

SUBMISSION ON

Freshwater Management Objectives

27 August 2023

To: Horizons Regional Council

Name of Submitter: Horticulture New Zealand

Contact for Service:

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OVERVIEW

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Our submission

Horticulture New Zealand (HortNZ) thanks Horizons Regional Council for the opportunity to submit on the draft Freshwater Management Objectives and welcomes any opportunity to continue to work with Horizons Regional Council and to discuss our submission.

HortNZ could not gain an advantage in trade competition through this submission.

HortNZ wishes to be heard in support of our submission and would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits, and vegetables. The horticultural sector provides over 40,000 jobs.

There is approximately, 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.

Executive Summary

[Heading - if an exec summary is required]

Submission

1. Horticulture in Horizons (Manawatū-Whanganui) Region

The Horizons (Manawatū-Whanganui) region is an important part of the national food production system. The region is host to a diverse range of horticultural production.

There is approximately 4,000 ha of horticultural land in the region, approximately 3,647 ha of which is planted in vegetables¹. Horticultural crops include potatoes, broccoli, lettuce, onions, peas, silverbeet, carrots, asparagus, cauliflower, cabbage, pumpkin and kiwifruit. The tables below outline type of crops grown and ha in the fruit and vegetable sub-sets of Horticulture.

Table 1. Fruit by ha grown in Horizons (Manawatū-Whanganui) region

Kiwifruit	Summerfruit	Avocado	Citrus	Berryfruit	Nuts	Olives	Other sub.trop	Other fruit	Total
116	13	3	1	20	25	34	28	2	242

Table 2. Vegetables grown by ha in Horizons (Manawatū-Whanganui) region

Asparagus	Broccoli, cab, cauli	Carrots	Peas & beans	Lettuces	Onions	Potatoes	Squash	Sweetcorn	Other	Total
191	695	191	224	315	281	984	6	25	735	3647

Within the Horizons region is the nationally significant Specified Vegetable Growing Area (SVGA), Horowhenua. This area is recognised for its role and importance in production of fresh vegetables for the national food supply network.

2. National documents and direction

2.1. Te Mana o te Wai

2.1.1. THE FIRST OBLIGATION TO THE HEALTH OF WATER

¹ [freshfacts-2020.pdf](#)

Te Mana o te Wai establishes a hierarchy of obligations. The first priority is to the health and wellbeing of water bodies and freshwater ecosystems.

The six principles of Te Mana o te Wai provides guidance on who makes resource management decisions and the matters to be considered.

HortNZ supports a Te Ao Māori position that each waterway, has its own mauri, and as such, approaches to each waterway should be approached individually when assessing freshwater outcomes and limits.

In our submission to the long-term vision and Values in May 2022, we highlighted the SVGA's provisions in the NPSFM 2020 are a specific acknowledgment of the need to balance different values, while still improving freshwater - it provides in catchments with specific freshwater challenges a means of doing so, elsewhere the same principle applies in our view but without the ability to set target attribute states below national bottom lines.

To support this view we refer to the Ministry for the Environment's factsheets and website:

*"The hierarchy does not mean, however, that in every case the water needs to be restored to a pristine or prehuman contact state before the other needs in the hierarchy can be addressed."*²

*"Making this the first priority in freshwater management does not mean that councils will ignore the health needs (or other needs) of people."*³

HortNZ consider that food production for domestic food supply (and food security) is a critical part for providing an essential human health need, and accordingly that it fits within the second hierarchy priority. We note that the High Court (in the Judicial Review decision) held that food security and TMOTW are not inconsistent nor unachievable, but that the council must undertake this balancing act.⁴

2.1.2. THE SECOND OBLIGATION TO HUMAN HEALTH

The second priority obligation under the Te Mana o te Wai framework is the health needs of people (such as drinking water)

Food, and in particular vegetables and fruit, are essential human health needs.

HortNZ seeks that the production of vegetables and fruit for domestic supply are recognised within the second priority obligation of the Te Mana o te Wai hierarchy.

The recent high court decision relating to the Specified Vegetable Growing Area Policy in the NPSFM 2020 notes "Continuity of supply in fresh vegetables is important for national food security and human health"⁵.

The Te Mana o te Wai principles most relevant to providing for the health needs of people are Manaakitanga, and Care and Respect.

The principle of Manaakitanga includes 'generosity and care for freshwater and for others. The principle of Care and Respect includes 'care for freshwater in providing for the health of the nation'

² <https://environment.govt.nz/assets/Publications/Files/essential-freshwater-te-mana-o-te-wai-factsheet.pdf>

³ <https://environment.govt.nz/acts-and-regulations/freshwater-implementation-guidance/clarification-of-the-essential-freshwater-programme-implementation-requirements/#implementing-te-mana-o-te-wai>

⁴ HortNZ feedback to Horizons Regional Council on Longterm Visions and Values 24 May 2022

⁵ MUAŪPOKO TRIBAL AUTHORITY INC v MINISTER FOR ENVIRONMENT [2022] NZHC 883 [29 April 2022]

The term 'nation' within the care and respect principle indicates freshwater decisions, need to consider both the local and national scale health benefits that are achieved through catchment activities, and 'providing' for the discharges and allocations that support the health of the nation.

New Zealand is geographically isolated. We cannot import most of the fresh fruit and vegetables our people need to eat, because most fruits and vegetables are too perishable to be efficiently transported to New Zealand.

New Zealand's national food system relies on reciprocity between regions, and a responsible approach to the management of natural resources to provide for the health of the nation.

Trade, manaakitanga and reciprocity underpinned the traditional approach to trading of goods. Horticultural production has had a long history of having certain crops and varieties being produced in some areas and traded to other areas⁶.

The principles of Manaakitanga and Care and Respect express that care for freshwater is part of how the health of the nation is provided for. However, the application of this principle is not limited to human health associated with in-stream freshwater values such as swimming and collecting mahinga kai from within waterbodies.

Under clause 3.2.2.c.ii of the NPSFM, Councils must apply the hierarchy of obligations to the National Objectives Framework, this includes applying the hierarchy of obligations to limit setting.

Enabling communities to provide for their social, economic, and cultural wellbeing in a manner consistent with the NPSFM, requires that second and third priority obligation activities are differentiated, and that the concept of health under the second obligation includes the health of the nation.

Recognising fruit and vegetables within the second priority obligation of Te Mana o te Wai, doesn't negate the need for fruit vegetable growers to manage their environmental effects through good management practices and to operate within the freshwater limits of the catchments they are located within.

HortNZ seeks that The Freshwater Management Objectives recognise the importance fruit and vegetables have in supporting the health of the population and the importance that Freshwater has in enabling horticultural production.

Growing operations in the Horizons region have a number of purposes depending on crop type and location. The Horowhenua area is nationally recognised through the SVGA as a significant and nationally important horticultural production area, its role supplying fresh vegetables for the domestic market, supporting the health of the nation and that there would be challenges meeting the national bottom lines for water quality targets⁷.

Fresh fruit and vegetables produced in the Horizons (Manawatū-Whanganui) region support populations in centres outside of the region's boundaries - Much of the produce from growers in the area is sent to Wellington and Auckland to be distributed into other areas⁸. Particular emphasis and relevance is given to the principles of Manaakitanga, and Care and Respect to make sufficient provision to produce enough fruit and vegetables to

⁶ [Maori Gardening: An archaeological perspective - Louise Furey \(doc.govt.nz\)](#)

⁷ [Action for healthy waterways information for horticultural growers \(environment.govt.nz\)](#)

⁸ [Farms & growing areas | Wilcox \(wilcoxgoodness.co.nz\)](#); [About Us | Woodhaven Gardens](#)

supply fresh fruit and vegetables for the population. It is important to note that not every area in New Zealand has the ability to grow horticultural produce, let alone year-round.

The value of domestic food supply in resource allocation decision making, has been recognised within a series of policy instruments including: NPSFM specified vegetable growing areas; Waikato PC1 Policy 3; Horizons PC2 Policy 14-6; Canterbury PC7 section 42A reply, Policy 4.36A.

2.1.3. THE THIRD OBLIGATION TO SOCIAL, CULTURAL AND ECONOMIC WELLBEING.

The third hierarchy of Te Mana o te Wai is the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

Except for food produced for the domestic market, most food production and primary production more generally is managed within the third priority obligation of Te Mana o te Wai, as this primary production for export supports wider social, economic, and cultural well-beings.

2.2. National direction and support for enabling fruit and vegetable production

National direction and guidance are providing clear direction and expectation regarding horticultural production. There have been many documents, letters and legislative tools that highlight both the importance of horticulture and concern for the fragility of the industry that provides fresh healthy produce to support the national population.

2.2.1. NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE LAND

The NPS Highly Productive land has the objective highly productive land is protected for use in land-based primary production, both now and for future generations.

The NPSHPL also requires that identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.

For future generations, it is critical that Highly Productive Land (HPL) is protected from the continual trend of cumulative loss and loss of productive capacity due to reverse sensitivity and competition for natural resources. Any protection of HPL from inappropriate subdivision, must also recognise its value for current and future generations for food production and enable its use for food production.

2.2.2. LETTER TO REGIONAL COUNCILS FROM MINISTER PARKER

The recent letter to Regional Councils from Minister Parker requested Councils to outline how fresh vegetables would be provided for in the development of new NPSFM plans - with specific interest being given to:

- *Vegetable growers to practice crop rotation, moving their production (and associated discharges) from one property to another - for example allowing a grower to lease land in different properties within a freshwater management unit.*

- *An expansion of the total area of production – noting this will almost certainly lead to an increase in Nitrogen related discharges, and potentially other discharges, from new land brought into vegetable production.*⁹

HortNZ notes in Horizons Regional Council’s reply there is reference to working with HortNZ through the PC2 process. HortNZ would like to work closer with Horizons Regional Council to develop better plans that work for the environment and our growing community. We believe this process needs to have dedicated stakeholder conversations so support better plans for the Horizons community and environment.

2.2.3. RESOURCE MANAGEMENT ACT REFORMS

The recently released National and Built Environment Act select committee report has recommended the NBA must provide direction on enabling supply of fresh fruit and vegetables¹⁰.

2.2.4. CLIMATE CHANGE OPPORTUNITIES

Diversification to horticulture presents an opportunity to reduce emissions while increasing food production, as identified by the Climate Change Commission.

‘Ināia tonu nei: a low emissions future for Aotearoa’ includes the assumption (in the Demonstration Path) that 2,000 ha of land will be converted to horticulture per year from 2025 and notes that the Commission expect this could increase if “barriers – such as water availability, labour, supply chains and path to market – are addressed”. Opening up more opportunities for conversion to lower emissions production systems and land uses, including horticulture, is listed as a critical outcome.¹¹

The advice also notes that further land use change from livestock agriculture into horticulture and forestry (from 2021, additional 3,500 ha per year converted from dairy) would be required to meet the more ambitious end of the 2050 methane target if new technology does not come through.

2.2.5. OTHER DOCUMENTS OF NOTE

In addition, the Aotearoa Horticulture Action Plan seeks to provide a framework to grow the value of the horticulture industry to \$12 billion by 2035¹². The AHAP has been developed in collaboration with Government, Industry and Growers¹³.

The Section 32 evaluation report for Action for Healthy Waterways specifically excludes horticulture from intensification rules to allow a degree of flexibility. It is recognised that fresh fruit and vegetables are required to both feed and meet health needs of the population and rules that make horticultural production more difficult threaten the ongoing food safety and security of New Zealanders¹⁴

⁹ [David Parker To Councils: How Does Your Garden Grow? | Newsroom](#)

¹⁰ [404 Not Found - New Zealand Parliament \(www.parliament.nz\)](#)

¹¹ <https://www.climatecommission.govt.nz/our-work/advice-to-government-topic/inaia-tonu-nei-a-low-emissions-future-for-aotearoa/>

¹² [Growing together 2035 - Aotearoa Horticulture Action Plan \(February 2023\) \(mpi.govt.nz\)](#)

¹³ [Growing together 2035 - Aotearoa Horticulture Action Plan \(February 2023\) \(mpi.govt.nz\)](#)

¹⁴ [Action for healthy waterways section 32 evaluation report \(environment.govt.nz\)](#)

3. Freshwater Management Objectives Submission

HortNZ has found the consultation process for the Horizons One Plan revision challenging. We note that in other areas and regions that we work, there has been a number of different approaches taken to prepare for the NPSFM 2020 plans. HortNZ feels there is an opportunity for Horizons to work more closely with our organisation to better understand the pressures and concerns of the horticultural community and what research and development growers and industry are working on to address environmental challenges.

HortNZ would like a better understanding of Horizons approach and process developing the NPSFM 2020 Plans. Is it Horizons intention to amend the One Plan to bring it in line with the requirements of the NPSFM 2020? Or will Horizons use the opportunity to create a plan together with the community that addresses the challenges ahead.

There seems to be a mixture of broad high-level concepts combined with very narrow and specific questions. HortNZ is also concerned that there is consultation on frameworks such as the Water Allocation Framework and Freshwater Outcomes, yet there has not been exploration and focused discussions on development of higher-level aspects of the NPSFM 2020 plan, such as Te Mana o te Wai and how these will influence the development of plans and frameworks.

There is a risk that the community will not be clear about the big picture and understand the implications of the decisions made without a cohesive understanding of the NPSFM process, policies and layers that guide these plans.

Discussion Questions

Below is HortNZ's response to the consultation questions. These need to be read in conjunction with the narrative above

Q. 1. What are your thoughts about the application of Te Mana o te Wai in the Horizons Region?

It is difficult to understand from the draft objective for Te Mana o te Wai¹⁵ how this will be applied in the Horizons (Manawatū-Whanganui region). It seems presumptuous to comment on the application on Te Mana o te Wai without having focused sector conversations on the draft objectives first.

With this in mind, Hort NZ believes that there are clear signals at a national scale to support elevation and recognition of the role of fresh fruit and vegetable produced for the domestic market to be elevated and recognised in the second hierarchy of Te Mana o te Wai.

The Horowhenua area is nationally recognised through the SVGA as a significant and nationally important horticultural production area, its role supplying fresh vegetables for the domestic market, supporting the health of the nation and that there would be challenges meeting the national bottom lines for water quality targets¹⁶. Vegetable production in the North of the region complements the growing season in other areas of the country and so fills a role of extending the availability and supply of fresh vegetables for the domestic market.

HortNZ believes that through use of tools such as the NZ GAP EMS, Horizons Regional Council will have insight into grower practice and what actions are being taken to address environmental issues while ensuring there is fresh fruit and vegetables available to support the health of the population.

HortNZ believes there needs to be more focused conversations with stakeholders and sectors to better understand the challenges and how application of Te Mana o te Wai in The Horizons (Manawatu-Whanganui) region will be applied.

Q 2. What do you think of the draft values for freshwater in the Horizons region?

HortNZ is supportive of the irrigation, cultivation and production of food and beverages value. We note there is specific support from iwi for this value¹⁷.

Given there is a nationally significant SVGA in Horowhenua, and the role horticultural produce grown across the Horizons region has in extending

¹⁵ [Te Mana o te Wai | Oranga Wai \(horizons.govt.nz\)](https://horizons.govt.nz/te-mana-o-te-wai)

¹⁶ [Action for healthy waterways information for horticultural growers \(environment.govt.nz\)](https://environment.govt.nz/action-for-healthy-waterways-information-for-horticultural-growers)

¹⁷ [Draft values | Oranga Wai \(horizons.govt.nz\)](https://horizons.govt.nz/draft-values) - specifically Ngā Wairiki Ngāti Apa, Ngāti Whitikaupeka, Ngāti Tamakōpiri, Ngāti Hauiti, and Ngāi te Ohuake

seasonal availability of produce nationally, we feel it is important to have this value recognised.

HortNZ is also supportive of the inclusion of the Domestic Fruit and Vegetable supply as a regional value.

Q 3.

What thoughts do you have about the draft environmental outcomes for the revised One Plan?

HortNZ is concerned that there is consultation on a large list of draft objectives, which have already been drafted, when higher-level documents and provisions, such as Te Mana o te Wai, have not been workshopped or finalised with the community. HortNZ is concerned at the approach to the NPSFM 2020 plans and the order of consultations. There is a combination of very broad concepts and then detailed or specific narrow questions without a wider understanding or conversation about the wider picture and journey Horizons are taking the community on with their next generation plan development.

HortNZ has comments on some specific objectives below:

OBJECTIVE 9

Regarding objective 9 - Use of Freshwater - Human Health, HortNZ sees the domestic supply of fruit and vegetables meets this objective's criteria. Specifically:

a) Meet reasonably foreseeable human health needs: Fruit and vegetables contribute to a healthy diet and improved health outcomes for the population¹⁸. A diet that incorporates the recommended daily intake of fruit and vegetables supports an individual's general health by providing fibre, nutrients and minerals needed to protect against conditions like heart disease, stroke and some cancers¹⁹. And.

c) All water abstracted is used efficiently: Water abstracted is used efficiently to irrigate a planting, matched to the crops water requirements as stages of growth. Over-irrigating can be as detrimental to producing a crop as under-watering. Water is also used in the post-harvest washing and preparation of fresh produce for human consumption. It is important water is of a sufficient quantity and quality to meet food safety requirements.

OBJECTIVE 10

Regarding Objective 10 - Use of Freshwater - Social, Economic and Cultural Wellbeing, HortNZ is pleased to see domestic fruit and vegetable supply recognised in this objective, but would see the following change

¹⁸ [Vegetables and fruit - NZ Nutrition Foundation](#)

¹⁹ [eating-and-activity-statements-for-new-zealand-adults-summary-of-guidelines-statements-and-key-related-information-jan_21.pdf \(health.govt.nz\)](#)

b) Support domestic fruit and vegetable supply: this should read 'Support fruit and vegetable supply' and have domestic fruit and vegetable supply specifically recognised in objective 9.

OBJECTIVE 14

Many objectives have not been completed or have any detail to provide comment on. For example, Objective 14 *Specified Vegetable Growing Area*, has no draft outcome. This is one objective that has particular relevance to the horticultural community and HortNZ would like to have direct discussions with Horizons Regional Council about this and other outcomes, and how they impact on growers. HortNZ would also like to facilitate structured discussions between Horizons Regional Council and the growing community in the region to help Horizons build a better picture of the needs and pressures growers are under, and how the objectives can support better outcomes for the region. facing, to better inform plans.

Q. 4. What feedback do you have to give on the draft long-term visions for freshwater management units (FMU) in the Horizons region?

HortNZ notes many of the draft long-term visions seem to be identical, with one bullet added at the end of a list. HortNZ notes there appears to have been considerable input from Mana Whenua developing visions and values, which is great to see. However, there has not been the same attention given to other community and stakeholder groups.

HortNZ would like to facilitate discussions with Horizons Regional Council and the horticultural community about long-term visions for the FMU's where horticulture is present. We note that the consultation period for the FMU visions and values was held late in 2022. This is a particularly challenging time for growers as this is the peak growing and harvest season and many will not have had the opportunity to participate in a general consultation exercise. HortNZ would like to work closer with Horizons Regional Council to facilitate better discussions and meaningful consultations with the growing community.

During the consultation process in 2022, growers and HortNZ submitted on having irrigation, cultivation and production of food and beverages included in each FMU where there was Horticultural activities. We believe there still needs to be recognition of this value in each FMU where there is horticulture as well as in the overarching values for the region.

