

**SUBMISSION ON OUR CLIMATE OUR SAY DISCUSSION PAPER FOR THE ZERO
CARBON BILL**

TO: CLIMATE CHANGE TEAM
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SUBMISSION ON: SUBMISSION OUR CLIMATE OUR SAY DISCUSSION PAPER FOR
THE ZERO CARBON BILL

NAME: HORTICULTURE NEW ZEALAND

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**1. Horticulture New Zealand's (HortNZ) submission and the decisions sought are
detailed in the attached schedules and appendices:**

Schedule 1: Horticulture in New Zealand
Schedule 2: Submission

2. This submission is supported by Katikati Fruitgrowers Association Incorporated,
Tomatoes New Zealand Incorporated, Potatoes New Zealand Incorporated, Vegetables
New Zealand Incorporated, New Zealand Kiwifruit Growers Incorporated, New Zealand
Passionfruit Growers Association Incorporated, Horticulture Canterbury, Process
Vegetables NZ, Onions New Zealand Incorporated, Strawberry Growers New Zealand
Incorporated, New Zealand Apples and Pears Incorporated, New Zealand Citrus
Growers Incorporated, Federated Farmers.

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SCHEDULE ONE: HORTICULTURE IN NEW ZEALAND

Horticulture New Zealand (HortNZ) was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.

HortNZ represents the interests of New Zealand's 5000 commercial fruit and vegetable growers who employ over 60,000 workers. Horticultural exports are rapidly growing, and the industry is on target to meet Horticulture New Zealand's industry mission of \$10 billion by 2020. ¹ For the first time New Zealand's total horticultural produce exports in 2017 exceeded \$5.6b Free On Board (FOB) value, \$600m above the 2016 export value, a remarkable increase recognising that New Zealand's horticultural produce exports were \$3b in 2008 and only exceeded \$4b FOB value in 2015^[1]. Land under horticultural crop cultivation in New Zealand is calculated to be approximately 120,000 hectares².

¹ Statistics from Fresh Facts 2017 for the year ending 30 June 2017.

^[1] Statistics from Fresh Facts 2017 for the year ending 30 June 2017.

² <https://www.mpi.govt.nz/dmsdocument/23056/loggedIn>

SCHEDULE TWO: SUBMISSION

Introduction to this submission

HortNZ welcomes the opportunity to provide this submission to the Ministry for the Environment on its Our Climate Your Say discussion paper for the Zero Carbon Bill.

HortNZ agrees that it is important to set out a clear road map to a low net emissions economy and that it is especially important for the road map to have wide political support.

Provided we are able to find viable alternative production systems and technology, then we support the concept of a Zero Carbon Bill with a 2050 target, that can be revised. HortNZ's preference is to target long-lived gases for reduction while targeting short-lived gases for stabilisation.

We support the Bill having provisions for a Climate Change Commission, emissions budgets and adaptation.

HortNZ is concerned about the impacts of the various 'net zero' options on emissions prices and on GDP, jobs, incomes and the health of New Zealanders.

The growers in the horticulture industry are mostly small to medium sized businesses with a few larger corporates in some sectors. Changes in costs can have a dramatic effect on the ability of these businesses to remain profitable and continue to offer job opportunities to New Zealanders. Horticulture is a significant employer and a key factor in the maintenance of provincial New Zealand's cultural and social wellbeing.

New Zealand's unsubsidised horticulture sector is highly efficient but is also highly exposed to competition from moderately to highly subsidised overseas producers³.

Successive New Zealand governments have worked hard to remove barriers to trade. It would be counterproductive for New Zealand governments to impose costs to New Zealand producers that would counter these free trade gains and policies that would reduce New Zealand's emissions-efficient food production. Any loss of New Zealand's food production ability would likely be taken up by much less emissions-efficient producers overseas who are not facing the same costs⁴. That would only worsen climate change.

It is important that New Zealand's climate change policies do not make New Zealand producers unilaterally less competitive than overseas competitors. The 2050 target should be set taking into account New Zealand's international competitiveness.

Some of the costs of a Carbon Zero Bill that will be borne by the horticulture sector, will be passed on to consumers. For example, most of the vegetables grown in New Zealand are for domestic supply, and increasing costs of vegetable production, may threaten the ability of growers to continue to provide fresh affordable vegetables for New Zealanders.

Eating plenty of vegetables and fruit can help protect against major diseases, such as heart disease, stroke, high blood pressure and some cancers. Combined dietary risks, such as low vegetable and fruit intake and high salt intake, contributed around 11 percent of the total

³ OECD Producer Support Equivalents show 1% for New Zealand compared to 18% average across the OECD, 21% in the EU and in some countries as high as 60%.

⁴ Saunders, C, Barber, A, Sorenson, L, Food Miles, Carbon Footprinting and their potential impact on trade. (https://researcharchive.lincoln.ac.nz/bitstream/handle/10182/4317/food_miles.pdf)

health loss in New Zealand in 2010. High body mass index (BMI) contributed around 9 percent.⁵

The expansion of Horticulture, in place of animal-based agriculture, has been identified as a method of reducing emissions. While HortNZ agrees that horticulture is an efficient land use, there are a number of barriers and challenges that would need to be resolved before horticulture could expand to the degree that may be required to achieve net zero emissions for short-lived gasses.

2050 target

1. The process for setting a target in legislation

HortNZ supports the Government setting a target now. In our view, it is important to set out a clear road map to a low net emissions economy and it is especially important for the road map to have wide political support.

However, given the uncertainty around how the targets could be achieved, we are of the view that setting targets in legislation could be too restrictive and therefore we consider it is important there is provision for the Climate Change Commission to advise on revising the target in future. The ability to revise the target would provide the opportunity to consider the options for implementing the target.

Recommendation

1.1. HortNZ recommends the Government sets a target and provides for the target to be revised based on advice from the Climate Change Commission.

2. Options for 2050 target

HortNZ supports the approach that treats long-lived greenhouse gases differently to short-lived greenhouse gases. It is appropriate and logical to treat the different greenhouse gases differently with regard to the emissions reduction target, and to design policies accordingly.

When considering which 2050 target to adopt, we agree that it is crucially important to cement a long-term approach that endures political cycles. An enduring approach will need to include consideration of the Paris Agreement (including its discussion on food security), the science of short-lived and long-lived gases, and economic impacts.

We agree with the need for a 2050 target that assists rather than impedes the development of a sustainable and productive economy and helps rather than hinders a just and inclusive society.

There needs to be greater certainty and knowledge about the impacts of low-emission policies for horticulture. Improving our knowledge of unintended consequences, and critically debating the reality that farming of food does generate emissions, is necessary to form a truly coordinated and well-grounded approach to a low-emission economy. This work needs commitment from policy makers to ensure the long-term vision is realised. It starts with recognition that horticulture is not pastoral farming – it is often a much more varied and complex system from fruit crop orchards, to outdoor vegetable cropping rotations, through to covered crop greenhouses.

⁵ https://www.health.govt.nz/system/files/documents/publications/eating-activity-guidelines-for-new-zealand-adults-oct15_0.pdf

Carbon and transport

The price on carbon will impact on the horticultural sector by increasing costs of transport and costs of running on-farm machinery. Horticultural production makes use of higher numbers of on farm vehicles per hectare compared with pastoral agricultural land use.

As in other countries, the transition away from fossil-fuel vehicles is feasible and occurring in public transport and light private transport. There currently are no feasible options for growers to convert heavy on-farm machinery to non-fossil fuel vehicles. Regulation on emissions intensity of vehicles in other countries has seen the forced obsolescence of older vehicles, which improves emissions intensity, but negatively impacts the life cycle assessment of vehicles and total emissions. A 'feebate' scheme may incentivise lower emissions for new vehicles, however excessively high 'feebates' may have the same effect of forced obsolescence.

Carbon and covered crops

Covered crop tomato, capsicum, lettuce and cucumber producers in the South Island (close to South Island urban centres for consumption) are reliant on coal as opposed to North Island counterparts with access to natural gas. The capital cost of conversion to alternative fuels such as wood chip is high, particularly for small and medium sized operations. In most cases there is no commercially viable alternative, especially given limited availability of quality biomass in NZ. Growers report that they are not confident of securing a consistent supply, and that the considerable volume increase that would be required for wood chip compared to coal would be difficult to manage and negate some of the benefits of conversion (i.e. more road transport is required). The NZ ETS cost is small compared to the large capital investment required to convert to a new system and in many cases there are no viable alternatives.

For indoor growers of fresh produce, energy is the second highest single input cost, following closely behind wages. Currently the average energy use by vegetable covered crop growers in the North Island is 26% less than in the South Island, due to climatic differences⁶. The main barriers to change remain the practicality of alternative fuels and lack of new energy efficiency technologies. To enable consideration of lower carbon fuel options, support at a regional level is required to ensure factors such as stability of price, availability, and consistent quality of alternative fuels is considered.

Covered crop growers are currently captured in the NZ ETS via ETS units charged by energy providers (coal and gas) for greenhouse heating fuels (and also units paid on transport fuel). Covered crops growers do have access to rebates via the Emissions Intensive Trade Exposed (EITE) scheme, which recognises the significant impact that the ETS has on business costs and the competitiveness of these growers. Rebates are based on yields, and set at a rate that applies throughout New Zealand. This means that in the South Island, where coal is used at a higher ETS cost than gas in the North Island, South Island growers are disadvantaged relative to North Island growers. The ETS of South Island growers are not fully recovered by the EITE rebates they receive.

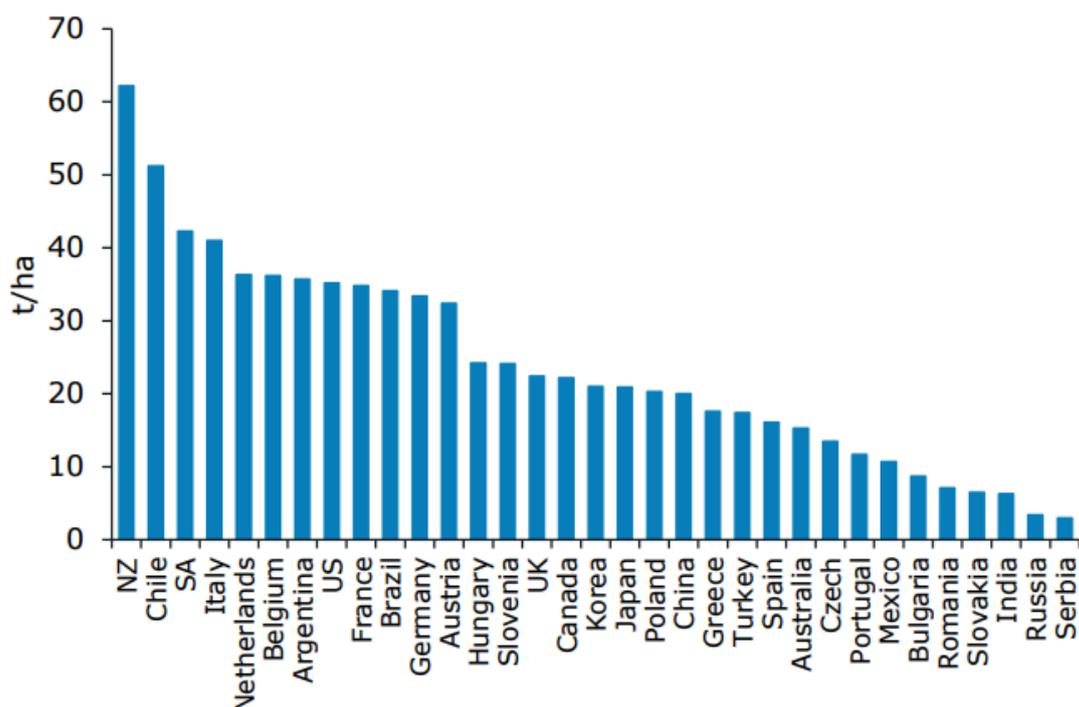
In theory, the current allocation system based on yield instead of energy use should have given a price signal for incentivising fuel source changes, however this has not occurred due to the constraints including lack of suitable alternatives and the capital costs of conversion. Research and development on developing and securing alternative fuel sources suitable for greenhouse use and support with funding conversions may accelerate a move away from coal.

⁶ Barber, A, Stenning, H. 2018 Vegetable Greenhouse Energy Use and LCA Update.

Carbon leakage

The 2015 Paris Agreement (and its predecessor the Kyoto Protocol), is strong on ensuring global food security and not reducing food production. New Zealand's unsubsidised, but highly efficient, primary sector is highly exposed to competition from moderately to highly subsidised producers⁷, for example New Zealand's pipfruit is the highest per hectare producer, with relatively low inputs. A carbon footprint study identified a lower carbon footprint for New Zealand apples delivered to UK, compared with domestic UK consumption⁸. If our costs rise and make us uneconomic there will be an increase in emissions as higher emitter producers stay in place. See Figure 1 for an illustration of New Zealand's pipfruit yields compared with other countries.

Figure 1 - Global Comparison of pipfruit yields by major producer⁹



Successive New Zealand governments have worked hard to remove barriers to trade. It would be counterproductive for New Zealand governments to impose costs to New Zealand producers that would counter these free trade gains and policies that would reduce New Zealand's emissions-efficient food production with that loss of food.

Carbon leakage is also a risk if our domestic supply is made less cost effective, for example for covered crops, an increase in the carbon price to a potential \$200/tC will put South Island covered crop growers out of business. The produce they grow will instead be trucked from the North Island at high costs and there is likely to be an increase in imports to fill the gap in production. Neither of these outcomes are likely to improve global emissions and will also result in poorer quality product for consumers at a higher cost.

It is important that New Zealand's climate change policies do not make New Zealand producers unilaterally less competitive than overseas competitors. The 2050 target should be set taking into account New Zealand's international competitiveness.

⁷ OECD Producer Support Equivalents show 1% for New Zealand compared to 18% average across the OECD, 21% in the EU and in some countries as high as 60%.

⁸ Barber, A, Stenning, H. 2018 Vegetable Greenhouse Energy Use and LCA Update.

⁹ <https://www.anz.co.nz/resources/1/b/1b383fe2-5668-470a-86f7-95f782880f49/ANZ-AgriFocus-20151216.pdf?MOD=AJPERES>

Nitrous oxide

Nitrogen fertiliser is used to provide for fruit and vegetable production. The rate of nitrogen fertilizer used for commercial vegetable rotations tends to be higher than other agricultural uses on a kilogram per hectare basis¹⁰, although total emissions per hectare tend to be lower. Due to the small footprint of the horticulture sector, the contribution to overall nitrous oxide emissions and New Zealand's total emissions is very low (<1.5% for entire horticulture and arable sectors). Overseer modelling¹¹ has found that reductions in the use of nitrogen fertilizer, results in reductions in vegetable yield. The proposal to reduce nitrous oxide, may result in reduced vegetable yields and increased costs for commercial vegetable and fruit production.

Domestic food supply and health outcomes

Most of the vegetables grown in New Zealand are for domestic consumption, (over 95% for most vegetables¹²). With New Zealand's increasing population, domestic supply of fresh vegetables is an issue that HortNZ is concerned about nationally. HortNZ have recently released a report on domestic vegetable production in New Zealand to help educate and inform New Zealanders of this issue¹³.

There is a general assumption that New Zealand is the land of plenty and we will always have enough locally-grown food to feed our population, supplemented by imported food where there is demand. But things are changing fast. Prime fruit and vegetable growing land is being squeezed by rapid growth in towns and cities and high demand for new housing, and with the implementation of the National Policy Statement for Freshwater Management 2014 (NPS-FM) placing restrictive regulations on commercial vegetable growing in many regions.

When supply is short and demand high, prices are subject to wide variations. This can potentially put healthy food out of some people's reach. In 2016/17 only 38.8% adult New Zealanders ate the recommended quantities of fruit and vegetables. Adults living in the most socially deprived areas were amongst those most likely to eat less than the recommended quantity of fruit and vegetables¹⁴.

Eating plenty of vegetables and fruit can help protect against major diseases, such as heart disease, stroke, high blood pressure and some cancers. Combined dietary risks, such as low vegetable and fruit intake and high salt intake, contributed around 11 percent of the total health loss in New Zealand in 2010. High body mass index (BMI) contributed around 9 percent.¹⁵

We need to look closely at our domestic food supply and be sure that policy decisions are seen in the context of impacting the whole of New Zealand's food supply. HortNZ have made projections around annual food volumes available for consumption in New Zealand. With New Zealand's population expecting to reach 5,045,000 by 2020 (based on annual growth between 1.5-2%), domestic supply of fresh vegetables will not be able to sustain our future population consumption needs.¹⁶ If our current domestic supply can't produce, we will either divert from export or import to meet the shortfall. This highlights the importance of food

¹⁰Di, H. & Cameron, K. Nutrient Cycling in Agroecosystems (2002) 64: 237. <https://doi.org/10.1023/A:1021471531188>.

¹¹Ford, S. 2017: Farm Scale Economic Impact Analysis of One Plan Intensive Land Use Provisions.

¹²KPMG 2017. New Zealand domestic Vegetable production: the growing story (<http://www.hortnz.co.nz/assets/Media-Release-Photos/HortNZ-Report-Final-A4-Single-Pages.pdf>)

¹³KPMG 2017. New Zealand domestic Vegetable production: the growing story

¹⁴https://minhealthnz.shinyapps.io/nz-health-survey-2016-17-annual-data-explorer/_w_e9a07e83/_w_aa03fb73/#!/explore-indicators

¹⁵https://www.health.govt.nz/system/files/documents/publications/eating-activity-guidelines-for-new-zealand-adults-oct15_0.pdf

¹⁶KPMG 2017. New Zealand domestic Vegetable production: the growing story.

security, land production and future-proofing the availability of resources to supply our growing population.

Recommendations

- 2.1. HortNZ prefers approach 2: net zero long-lived gases (carbon dioxide, nitrous oxide) and stabilised short-lived gases (methane): Long-lived gases to net zero by 2050, while also stabilising short-lived gases.
- 2.2. HortNZ recommends that attention is paid to the impact of the targets on New Zealand's international competitiveness and the potential for carbon leakage.
- 2.3. Nitrous oxide should not be brought into the emissions trading scheme (or any other policy mechanism) until cost-effective mitigation technologies are available to farmers;
- 2.4. HortNZ recommends particular attention is paid to the impact of the emissions targets on the supply of reliable fresh fruit and vegetables to domestic consumers.
- 2.5. HortNZ recommends investment in research to develop alternative technologies and fuels that growers will need to enable viable fruit and vegetable production to continue.

3. Meeting targets

HortNZ supports providing for meeting reduction targets using both domestic emissions reductions and some emissions from overseas.

We are of the view that New Zealand should do what it can to achieve the targets domestically, acknowledging New Zealand's primary production landscape. Emissions reduction and climate change adaptation are not stand alone, or single-issue considerations, rather they are integral to complex production systems and investment cycles. Approaching the design and application of new tools and policy interventions requires a system-based approach to identify, and enable, all complementary measures and co-benefits, which in turn will enable the development of investment and cost sharing methods and schemes.

Sequestration

Removals of carbon from the atmosphere by sequestration through the establishment of forests and other woody vegetation are an important component of delivering net emissions reductions.

In the context of horticulture opportunities for carbon removals into the future are through plantings, including shelter belts, riparian planting and orchards. The focus should be on ensuring that existing carbon removals from these sources are fully accounted for – the development of robust and defensible methodologies appropriate to New Zealand's landscapes and land management would better account for such removals.

Land use change

Horticulture has been identified as an alternative land use to animal-based agriculture, as a potential method of achieving emissions reductions. Horticulture is an efficient user of land, producing high value returns per hectare, as illustrated in Figure 1 and Figure 2 below.

Figure 1 Land use area comparing horticulture with dairy land use.¹⁷

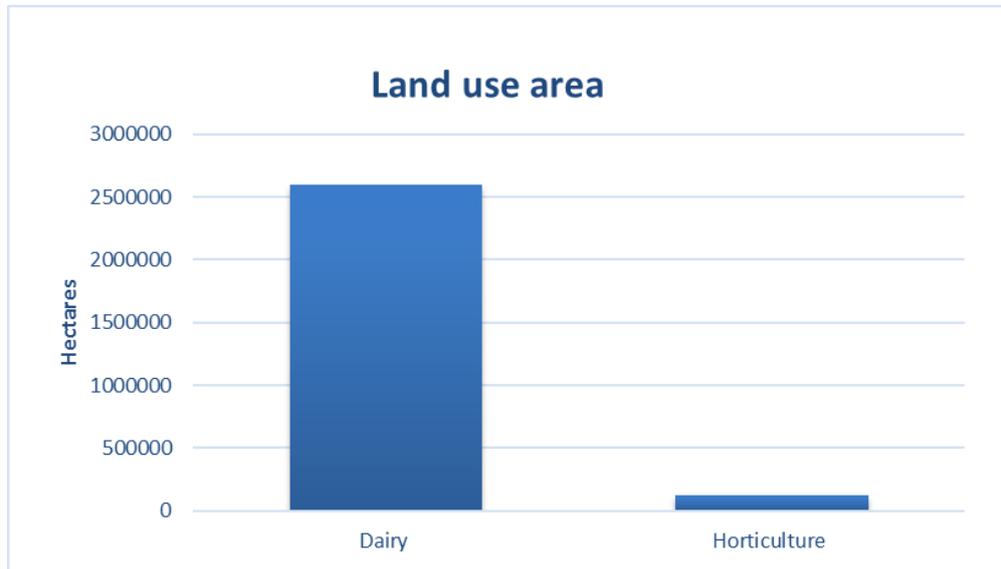
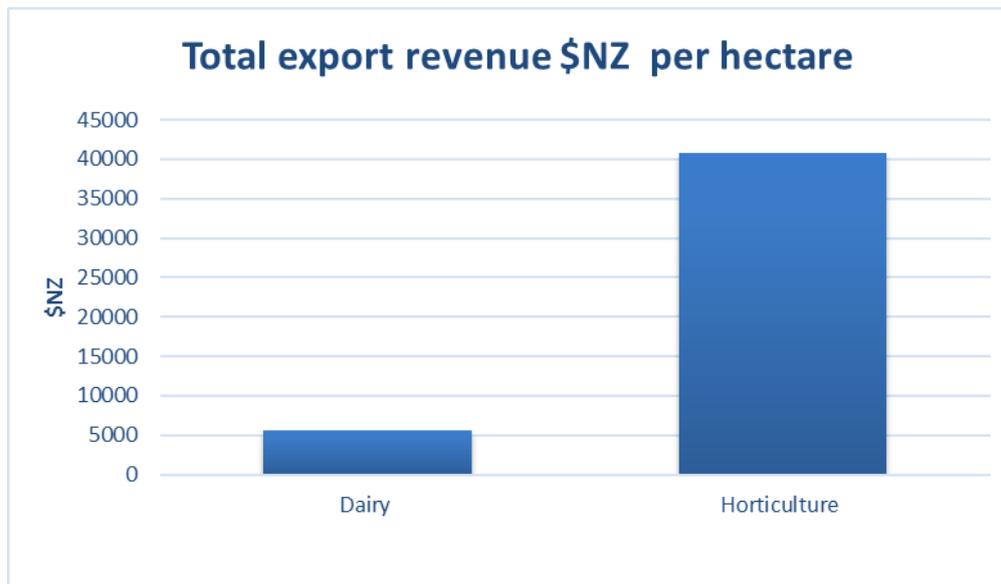


Figure 2 Total export revenue \$NZ per hectare.¹⁸



A report on the drivers and barriers to land use change commissioned by Ministry for Primary Industries (MPI)¹⁹ lists at least 14 drivers and/or barriers to land use change including biophysical, economic, technological, societal and personal factors.

While certainly horticulture can add value to a lower emissions economy, the significance of the diversity within the industry, and the barriers outlined below, must be acknowledged and

¹⁷ <http://www.mfe.govt.nz/sites/default/files/media/Environmental%20reporting/Our-land-2018-at-a-glance-final.pdf>, <http://www.freshfacts.co.nz/files/freshfacts-2017.pdf>

¹⁸ <https://www.mpi.govt.nz/news-and-resources/open-data-and-forecasting/situation-and-outlook-for-primary-industries-data/>

¹⁹ Journeaux, P, van Reenan, E, Manjala, T, Pike, S, Hanmore, I, Miller, S: 2017. Analysis of Drivers and Barriers to Land Use Change. A report prepared for the Ministry for Primary Industry.

resolved satisfactorily. Some of the challenges and barriers to horticulture conversions include:

- Access to markets – maintaining current markets, reducing trade barriers and opening new markets to facilitate the growth of horticulture exports;
- Access to suitable growing land – preserving high quality soils and preventing urban encroachment is crucial to growing horticultural developments;
- Access to irrigation - without certainty of water, including root stock and crop survival water, capital investment commitments won't be made;
- Access to nutrient allocation. Commercial vegetables require greater nitrogen allocations on a per hectare basis than may other land uses. The implementation of the NPS-FM has placed very restrictive limits on commercial vegetable growing in many regions;
- Horticulture investment timeframes are 25-year plus for fixed production, (trees and greenhouses);
- Access to labour – without skilled labour, further investment commitments in horticulture won't be made;
- The position of the industry as a price-taker – enabling certainty of development at scale, increasing R&D for high quality production, and preserving high quality market access will be key to reducing the price taker position of much horticultural production.

Each of these factors should be considered when thinking about promoting horticulture as an alternative land use to animal farming. Market access and natural resources are discussed in more detail below.

Market Access - Trade barriers to horticulture conversion

If significantly more land is converted to horticulture, particularly fruit-production, this produce will need access to viable export markets.

Unlike other products, our market access is not all guaranteed by having a free trade agreement and agreeing mutual recognition of food safety etc. For each individual plant product, importing countries require a lengthy and detailed pest risk assessment before agreeing to imports. This can take 3-10 years. Our export markets also expect New Zealand to process their produce import requests; currently MPI has about 250 requests and processes 2-3 per annum. The solution is several fold: more MPI market access and technical staff for both export and import market access; a strong and committed presence in the international plant health arena (commitment by MPI to IPPC in particular); investment in innovation that enables and supports market access, particularly the reduction in pest/disease, and management of agricultural residues.

The relative certainty of import conditions arising from the World Trade Organization system has helped grow our exports. Increasing the export risks of highly valuable and perishable produce will not grow horticulture exports. New Zealand needs a stronger focus in free trade agreements on getting better access for horticultural products, including tariff reduction, quarantine market access (as above), reduction in non-tariff measures/barriers, and regulatory alignment in food safety. This requires a shift in focus by agencies towards horticulture.

Access to Natural Resources – allocation for horticulture conversion

If more land is converted to horticulture to achieve a low emissions economy, this will require access to water and nutrient allocation. With the implementation of the NPS-FM, regional councils are in the process of setting limits and allocation regimes for water abstractions and

nutrient discharges. Horticulture cannot expand without access to water and nutrients. The allocation of water does not currently account for the emissions associated with the different sectors use of water. There is a relationship between the emission target and the availability of water for allocation.

Recommendations

- 3.1. HortNZ recommends that New Zealand should meet its domestic emissions reductions (including from new forest planting and horticultural plantings) and using some emissions reductions from overseas (international carbon units) that have strong environmental safeguards.
- 3.2. HortNZ recommends that shelter belts and orchard trees, vines and riparian and native planting should be included as carbon sinks, to assist with reaching the targets.
- 3.3. HortNZ recommends investment in data collection and modelling, research and development, and supporting the implementation of new technology to better inform the discussion around land conversion to horticulture as a method of lowering emissions.
- 3.4. HortNZ recommends that in order to mitigate emissions through increases in horticulture, barriers to horticultural expansion will need to be reduced, and in particular trade barriers.
- 3.5. HortNZ recommends that in order to mitigate emissions through increases in horticulture, consideration should be given to the methods for providing access to water and nutrient allocation.

4. Revision of the 2050 target

Certainty over the target is important to provide for investment and land use change, however we support the Bill providing for a target and the Climate Change Commission advising on a revised target at a later date.

Recommendation

- 4.1. HortNZ is of the view the 2050 target should be able to be revised.

Emissions budgets

HortNZ agrees with the concept of emissions budgets. It makes sense for them to be set 10-15 years in advance in five-year periods, however the nature of carbon fluxes and mitigation adoption rates need to be taken into account for short-term and long-term targets given that reductions are not likely to be linear. They should definitely be able to be reviewed depending on progress being made, economic and social conditions, and other factors, such as technology. We agree that it will be an important accountability measure for governments to set out plans to meet the budgets.

Recommendations

5. HortNZ supports the Government proposal that three emissions budgets of five years each (i.e. covering the next 15 years) be in place at any given time.
6. HortNZ recommends that the third emissions budget should be able to be changed, but only when the subsequent budget is set.
7. HortNZ recommends the Government should have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances.
8. HortNZ agrees with the considerations we propose that the Government and the Climate Change Commission take into account when advising on and setting budgets.
9. HortNZ recommends the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets.
10. HortNZ is of the view that the most important issues for the Government to consider in setting plans to meet targets are: availability/suitability/cost of mitigations, barriers to adoption of mitigations, measurement of emissions and point of obligation, barriers to land use change, social and economic impacts, impact on domestic food supply, rate of change, link with climate adaptation and carbon leakage.

Climate Change Commission

HortNZ supports the establishment of an independent Climate Change Commission to provide expert advice and help hold governments to account. We note that the concept has been supported by the previous and current Parliamentary Commissioners for the Environment and by the Productivity Commission.

We agree that its role should be that of an advisor rather than a decision-maker, with decisions to be made by governments which are democratically accountable to the electorate. While preferring it to have an advisory role, we do agree governments should be required to publicly respond to its advice and provide rationale when it deviates from that advice.

Recommendations

11. HortNZ agrees with the Government proposal that the Climate Change Commission advises on and monitors New Zealand's progress towards its goals.
12. HortNZ recommends the Climate Change Commission should advise the Government

on policy settings in the NZ ETS.

13. HortNZ agrees with the Government proposal that Climate Change Commissioners need to have a range of essential and desirable expertise, and in our view that expertise should include horticulture.

Adapting to the impacts of climate change

Farmers and growers have a long history of adapting to seasonal and annual variability in climate-related conditions, including coping with extreme events. The challenge they will face is increased range in that variability, changes to baseline rainfall and temperatures, and an increase in the frequency of extreme events.

It is important to have plans in place to help New Zealand adapt to the impacts of climate change. We agree that the Climate Change Commission can play a role to provide advice on climate change risk assessment, adaptation plans, and to review progress. We are not opposed to organisations that own public infrastructure or deliver public services being required to provide information on action being taken on risk management, provided it does not result in unduly high administrative and compliance costs that would be passed on to consumers.

Recommendations

14. HortNZ agrees with the government proposal the Zero Carbon Bill should cover adapting to climate change
15. HortNZ agrees with the government proposed new functions.
16. HortNZ supports setting up a targeted adaptation reporting power, provided it does not result in unduly high administrative and compliance costs that would be passed on to consumers.