Key submissions

1. Silver Fern Farms strongly supports actions to support thriving Biodiversity across Aotearoa New Zealand.

2. Silver Fern Farms has taken a number of specific actions as a company and in partnership with others to support an integrated approach to Biodiversity on our suppliers’ farms.

3. Silver Fern Farms does not support adopting the National Policy Statement as it is proposed. We do not consider that the proposals to adopt a National Policy Statement will provide a step change to help us achieve thriving biodiversity.

4. Silver Fern Farms considers that there should be a shift in focus from Government to one of empowering landscape scale biodiversity outcomes through a true partnership approach.

5. Sheep and beef farms make up nearly 40% of Aotearoa’s landscape, host a quarter of New Zealand’s native vegetation, play a vital role in our economy, gaining their support and trust are imperative if we want to rapidly progress our collective Biodiversity goals.

6. Sheep and Beef farmers already invest thousands of dollars in fencing, weed and pest control, selective planting and voluntary projects and time that contribute to enhancing Biodiversity outcomes.

7. New Zealand farmers are in a unique position to take advantage of a growing market and consumer appetite for a variety of proven sustainability attributes in their food.

8. While there will always be isolated examples of where Biodiversity is singularly impacted by actions of landowners, there appears to be no evidence presented that would suggest that the actions of red meat farmers are significantly contributing to Biodiversity loss nor that the approach outlined in the proposed NPS will address the loss.

Silver Fern Farms specific actions to understand and support thriving biodiversity.
Silver Fern Farms has taken a number of specific actions as a company and in partnership with others to support Biodiversity on our suppliers farms

- We are members of the Aotearoa Circle - a group of business leaders committed to a sustainable future for Aotearoa, New Zealand. Specifically, one of our directors is co-chair of the Biodiversity workstream of the circle, building consensus and a pathway for action to support business actions for landscape scale Biodiversity projects.
- We are a financial supporter and partner of the Trees for Bees project. This project aims to support and encourage a diversity of planting on farm to support bee populations.
- We are a partner in a funding bid to the Ministry for Business Innovation and Employment to develop a nature-based solutions framework for Aotearoa New Zealand.
- We are a financial partner in the development of a Farm Assurance Programme for the New Zealand Red Meat sector and a key partner in advancing the next stage of that programme which includes a requirement for farmers to develop a Biodiversity monitoring and implementation plan for their farms
- Silver Fern Farms are a critical partner in setting up the New Zealand chapter of the Global Roundtable for Sustainable Beef which among other priorities requires farmers to monitor and implement plans for Biodiversity on their farms – Silver Fern Farms is part of a pilot programme to support how this will be supported and undertaken by New Zealand farmers
- We are a supporter of and contributor to the biological heritage project with a specific focus on Biodiversity and Farming [https://www.farmingnatureconservation.org/](https://www.farmingnatureconservation.org/).
- Silver Fern Farms staff have met with UN staff to investigate how Silver Fern Farms can support New Zealand based work to feed into global actions and reporting on sustainable agriculture
- We are responding to climate change and are a founding signatory to the Climate Leaders Coalition. We are the first meat processing and marketing company with a verified carbon footprint under Toitu Envirocare’s CEMARS programme. How are these actions relevant to Biodiversity? – Silver Fern Farms considers that optimising carbon sequestration and management on farm are absolutely intertwined with optimising Biodiversity actions on farm – to that end we are working proactively with a group of suppliers to understand how we can link these shared objectives to market returns – through the production of low carbon, biodiverse highly profitable and sustainable red meat.

Submissions on the proposal: He Kura Koiora i hokia: A discussion document for a proposed National Policy Statement for Indigenous Biodiversity

The important contribution of red meat farms to biodiversity

Sheep, beef farms and deer farms make up nearly 40% of Aotearoa’s landscape, they play host to a quarter of New Zealand’s native vegetation, continue to play a vital role in our economy and just like all of us contribute an immense amount to New Zealand’s social capital. Gaining their support and trust into the wider objectives of an NPS are imperative if we want to rapidly progress our collective biodiversity goals.

Sheep and Beef farmers already invest thousands of dollars in fencing, weed and pest control, selective planting and voluntary projects and time that contribute to enhancing Biodiversity outcomes. They have, are and will play a critical role in progressing our steps towards a predator free New Zealand. They have collectively taken action to voluntarily
protect over a million hectares of land in perpetuity through the QEII Trust. They are investing in, and are taking steps every day to actively manage habitats that host our indigenous fauna. These are real actions, real time and real money spent on achieving real outcomes for biodiversity.

The value proposition

New Zealand farmers are in a unique position to take advantage of a growing market and consumer appetite for a variety of proven sustainability attributes in their food. It is critical to our competitive success in the market that farmers can confidently take proactive action to improve biodiversity outcomes on their farms. The threat of being rewarded with regulation for doing that is a major barrier to increasing the nature and scale of landscape scale biodiversity outcomes.

In order to realise that value we need to continue to ensure that we have integrity behind our biodiversity story. Government could focus on helping the sector to build the integrity behind our biodiversity story by funding monitoring and assessment at scale that gives us objective data to share with customers and consumers around the world. Farmers will connect with this information to use it to inform their on farm decisions. We can use this information to help target support and extension to the right people at the right times and to engage the wider New Zealand public in the actions and progress that is being made. In addition, there are real opportunities being lost for international partnerships and recognition of New Zealand farming's unique biodiversity through UN programmes and international recognition through certification and product claims. Farmers will see the value proposition in investing in actions that improve biodiversity because they directly connect to the increased returns, market share and trade access that will continue to build as consumers connect with and most importantly see the integrity in those claims and stories.

Creating SNAs – The significance criteria

Silver Fern Farms does not support adopting the National Policy Statement as it is proposed. We do not consider that the proposals to adopt a National Policy Statement will provide a step change to help us achieve thriving biodiversity.

Silver Fern Farms is concerned about the implications of the fundamental approach to the classification of indigenous vegetation in the proposal. It is our view that as a country we have turned a significant corner since the first generation of district plans and their attempts to identify and protect significant natural areas. That process created a culture of mistrust between landowners, consultant ecologists and councils. For some landowners that trust has never been restored and they view their significant areas of indigenous vegetation and special habitats for native fauna as a significant liability. It is Silver Fern Farms' view that the almost 'capture all' approach that will result from the significance criteria will see us return a new generation of farmers to a culture of uncertainty and a lack of trust between them and the exact agencies and individuals that we should be fostering enduring partnerships with.

It is Silver Fern Farms view that by taking the approach of trying to identify almost everything within the context of the objectives of the NPS and wrap legislative protection around it is counterintuitive to empowering “ownership” of the landowner's part that they play in fulfilling Aotearoa New Zealand's wider biodiversity goals.

While the starting point for embedding that approach might be the identification of the values present, and or its potential, it is not until a landowner or a partner with a landowner takes an action that anything will change to the way that area contributes to biodiversity. The NPS needs to provide for a more empowering approach that encourages
landowners to take positive actions to address our main threats to biodiversity - pests, weeds and animals not by trying to address habitat loss through clearance. In its current form it does not empower landowners.

**Complimentary measures**

Silver Fern Farms strongly supports actions to support thriving biodiversity across Aotearoa New Zealand.

It is Silver Fern Farms’ view that any additional complimentary measures will fail if the proposed NPS continues in its current form. It is simply too wide-ranging, too focused on identify and falsely assuming rules will make a difference to current management to achieve its desired objectives.

We are already have thousands of pages of guidance, hours of video and endless ways for landowners to know what they could, should or need to be doing to enhance biodiversity. [https://www.farmingnatureconservation.org/resources](https://www.farmingnatureconservation.org/resources)

These are not being reached or used and won’t be unless they are integrated into the web of support that already exists for farmers. The complimentary measures need to be closely linked to:

- Creating market value for a landowner’s actions
- Directing funding to agreed landscape-scale projects based on actions not guidance or identification of values
- Creating a safe place for landowners to ask for one on one expert guidance and help
- Building strong complimentary biodiversity objectives into farm plans that support sustainable profitable farms
- Enabling transparent check points through existing programmes without duplicating effort (such as selected audit information from industry assurance programmes)
- Building a much more integrated approach to natural resource management on farms and through Government initiatives – one that empowers a farm and landscape scale approach to shared objectives of thriving Biodiversity, low carbon farming and carbon sequestration, clean freshwater and healthy stable soil.

**Evidence that further regulation will be effective**

While there will always be isolated examples of where biodiversity is singularly impacted by actions of landowners, there appears to be no substantial evidence presented that would suggest that the actions of red meat farmers are significantly contributing to biodiversity loss. We know from the evidence that is presented that habitat loss is not our major driver of biodiversity loss, yet it is the major focus of the NPS itself. This would suggest that the NPS has been designed to try and halt habitat loss but will not contribute in any way to its main objectives of achieving thriving biodiversity across New Zealand.

Silver Fern Farms recommends that the proposed NPS is withdrawn, that Government commits to funding councils to strengthen their existing approach to biodiversity in their plans and more importantly funds and builds a landscape approach to scaling up our biodiversity work so that landowners are clear about what their efforts are contributing to
and why and where their priorities lie to achieve it. There are enough “backstop” measures in place to protect us from significant habitat loss, but nowhere near enough support for the people who need to make it happen.

**Building true partnerships**

Silver Fern Farms considers that there should be a shift in focus from Government to empowering landscape scale biodiversity outcomes through a true partnership approach.

We know that voluntary collective action can work by building a landscape scale approach to pest and weed control, through the efforts of landowners and agencies to fund and take action to reduce predator populations at scale.

Government action on biodiversity needs to focus on replicating our approach to a predator free New Zealand. Start with exemplars and build scale through meaningful partnerships. Landowners will feel alienated and disenchanted should the proposed NPS go ahead in its current form. The starting points for building those partnerships will be broken trust, angst around rules and an isolated approach to achieving biodiversity outcomes.

Silver Fern Farms considers that the NPS should provide a platform for this partnership approach.
Silver Fern Farms

Established in 1948, Silver Fern Farms is New Zealand's leading processor, marketer and exporter of premium quality lamb, beef, venison and associated products. Silver Fern Farms is an equal partnership between Shanghai Maling Aquarius Ltd. and farmer-owned Silver Fern Farms Cooperative Ltd.

We are a food processor with annual revenues of $2.4b in 2018, of which approximately $500m comes from added value, customer specific and differentiated branded products. Over 80% is exported to more than 60 markets, the largest of which are North America, China, Asia, the Middle East, Europe and the UK.

Our contribution to regional communities across New Zealand is significant. Silver Fern Farms consists of 14 processing sites spread throughout both islands of New Zealand, two regional support offices and a corporate support site based in Dunedin. At peak seasonal employment we employ over 7000 staff across our sites.

Our contribution on farms is extensive as our services support over 15,500 farmer suppliers nationwide.

Silver Fern Farms is part of the broader meat processing industry which employs some 25,000 people across regional New Zealand and has combined export earnings of $8.6 billion.

Silver Fern Farms' strategic purpose is to sustainably add value to New Zealand’s grass-fed red meat by being the first choice for people who care about food. Our vision is to be the world's most successful and sustainable grass-fed red meat company.

Our Commitment to Sustainability

As a food producer Silver Fern Farms has made a long-term commitment to sustainability across a broad range of material sustainability issues.

Silver Fern Farms produced its first sustainability report in 2018 and updated this with a scorecard on our progress in 2019. We have identified our material issues and set targets across each of those issues. The issues and targets align strongly with the United Nations Sustainable Development Goals. More on our progress can be found at: our-sustainable-chain-of-care

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