

10 October 2019

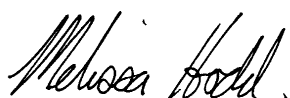
Highly Productive Land Consultation
Ministry of Primary Industries
WELLINGTON

Valuing Highly Productive Land

1. This submission is made by Foodstuffs (NZ) Ltd on behalf of the Foodstuffs group of companies [Foodstuffs] including Foodstuffs North Island Ltd and Foodstuffs South Island Ltd.
2. The regional Foodstuffs companies are retailer owned co-operatives. Members of each co-operative operate supermarkets and grocery stores trading under the Foodstuffs owned brands: PAK'nSAVE, New World, Four Square, Raeward Fresh, and On the Spot.
3. Foodstuffs supports having a National Policy Statement for Highly Productive Land (NPS-HPL). There are pros and cons to having a stand-alone NPS or incorporating the provisions of the NPS into the NPS-UD as proposed by some parties. Foodstuffs does not have a preference.
4. Foodstuffs stores account for a significant share of the domestic retail market for fresh produce, meat, seafood, and milk. We have objectives to support local growers, reduce food poverty by supplying healthy and affordable food, and support New Zealand's transition to a low carbon economy. The proposed NPS should also support these objectives.
5. We are aware that HPL, particularly that used for fruit and vegetable production, is vulnerable to pressure from urban sprawl, life-style developments, and reverse sensitivity issues. We agree that once HPL is converted to urban use, the likelihood of it reverting to primary production is extremely low. On this basis, a proactive approach to preserving HPL for high-value use is highly desirable, and regulatory protection is probably necessary.
6. Foodstuffs agrees there is currently a lack of clarity on how HPL should be managed by councils under the RMA. A NPS would provide councils with a framework to manage this resource and assess the various trade-off between competing land uses. The NPS should provide clear direction to councils that urban development should be avoided on HPL where other feasible options for urban development and life-style developments exist.
7. We agree the NPS tool is preferable to an Environmental Standard because of the flexibility that a NPS provides. We agree that a NPS would not and should not provide absolute protection of highly productive land but rather require local authorities to proactively consider the HPL resource in their area to ensure enough HPL is available for present and future production. The prescriptive nature of an Environmental Standard would not provide enough discretion for councils to apply local context.

8. HPL is currently identified using the Land Use Capability (LUC) classification system for soil quality. We support the proposal that councils initially be required to classify LUC classes 1-3 as HPL, by default, until they complete their own regional or district assessment. This will preserve the use of land until the more detailed analysis is able to be finished. It will also encourage councils to undertake this work in an expedient fashion. It is appropriate that the outcomes of the analysis are defined in regional policy statements and district plans.
9. It is intended that the NPS will not favour any specific types of primary production e.g. vegetable growing, at the expense of other forms of primary production, the focus being to reduce the irreversible loss in availability of highly productive land for primary production generally. However, Foodstuffs does not support this approach and believes it will lead to perverse outcomes.
10. Land uses that support domestic food security, reduce food poverty, and will assist New Zealand's transition to a low carbon economy should have priority over other forms of primary production. Additionally, some forms of primary production may themselves have significantly detrimental impacts on soil health. For example, forestry grown on land traditionally used for vegetable production would lead to irreversible damage to soil quality and exclude the land from being used for vegetable growing in the foreseeable future. Loss of fruit and vegetable growing capacity would also lead to greater import substitution – which is accompanied with higher carbon emissions for the extended transportation.
11. Our consumer research indicates that New Zealanders are placing increasing value on purchasing local fruit and vegetables. Not only does this support local economy (jobs, taxes etc), and reduce carbon emissions (by growing food in proximity to where it is consumed), but it helps to keep the cost of produce down. A plentiful supply of affordable fresh produce will aid the government's public health objectives – making it easier for New Zealanders to eat healthily. On this basis, Foodstuffs would like to see the NPS amended to ensure councils give greater weighting to land uses which support domestic food security, reduce food poverty, and the transition to a low carbon economy.
12. We understand the intent to preserve land for primary production over food production per se is because New Zealand is a net exporter of food and isn't considered to be vulnerable to food security issues. That may be true at a primary sector level, but is not the case for individual crops, and may not be the case in the longer term. Continuing shrinkage of vegetable and fruit growing land, population growth, and the impacts of climate change may inevitably lead to greater reliance on imported food to society's detriment. As outlined above, we recommend food security, food poverty, and carbon considerations warrant greater weighing in the policy framework. Additionally, such weighting would support the intent to ensure enough HPL is preserved for present and future production.

Yours sincerely



Melissa Hodd
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