

SUBMISSION



To: Ministry of Business, Innovation and Employment

Submission on: Issues Paper: Review of the Plant Variety Rights Act 1987

Date: 21 December 2018

Contact: Philippa Rawlinson
Policy Advisor
Federated Farmers of New Zealand

m: | e:

SUBMISSION TO THE MINISTRY OF BUSINESS, INNOVATION AND EMPLOYMENT ON THEIR ISSUES PAPER: REVIEW OF THE PLANT VARIETY RIGHTS ACT 1987

1. INTRODUCTION

- 1.1. Federated Farmers of New Zealand (Federated Farmers) welcomes the opportunity to submit to the Ministry of Business, Innovation and Employment (MBIE) on their consultation document "Issues Paper: Review of the Plant Variety Rights Act 1987" (the Issues Paper).
- 1.2. The Issues Paper is the first phase of public consultation on the review of the Plant Variety Rights Act 1987 (PVRA). The review is expected to take up to three years as legislation is amended to comply with New Zealand's requirements to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). To meet our obligations to CPTPP, New Zealand can either ratify the International Convention on the Protection of New Varieties of Plants (UPOV) 1991 agreement or give effect to it. The UPOV agreements have strengthened the rights of plant breeders, at what could be considered a reduction in the rights of farmers and other end-users.
- 1.3. Federated Farmers represents the interests of those farmers who are growing the seed on farm bred by plant breeders for multiplication, those who purchase seed for sowing on their own farms or farming enterprises and those who save their own seed for future use on their own farms. Our interest in the PVRA review relates to any possible changes to provisions relating to the use of farm-saved seed, extension of rights over harvested material, changes to compulsory licensing provisions and a strengthening of enforcement provisions. Federated Farmers will comment on all these issues raised in the Issues Paper.
- 1.4. Federated Farmers has been a participant in the pre-consultation workshops held by MBIE in 2017 and the most recent public consultation meeting and looks forward to continued engagement with the Ministry as the review unfolds.

2. SUMMARY OF RECOMMENDATIONS

- 2.1. Federated Farmers recommends that in any future documents the phrase "Plant Market Access Council" which will be familiar to the exporting industry is used.
- 2.2. Federated Farmers recommends that plant breeding is defined as the science of changing traits of plants to produce desired characteristics.
- 2.3. Federated Farmers recommends that an objective is amended to recognise the need to ensure farmers and growers remain competitive domestically and internationally.
- 2.4. Federated Farmers recommends that growers/farmers do not need to gain permission from PVR Owners or Licensees to use farm-saved seed from protected varieties.

- 2.5. Federated Farmers recommends a royalty payment on farm saved seed is applied per kilogram of named cultivars sown by farmers.
- 2.6. Federated Farmers does not support an end point royalty on farm-saved seed.
- 2.7. Federated Farmers recommends that any farm-saved seed should only be paid on the first two generations of that seed.
- 2.8. Federated Farmers recommends if a royalty payment is required on farm-saved seed, that these royalty rates are set annually by a representative group of farmers, industry and MBIE.
- 2.9. Federated Farmers supports the definition of harvested material as described in the Issues Paper.
- 2.10. Federated Farmers does not support any extension of plant breeders rights over harvested material.
- 2.11. Federated Farmers recommends that provisions around Compulsory Licences are retained in any new PVRA regime.

3. GENERAL COMMENTS

- 3.1. The Federated Farmers submission has been developed based on the feedback which we have received from our membership on the Issues Paper. We acknowledge any submissions which MBIE has received from individual farmers on the Issues Paper. It is our expectation that few arable farmers will directly submit on the Issues Paper, as they are concerned that Plant Breeders, PVR Owners, Licensees or Companies may read the submissions and withdraw seed contracts or other contracts from those farmers because of that submission.
- 3.2. Federated Farmers wishes to express some concern with the notion reiterated throughout the Issues Paper, that International Companies are less likely to bring new varieties to New Zealand because of a lack of protection around their investment. This claim was made in the early 2000s and feedback from our membership indicates that farmers have a wide variety and choice of cultivars in the market. New Zealand is a small and competitive market for seed production and seed sales and Federated Farmers encourages MBIE to consider these factors which influence the decision making of companies when making decisions about new cultivars in the New Zealand market.
- 3.3. Another notion reflected throughout the Issues Paper is that the weakness of the current PVRA restricts local investment in plant breeding in New Zealand. Federated Farmers encourages MBIE to take a holistic view at the New Zealand seed breeding. Feedback from our membership indicates that there is a catalogue of tax-payer funded germplasm which has not been commercialised because of an exclusive relationship between one company and one Crown Research Institute (CRI). This relationship prevents the release of the germplasm for commercialisation.
- 3.4. In the Glossary and Acronyms section of the Issues Paper there is a definition of PMAC and an explanation that the organisation is familiar to farmers. Federated Farmers acknowledges that we raised clarification of PMAC when the pre-consultation draft of the

Issues Paper was circulated earlier in 2018. It is unlikely that any farmers will be aware that the Plant Market Access Council (also PMAC) exists as its scope is market access, export assurance and Free Trade Agreements with a membership encompassing the export industry. The clarification around PMAC is still required, but the explanation that it is familiar with farmers is not correct. Federated Farmers recommends that in any future documents the phrase Plant Market Access Council which will be familiar to the export industry is used.

Federated Farmers recommends that in any future documents the phrase Plant Market Access Council which will be familiar to the exporting industry is used.

- 3.5. On Page Six of the Issues Paper, plant breeding is defined as the process to “improve the performance of plant varieties which enables growers and farmers to gain higher yields of better quality”. The harvested material from these varieties is then said to lead to production of new and improved products. Federated Farmers wishes MBIE to note that plant breeding is not the only reason that farmers are able to extract improved yields from seed sown. It is also the individual skills, agronomic expertise and utilisation of inputs which leads to greater outputs and production. Federated Farmers encourages MBIE to consider the definition of plant breeding as “the science of changing traits of plants to produce desired characteristics”.

Federated Farmers recommends that plant breeding is defined as the science of changing traits of plants to produce desired characteristics.

- 3.6. On Page 25 of the Issues Paper MBIE notes that arable farmers are generally price takers and are unable to pass any increase in costs on. Federated Farmers wishes MBIE to note that this is in fact the case for many farmers across New Zealand, not just arable farmers. There are few instances where farmers can pass costs onto end users. So, any increase in costs will be absorbed by farmers and their businesses.

4. OBJECTIVES OF THE PVR REGIME

- 4.1. As outlined in the Issues Paper, the purpose of the Plant Variety Rights regime is to incentivise development and importation of new varieties of plants. The overall goal of the new PVRA is to ensure that the new Plant Variety Rights regime provides a net benefit to New Zealand as a whole. To meet this goal, MBIE have developed three objectives which may deliver a modern and fit for purpose Plant Variety Rights regime which relates to the needs of breeders, growers and society, compliance with New Zealand’s international obligations and the Treaty of Waitangi.
- 4.2. Generally Federated Farmers is supportive of the objectives for the new Plant Variety Rights regime. However, feedback from our membership indicated that they felt it was important for an additional objective of the Plant Variety Rights regime which was focused on the needs of growers, farmers and society. Our members believe that it is essential for any new Plant Variety Rights regime to be workable and fit for purpose for all users.
- 4.3. We propose that the three original objectives are amended to read:

- To promote innovation and economic growth by incentivising the development and dissemination of new plant varieties while ensuring farmers and growers can remain competitive domestically and internationally;
- Consistency with the Treaty of Waitangi; and
- Compliance with New Zealand’s international obligations.

Federated Farmers recommends that an objective is amended to recognise the need to ensure farmers and growers remain competitive domestically and internationally.

- 4.4. The Issues Paper seeks feedback on whether the current Plant Variety Rights regime meets the objectives. Our membership is satisfied with the current Plant Variety Rights regime meeting objectives, but as we have mentioned, we believe that there are opportunities to improve the balance between the rights of growers, farmers, society and breeders.
- 4.5. The Issues Paper discusses some of the costs of the New Zealand Plant Variety Rights regime being inconsistent with UPOV91 and the perceived benefits of ratifying the agreement in our legislation. Two benefits are “the development of more new varieties by local plant companies; and the release of more new varieties in New Zealand by foreign plant breeding companies”. We caution whether the adoption of UPOV91 will result in the release of new varieties in New Zealand. Feedback from our membership indicates that there are too many varieties of ryegrass on offer in New Zealand for the size of our market. Federated Farmers is cautious whether the adoption of UPOV91 will result in greater investment in local breeding. As we shall explain further in our submission, we do not believe that the collection of royalties from farm-saved seed will stimulate additional investment in New Zealand based seed breeding.
- 4.6. It is difficult to determine the costs to farmers of the adoption of UPOV91. The cost of UPOV91 will largely be dependent on what elements of the agreement the Government choose to action. The most obvious example may be costs associated with any royalty payment on farm saved seed and additional royalties which may be imposed on the cost of seed. New Zealand farmers are unable to pass any increased costs onto any end-users. If the use of farm-saved seed is prohibited, then farmers will need to purchase retail seed every year which will add significant cost to their businesses (between \$20,000 and \$100,000). The increase in cost may mean that they diversify to another land use (if allowable under Regional Land Use Plans).
- 4.7. If there was an extension of plant breeders rights over harvested material, there would be a cost impact as it would mean they no longer have the freedom of choice about the end use of their product. For example, arable farmers can sow a crop of wheat and can have the option of selling to the feed or milling industry (milling wheat can also go to the feed industry). If there was an extension of breeders rights over harvested material then this would remove the farmers freedom to choose the most profitable end use for their products.
- 4.8. The Issues Paper asks for feedback on whether it would be easier implementing UPOV91 or implementing a sui generis regime which gives effect to UPOV91. The first option would almost certainly be easier than developing a sui generis regime, however, the latter may be

able to deliver and meet the objectives of all users of the PVRA. Federated Farmers does not have an opinion on whether UPOV91 should be adopted or a sui generis regime implemented to give effect to it.

5. THE PVR REGIME

- 5.1. The Issues Paper now calls for specific feedback on five key issues with the current PVRA which were identified by industry during the pre-consultation phase of the review. These were: farm-saved seed, rights over harvested material, rights over similar varieties, compulsory licences, and enforcement: infringements and offences. Federated Farmers will provide comment on farm-saved seed, rights over harvested material, compulsory licences and enforcement. At this time we do not consider we are well placed to comment on rights over similar varieties.

6. FARM-MADE SEED

- 6.1. The practice of farm-saved seed is the process where a farmer or farming enterprise saves seed from a harvested crop to sow for the following years crop. This practice is a vital part of some farmers businesses, whereas others prefer to purchase new seed annually. The practice is largely based on farmers personal preferences.
- 6.2. The Issues Paper asks for information on the nature and extent of royalties that are currently being paid in different sectors. Feedback from our membership indicates that arable farmers are offered a contract price of about \$2/kg¹ to grow, process and package grass seed on behalf of companies. It is harvested, processed and packaged and then supplied back to companies. If they wish to sow the seed themselves these same farmers are then required to purchase the seed for \$10-12/kg. In this situation, the farmer has taken all the risk of seed production (\$1/kg), paid most of the processing costs and then there can be a spread payment schedule (progress and final) over several months. We recognise that there are seed treatment costs that maybe built into this purchase seed price, however there is a clear royalty and other mark ups built into the cost of seed.
- 6.3. Farmers also pay a royalty on varieties of milling wheat listed on the NZGSTA's website annually². The royalty collected is intended to be returned to the plant breeder, however, whether this is occurring in practice can be debatable. Our members have reported a perception that often with deliveries of feed grain, Company Y will list the delivered variety as one they hold the PVR over and thus collect the royalty from, rather than correctly listing the variety and returning it to Company X. In these situations where farmers are required to pay an end point royalty, farmers perceive they are paying a royalty twice, once when they purchase the seed and then again at the end point. Further complicating the situation, plant breeders are benefitting from any yield gains which should be returned to the farmer. An increase in yield due to farmer agronomy and management skills should not be reflected in an increased royalty.

¹ This contract price will differ from year to year, company to company.

² These are available here: <https://www.nzgsta.co.nz/end-point-royalties-2019>

- 6.4. The Issues Paper seeks to build a clearer understanding of the proportion of crops which are planted annually using farm-saved seed. Federated Farmers sought feedback from our membership on the type and amount of crop which they save for their own future use. Wheat and barley are the main crop types which are saved by farmers for future use. The amount varies with farmer feedback suggesting up to 20 tonnes of seed used, which depending on sowing rates and planting times may be enough to plant up to 160 hectares. Feed and milling wheat, feed barley and oats can be saved for future use by farmers.
- 6.5. The Arable Industry does collect information related to the estimated areas which have been planted in milling wheat, feed wheat, malting barley, feed barley, milling oats, feed oats, maize grain and maize silage. This work is undertaken by the Arable Industry Marketing Initiative (AIMI) funded by Federated Farmers, Foundation for Arable Research (FAR), United Wheatgrowers Limited (UWG), New Zealand Grain and Seed Trade Association (NZGSTA), the Arable Food Industry Council (AFIC) and the New Zealand Flour Millers Association. It is estimated for the 2019 harvest the following areas will be harvested: 9,062ha of milling wheat, 36,706ha of feed wheat, 10,858ha of malting barley, 45,124ha feed barley, 2,972ha milling oats and 1,615ha feed oats³. It is important to note that the area planted in these crops varies annually, based on planting conditions, market demands, individual farmer choice and the requirements of the crop rotation. While the arable industry does collect information on planting intentions and economic value of arable production, there is no information collected on areas planted in farm-saved seed. Short of asking farmers directly or DNA testing varieties sold by farmers, there is no accurate way of estimating the exact tonnages of specific cultivars which may be used as farm-saved seed.
- 6.6. Federated Farmers seeks clarification on the claim that plant breeders are “missing out” on approximately \$2million in annual royalties because farmers are using farm-saved seed from protected varieties.
- 6.7. Feedback from our membership indicates that they do not think there are any problems with the current farm-saved seed arrangements but accept there may be a justified reason why a royalty should be paid to use farm saved seed. The Issues Paper summarises the major benefits of the continued access to farm-saved seed and this is reinforced by feedback which we have received from our membership. Farmers use farm-saved seed because it can be the most reliable way of getting good seed in the ground on time, for its assured quality, supplied with only the extraneous weed seeds that exist on the farm already, get to choose the seed treatments which are placed on the seed, enables them to use seed that is no longer for sale in New Zealand, and the cost of seed is reduced. The availability and timeliness of delivery of seed is a point that cannot be over emphasised, especially in years such as 2018 where optimal planting times were missed because of a lack of availability of seed (sold out) or they were not supplied to the required standard. In terms of the financial benefit to farmers of using farm-saved seed, feedback from our membership indicates that it can cost \$800/tonne to use treated wheat seed and this cost includes any seed cleaning, treatments and transport costs, or \$400 if using untreated (which provides a quicker

³ On behalf of AFIC, BERL undertakes research to estimate the economic value of arable production in New Zealand. FAR is the levy payer body funded to undertake scientific research and development on behalf of the arable industry and collects a levy from different crop groups.

germination). In comparison, it can cost up to \$1500/tonne plus freight (which varies between \$50-\$100/tonne) to use retail seed.

- 6.8. The Issues Paper seeks feedback on whether PVR owners are using mechanisms outside the current PVRA to control farmers use of seed. Federated Farmers is aware of some PVR owners or licensees who are using contracts to control the use of seed. For example, one company will not release a cultivar for sowing unless the farmer signs a contract to deliver it to the mill at a buyer determined price. Contracts are also used to specify the terms of the agreement to grow between PVR owners or licensees and farmers, including any end point royalties which need to be paid. Feedback from our membership indicates that some farmers are paying an end point royalty on milling wheat, even though the grant of that Plant Variety Right has expired, been cancelled or lapsed.
- 6.9. The Issues Paper asks whether farmers should need to get permission from the PVR owner or licensee before sowing farm saved seed of a protected variety. Feedback from our membership was unanimous, they do not think that farmers should need to get permission from the PVR owner or licensee before sowing farm saved seed of a protected variety. Federated Farmers does not see how it will be practical for farmers to seek permission from PVR owners to use farm-saved seed. What opportunity for recourse would there be if a PVR owner or licensee refuses to allow to use that variety? Federated Farmers is concerned about possible delays that the need to gain permission would add to the sowing process, how the information would then be used and whether then the PVR owner or licensee would then seek a royalty payment from the farmer to use that seed. Our members indicate that they are concerned that PVR owners or licensees would use illegitimate reasons for declining the application to use farm saved seed of a protected variety.

Federated Farmers recommends that growers/farmers do not need to gain permission from PVR Owners or Licensees to use farm-saved seed from protected varieties.

- 6.10. Federated Farmers has had discussions with representatives from the NZGSTA and New Zealand Plant Breeders and Research Association (NZPBRA) on the review of the PVRA since 2014. Chief amongst these discussions has been the potential royalty payment on the use of farm-saved seed, the collection point and an appropriate collection mechanism. The Issues Paper seeks feedback on the costs and benefits of a mandatory royalty scheme for farm-saved seed.
- 6.11. The position of Federated Farmers is any royalty to be applied to farm saved seed can only be applied per kilogram of named cultivars sown by farmers that are registered under PVR. This royalty mechanism would enable the plant breeder to be reimbursed, allow fairness and be equitable for farmers, and ensures that farmers and plant breeders are sharing the benefits.

Federated Farmers recommends a royalty payment on farm saved seed is applied per kilogram of named cultivars sown by farmers.

- 6.12. We understand that it is the view of some plant breeders that they would prefer a flexible approach which allows for both seed point and end point royalties. Our membership has

several concerns over the concept of end point royalties. The first concern relates to the concept of “double dipping”, that is collecting royalties at seed point and end point. The view of our membership is that an end point royalty penalises those good farmers who have maximised inputs to get the yield reward and rewards those average farmers who have not made these gains. Federated Farmers does not support an end point royalty on farm-saved seed.

Federated Farmers does not support an end point royalty on farm-saved seed.

6.13. If a royalty payment is required on the use of farm-saved seed, Federated Farmers recommends that it should only be paid on the first two generations of that seed, with a graduated payment on generations after this. This could be a matter for the independent board to consider and set.

Federated Farmers recommends that any farm-saved seed should only be paid on the first two generations of that seed.

6.14. Federated Farmers has had discussions with the NZGSTA and NZPBRA about a proposed royalty collection mechanism for farm-saved seed arable crops. The favoured approach from the NZGSTA and NZPBRA is an industry-based body based out of the Seed Industry Offices, which is operated by a Board, independently chaired and has representatives from NZGSTA, NZBPRA and Federated Farmers. Importantly royalty rates would not be set by this organisation but sent into the entity by PVR owners and licensees. Farmers would complete an annual declaration and then be sent an invoice for the royalties which are then diverted to plant breeders. Federated Farmers opposes this process because there is no way of independently setting the rate for farm-saved seed, nor a transparent process for ensuring royalties flow back to research and development in New Zealand (which is what the argument for royalties is driven by). Feedback from our membership indicates that if they had to pay a royalty on farm-saved seed then farmers, industry and MBIE representatives should be responsible for setting the royalty rate. This model could be similar to the way in which the Seed Quality Management Authority (SQMA) operates. The SQMA is made up of representatives from MPI, NZGSTA, Federated Farmers, Seed Processors Association and AsureQuality to manage the seed certification system on behalf of all farmers.

Federated Farmers recommends if a royalty payment is required on farm-saved seed, that these royalty rates are set annually by a representative group of farmers, industry and MBIE.

7. RIGHTS OVER HARVESTED MATERIAL

7.1. Feedback from our membership indicates that they agree with the definition of harvested material provided in the Issues Paper.

Federated Farmers supports the definition of harvested material as described in the Issues Paper.

7.2. The Issues Paper describes the current situation relating to rights over harvested material. The current PVRA provides limited rights for plant breeders over harvested material of protected varieties. For our membership this means that farmers have total control over

the end use of their harvested material. For example, farmers are able to plant the cultivar “Discovery/Destination” which is a feed or milling wheat variety and have the option of selling it into the feed and milling industry. In 2018 the price for feed wheat is more advantageous than milling and the farmer makes the decision to sell to the feed industry. If there was an extension of breeders rights over harvested material, then this would remove the autonomy of farmers and reduce the likelihood that they will make a meaningful return on that product because they no longer have any alternative options over its end use. Farmers are running business operations and they need to maintain the autonomy to make the best decisions for their business. Extending the rights of breeders over harvested material would introduce an element of unnecessary control.

- 7.3. That being said, there are plant breeders who are using contracts to control the end use of harvested material. Feedback from our membership indicates that farmers are only able to sow the variety Dutchess or Reliance (for example) and contract through that company to supply it to the mills. There is a problem for these farmers when the mill may refuse to take the supplied variety because it does not meet the required specifications of the contract.
- 7.4. The Issues Paper asks whether there are any problems with the current situation relating to rights over harvested material. Feedback from our membership indicates that they do not perceive there to be any problems with the current situation over harvested material. Our members are concerned about any move to enhance the rights of plant breeders over harvested material. We disagree with the assertion that gaining control over the harvested material would provide plant breeders with the opportunity to control the supply and standards to which the seeds are grown. This may allow plant breeders to seek to control the agronomic management of that crop and we are certain that farmers would be expected to meet this cost. Federated Farmers does not support any extension of Plant Variety Owners or Licensees rights over harvested material.

Federated Farmers does not support any extension of plant breeders rights over harvested material.

8. RIGHTS OVER SIMILAR VARIETIES

- 8.1. Federated Farmers has no comment to make on Chapter 9: rights over similar varieties.

9. COMPULSORY LICENCES

- 9.1. The Issues Paper defines compulsory licences as the mechanism which is used to ensure that protected varieties are made available to the public at reasonable prices and on reasonable terms. There have been few applications made for Compulsory Licences in recent years. We are aware of situations where farmers have attempted to but not obtained rights to varieties that are not commercially available. Feedback from our membership indicates that there have been times when they have considered applying for a Compulsory Licence.
- 9.2. We consider the reason why farmers and other end users have not applied for a Compulsory Licence is because either the process is too complex or not well understood. Federated Farmers members indicate that while they have not utilised the Compulsory Licence

process, they would be concerned if this opportunity was not in any new PVRA regime. Federated Farmers recommends that provisions around Compulsory Licences are retained in any new PVRA regime and an education package is used to update growers and end users about the opportunities that exist.

Federated Farmers recommends that provisions around Compulsory Licences are retained in any new PVRA regime, and education is undertaken around the use of Compulsory Licenses.

10. ENFORCEMENT: INFRINGEMENTS AND OFFENCES

10.1. Chapter 11 of the Issues Paper focuses on enforcement infringements and offences. Feedback from our membership indicates that they do not perceive any problems with the current situation. We have no further comment at this time on offence provisions in the PVRA.

11. PART 4 – PLANT VARIETY RIGHTS AND THE TREATY OF WAITANGI

11.1. Part 4 of the Issues Paper discusses Plant Variety Rights and the Treaty of Waitangi. Federated Farmers has no comment to make on this matter.

12. ADDITIONAL ISSUES

12.1. The Issues Paper calls for some feedback on additional issues which they have identified outside consultation with industry on the current PVRA. One of these issues is the term of a grant of a plant variety right and whether this is long enough to recoup investment in the plant. The current term of grant for woody plants is 23 years and for everything else it is 20 years. Federated Farmers would be concerned if the grant was extended for longer than 20 years as we feel this timeframe is sufficient for PVR owners to recoup their investment in the product.

12.2. The Issues Paper also calls for feedback on the problems and benefits of the current exemption for non-commercial use which extends to use by local government organisations without payment to PVR owners. The concern of PVR owners is that local government organisations were propagating protected varieties without payment to PVR owners. Federated Farmers would be concerned if a royalty payment was going to be required on propagated protected varieties be paid by local government organisations. In all likelihood this cost would not be absorbed by the local government organisations but passed onto rate payers and be an additional cost for society.

13. CONCLUSION

13.1. Federated Farmers welcomes this opportunity to submit to MBIE on their consultation document “Issues Paper” Review of the Plant Variety Rights Act 1987.

13.2. Federated Farmers represents the interests of farmers who grow seed for multiplication, those who purchase seed and those that save seed for their own use. Federated Farmers has provided comment on use of farm-saved seed, extension of rights over harvested

material, changes to compulsory licencing provisions and a strengthening of enforcement provisions.

13.3. Federated Farmers looks forward to participating in the PVRA review process as it moves forward into the future.

14. ABOUT FEDERATED FARMERS

14.1. Federated Farmers of New Zealand is a primary sector organisation that represents farmers and other farming businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.

14.2. The Federation aims to add value to its members' businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

14.3. Our members may operate their businesses in a fair and flexible commercial environment;

14.4. Our members families and their staff have access to services essential to the needs of the rural community; and

14.5. Our members adopt responsible management and environmental practices.

ENDS