

## **SUBMISSION ON THE PROPOSED NATIONAL POLICY STATEMENT ON HIGHLY PRODUCTIVE LAND**

### **Introduction**

1. The Aotearoa Food Policy Network (AFPN) commends the Ministry for Primary Industry and the Ministry for the Environment on the development of the proposed National Policy Statement (NPS) for Highly Productive Land and appreciates the opportunity to provide feedback.
2. This submission provides general feedback and recommendations in relation to matters raised in the discussion document.

### **AFPN roles and responsibilities**

1. We are an open and collaborative network with strategic oversight and influence, enabling a regenerative and sustainable food system in New Zealand.
  - a. We provide a collective voice and enable collective impact.
  - b. We exchange ideas and accelerate the uptake of good practice.
  - c. We cultivate purposeful relationships throughout New Zealand and internationally.
  - d. We provide strategic advice and influence on policy, research and practice.
  - e. We explore issues and opportunities, grow an evidence base, foster solutions and support innovation.
  - f. We are a voice for Papatūānuku and cultural diversity, equity and inclusion.

### **Key points**

1. The AFPN agrees that the maintenance and enhancement of New Zealand's most versatile soils and productive land resource is of vital importance for economic productivity, social and cultural wellbeing and environmental sustainability, including through local food production.
2. The AFPN supports the introduction of the NPS for Highly Productive Land and agrees that it is important to have consistent national level direction to facilitate policy and to assist in good decision-making.
3. With regard to scope of the proposed NPS, the AFPN submits that it is important to retain a wide scope on highly productive land as opposed to soils or certain types of activity, to allow for flexibility to adapt to future environmental and socio-economic conditions, respond to new research and technology, and provide for areas that are not currently food growing hubs but one day could be.
4. The AFPN submits that the proposed policies should also be amended to provide for potential future as well as current productive capacity of land based on the way rural land is being used now.
5. The AFPN also requests that the government investigate the possibility of a nationally co-ordinated exercise to map the highly productive land areas across the country. This will ensure consistency across the different councils and assist smaller councils where the costs would be prohibitive.

6. The AFPN is concerned by the wording that greater protection of highly productive must only be “considered” and only then for the “land that makes a greater contribution to the economy and community. “The AFPN requests that this wording be strengthened.
7. The AFPN requests strengthening of policies to prevent reverse sensitivity and establishment of non-agricultural landuses including further clarification of what is meant by ‘inappropriate’ use and preventing establishment of new sensitive activities outside of the HPL where they may impact normal agricultural operations inside the HPL.

## **Conclusion**

The AFPN is committed to advocating for the safeguarding of New Zealand’s highly productive land and looks forward to working with central and local government on the implementation of the National Policy Statement for Highly Productive Land.

*Submitted on behalf of the Aotearoa Food Policy Network Members by:*

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