hard to see how this can be expected to occur as resource consents will still be required for the same activities, and they will be processed by the same consenting authorities. If the new system does not live up to promises to be 'cheaper, faster, better' there will be an impact on the operations of food producers, with potential flow on effects for pollination services and limiting the ability to sustain a thriving bee population.

Another area that is important to the apiculture industry is obtaining consent for access tracks, for example to apiary sites and manuka plantations. Building access tracks makes it possible to reach sites that have good pollen sources but are too far from existing apiary sites for bees to travel to gather nectar and pollen, or to access sites that have been planted specifically for honey production such as plantations of manuka to produce a consistent supply of monofloral manuka honey. We would be concerned both at the cost of the new process constraining the ability of beekeepers both to undertake their existing business but also constrain investment in the sector's future.

2.4. Urban/rural boundaries

Many of our members have built processing facilities for bee products in manufacturing areas or in rural areas. These facilities attract local bees so can cause nuisance to properties immediately surrounding them. Careful consideration is given to the siting of these processing facilities to ensure that they are away from properties, such as urban housing, where they could cause unacceptable levels of nuisance. These facilities are vulnerable to urban encroachment which can impact on their



social license to operate through additional complaints. Having to move these facilities, even only once, impacts on the viability of these operations.

Yours sincerely

Karin Kos
Chief Executive
Apiculture New Zealand

ⁱ We also support HortNZ's suggestion that an additional outcome be added to support national and regional planning to provide sufficient suitable land, water and assimilative capacity to support food production to meet the nutritional needs of New Zealanders.