



In the matter of: Proposed National Policy Statement for Indigenous Biodiversity

And: **Hira Bhana and Co. Limited**

Submitter

And: **Ministry for the Environment**

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Submission on proposed National Policy Statement for Indigenous Biodiversity

Dated: 12 March 2020

1. This submission is on behalf of Hira Bhana and Co. Limited (Hira Bhana's) in relation to the Ministry for the Environment and Ministry for Primary Industries proposed National Policy Statement for Highly Productive Land. Hira Bhana and Co. Limited will gain no competitive advantage through the lodgment of this submission.
2. Hira Bhana's is a family owned and run business based in Pukekohe. We crop 1800 acres across the Auckland and Northern Waikato regions. As a company, we support our local communities and are devoted to growing, packing and distributing fresh produce throughout New Zealand and the world. We are wholesale suppliers within New Zealand to Turner's and Growers, Fresh Direct, Market Gardeners, Primor Produce, Foodstuffs and Fruit World as well as other individual vegetable outlets across New Zealand. Produce is also exported worldwide with onions going to Europe, UK, Japan, Asia, USA and Fiji and carrots and potatoes to the Pacific Islands. The company was established in 1957 and is currently run by second and third generation family members, employing up to 90 staff members.



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3. Cropping responsibly and sustainably is an important part of the company's philosophy. All of the farms employ the latest harvesting planting, ground preparation and spraying techniques, including GPS technology, which is used for planting and drilling. Practices such as water runoff management, wheel track ripping after planting, reducing cultivation through minimum tillage practices, the use of cover crops, fertiliser and irrigation management and mulching are well established across all farms. These practices reduce erosion, nitrogen leaching and runoff and contribute toward increases in organic matter levels and improved soil condition. Other sustainability measures adopted include conserving energy and fuel, improving water efficiency and recycling waste. Hira Bhana's took part in the Franklin Sustainability Project in 1997 which sought to test a range of sustainable land management techniques and continue to employ and improve on these good management practices on their farms.
 4. Hira Bhana's employ an integrated pest management plan to help reduce the use of pesticides and soil quality monitoring to ensure that changes in soil quality and suitability for crops can be managed. For a number of years, we have been accredited with the LEAF marquee, an environmental certification scheme which comprises an annual audit. The LEAF scheme encompasses environmental aspects such as landscape and nature conservation, soil fertility, crop health, pollution control and energy efficiency. We utilize professional farm consultants to assist in these areas.
 5. Hira Bhana's do not support the proposed National Policy Statement for Indigenous Biodiversity (NPS-IB) in its current form. We consider that the NPSIB as currently worded, fails to recognize the existing contributions to indigenous biodiversity by landowners and does not incentivize environmental initiatives. This does not promote good behavior among New Zealanders and has the potential to penalise a landowner who has made environmental investment historically by impacting on their property rights and business operations.
 6. We consider that incentivization will be the most effective method of protecting and enhancing New Zealand's indigenous biodiversity. Hira Bhana's in particular, support the use of transferable development rights (TDR's) in rural areas to avoid fragmentation of productive land while promoting and financially supporting the protection, enhancement and management of indigenous biodiversity.
 7. We consider that under the current proposal, there is the potential for the proposed regulation to be interpreted in a way that affects commercial vegetable growers in their ability to grow fresh produce. As currently worded, the NPSIB could lead to regulators considering some unavoidable operational effects as a threat to surrounding indigenous biodiversity, despite operating in accordance with good management practices.



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8. It also seems unreasonable that the many indigenous areas planted by growers as buffer zones to mitigate effects, or as surrounds for sediment retention structures, could then be identified as SNA's and impact on their ability to operate. This is perverse and will result in undesirable behavior.
 9. Commercial vegetable production (CVP) should be excluded from the assessment of 'existing activities' under the NPSIB. It is also considered that sediment retention structures, former wetland and constructed wetlands should be excluded from the SNA criteria to avoid mis-interpretation and unintended outcomes.
 10. Hira Bhana's do not support the inclusion of mobile fauna within the provisions set out in the NPSIB. We consider that these provisions are open to interpretation and may result in a significant financial burden to landowners.
 11. Lastly, we consider that where land use capability is affected by the proposals set out in the NPSIB, then landowner incentivisation and financial compensation should be provided.
 12. Hira Bhana's support submissions made by Balle Bros and Horticulture NZ.