



SUBMISSION ON

Exposure Draft Natural and Built Environments Bill

4 August 2021

To: Environment Committee

Submitter: Potatoes New Zealand

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INTRODUCTION

1. Potatoes are Aotearoa New Zealand's third largest horticultural export earner, after apples and kiwifruit. Potatoes earn \$1.2 billion annually.¹
2. Potatoes New Zealand (PNZ) is a Primary Sector membership organisation. Unlike some other grower groups its membership is pan-industry. PNZ members include potato growers, potato processors, potato seed growers, potato exporters, and other interested parties. PNZ has 172 members across Aotearoa New Zealand. These members pay a levy to PNZ.

PNZ may spend levy money for any or all the following purposes relating to potatoes: (a) research and development: (b) market development and promotion: (c) development of quality assurance: (d) education and training: (e) information and communication: (f) grower representation: (g) day-to-day administration of PNZ: (h) protection or improvement of plant health: (i) readiness and response to biosecurity threats.

3. PNZ acknowledges and is generally in support of the submissions of the Pukekohe Vegetable Growers' Association, Horticulture New Zealand, and Onions New Zealand, on the Natural and Built Environments Bill.
4. PNZ welcomes the opportunity to provide its input on this draft exposure bill and wishes to speak to its submission at the Select Committee stages.

CONTEXT

5. While the potato may be humble, producing it is dynamic, complex, and occurs in the context of a global marketplace and a highly regulated environmental and commercial eco-system.
6. Aotearoa New Zealand grows three basic types of potatoes.
 - Table potatoes (fresh ones that you cook)
 - Processing potatoes (get turned into fries or crisps)
 - Crops of seed potatoes (an annual crop potato seed is multiplied over a 4-year cycle to produce enough commercial quantities of seed)².

¹ See our website for statistics. <https://potatoesnz.co.nz/administration/industry-values/>

² Each new potato variety starts out as germplasm which is imported from Scotland. There it is grown under laboratory conditions and carefully examined for diseases and defects in the variety. It is sent around the world in a test tube and seed potato growers then nurture it year after year until the potatoes are mature enough to grow eating potatoes.

7. Aotearoa New Zealand exports processed potatoes as part of the international market as the world requires supplies of potatoes 365 days a year. Not everywhere in the world can grow potatoes. While NZ potato farmers grow very high yielding potato crops, they are not high profit, and it does not take a great deal of volatility for potato farming to rapidly become uneconomic.
8. The land on which potatoes are grown must be changed every year to stop disease (this method is known as crop rotation). Unlike fruit trees which remain on the same land, the potato crop must completely move every year over a cycle which is typically seven years in duration. This means that over that seven-year cycle, a potato farmer who crops (say) 100 ha of land each year would need access to 700 ha.
9. Potatoes are one of the most efficient crops in the use of water and irrigation to produce food with only 287 litres needed to produce one kg of potatoes versus bread at 1,608 litres per kg, or 1,956 litres for a dozen eggs.
10. Potato farmers lease land as a result. Most cannot afford to own all the land they need, and leasing land is also excellent revenue for the lessor. While rotation (with crops such as onions and carrots) occurs, potato farmers are still constantly looking for other horticultural land for their business to survive. Because of that, predictability of consenting is enormously important, and the knowledge of the sector is not necessarily present Council to Council across Aotearoa New Zealand. Consents can be required under district as well as regional plans, and most Aotearoa New Zealand potato farmers are small enterprises, with a handful of staff. Potato farmers are there because they are good at horticulture, not because they are experts in the RMA.
11. The potato processors, while large, are 'just-in-time' businesses, which are heavily dependent on predictable volumes of goods coming in and going out at predictable intervals. PNZ witnessed a 'near-miss' event during a biosecurity outbreak in 2018, where a very subtle change in a consent requirement nearly shut the industry down overnight due to the inability to process potato waste in the previous manner. The potato food chain is fragile, easily disrupted and needs protection.
12. Aotearoa New Zealand is also exposed to global competition, such as the dumping which was proven to have taken place over the last year by European exporters. Processed potatoes can be stockpiled and if they are then sold under market price internationally that can have devastating effects on local producers. While potato growing is high volume, the margins in potato farming are low, and there is little leeway for black swan events (events which are unexpected or unknowable) and if the owners of land which growers have previously leased becomes unavailable then that makes things all the harder.
13. For example, one of the biggest risks to the industry now is the pressure for housing on rich fertile land near cities. Pukekohe is a case in point, where the potato belt now hosts very low-density urban sprawl. Once that land has gone into housing, it will never come

back. The growers in the area will soon find themselves at a tipping point where there is insufficient land for the crop rotation they need. With urban sprawl comes reverse sensitivity where rural practices are considered offensive by the new neighbours. The current environmental planning regime has allowed this to occur, and it is not good urban planning. For these reasons Potatoes NZ wholeheartedly supports the intention to consolidate planning documents across Aotearoa New Zealand and make them more answerable to National Policy Statements.

14. PNZ supports through our levies the continuous improvement of environmental outcomes, to create opportunities efficient resource use, while meeting the expanding number of environmental thresholds for resource use in each of our key production regions. We believe nationally consistent direction and leadership is critical for consistent limit setting and monitoring of resource use and to allow for sophisticated management of environmental risks.
15. However, Potatoes NZ is deeply concerned that one of the most fundamental issues has not been given sufficient weight in the draft legislation. While we absolutely need to provide housing for people, people need to eat. Food must be grown to do that. There must be sufficient land for that to occur. We cannot keep planting houses on horticultural land and then still expect to continue to feed people. We need a National Policy Statement that recognises food security as a key pillar of Aotearoa New Zealand's sustainability. If NZ is serious about climate change, then reducing our dependence on imported food is essential. Protecting our own horticultural land for that purpose needs to be specifically recognised. A sustainable food ecosystem creates independent food supplies and secure foreign exchange in times of uncertainty.
16. Food security is now recognised as a global issue and with fragile supply chains Aotearoa New Zealand is not immune to it. Food security is as much a hazard as any other natural hazard. It is not sufficiently recognised in the legislation. In Maslow's hierarchy of needs, food, shelter, water, and air are the basic platforms of survival. In Aotearoa New Zealand's planning documents, food is barely even an afterthought. It cannot remain that way. It needs to be given equivalency with housing, water quality and air quality. Food does not come from the supermarket, it comes from the land, from the water and the air which nourishes. Food cannot be ignored.
17. It is easy to look away from this issue, as we do with any natural hazard, but crops fail and the world changes as a result. The Irish potato blight of the 1830s drove the emigration of hundreds of thousands of citizens away from Ireland. Drought compelled famine is well understood in our lifetime in many parts of the globe. We routinely see calls for Food Aid due to climatic or martial events. At the beginning of the COVID19 lockdown, the primal urge to hoard flour and yeast (as well as toilet paper) should have surprised no-one. People understand it. They need food to survive, and they need the government's planning instruments to recognise and provide for its production to occur.
18. With climate change, primary production is increasingly difficult. Protecting it is therefore even more important for sustainability and to avoid contributing to greenhouse gas emissions by having sustainable food production systems to meet our needs.

19. PNZ supports a robust and coherent response to the challenges of climate change which provides a pathway for our sector to adapt while meeting the food security needs of communities and the intrinsic environmental outcomes for the environment. A holistic understanding of the infrastructure requirements for potato growing is required to recognise diverse elements (plant breeding centres to post-harvest processing and transportation services).
20. PNZ is delighted to see acknowledgment and recognition of the place of sustainable production of kai and mahinga kai in the legislation. Protection of the ability to feed people is essential. We observe a desire from many iwi and hapu to engage in vegetable production. This is recognised as a key opportunity by many to address climate change risks and provide food security for urban and rural whanau.
21. In times of disruption and change the sector will face rising costs, it is important to recognise that sector has a limited ability to pass these on to the consumer or retailer.

CONCLUSION

22. Potatoes New Zealand wishes to be heard and welcomes the opportunity to speak to the Select Committee.

Nāu te rourou, nāku te rourou, ka ora ai te iwi.

With your food basket and my food basket the people will thrive.