1. The proposals and recommendations put forward by the Interim Climate Change Commission (ICCC) are designed for the ruminant livestock sector. The poultry industry birds, layer and meat, are mono gastric, and thus have no enteric fermentation to produce metabolic methane, resulting in much lower emissions compared to the ruminant sectors.

2. The poultry industry is committed to involvement in emissions reduction but it must be on the basis of recommendations and proposals that are relevant to the poultry sector.

3. The New Zealand egg industry

The EPFNZ is the trade association representing 100% of the commercial egg laying industry in New Zealand. Egg consumption is very high in NZ at 240 eggs per person per year and has been growing over recent years. Eggs are a very cost effective and healthy form of protein.

Layer hens are housed in a series of farming systems. These include the current cages, colony cages and barn systems which mean the birds are all inside an enclosed shed providing food, water, heating and ventilation. Free range farming means the birds are housed in an enclosed shed but with access to an outdoor range during daylight hours.

The layer hen industry is unusual in that the farm is also the processing centre and this is an important factor to consider in terms of the point of obligation for measuring of emissions.

4. Poultry production and greenhouse gas emissions

Poultry, meat and eggs are recognised as one of, if not the most, greenhouse gas efficient livestock sectors. There are a range of reasons but primarily is the fact that poultry are monogastric rather than ruminant animals. Feed conversion for egg production is extremely efficient and New Zealand layers are recognised as among the most efficient converters of feed to eggs anywhere in the world.

The EPFNZ is aware that the agriculture livestock sector is responsible for 48% of New Zealand’s total greenhouse gas emissions. The NZ greenhouse gas inventory data for 2017 says that of that 48% a total of 91.7% comes from the four ruminant sectors (deer, beef, sheep and dairy). 4.3% from synthetic N fertiliser application; 2.7% liming and urea application and 0.8% organic fertiliser and cropland activities. Only 0.5% is produced by minor livestock categories including Poultry, meat and eggs, and other sectors including pork.
Therefore the unique emissions profile of poultry production sets some interesting challenges for emissions reduction which need to be recognised in the application of emission regulations.

5. **Egg industry position on climate change action**

Eggs are a naturally low emission product but nevertheless the industry makes a commitment to respond to the challenges posed by climate change. The egg industry accepts that every sector needs to make changes to meet New Zealand’s emission reduction targets. The industry will work with regulators on targets for on-farm measuring and reporting of greenhouse gas emissions and for emission reductions over time.

6. **Long-term options for 2025 and beyond**

The ICCC recommendation is that livestock emissions should be priced at the farm level from 2025. This is seen as the best option as it can lead to the best implementation platform for incentives to reduce emissions.

As previously noted with eggs being produced on the farm, the farm and processor level are one and the same and therefore for the industry application commences at the farm level.

The ICCC policy options have been developed for the ruminant livestock sector. The nature of the farming model for the egg industry and its much lower emissions means EPFNZ does not believe these policies are appropriate for the egg industry.

Nevertheless the egg industry would like to engage with the Government as part of this process to develop a practical and cost-effective system for calculating and reducing emissions of farm level for poultry by 2025. EPFNZ believes the following criteria would be critical in such a process – (a) accuracy for industry, (b) help to achieve emissions mitigations through incentivising emission reductions and (c) recognising and supporting the egg industry as a low emission animal protein source.

7. **Interim options until 2025**

The egg industry, like other smaller and non-ruminant sectors, was not involved in the development of the Primary Sector Climate Change Commitment and egg farming will require a different approach to that of the ruminant livestock sector.

Poultry would like to work with Government on an interim work program to 2025 specific to our industry. Such work could be partly funded by industry financial reserves but we would like to explore options for co-funding with Government.
EPFNZ notes that, among its many attributes, eggs are amongst the most popular and consumed protein in New Zealand because of their affordability for NZ consumers, and via their role as a staple in a range of food products, an important element in food security. Therefore all parties should be keen to ensure that as much as is possible costs from this process are kept to a minimum. NZ is elf sufficient in eggs and there are a small amount of exports.

Summary

Any decision on an emissions strategy for NZ livestock industries should reflect the small scale of the NZ egg industry compared to the red meat and dairy sectors. Given the already low emissions from egg production per kg of food protein produced, the strategy should take cognisance of the benefits that increasing consumption of New Zealand eggs could bring to reducing our national greenhouse gas emissions.

Michael Brooks
Executive Director
Egg Producers Federation of New Zealand (EPFNZ)
1. The proposals and recommendations put forward by the Interim Climate Change Commission (ICCC) are designed for the ruminant livestock sector. The poultry industry, layer and meat, are mono gastric, and thus have no enteric fermentation to produce metabolic methane, resulting in much lower emissions compared to the ruminant sectors.

2. The poultry industry is committed to involvement in emissions reduction but it must be on the basis of recommendations and proposals that are relevant to the non-ruminant poultry sector.

3. The New Zealand poultry meat industry

PIANZ is the trade association representing 98.5%, if measured by production, of the poultry meat industry in New Zealand. Poultry, including chicken, duck and turkey, is the number one domestically consumed protein and New Zealanders eat 36 kg of poultry meat per person per year. Production has grown on average at 5% per year for the last 20 years. Poultry is the most popular meat protein in New Zealand due to its price, health status and adaptability for meal options.

Poultry meat is raised in NZ’s most vertically integrated agriculture production system. The birds are owned by the processing companies and raised by contracted farmers on behalf of the company. This is an important issue to consider in relation to the point of obligation.

Meat poultry are housed in an enclosed shed with computer systems that manage feed, water, heating and ventilation. The birds are raised on are in sheds with concrete floors covered by woodchip litter. Eighty – two percent of the poultry meat birds are housed indoors. The remaining 18% of the national flock industry is farmed in free range systems that allow the bird’s access to the outdoors from the sheds during daylight hours. At the end of each cycle, approximately 6 times a year, the woodchips and animal excrement is sold to other farming systems as a cost-effective fertiliser for further beneficial use.

4. Poultry production and greenhouse gas emissions

Poultry is recognised as one of, if not the most, greenhouse gas efficient livestock meat sector. There are a range of reasons primarily the fact that poultry are monogastric rather than ruminant animals. Feed conversion for poultry meat is extremely efficient and New Zealand poultry is recognised as amongst most efficient feed converting poultry in the world.
PIANZ is aware that agriculture livestock sector is responsible for 48% of New Zealand’s total greenhouse gas emissions. The NZ greenhouse gas inventory data for 2017 says that of that 48% a total of 91.7% comes from the four ruminant sectors (dairy, beef, sheep and dairy). 4.3% from synthetic N fertiliser application; 2.7% liming and urea application and 0.8% organic fertiliser and cropland activities. Only 0.5% is produced by minor livestock categories including Poultry.

Therefore the unique emissions profile of poultry production sets some interesting challenges for emissions reduction. Increasing the efficiency of poultry meat feed conversion is another option although NZ is already amongst world poultry meat industry leaders for efficiency of feed conversion.

5. **Poultry industry position on climate change action**

Poultry is a naturally low emission product but nevertheless makes a commitment to respond to the challenges posed by climate change. The poultry industry accepts that every sector needs to make changes to meet New Zealand’s emission reduction targets. The industry will work with the appropriate regulators on targets for on-farm measuring and reporting of greenhouse gas emissions and for emission reductions over time.

6. **Long-term options for 2025 and beyond**

The ICCC recommendation is that livestock emissions should be priced at the farm level from 2025. This is seen as the best option as it can lead to the best implementation platform for incentives to reduce emissions.

However the NZ poultry meat industry is NZ’s agriculture’s most vertically integrated process including the fact that processors own the birds with farmers growing for the processor on a contract basis and the vertical integration approach means that the option of maintaining the processor led approach beyond 2025 must be considered.

The ICCC policy options have been developed for the ruminant livestock sector. The nature of the farming model for the poultry industry and its much lower emissions means PIANZ does not believe these policies are appropriate for poultry.

Nevertheless the poultry industry would like to engage with the Government as part of this process to develop a practical and cost-effective system for calculating and reducing emissions of farm level for poultry by 2025. PIANZ believes the following criteria would be critical in such a process – (a) accuracy for industry, (b) help to achieve emissions mitigations through incentivising emission reductions and (c) recognising and supporting the poultry industry as a low emission animal protein source.
7. **Interim options until 2025**

The Poultry industry, like other smaller and non-ruminant sectors, was not involved in the development of the Primary Sector Climate Change Commitment and poultry farming will require a different approach to that of the ruminant livestock sector.

Poultry would like to work with Government on an interim work program to 2025 specific to our industry. Such work could be partly funded by industry financial reserves but we would like to explore options for co-funding with Government.

PIANZ notes that among its many attributes poultry is also the most popular and consumed meat protein New Zealand because of its affordability to NZ consumers, an important element in food security. NZ is self-sufficient in poultry meat and there are a small but growing amount of exports. Therefore all parties should be keen to ensure that as much as is possible costs from this process are kept to a minimum.

**Summary**

Any decision on an emissions strategy for NZ livestock industries should reflect the relatively small scale of the industry compared to the red meat and dairy sectors, the relatively low emissions from poultry meat production per kilogram of protein produced and the benefits that increasing consumption of New Zealand poultry meat could bring to reducing our national greenhouse gas footprint.

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Michael Brooks  
Executive Director  
Poultry Industry Association of New Zealand (PIANZ)