To: Ministry for the Environment

Submission on: The Action on Agriculture Discussion Document

Date: 13 August 2019

From: North Canterbury Province
Federated Farmers of New Zealand

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Introduction
The North Canterbury province of Federated Farmers of New Zealand (NCFF) appreciates the opportunity to submit to the Ministry for the Environment on the Action on Agriculture discussion document.

NCFF has over 1,000 members across North Canterbury, from the district of Kaikoura down to Selwyn. We have an active and progressive provincial membership who take pride in adopting and operating environmentally sustainable farms.

NCFF is aware Federated Farmers of New Zealand is giving a comprehensive submission on the discussion document, on behalf of all members across the country, and NCFF unreservedly supports the nation-wide submission.

NCFF writes to highlight our support of the Federation’s recommendation for Option 2, which is to conduct a five-year programme with the primary industry driving the daily on-farm practices to achieve all the Government objectives in the most efficient way.

Education and best practice to manage agricultural emissions must come first
Our members are committed to the reduction of on-farm emissions and but they, first and foremost, need an industry-wide framework that educates them on what their on-farm emissions sources and sinks are, and helps them to understand the economic and environmental impact of mitigation options will be.

Cost-effective mitigation tools must come first before we even consider pricing.

It is impractical price agricultural emissions, either at an on-farm or processor level, for both livestock and fertiliser. NCFF would prefer to see practical ways to measure emissions on-farm and to empower farmers with the ability to manage their carbon sources and sinks effectively.

On-farm emissions reporting does not prohibit groups of farmers (or growers) voluntarily opting in to a catchment or processor level scheme in order to minimise administration costs.

Let farmers and Government work together on a Joint Action Plan
NCFF strongly supports the option for a Joint Action Plan to establish a farm-based system for reducing emissions. This is a sensible alignment with what the Primary Sector Climate Change Commitment seeks to achieve: enduring progress towards the goals of reducing and mitigating agricultural emissions, while fostering resilience within our primary sectors based on a genuine partnership between the primary sector, Iwi and the government.

The best outcome needs the right base measurements
NCFF considers the government’s application of the GWP_{100} metric is wrong. The metric does not accurately measure methane and unfairly creates a public perception that the separate target for biogenic methane is a political concession for farmers when, in fact, it is fundamentally a scientifically flawed measurement.
Conclusion

NCFF believes that a joint action plan - with the primary sector, government and Iwi – will allow farmers and growers alike to calculate their emissions and offsets at the farm gate, assess options to reduce or mitigate their emissions, and have confidence that there is ongoing investment in a pipeline of research and tools.

The framework will address climate change within a whole farm systems framework, recognising that farmers efforts to reduce emissions sits alongside water quality, biosecurity, biodiversity, animal welfare, and financial sustainability.

Most of all, Option 2 represents an unprecedented commitment from across the agricultural, horticultural and arable sectors to achieve enduring progress towards the reducing and mitigating agricultural emissions, and building the resilience of our primary sectors.

ABOUT FEDERATED FARMERS OF NEW ZEALAND

Federated Farmers is a member-based organisation that represents farmers and other rural businesses throughout New Zealand. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand’s farmers.

The Federation aims to add value to its members’ business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment, where:

- our members may operate their business in a fair and flexible commercial environment;
- our members’ families and their staff have access to services essential to the needs of the rural community; and
- our members adopt responsible management and environmental practices.

Cameron Henderson
President – North Canterbury Province
Federated Farmers of New Zealand