

SUBMISSION ON Marlborough NPSFM consultation: Proposed Values

15 December 2023

To: Marlborough District Council

Name of Submitter: Horticulture New Zealand

Supported by:

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OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) thanks Marlborough District Council for the opportunity to submit on the second round of community engagement and welcomes any opportunity to continue to work with Marlborough District 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 4,200 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 are 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

Horticulture New Zealand would like to seek the following considerations:

- Domestic food production as a region wide value.
- Retaining flexibility in freshwater plans to enable other suitable production activities, such as horticulture in the future.
- Supports the recognition of water storage as an approach to creating freshwater reliability and security in the region.

Submission

1. Horticulture in Marlborough

Freshfacts¹, published annually since 1999 by Plant & Food Research and more recently produced by United Fresh, provides a year-by-year report on horticulture in New Zealand. The survey gathers information about farms, fields, orchards, and forests to identify trends and provide current statistics that benefit the agricultural sector, inform decision-makers, and measure New Zealand's growth.

Table 1: Area planted fruit (hectares)

Apples	Summerfruit	Berryfruit	Olives	Other sub-tropical	Other fruit
20	35	3	16	1 +S	440 +S

Table 2: Area planted vegetables hectare

Broccoli, cab & caulis	Carrots	Peas & beans	Onions	Potatoes	Sweet corn	Other veg	TOTAL Veg
1	51	30	20	10	320	2	434

Table 3: Indoor crops (m2; 000's)

Salad greens	Tomatoes	Other veg & herbs	TOTAL Indoor
4	19	4	27

The main characteristic of the Marlborough climate is dryness, typically hot dry summers and cold winters, and a large number of annual sunshine hours².

1.1 Horticulture subsets in Marlborough

Horticulture in Marlborough is diverse, and constantly changing. While viticultural crops dominate the landscape, in previous years, Marlborough has been a hub for summer fruit, process vegetable crops and garlic. Marlborough is a transport hub with close proximity to the ferries connecting the North and South Islands and State Highway One.

¹ [Fresh-Facts--December-2023.pdf \(unitedfresh.co.nz\)](#)

² [Marlborough | NIWA](#)

While the pockets of land utilised for horticulture appear small, there is still a degree of diversity and potential in the region for horticulture to grow. It is important to consider the need for increased food security and the recent history the Marlborough region has in supporting a wide range of horticultural production. There has been a notable decline in the area used for horticultural production of food crops - however this is largely due to the expansion of viticultural crops³.

1.1.1 VEGETABLE GROWING

While spread out across a wider area, there is process vegetable production of crops, such as peas, spinach, beans, and corn in the region. Further to this, there is a considerable amount of garlic production in the Marlborough region. The stony soils and unique microclimates provide opportunities for vegetable production in parts of Marlborough. There is also a small amount of non-soil based production in Marlborough. The combination of large process vegetable growing, and small family operations provide a range of employment and lifestyle opportunities in the region.

1.1.2 FRUIT GROWING

Marlborough has some pipfruit, summerfruit and olive orchards. There are also small amounts of berry production based in the region. There are some post-harvest facilities such as packhouses to facilitate the berry packing and distribution. Neighbouring regions, such as Tasman, have centres of specialist fruit production.

2. National issues and the Marlborough productive region's role

2.1. Food security

Domestic food security is a nationally important issue which needs to be addressed at a strategic level with sufficient recognition in regional planning. Access to secure and reliable highly productive soils and freshwater across growing regions in New Zealand is critical to domestic food security.

New Zealand's domestic food security remains vulnerable. In 2022, Statistics New Zealand reported annual food prices rose 6.8 percent in February 2022 compared with February 2021. This was the largest annual increase since July 2011 when prices increased 7.9 percent. Fruits and vegetables were the largest contributor to the annual movement, with prices increasing by 17 percent⁴. There are several contributing factors, including adverse weather events, labour shortages, increased costs in compliance, increased costs of horticultural supplies as well as freight and energy costs⁵.

The increase of energy costs directly impacts the cost of production in New Zealand fresh produce. Consumers are price driven, and the consequence of high production and therefore produce costs is that retailers will look to importing produce or substitutes to meet consumer expectations of price. Some fresh products cannot be imported, as they

³ [Fresh-Facts--December-2023.pdf \(unitedfresh.co.nz\)](#)

⁴ [Fruit and vegetables drive up annual food prices | Stats NZ](#)

⁵ [Food prices are up, but the cost to grow it has skyrocketed | Stuff.co.nz](#)

will not survive the journey and, due to the cost of freight, become cost-prohibitive to consumers. Importing fresh fruit and vegetables produced in other countries that can otherwise be grown in New Zealand increases carbon leakage due to freight and supports less climate-friendly growing and environmental practices in other countries.

We have a national food producing system that relies on growing vegetables and fruit in pockets of HPL across the country, with good climate and soils, and reliable access to freshwater. Growing the same crops on HPL in different parts of the country is important for food security. It creates a longer growing window to maintain supply, and if one or more growing areas are impacted by adverse weather, production can be increased in other areas to address domestic shortages. Even in areas where horticultural production of food crops is seen as a minor industry, this plays an important role in contributing to overall food security of the country.

2.1.1. WEATHER EVENTS, AND THE IMPACT ON DOMESTIC FOOD SUPPLY

Vulnerabilities in our domestic food supply network have been highlighted during recent weather events. The availability of fresh New Zealand-grown produce was affected by the recent rain events,⁶ and Cyclone Gabrielle caused damage to key horticultural growing areas such as Pukekohe, Northland, Gisborne, and Hawkes Bay⁷.

The timing of these events also increased the scale of impact, as many seasonal crops were in their harvest period. Considerable investment into growing the crop was lost, along with the product. There were flow-on impacts to employment and mental well-being. This highlights the need to ensure our domestic vegetable production is maintained over a wider range of locations to ensure that production and supply can continue.

The recovery in some areas from these events is likely to be long and will affect the ongoing supply of fresh fruit and vegetables vulnerable during this recovery. The Pukekohe and South Auckland production areas were also impacted by the 2023 Auckland Anniversary rain event which occurred just prior to Cyclone Gabrielle. All of these events placed more pressure on relatively unaffected areas to try and fill the supply gap. Consumers experienced product shortages and significant pricing fluctuations, and growers in less impacted areas faced pressure to supply a much greater area of the country for a lengthy period while affected areas recover.

2.1.2. ADAPTING TO A CHANGING CLIMATE

The climate and warmer stony soils of the Marlborough area help provide a climate for production of a wide variety of crops. Before the increase and growth in the viticultural industry, Marlborough supported a diverse range of horticultural crops such as cherries, apricots and pipfruit. There was also a significant amount of vegetable crops grown for processing. The ability for the region to support these crops again remains and it is important plans, policies, and rules support transitions to appropriate industries for the region such as a return to horticulture. In the South Island, this is an important function as the further south you go, the cooler the temperatures get and the less ability there is

⁶ [Auckland storm event 9 May 2023 rapid analysis \(knowledgeauckland.org.nz\)](https://knowledgeauckland.org.nz)

⁷ [Cyclone Gabrielle's impact on the New Zealand economy and exports - March 2023 | New Zealand Ministry of Foreign Affairs and Trade \(mfat.govt.nz\)](https://mfat.govt.nz)

to produce crops year-round. This is because the number of growing degree days (GDD) decreases.

With climate change, the Marlborough region is projected to become warmer and have a significant increase in the number of GDD, particularly in productive areas such as the Waimea Plains⁸. A warmer climate will likely mean some subsets of horticulture will become more able to thrive, and others with chilling requirements in their growth cycle are more likely to establish and grow in areas that retain a chill factor into the future.

Generally, there will likely be more significant weather events that can cause disruption in different locations across New Zealand. It is important to retain a diverse geographic spread and ability to grow produce for domestic consumption to reduce the risk of supply shocks and ensure there is fresh healthy produce available to feed the population.

2.1.3. NATIONAL DIRECTION AND SUPPORT FOR HORTICULTURE

The Government has given national direction aimed at protecting domestic food security, via the following three pathways.

The National Policy Statement for Highly Productive Land (NPSHPL) came into effect October 2022 and provides a clear direction about how to preserve productive land, of which horticulture is reliant.

Minister Parker's letter to Regional Council sent in April 2023 seeking a report on how each council is providing for crop rotation vegetable growing at the FMU scale in NPSFM plans.

The Natural and Built Environment Act required the National Planning Framework to provide direction on enabling supply of fresh fruit and vegetables⁹. While this legislation is likely to be repealed, the recognition of the vulnerability to our domestic food supply and the role of horticulture in supporting the health needs of the population is unchanged.

In addition, the Aotearoa Horticulture Action Plan¹⁰ seeks to provide a framework to grow the value of the horticulture industry to \$12 billion by 2035¹¹. This is a 'quadruple helix' strategy that involves a combination of effort between industry, government, Māori, and growers.

While we are in a time of post-election transition, HortNZ believes there is clear support for the horticulture industry and ensuring domestic food supply is provided for when developing the NPSFM 2020 plans.

Social and economic impacts assessments will provide Council and community with understanding of how proposed catchment visions and limits will impact rural production and the wider community. It is important to understand how the different industries will be affected (i.e. the dairy sector will be impacted differently from the extensive pastoral

⁸[Marlborough-Climatology.pdf \(niwa.co.nz\)](#)

⁹ [Natural and Built Environment Act 2023](#)

¹⁰ [Horticulture-Action-Plan \(hortnz.co.nz\)](#)

¹¹ [Growing together 2035 - Aotearoa Horticulture Action Plan \(February 2023\) \(mpi.govt.nz\)](#)

sector and then again from horticulture). Even within horticulture, the different subsets will be impacted in very different ways.

There are many ways to achieve freshwater visions. HortNZ advocates for the following approaches:

- values based
- multi-contaminant
- whole of catchment
- use of freshwater farm plans (FWFPs)
- social and economic impact assessments of proposed visions and limits.

Rules need to provide structure and guidance on addressing environmental concerns. It is more effective to have flexibility to ensure rules are able to be implemented and focused on achieving the desired environmental outcomes while activities occur. The same rule for everyone does not necessarily create good plans.

2.1.4. TE MANA O TE WAI

Te Mana o te Wai is a framework that provides a hierarchy of obligations to guide the way we manage our freshwater resources in the future. The first priority is to the health of the river, the second is to provide for the health needs of the people, and the third priority is to all other uses.

It is important to recognise the life supporting capacity and purpose of freshwater for sustaining communities. Populations have always thrived and centred in areas where there is access to freshwater. Freshwater has long been used to grow crops to feed populations. A healthy waterway will in turn support populations to thrive.

This framework applies to the whole plan development process, not just setting the environmental outcomes or drafting of visions. Te Mana o te Wai also applies to limits and how they are designed, as well as the impacts of these on communities and iwi.

HortNZ believes it is important to enable the community to revisit choices made earlier in the process. As more information becomes available about the state of freshwater in Marlborough and the consequences and trade-offs of action, the community may choose to re-evaluate levels of ambition, time frames and comfort levels.

2.1.5. RECOGNITION OF DOMESTIC FOOD PRODUCTION

When considering uses of water, it is important to recognise some uses have a greater role in supporting primary health needs than others. Water for irrigation of vegetable crops, for example would be more essential for ongoing human health and survival than irrigation of sports fields, or water for industrial uses.

Draft Freshwater Plan for Northland recognises domestic food supply as a regional value. This is recognising that domestic food production is important and can occur in many areas over the region¹². This then is considered as a value region wide.

3. Proposed visions, values, and environmental outcomes for FMU's

When considering uses of water, it is important to recognise some uses have a greater role in supporting primary health needs than others. Water for irrigation of vegetable crops, for example would be more essential for ongoing human health and survival than irrigation of sports fields, or water for industrial uses.

The Draft Freshwater Plan for Northland recognises domestic food supply as a regional value. This is recognising that domestic food production is important and can occur in many areas over the region¹³. This is an approach Marlborough District Council could choose to take.

Outlined below is feedback on each of the proposed visions, values and environmental outcomes listed for each FMU.

3.1. Awatere FMU

More emphasis needs to be given to the importance of the role of food production and freshwater requirements. Irrigation of food crops should be given priority status over non-food crops, and irrigation for other purposes. Food is critical to national health, and domestic production of fruit and vegetables arguably fits in the second hierarchy of Te Mana o Te Wai¹⁴.

3.1.1. PROPOSED VALUES FOR AWATERE FMU

HortNZ supports recognition of water storage and the need for freshwater for irrigation, cultivation and food and beverage production. It is important flexibility is retained to ensure growers or landowners can revert to other horticultural land uses if conditions require a change from viticulture.

The value description also needed to reflect the importance of the allocation regime to provide sufficient volumes of water for irrigation. A possible redraft could be: "Sufficient volumes of clean water are available for irrigation of food crops".

Arguably, freshwater to support farmed animals is provided for in the Animal Drinking water value. It is worth noting that in times of drought, livestock farmers can move livestock to other areas to ensure their needs are met. Plants are unable to be moved once planted and this reflects the importance of having highly efficient irrigation systems,

¹² F.A 1.3 - [the-draft-freshwater-plan-change_uvn_1.pdf\(nrc.govt.nz\)](#)

¹³ F.A 1.3 - [the-draft-freshwater-plan-change_uvn_1.pdf\(nrc.govt.nz\)](#)

¹⁴ BOP regional council in their response to Minister Parkers letter requesting councils respond to how vegetable production will be enabled through the NSFM 2020 plan development supports the idea that vegetables produced for domestic market fit within the second hierarchy as a supporting human health needs.

support for water storage schemes and policies and the recognition of the role horticultural production plays in supporting the health needs of the population.

Stock drinking water is already provided for and protected by s14 of the RMA.

HortNZ supports the inclusion of water storage. This will be one way which grower and farmers will be able to create reliability and continuity of freshwater supply and access.

3.1.2. PROPOSED VISION FOR AWATERE FMU

HortNZ supports inclusion of water requirements for irrigation purposes and would like to see recognition of the importance of freshwater for irrigation of crops that support and protect domestic food supply.

3.1.3. PROPOSED ENVIRONMENTAL OUTCOMES

As noted above in the values, HortNZ sees a cross over in provision of water for animal and stock drinking water. We note this is provided for in s14 of the RMA.

HortNZ supports the inclusion of water for irrigation cultivation and production of food and beverages and water storage.

More emphasis needs to be given to the importance of the role of food production. Irrigation of food crops should be given priority status over non-food crops, and irrigation of recreational areas. Food is critical to national health, and domestic production of fruit and vegetables arguably fits in the second hierarchy of Te Mana o Te Wai¹⁵.

The value description also needed to reflect the importance of the allocation regime to provide sufficient volumes of water for irrigation. A possible redraft could be: "Sufficient volumes of clean water are available for irrigation of food crops".

3.2. East Coast Complex

HortNZ supports recognition of water storage and the need for freshwater for irrigation, cultivation and food and beverage production. It is important flexibility is retained to ensure growers or landowners can revert to other horticultural land uses if conditions require a change from viticulture or pastoral systems.

3.2.1. PROPOSED VALUES FOR THE EAST COAST COMPLEX

The value description also needed to reflect the importance of the allocation regime to provide sufficient volumes of water for irrigation. A possible redraft could be: Sufficient volumes of clean water are available for irrigation of food crops etc

Arguably, freshwater to support farmed animals is provided for in the Animal Drinking water value. It is worth noting that in times of drought, livestock farmers can move livestock to other areas to ensure their needs are met. Plants are unable to be moved

¹⁵ BOP regional council in their response to Minister Parkers letter requesting councils respond to how vegetable production will be enabled through the NSFM 2020 plan development supports the idea that vegetables produced for domestic market fit within the second hierarchy as a supporting human health needs.

once planted and this reflects the importance of having highly efficient irrigation systems, support for water storage schemes and policies and the recognition of the role horticultural production plays in supporting the health needs of the population.

Stock drinking water is already provided for and protected by s14 of the RMA.

HortNZ supports the inclusion of water storage. This will be one way which grower and farmers will be able to create reliability and continuity of freshwater supply and access.

3.2.2. PROPOSED VISION FOR THE EAST COAST COMPLEX

HortNZ supports inclusion of water requirements for irrigation purposes and would like to see recognition of the importance of freshwater for irrigation of crops that support and protect domestic food supply.

3.2.3. PROPOSED ENVIRONMENTAL OUTCOMES

As noted above in the values, HortNZ sees a cross over in provision of water for animal and stock drinking water. We note this is provided for in s14 of the RMA.

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The value description also needed to reflect the importance of the allocation regime to provide sufficient volumes of water for irrigation. A possible redraft could be: "Sufficient volumes of clean water are available for irrigation of food crops".

3.3. Te Hoiere / Pelorus FMU

HortNZ supports recognition of water storage and the need for freshwater for irrigation, cultivation and food and beverage production. Water storage has been specifically included in other FMU and needs to be considered for all FMU in the district. This is with the view of future proofing freshwater access and security into the future. It is important flexibility is retained to ensure growers or landowners can revert to other horticultural land uses if conditions require a change from viticulture or pastoral systems.

3.3.1. PROPOSED VALUES FOR TE HOIERE / PELORUS FMU

The value description also needed to reflect the importance of the allocation regime to provide sufficient volumes of water for irrigation. A possible redraft could be: "Sufficient volumes of clean water are available for irrigation of food crops".

¹⁶ BOP regional council in their response to Minister Parkers letter requesting councils respond to how vegetable production will be enabled through the NSF 2020 plan development supports the idea that vegetables produced for domestic market fit within the second hierarchy as a supporting human health needs.

Arguably, freshwater to support farmed animals is provided for in the Animal Drinking water value. It is worth noting that in times of drought, livestock farmers can move livestock to other areas to ensure their needs are met. Plants are unable to be moved once planted and this reflects the importance of having highly efficient irrigation systems, support for water storage schemes and policies and the recognition of the role horticultural production plays in supporting the health needs of the population.

Stock drinking water is already provided for and protected by s14 of the RMA.

3.3.2. PROPOSED VISION FOR TE HOIERE / PELORUS FMU

HortNZ supports inclusion of water requirements for irrigation purposes and would like to see recognition of the importance of freshwater for irrigation of crops that support and protect domestic food supply.

3.3.3. PROPOSED ENVIRONMENTAL OUTCOMES FOR TE HOIERE / PELORUS FMU

As noted above in the values, HortNZ sees a cross over in provision of water for animal and stock drinking water. We note this is provided for in s14 of the RMA.

HortNZ supports the inclusion of water for irrigation cultivation and production of food and beverages and water storage.

HortNZ would like to see More emphasis needs to be given to the importance of the role of food production. Irrigation of food crops should be given priority status over non-food crops, and irrigation of recreational areas. Food is critical to national health, and domestic production of fruit and vegetables arguably fits in the second hierarchy of Te Mana o Te Wai¹⁷.

The value description also needed to reflect the importance of the allocation regime to provide sufficient volumes of water for irrigation. A possible redraft could be: "Sufficient volumes of clean water are available for irrigation of food crops".

3.4. Waiau-toa / Clarence FMU

HortNZ is mindful that a great proportion of the productive Waiau/Clarence FMU area is the Rangitahi / Molesworth station. While historically pastoral, HortNZ would like to maintain flexibility in the appropriate use of the land, including flexibility to change to horticultural crops.

This flexibility would come about from including irrigation of food and beverage crops, enabling water storage, and recognising the dry climate and free-draining soils could support horticultural production such as some orchard crops in the future.

3.5. Wairau

¹⁷ BOP regional council in their response to Minister Parkers letter requesting councils respond to how vegetable production will be enabled through the NSF 2020 plan development supports the idea that vegetables produced for domestic market fit within the second hierarchy as a supporting human health needs.

The Wairau FMU is host to much of the production in the Marlborough areas as well as key population centres. It is also important to note, there has been a long history of settlement and occupation in the area, with the Wairau bar having supported communities to live in the area for over 800 years¹⁸. Communities have been able to thrive through access to abundant resources and maara which included use of stone rows to support horticultural production¹⁹.

While in recent times there has been a shift to viticultural production, it is important to note that the Wairau FMU has supported a wide range of production in the past, including orchard crops, process vegetable crops and vegetables. It is important given the vulnerabilities with domestic food supply and climate change that there is flexibility retained in the plan for land use change to activities such as horticulture in the future.

3.5.1. PROPOSED VALUES FOR THE WAIRAU FMU

HortNZ supports recognition of water storage and the need for freshwater for irrigation, cultivation and food and beverage production. It is important flexibility is retained to ensure growers or landowners can revert to other horticultural land uses if conditions require a change from viticulture.

The value description also needed to reflect the importance of the allocation regime to provide sufficient volumes of water for irrigation. A possible redraft could be: "Sufficient volumes of clean water are available for irrigation of food crops".

Arguably, freshwater to support farmed animals is provided for in the Animal Drinking water value. It is worth noting that in times of drought, livestock farmers can move livestock to other areas to ensure their needs are met. Plants are unable to be moved once planted and this reflects the importance of having highly efficient irrigation systems, support for water storage schemes and policies and the recognition of the role horticultural production plays in supporting the health needs of the population.

Stock drinking water is already provided for and protected by s14 of the RMA.

HortNZ supports the inclusion of water storage. This will be one way which grower and farmers will be able to create reliability and continuity of freshwater supply and access.

Recognition of the Southern Valleys Irrigation Scheme in the irrigation, cultivation and production of food and beverages value, and the role it plays providing freshwater access to support horticultural, farming, and rural residential properties is supported by HortNZ.

3.5.2. PROPOSED VISION FOR WAIRAU FMU

HortNZ supports inclusion of water requirements for irrigation purposes and would like to see recognition of the importance of freshwater for irrigation of crops that support and protect domestic food supply.

3.5.3. PROPOSED ENVIRONMENTAL OUTCOMES FOR WAIRAU FMU

¹⁸ [FMU History and Land Use - Marlborough District Council](#)

¹⁹ [Māori gardening: an archaeological perspective: Historic heritage publications \(doc.govt.nz\)](#)

As noted above in the values, HortNZ sees a cross over in provision of water for animal and stock drinking water. We note this is provided for in s14 of the RMA.

HortNZ supports hydroelectricity generation as communities are reliant on electricity for day-to-day life, consideration could be given to water storage solutions that provide water for hydro-electricity generation and can provide water for use of irrigation of crops.

HortNZ supports the inclusion of water for irrigation cultivation and production of food and beverages and water storage.

More emphasis needs to be given to the importance of the role of food production. Irrigation of food crops should be given priority status over non-food crops, and irrigation of recreational areas. Food is critical to national health, and domestic production of fruit and vegetables arguably fits in the second hierarchy of Te Mana o Te Wai²⁰.

The value description also needed to reflect the importance of the allocation regime to provide sufficient volumes of water for irrigation. A possible redraft could be: "Sufficient volumes of clean water are available for irrigation of food crops".

²⁰ BOP regional council in their response to Minister Parkers letter requesting councils respond to how vegetable production will be enabled through the NSFM 2020 plan development supports the idea that vegetables produced for domestic market fit within the second hierarchy as a supporting human health needs.