



Meat Industry Association of New Zealand (Incorporated)

Submission to:

The Ministry for the Environment

on:

Updating RMA National Direction

27 July 2025

1. Introduction

- 1) The Meat Industry Association (MIA) is a voluntary, membership-based organisation representing processors, marketers, and exporters of New Zealand red meat, rendered products, and hides and skins. MIA represents 99 percent of domestic red meat production and exports. With export revenues of \$9.86 billion (2024), the red meat industry is New Zealand's second largest goods exporter.
- 2) The meat processing sector is New Zealand's largest manufacturing sector that employs over 25,000 people in about 60 processing plants, located mainly in the regions. The sector is a significant employer in many of New Zealand's rural communities and contributes over \$4 billion in household income.
- 3) A list of members is attached (Appendix A). In drafting this submission MIA members were consulted. Individual members, however, may have also made their own submissions.

2. Overview

- 4) MIA welcomes the opportunity to comment on *Updating RMA National Direction*.
- 5) MIA supports the overarching goals behind the Government's resource management reform programme, namely:
 - unlocking development capacity for housing and business growth
 - enabling delivery of high-quality infrastructure for the future, including doubling renewable energy
 - enabling primary sector growth and development
- 6) Functioning infrastructure is essential for the productivity and resilience of the meat processing industry:
 - Reliable transport networks, including roads, rail and ports, enable the timely movement of livestock to processing facilities and finished products to domestic and export markets.
 - Utilities infrastructure, such as electricity, water supply, wastewater treatment, and telecommunications, is required for maintaining operations and meeting regulatory standards.
- 7) In particular, reliable access to water is essential for red meat processors, who need it for many applications and at every stage of production. Ensuring that the Resource Management Act (RMA) supports rather than hinders access to water is critical for the industry's efficiency and international competitiveness.
- 8) Similarly, MIA notes that access to affordable electricity is vital to the daily functioning of processing plants, which are energy-intensive operations running heating and lighting, refrigeration, automation systems, and waste treatment. Rising electricity prices or inconsistent supply threaten the sector's viability, particularly for regional plants that are major employers and export earners.

MIA welcomes RMA reform prioritising infrastructure development that will enable energy investments that support both climate goals and economic resilience. The new framework must balance environmental protection with practical, timely consenting for essential utilities that underpin food production.

- 9) MIA acknowledges the Government's commitment to progressing further Resource Management reforms in future, with a focus on protecting property rights. MIA supports this direction and recognises the value of removing unnecessary barriers to growth in the interim.

3. MIA Members' experiences with the implementation of the RMA

- 10) Feedback from MIA's Members indicates that the current resource management and consenting system has become so complex, costly, and time-consuming that it is actively discouraging development. Businesses are choosing not to pursue projects at all due to the sheer burden of compliance. Even well-resourced

companies find the system daunting, particularly when even relatively straightforward proposals are treated as *complex*, triggering extended timelines and higher costs.

- 11) For those companies that do proceed, the need to engage legal, planning, and other technical experts has become unavoidable. While a certain level of expert input is expected for significant developments, the scale and cost now required to navigate the process far exceeds what is reasonable. The current regime often demands hundreds of pages of documentation and costs that run into hundreds of thousands of dollars, even for projects with clear public benefit or positive environmental outcomes. This creates a strong disincentive for initiatives that may align with national goals, such as doubling the value of exports or enhancing environmental stewardship.
- 12) MIA Members have expressed concern that the system has become excessively rules-based and process-driven, at the expense of common sense and practical outcomes. Councils appear under-resourced and are frequently unable to process applications in a timely manner, sometimes extending timelines by labelling applications “complex” regardless of their actual nature. MIA wishes to see progress towards a more outcomes-based approach that is proportionate to risk, less burdensome for applicants and easier for Councils to administer.

4. Commentary on the Proposals

Package 1: Infrastructure and development

- 13) MIA is generally supportive of the components of Package 1.

Part 2.1: National Policy Statement for Infrastructure

- 14) MIA notes that basic infrastructure is essential for a thriving business sector where commercial enterprise enables economic growth and prosperity.
- 15) Given its importance, it appears incongruous that enabling and supporting commercial enterprise is not specifically referred to in the (*New Zealand's infrastructure:...*) objectives statement (OB1). MIA recommends that ‘*enables sustainable commercial enterprise*’ (or similar) be added to these objectives.

Part 2.2: National Policy Statement for Renewable Electricity Generation, Part 2.3: National Policy Statement on Electricity Transmission and Part 2.4: National Environmental Standards for Electricity Transmission Activities

- 16) MIA is supportive of changes that will enable investment into and maintenance of renewable electricity generation and transmission infrastructure, intended to deliver more reliable and affordable electricity.
- 17) Meat processors continue to increase the energy efficiency of their operations and, in decarbonising their energy requirements, are becoming more reliant upon affordable electricity.

Package 3: Freshwater

Part 2.1: Rebalancing freshwater management through multiple objectives

- 18) MIA supports the proposed amendments to National Policy Statement for Freshwater Management 2020 (NPS-FM) to allow for multiple objectives. The addition of the second objective, with no hierarchy and as proposed, should allow councils to strike a balance between managing water quality with the needs of community well-being, including commercial activities.
- 19) MIA is also supportive of including an objective that requires councils to consider the pace and cost of change, and who bears those costs. These are fundamental considerations for any regulatory framework.

Part 2.2: Rebalancing Te Mana o te Wai

- 20) MIA is concerned that retaining *Te Mana o te Wai* (TMotW) in its current form will not enable the reductions in cost and complexity urgently needed in resource consenting processes. The framework's rigid hierarchy of obligations, combined with extensive consultation and cultural assessment requirements, imposes significant regulatory burdens on businesses.
- 21) Of the options presented, MIA considers that Option 3 (Remove Te Mana o te Wai provisions) is most likely to restore regulatory certainty, reduce consenting cost and complexity, and support primary sector growth.

MIA Contact

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Appendix 1

MIA members and affiliate members as at 17 February 2025

Members	
Advance Marketing Limited Exporter Membership	Waimarie Meats Partnership
AFFCO NZ Ltd - Membership Levy	Wallace Group LP
Alliance Group Limited	Wilbur Ellis NZ Ltd
Ample Group Limited	Wilmar Trading (Australia) Pty Ltd
ANZCO Foods Ltd	
Ashburton Meat Processors Limited	
Auckland Meat Processors	Affiliate Members
Bakels Edible Oils (NZ) Ltd	Abattoirs Association of NZ
Ballande NZ Ltd	AgResearch
Black Origin Meat Processors	Alfa Laval New Zealand Ltd
Blue Sky Meats (NZ) Limited	Americold NZ Ltd
Columbia Exports Ltd	Aon New Zealand Ltd
Crusader Meats	AsureQuality NZ Ltd
Davmet NZ Limited	AusPac Ingredients NZ Ltd
Fern Ridge Ltd	Beca Ltd
Firstlight Foods Limited	Centreport Wellington
Garra International Limited	CMA CGM Group Agencies (NZ) Ltd
GrainCorp Commodity Management	CoolTranz 2014 Ltd
Greenlea Premier Meats	G-Tech Separation - Bellmor Engineering
Harrier Exports Ltd	Global Life Sciences Solutions New Zealand
Intergrated Foods Consortium	Haarslev Industries New Zealand
Kintyre Meats Ltd	Hapag-Lloyd (New Zealand) Ltd
Lean Meats Oamaru	IBEX Industries Limited
Lowe Corporation Ltd	Intralox LLC
Mathias NZ Limited	Kemin Industries Ltd
Ovation NZ Ltd	Liquistore
Peak Commodities Limited	Maersk A/S
Prime Range Meats	MJI Universal Pte Ltd
Progressive Meats Limited	Oceanic Navigation Ltd
PVL Proteins Ltd	Port of Napier
SBT Marketing (2009) Ltd	Port of Otago Ltd
Silver Fern Farms Ltd	Pyramid Trucking Ltd
Standard Commodities NZ Limited	Rendertech
Taylor Preston Limited	SCL Products Limited
Te Kuiti Meat Processors Limited	Scott Technology Ltd
UBP Limited	Sealed Air - Cryovac
Value Proteins Ltd	Suncorp New Zealand Services Limited