



FEDERATED FARMERS

SUBMISSION ON:

“RE-STARTING AQUACULTURE” – CONSULTATION ON
AQUACULTURE TECHNICAL ADVISORY GROUP REPORT

SUBMISSION

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SUBMISSION ON: "Re-Starting Aquaculture" - Consultation on Aquaculture Technical Advisory Group Report

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Chapter 1

Active Role for Government

FEDERATED FARMERS RECOMMENDS:

- The TAG report throws up strategic issues that Federated Farmers believes should be subject to a high level review of both the Ministry of Agriculture & Forestry and the Ministry of Fisheries. The fundamental question is whether the Ministry of Fisheries or the Ministry of Agriculture & Forestry is better suited to exploit the opportunities offered by aquaculture that, seemingly, is more related to terrestrial farming than capture fisheries. The TAG review seems to focus on the output (fish) as opposed to the function (farming). The Federation recommends that the Prime Minister establish a high level review of the Ministry of Agriculture & Forestry and the Ministry of Fisheries to determine which portfolio offers optimum operational and strategic efficiencies to support aquaculture.
- The Federation does not support the creation of a dedicated aquaculture agency as it could easily duplicate policy and skill sets that already exist. The word 'Agency' directly implies it has a regulatory authority inconsistent with other parts of Government (e.g., would there be clamour for a dairy agency?).
- The TAG report is too focused on marine species and ignores the commercial potential offered by freshwater species such as trout (currently illegal), whitebait, freshwater mussel and the freshwater crayfish (Koura). The Federation accordingly recommends repeal of the non-commercial status for trout under the Fisheries Act 1983 and the Conservation Act 1987.
- That the focus of Ministerial powers be directed at all regional plans and not just regional coastal plans;
- Instead of creating a separate Aquaculture Fund, any Vote intended for the Fund, be ring-fenced within the Sustainable Farming Fund. This seemingly avoids the duplication of effort and resources;
- Before any Aquaculture Levy is implemented, the desire of industry be gauged by way of a mandate arising from an independently conducted referendum. If successful, the levy to operate under the auspices of the Commodity Levies Act; and
- Development of a logical National Environmental Standard for aquaculture is supported in order to create consistency and certainty in regional plans.

Chapter 2

Re-setting aquaculture planning

FEDERATED FARMERS RECOMMENDS:

- That aquaculture should be normalised in terms of RMA processes and be treated in the same way as any other activity;
- The Federation supports the Minister for the Environment having sole responsibility for call-in and appointment a Board of Inquiry; and
- Federated Farmers believes, however, the TAG Group was too focused upon marine aquaculture and has paid insignificant attention to the policy environment around inland/freshwater aquaculture and the significant commercial potential this offers.

Chapter 3

Enhancing consents for aquaculture

FEDERATED FARMERS RECOMMENDS:

Legislative Amendments

- Instead of fragmentation, as an aquaculture consent register would potentially bring, Federated Farmers believes this should form part of a wider examination of a general consents register and the role of consents as an 'asset'. This avoids focussing on a specific sector in isolation to the rest. The Federation agrees that consents do represent commercial assets that can be used to secure development funding, however development of a register should not just be limited to aquaculture.

Regulations

- The focus is too weighted towards coastal operations for marine farming. While many of the regulatory provisions are logical there is little focus on impediments to freshwater/inland aquaculture - specifically, repeal of the non-commercial status for trout under the Fisheries Act 1983 and the Conservation Act 1987.

Good practice

- Use of template evergreen consents is supported.

Chapter 4

Allocating space for aquaculture

FEDERATED FARMERS RECOMMENDS:

- Federated Farmers supports modification to 'first-in-first served' instead of tendering, which, inevitably, will see councils taking a substantial role in what ought to be commercial decision. The problem with traditional 'first-in-first served' was that the first coastal permit had priority, there was no limit on space and that to gain 'priority', applications were lodged without a thorough assessment of environmental effects. We believe these weaknesses can be corrected without the implementation of a new bureaucracy to manage a tendering system.

Chapter 5

Cost recovery and charges

FEDERATED FARMERS RECOMMENDS:

- That cost recovery for processing of resource consents and private plan changes, monitoring, and other council services continue;
- That marine as well as inland/freshwater planning be paid for out of the Vote for aquaculture, instead of the proposed Aquaculture Fund. The fund seems more of a user generated pool from which to fund the activities of the proposed Agency (which the Federation does not support). This may confuse the role of central government and that of industry; and
- That any Aquaculture Levy (if desired by industry), be subject to a mandate arising from an independently conducted referendum. If successful, any levy will operate under the Commodity Levies Act.

Chapter 6

Streamlining the interface between aquaculture and fishing (UAE)

FEDERATED FARMERS RECOMMENDS:

- That any settlement under the Maori Commercial Aquaculture Claims Settlement Act 2004, be left until the status of the Seabed and Foreshore Act 2004 is clarified. Federated Farmers acknowledges the property right afforded by the former Act but this may be impacted by the proposed repeal of the latter Act.

Chapter 7

Delivering on the Maori Commercial Aquaculture Settlement

FEDERATED FARMERS RECOMMENDS:

- That any settlement under the Maori Commercial Aquaculture Claims Settlement Act 2004, be left until the status of the Seabed and Foreshore Act 2004 is clarified. Federated Farmers acknowledges the property right afforded by the former Act but this may be impacted by the proposed repeal of the latter Act.

Chapter 8

Transition arrangements

FEDERATED FARMERS RECOMMENDS:

- Federated Farmers is generally supportive of the transition arrangements proposed

Federated Farmers summarises its proposals as:

- The Federation believes, strategically, that aquaculture has major economic potential that needs to be harnessed. 20 percent of the diet for 2.6 billion people is made up of fish protein and in the next four decades, the world's human population will grow by some 3.7 billion more.
- There are considerable proposals for reform of the RMA that demands a wider perspective be taken to ensure reform benefits the wider agricultural sector. The development of an absolute minimum National Environmental Standard for aquaculture is supported in order to create consistency and certainty in regional plans.
- Policy should not be limited to coastal policy statements but instead focus on regional plans to promote marine as well as inland/freshwater aquaculture.
- The TAG report is too focused on marine species and ignores the commercial potential offered by freshwater species such as whitebait, freshwater mussel and the freshwater crayfish (Koura). Trout farming is currently illegal but the European Union's annual harvest of farmed trout is some 203,000 tonnes giving some sense of scale to the economic potential, removing the prohibition would unlock. Accordingly, the Federation recommends repeal of the non-commercial status for trout under the Fisheries Act 1983 and the Conservation Act 1987.
- Federated Farmers wishes to exploit the full economic potential offered by inland/freshwater as well as marine aquaculture but to do this needs engagement with the agricultural sector instead of necessarily viewing it as a subset of fisheries.
- Accordingly, the Federation believes there should be a review over where aquaculture best fits – whether that is the Ministry of Fisheries or the Ministry of Agriculture & Forestry. The Federation recommends that the Prime Minister establish a review to determine this.
- The Federation does, however, not support the creation of a dedicated aquaculture agency as it could duplicate policy and skill sets that already exist. The word 'Agency' directly implies it has a regulatory authority inconsistent with other parts of Government (e.g., would a lamb agency be formed next?).
- Instead of creating a separate Aquaculture Fund, any Vote intended for the Fund, be ring-fenced within the Sustainable Farming Fund. Again, this avoids the duplication of effort and resources. Before any Aquaculture Levy is implemented, the desire of industry be gauged by way of a mandate arising from an independently conducted referendum. If successful, the levy must operate under the Commodity Levies Act.