

SUBMISSION ON

Update to the advice on the fourth emissions budget

19 July 2026

To: Climate Change Commission

Name of Submitter: Horticulture New Zealand

Supported by: Strawberry Growers NZ, Te Awanui Huka
Pak (support for this submission sits alongside and does not replace their
independent submission)

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OVERVIEW

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Our submission

Horticulture New Zealand (HortNZ) thanks the Climate Change Commission for the opportunity to submit on the update to the advice on the fourth emissions budget and welcomes any opportunity to continue to work with the Climate Change Commission 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

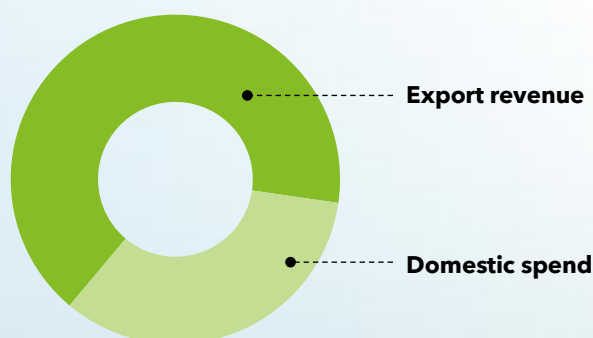
HortNZ represents the interests of approximately 4,300 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruits and vegetables. The horticultural sector provides over 40,000 jobs.

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.



Industry value \$7.54bn
Farmgate value \$4.89bn
Export revenue \$4.99bn
Domestic spend \$2.55bn

Source: HortNZ Annual Report 2025

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

HortNZ supports the Climate Change Commission's continued recognition of horticulture as part of New Zealand's transition to a low emissions economy and in meeting our 2050 targets. We welcome the inclusion of horticultural expansion within the fourth emissions budget (EB4) demonstration path to.

Land-use change to horticulture is one of the few options available to New Zealand that can deliver multiple public benefits.

The Commission's advice recognises that horticulture has a role to play in meeting New Zealand's emissions budgets. HortNZ supports this recognition. Expansion of horticulture can simultaneously deliver emissions reductions, boost regional economic development, increase export value and provide the supply of healthy and affordable fruit and vegetables for New Zealand's growing population.

Future emissions budgets need to provide for a realistic and fair transition for food production, taking into consideration environmental, social and economic impacts, including global emissions and food security.

We consider the advice understates both the scale of the opportunity and wider benefits associated with horticultural expansion.

There is scope for future advice to more fully reflect the contribution that horticulture can make alongside other emissions reduction options. These benefits extend beyond emissions reductions to include regional employment, Māori economic development, resilient domestic food supply, and export growth.

HortNZ supports the proposed new requirement to consider implications for domestic food production in the Commission's updated advice. Horticulture is uniquely placed to contribute to this objective, alongside emissions reductions. Fruit production supports export growth through low emissions, high value products. Vegetable production is also relatively low emissions and plays a critical role in domestic food security and public health. We urge the Commission to recognise the contribution of both.

Achieving horticultural expansion requires the right enabling conditions.

The Climate Change Response Act 2002 and the Resource Management Act 1991 are already integrated. How that integration plays out, however, is uncertain, particularly as we continue through the resource management reform process. This connection could be streamlined to make the integration of climate change and resource management policy far simpler and easier to implement.

Submission

Horticulture has a role to play in New Zealand's transition to a low emissions economy and in meeting our 2050 targets. HortNZ welcomes the opportunity to provide feedback on the Climate Change Commission's update to its advice on the fourth emissions budget.

1. Horticulture is key to meeting New Zealand's emissions budgets

1.1. Horticulture and climate policy

We support the Commission's increased recognition of horticulture within future emissions pathways and agree that land-use change will be required if New Zealand is to meet future emissions budgets. However, we consider the opportunity for horticultural expansion may be greater than currently reflected in the advice.

Land-use change to horticulture is one of the few options available to New Zealand that can simultaneously reduce emissions, increase export value, support regional economies and maintain the supply of healthy and nutritious fruit and vegetables for a growing population.

While the EB4 advice includes some conversion predominantly dairy farming to horticulture under certain scenarios. The scale of conversion assumed remains relatively modest, reaching approximately 54,000 hectares of additional horticultural land by 2050.

In New Zealand, there are 1,000,000 ha of land that could potentially be converted to horticulture to meet increased demand for plant-based foods. If this land was converted to horticulture, it would be as effective at reducing New Zealand's agricultural emissions as a methane vaccine.¹ This illustrates that the opportunity for future expansion extends beyond dairy conversion alone and could also arise through, for example, diversification of other pastoral land uses and Māori land development.

Land use change to horticulture is one option of many that the country should draw on to reach New Zealand's emissions reduction targets. For the least risk pathway to net-zero, the Government should be developing a diverse portfolio of emissions reduction policies, rather than relying on a few "deus ex machina" technological developments. The Climate Change Commission accounted for, at most, 54,000 hectares of land use change from livestock farming to horticulture by 2050.

There are further gains to be made in reducing emissions within horticulture with support for greenhouse decarbonisation (discussed in Section 4 of this submission) research into

¹ Dorner, Z et al. (2018) Land-use Change as a Mitigation Option for Climate Change. Report to the Biological Emissions Reference Group (Project No. 18398) <https://www.mpi.govt.nz/dmsdocument/32140/direct> Accessed 24/04/23. (p. 12)

regenerative farming, soil health best practices, and alternatives or improvements to synthetic fertiliser.

1.2. Enabling land use change to horticulture

Future emissions budgets should recognise that land-use change is ultimately delivered through resource management decisions.

Horticultural expansion requires supportive resource management plans which allocate water and give permission to use the land (to discharge, make noise, etc.). Regional and district councils also play a vital role in natural hazard planning, which is critical to climate adaptation. Ongoing food security in the face of climate disasters is a strategic risk for New Zealand.² There is a need for strategic national planning to consider how our country's food system will need to adapt to climate change, including directing that food production and ancillary activities (e.g. packhouses) should be able to continue on flood prone land under resource management plans.

HortNZ has previously submitted that the Climate Change Response Act and the resource management system are already connected, but not always reflected clearly in emissions reduction planning. Regional and district councils are required to have regard to emissions reduction plans and national adaptation plans when preparing planning documents, yet emissions reduction plans have generally provided limited direction on how resource management settings can enable lower emissions land uses like horticulture.

Many of the factors that determine whether land can transition to horticulture sit outside the Climate Change Response Act framework. These are shaped through resource management policy and planning decisions. And any such land use change, will not be possible without supportive resource management plans which allocate water and give permission to use the land (to discharge, make noise, etc.).

The challenges facing commercial vegetable production in Horowhenua and Waikato provide a useful case study. For more than ten years, growers have been seeking workable resource management settings that recognise both the importance of freshwater outcomes and the national significance of maintaining commercial vegetable production for domestic food supply. Despite this, uncertainty remains around viable consenting pathways in some of New Zealand's key vegetable growing regions. If New Zealand wishes to enable horticultural production as part of its emissions reduction pathway alongside the protection of domestic food production, it is important that the planning system provides certainty for low emissions food production rather than creating barriers to it.

Furthermore, there are other local government considerations such as rating based on land use which need to be addressed. In Gisborne, the Council have included the value of

² Ministry for the Environment. [National Climate Change Risk Assessment for New Zealand](#). August 2020 (p. 67)

kiwifruit licences into property valuations for rating purposes³. This has a significant impact on the economics of conversion and is a barrier for land use conversion to horticulture.

Greenhouse decarbonisation remains a significant opportunity and further support may be required to accelerate fuel switching.

HortNZ urges the Commission, in their updated advice on EB4, to recognise that the successful delivery of future emissions budgets depends not only on emissions reduction technologies and incentives, but also on whether resource management settings enable lower emissions land uses to establish and expand. The relationship between emissions reduction planning and resource management policy is therefore critical to achieving the outcomes assumed in emissions pathways.

1.3. Reducing Emissions While Doubling Export Value

We support the Commission's observation that export growth can be achieved through higher value land uses, including horticulture, and not limited to increased dairy production.

The Government has committed to double export value by 2035. Horticulture is an incredibly low emissions land use. Fruit growing is a low-emissions, high-value export industry and global demand for New Zealand fruit has not been saturated. For instance, kiwifruit represents less than 1% of the global fruit bowl but is still rising in popularity in key markets.⁴ Zespri estimates that license for 450-800 hectares of SunGold and RubyRed™ kiwifruit will be released per annum between 2026 and 2028 (including some transition from green kiwifruit).⁵ Crops like cherries,⁶ blackcurrants⁷ and onions⁸ are all finding new value streams. Horticulture has room to grow, and yet that opportunity for the transition to a low emissions economy has been missed in ERP 2.

HortNZ calls on the Government to plan to double horticultural value in this timeframe as part of their plan to reduce New Zealand's emissions, which is the aim of the Aotearoa Horticulture Action Plan, a strategy that is co-owned by Government, Industry, Science and Māori.⁹

Doubling horticultural value will require reducing regulatory barriers to horticulture. Examples include a water allocation framework that considers the sustainability and efficiency of activities, recognition of industry assurance programmes to deliver Freshwater Farm Plans and breaking down barriers for crop protection approvals.

³ [Growers stung by court's rates decision](#)

⁴ [2023-Outlook.pdf \(zespri.com\)](#)

⁵ [2023-Outlook.pdf \(zespri.com\)](#)

⁶ [Eden Orchards | 100% Pure NZ Cherry Juice](#),

⁷ [Blackcurrant Benefits - Blackcurrants New Zealand Inc.](#) [Blackcurrants New Zealand Inc.](#)

⁸ Onions NZ. Humble to Hero project.

⁹ [Aotearoa Horticulture Action Plan | Horticulture New Zealand – Ahumāra Kai Aotearoa \(hortnz.co.nz\)](#)

1.4. Making an equitable transition

The Commission's discussion of regions and communities gives less attention to the positive impacts of conversion to, and expansion of, horticulture. Including a range of employment opportunities, contracting, post-harvest operations, logistics, advisory services, input suppliers and export growth.

The wider regional impacts of horticultural expansion are not fully reflected in the Commission's EB4 final advice. Horticulture is largely discussed as an alternative to dairy farming rather than as a significant contributor to regional economic development in its own right.

Horticulture supports regional economies through direct employment and through the post-harvest and support services required to run successful operations. The horticultural growing activity in an area supports a wider economy. For example, half of the national summerfruit production occurs in Central Otago, where the combination of climate and soils support the best growing conditions for crops such as cherries. In addition to the area hosting a number of orcharding operations, there are specialised post-harvest facilities that facilitate the preparation and packing of domestic and export cherries, specialist growing advisor services, transport and logistics providers dedicated to the transportation of fresh packed cherries.¹⁰ Similar regional economies have been structured around the predominant type of horticulture, for example Bay of Plenty has considerable packhouses and support services specialised to support the kiwifruit industry and Tasman similarly has a similar focus on pip fruit production. There are 64,835 people employed in horticulture¹¹. With approximately 80,000 ha in horticultural production around the country, this is a significant number of employed people per hectare of productive land. Horticultural expansion presents opportunities for emissions reductions as well as boosting regional employment.

Our understanding is that many different types of land users are exploring the horticultural potential of what their land and climate can support. HortNZ considers the wider contribution of horticulture to regional economies would benefit from greater recognition.

As an example, a growing business cropping approximately 1,000 hectares employs between 220-250 full-time staff with over 80% NZ residents or citizens¹². Equivalent to about 4 jobs per hectare of production. This business also contributes \$30-35 million to local GDP.

These wider economic and employment benefits demonstrate that land-use change to horticulture can deliver outcomes that extend beyond emissions reductions alone.

In our view, some assumptions around horticultural employment do not fully reflect the diversity of the sector. While some fruit sectors rely heavily on seasonal labour particularly at harvest, all commercial horticultural businesses depend on a permanent workforce.

¹⁰ [ORC-Phase-1-Farmers-and-Growers-in-Otago-Report-2022.pdf](#) - Chapter 7 Horticulture

¹¹ [Horticulture » Food and fibre workforce insights](#)

¹² [Woodhaven-Gardens-2020-PC2-Evidence.pdf](#)

Other sectors like commercial vegetable production and covered cropping that operate year-round, rely on stable teams of permanent staff, supplemented by seasonal workers. Even those industries that are more seasonal still require staff to undertake crop maintenance like pruning in preparation for the next season.

HortNZ encourages the Commission to continue working with industry when testing assumptions about workforce impacts from conversion to horticulture, in order to fully realise the positive benefits to those communities, beyond the farm-gate value.

HortNZ supports the development of a national Equitable Transitions Strategy for Aotearoa. We consider domestic food security to be a critical consideration of a future strategy.

The CCRA framework assumes a managed and economically and socially acceptable transition to a low-emissions economy. While the ERP committed to an Equitable Transitions Strategy, there has been limited opportunity for a comprehensive public discussion about how climate mitigation, adaptation, resource management, regional development, food production and security, workforce transition should be integrated. Domestic food production strengthens the case for a broader conversation on transition, because it is closely tied to land use planning, freshwater management, adaptation, and regional economies, not just emissions reductions.

1.5. Māori Agribusiness is well placed to benefit from horticultural expansion

HortNZ considers the Commission's advice could better recognise the significant opportunity horticulture presents for Māori landowners and Māori agribusiness aspirations and economic development.

The EB4 advice largely frames horticultural expansion as occurring through conversion from dairy farming. While dairy conversion is one pathway, future horticultural growth is likely to come from a much wider range of sources. This includes diversification by Māori agribusiness, development of Māori-owned land, conversion from other pastoral land uses and new entrants into horticultural production.

The Aotearoa Horticulture Action Plan¹³ (AHAP) identifies increasing Māori participation in horticulture as a key opportunity for the sector. Alongside the goal of doubling horticultural farmgate value by 2035, AHAP includes ambitions to increase Māori participation across the horticulture value chain threefold by 2035. Many of the opportunities for future sector growth are expected to come from Māori investment, land-use diversification and new horticultural developments.

Many iwi, Māori landowners and Māori agribusinesses are actively exploring opportunities to diversify into horticulture or expand existing horticultural operations. Horticulture can provide opportunities for landowners to transition to lower emissions

¹³ [Aotearoa Horticulture Action Plan | Horticulture New Zealand – Ahumāra Kai Aotearoa](#)

land uses while maintaining productive use of the land and creating long-term economic opportunities for whānau and communities.¹⁴

These opportunities are not limited to any one crop or region. Māori participation in horticulture continues to grow across a range of production systems and regions. In some areas, Māori landowners are exploring opportunities in fruit production, while in others there is growing interest in vegetable production and rotational land-use arrangements. For example, vegetable production can involve growers leasing land from neighbouring iwi provide opportunities for productive land use while maintaining land ownership.

The Commission's assessment of the impacts of land-use change would benefit from greater consideration of these opportunities, including the potential contribution of Māori-owned land and Māori agribusiness to future horticultural expansion. Recognising these opportunities would provide a more complete picture of the contribution horticulture can make to emissions reductions, regional development and future food production.

1.6. A missed opportunity in ERP2

HortNZ supports the Commission's advice recognising horticulture as part of New Zealand's future emissions pathway, alongside the new requirement to consider implications for domestic food production. However, this recognition has not been reflected in the Government's updated ERP2. HortNZ considers this a missed opportunity.

Both the first emissions reduction plan and the Climate Change Commission's advice for the second discuss a transition to lower emissions systems and land uses, but the focus in ERP 2 remains on making systems changes to pastoral farming, rather than supporting and enabling land use change to horticulture.

While regenerative farming and technological advancements may offer opportunities on the margin to reduce emissions from pastoral farming, much more significant emissions reductions could be achieved through land use change. Unlike many of the initiatives within the emissions reduction plan, the emissions reductions are certain.

HortNZ is disappointed that the January 2026 amendments to ERP2 do not identify horticultural expansion as a land-use change opportunity despite its potential to reduce emissions, grow export value, support regional economies and help meet future demand for healthy and affordable fruit and vegetables.

¹⁴ [Māori in horticulture](#)

2. Climate Change, Resource Management, Food Security, and Human Health

HortNZ sees food security and reducing emissions as a dual focus for climate action, where these two priorities are held equally without one compromising the other. The cover decision for COP 27 was the first ever to mention food, recognising “the fundamental priority of safeguarding food security and ending hunger, and the particular vulnerabilities of food production systems to the adverse impacts of climate change.”¹⁵ This put food at the top of the global environmental agenda, and it should also be a priority for New Zealand. Food is simultaneously a necessity for human survival, a possible casualty of climate change, and a sector that can be leveraged to reduce greenhouse gas emissions. The New Zealand government should work toward emissions reduction through land use change for health and climate impacts.

2.1. Climate Change Response Act and Resource Management

The Climate Change Response Act 2002 (CCRA) and the Resource Management Act 1991 (RMA) are already integrated. How that integration plays out, however, is uncertain. This connection could be streamlined to make the integration of climate change and resource management policy far simpler and easier to implement.

Achieving New Zealand’s emissions reduction goals will require some land use change. The Parliamentary Commissioner for the Environment has called for strategic planning for land use change to limit climate change effects (as well as respond to biodiversity loss and freshwater quality concerns).¹⁶

2.2. Food Security and Human Health

HortNZ welcomes the inclusion of domestic food production in the updated EB4 advice. It would be beneficial if the Commission clarified whether assumptions about horticultural expansion include the vegetable production needed to meet future domestic demand in its updated advice.

The Paris Agreement speaks to a ‘fundamental priority of safeguarding food security’ and action in a manner that does not threaten food production. It is important that New Zealand retains the ability to provide for our own fruit and vegetables – in terms of availability, but also affordability. Rising produce costs contribute to food insecurity in New Zealand; and as prices increase, consumption of fruit and vegetables decreases.

However, not all food production systems face the same risks or constraints, and HortNZ encourages the Commission to recognise the importance of protecting and enabling the production of food grown for domestic consumption, particularly vegetable production. Unlike many export-oriented sectors, the majority of vegetables grown in New Zealand

¹⁵ Sharm el-Sheikh Implementation Plan. 2022. Accessed 21/04/23 [COP27 AUV 2 \(unfccc.int\)](https://unfccc.int/cop27/implementation-plan) (p. 1)

¹⁶ Parliamentary Commissioner for the Environment. [Going with the grain: Changing land uses to fit a changing landscape](#). May 2024.

are consumed domestically. However, vegetable production is increasingly constrained by regulatory uncertainty, freshwater management requirements and access to suitable growing land in key production regions.

Future emissions pathways should recognise that maintaining and expanding the domestic supply of fruits and vegetables does not simply exist in the context of emissions reductions or as a food system issue, but a strategic public health and resilience issue for New Zealand. If horticulture is expected to make a greater contribution to New Zealand's emissions pathway, resource management settings must actively enable that transition.

Food security is a nationally important issue which needs to be addressed at a policy level; it is integral to human health. While New Zealand is a net food exporter, New Zealand does experience food insecurity - many New Zealanders live in food insecurity. A 2019 Ministry of Health study analysed household food insecurity among children in New Zealand estimated that 174,000 (19%) of all children in New Zealand live in food-insecure households.¹⁷

Zero hunger is the second United Nations sustainable development goal, and good health and well-being is the third.¹⁸ There is a strong link between climate action and human health particularly regarding food security and hunger.

Improving food security requires sustainable local market and regulatory conditions to feed the population. Changes in environmental regulations and extreme weather events may also lead to increases in the cost of food in New Zealand.

New Zealand's existing food production systems are coming under increased pressure from population growth (and competing land use demands reducing availability of highly productive land), climate change, water concerns, ETS costs and the cost of energy, and the need to improve environmental outcomes. There are societal and health costs to increases to the prices of vegetables in New Zealand and a decline in availability.

Health costs of increase in vegetable prices

Otago University has recently modelled the potential health impacts of increased vegetable prices. This study found that using the health costs of an increase in vegetable prices of 43 - 58 percent, (Deloitte, 2018) would be a loss of 58,300 - 72,800 Quality Adjusted Life Years and health costs of \$490 - \$610 million across the population.⁶

Climate policy should not unintentionally undermine food-system resilience, and decisions about where public support is directed should consider impacts on food production and food security. Add something to this effect (and I've added to outcome sought):

¹⁷ Ministry of Health. (2019). Household food insecurity among children, New Zealand Health Survey

¹⁸ [THE 17 GOALS | Sustainable Development \(un.org\)](https://un.org/sustainabledevelopment)

Outcome sought in Fourth emissions budget:

Make food security and domestic food production explicit considerations in the design and assessment of climate policy measures, including decisions relating to public investment, research priorities and emissions reduction initiatives.

2.3. Role of Plant-Based Industries in Reducing Emissions

Horticulture is already a low emissions land use which produces food for New Zealanders and the world, while making \$7.48 billion of value between the domestic and export markets,¹⁹ all on less than 0.1% of New Zealand's land area²⁰ and while contributing only 1.1% of New Zealand's greenhouse gas emissions.²¹

It is well known that horticulture is a low emissions land use and incredibly emissions efficient, with the sector's limited carbon dioxide emissions coming from the use of fuel for farm equipment, processing, cool storage and freight. Horticulture also produces nitrous oxide emissions from fertiliser, although horticulture's share of nitrous oxide emissions is only 1% of New Zealand agriculture's total, compared to 99% from livestock farming.²²

Land-use change to horticulture is one of the few options available to New Zealand that can simultaneously reduce emissions, increase export value, support regional economies and maintain the supply of healthy and nutritious fruit and vegetables for a growing population.

Horticulture is New Zealand's lowest emissions food source. We seek a robust discussion of the policies needed to enable horticulture for a high-nutrition, low-emissions future. The ERP 2 discussion document's agriculture chapter is focused on continuing current rates of pastoral farming while waiting on uncertain technological solutions which are "several years away from use or are still at an early stage of research".²³

¹⁹ [Annual-Report-2024-final.pdf \(hortnz.co.nz\)](#)

²⁰ [Agricultural and horticultural land use | Stats NZ](#)

²¹ [StatsNZ. Greenhouse gas emissions \(industry and household\): Year ended 2022](#)

²² [StatsNZ. Greenhouse gas emissions \(industry and household\): Year ended 2022](#)

²³ [New-Zealands-second-emissions-reduction-plan-Discussion-document.pdf \(environment.govt.nz\)](#) (p. 71)

3. Policy levers to enable horticultural expansion

3.1. Enabling the supply of fresh fruits and vegetables

If horticulture is expected to play a greater role in future emissions pathways, EB4 pathways must actively enable the production of healthy and nutritious food.

Fresh fruit and vegetables are nationally significant for the health of the nation, for domestic nutrition and food security and for export value as low emissions, high value products. Recognition of the importance of fresh fruit and vegetables is needed at a national level because regional and district councils cannot be expected to make policy for national value without Central Government direction.

The supply of fresh fruits and vegetables should be enabled as a matter that all RMA practitioners should have particular regard to under Section 7 of the Resource Management Act 1991 (RMA). This wording is preceded in Section 129 of the repealed Natural and Built Environment Act 2023²⁴ and Section 3.33 of the National Policy Statement for Freshwater Management (NPS-FM) 2020.²⁵

This proposal aligns with the Government's target to double export value in the next ten years²⁶ and coalition agreements to lift New Zealand's productivity and economic growth to increase opportunities and prosperity for all New Zealanders and "grow the economy to ease the cost of living".²⁷

3.2. National direction for commercial vegetable production

HortNZ seeks national direction for commercial vegetable production (CVP) to make vegetable growing a permitted activity. This needs to be progressed urgently. Over 20% of New Zealand's fresh vegetable supply is seriously threatened by unworkable freshwater regulations likely to become operative in 2024-25. If over one-fifth of the country's supply of fresh vegetables is disrupted by unworkable regulations, the impact on the price and access to fresh vegetables for New Zealanders will be severe. This threatens the viability of a sector that is both low emissions and essential for the health of New Zealanders. In order for the country to meet our emissions budgets, we need to enable, rather than stifle, low emissions industry.

This has become more visible with the recent Environment Court decision in Waikato (Plan Change 1) and Horizons (Plan Change 2). These decisions affect CVP in two of the main vegetable growing hubs, where unworkable rules will constrain 20% of the commercial vegetable supply in New Zealand²⁸. The government is in the midst of

²⁴ [Natural and Built Environment Act 2023 No 46 \(as at 23 December 2023\), Public Act 129 National planning framework must provide direction on certain matters - New Zealand Legislation](#)

²⁵ This section was quashed only due to deficiencies in the consultation process, not due to the content of the policy. [National Policy Statement for Freshwater Management 2020.pdf \(environment.govt.nz\)](#)

²⁶ https://www.national.org.nz/national_sets_bold_target_for_export_growth

²⁷ [Coalition Agreement: New Zealand National Party & ACT New Zealand, 54th Parliament](#)

²⁸ [National Direction for Commercial Vegetable Production Summary.pdf](#)

reforming the Resource Management Act²⁹, which will see this replaced with two different pieces of legislation, change is urgently needed to ensure our domestic food security is not undermined.

A consistent approach is needed to ensure that New Zealanders' access to fresh, affordable domestically grown vegetables is not put at risk by regional freshwater regulations. We believe that this can be best provided through a new National Environmental Standard. Workable rules for vegetable production are possible while progressing aspirations for protecting and improving our freshwater.

HortNZ has written an extensive policy position document on this topic, which can be found on our website.³⁰

²⁹ [Resource management reforms | Ministry for the Environment](#)

³⁰ [National-Direction-Vegetables-HortNZ-position-paper.pdf](#)

4. Consultation questions

Do you Agree with our proposed approach

Overall, HortNZ agrees with the proposed approach and welcomes the inclusion of domestic food production as a consideration in the Commission's updated advice.

Climate change presents both challenges and opportunities for New Zealand's food production system. In our view, future emissions pathways should support land-use change to lower-emissions food production systems like horticulture where this can contribute to emissions reductions while maintaining domestic food production and supporting regional economies.

HortNZ urges the Commission to continue to recognise horticulture as a land-use change opportunity and consider the full potential for expansion alongside other positive social and economic benefits. Realising this opportunity will require policy settings that enable horticultural expansion, including access to water, highly productive land and resource management settings that support lower-emissions land uses.

The submission above outlines several practical considerations and policy settings that could help enable horticulture to make a greater contribution to New Zealand's emissions reduction pathway while continuing to provide healthy and nutritious food for New Zealanders.

Do you have any feedback?

Overall HortNZ agrees with the proposed approach and feel the inclusion of domestic food production is important.

Climate change presents both challenges and opportunities. It is important for policy settings, both regionally and nationally to support people to be able to make changes to their activities and land use to respond to the change in climate. This includes policy settings to ensure land use change to horticulture is provided for nationally so the country is able to respond to the opportunities. This includes enabling people to have choices about how they can adapt to support themselves, continue to be productive on the land and are informed about ways to transition to low-emissions land uses to support our domestic food production to continue.

Included above in the preamble are some key policy suggestions from our previous submission on the fourth emissions budget about regulatory barriers to horticultural expansion and considerations to enable the sector to adapt to the changing climate that are still relevant for the updated advice feedback to consider.

What implications and evidence regarding domestic food production should the commission consider in its advice?

HortNZ welcomes the inclusion of domestic food production being reflected in this way and agrees with the advice reflecting that horticulture has a role to play in supporting the transition to a low emissions economy.

Horticulture is a dynamic industry with two distinct aspects.

Fruit production is typically low emissions and forms an important part of the export economy for New Zealand. Launched in 2023, the Aotearoa Horticulture Action Plan (AHAP) is a collaborative initiative developed with input from industry, government, Māori, and research providers. It serves as a guiding framework to align efforts and investments across the horticulture sector, ensuring growth, sustainability, and prosperity for New Zealanders while protecting the environment³¹

When considering climate change opportunity and changing climates within New Zealand, some of the main factors for fruit production will be to ensure that different regions and districts have water security strategies in place that enable water storage and other mechanisms to provide freshwater to support production. Also ensuring there is provision for the needs of orchardists including artificial crop protection structures, shelterbelts and other functional needs of orcharding in areas with the potential to support production of fruit crops early, will enable land owners to have choices about how they can utilise their land into the future.

Vegetable production has a greater role in domestic food supply. While a small proportion of crops are exported, the majority of crops are grown for domestic markets. One key consideration is the ability to produce fresh vegetables for the winter season. Climate change may open up opportunity in different locations and this can be supported through good provision for commercial vegetable production nationally to ensure key practices such as crop rotation are enabled.

Horticultural crops are produced in key areas that have the climate, soil and access to resources that support production. These hubs are where production occurs and post-harvest activities are often based. From here produce is then transported to markets and ports. The ability to grow produce is one aspect that needs to be enabled, but there is a need to consider the logistics and requirements of successfully getting crops to the end market (whether that be export or domestic).

Some helpful information to support understanding of supply chain vulnerabilities in horticulture are³²:

- Vulnerabilities in key transport routes such as the interisland ferries.
- the need for robust roading infrastructure from growing hubs to ensure produce can successfully be transported to large centres, distribution centres and ports.
- Fresh produce has a short shelf-life and the need to have timely transport of produce from the orchard/farm to post-harvest facilities so it can be prepared, and appropriately stored in some cases, for market.

Further to this, some of the challenges that will arise from climate change are increases in pest and disease pressure³³ and there is a need to consider policy settings also enable access to tools and options to manage these appropriately. This means having access to

³¹ [Aotearoa Horticulture Action Plan | Horticulture New Zealand – Ahumāra Kai Aotearoa](#)

³² [Supply-chain-vulnerabilities-final.pdf](#)

³³ [Effects of climate change on current and potential biosecurity pests and diseases in New Zealand](#)

agrichemicals, including soft chemistry and biological control options to ensure resistance management is achieved. This will also extend to consideration of how biosecurity incursions and threats are planned for and managed.

Is there particular evidence you think we should consider on how the specific assumptions used in the modelling for the original advice on the level of the fourth emissions budget have changed since 2024

HortNZ has not identified evidence that would fundamentally change the overall direction of the Commission's advice. However, it is difficult to assess whether there have been material changes to the assumptions underpinning horticultural expansion, as the assumptions and constraints applied within the modelling are not always clear from the published advice.

HortNZ considers there may be value in revisiting the scale of horticultural expansion considered in future modelling. Given the range of economic, environmental and social co-benefits associated with horticultural expansion, HortNZ considers there may be merit in further exploring both the scale of expansion assumed and the sources of that expansion, including Māori land development, land-use diversification and new entrants into horticultural production, not just conversion from dairy farming.

Are there any notable changes since December 2024 which are likely to materially or permanently affect the level of emissions reductions which are appropriate?

No. However, HortNZ considers increasing constraints on vegetable production, ongoing uncertainty around resource management settings and continued interest in horticultural expansion reinforce the importance of enabling land-use change as part of New Zealand's emissions reduction pathway.

The one big thing about the emissions budget you want us to think about:

The key issue is not whether horticulture has a role to play, but whether, and the scale of expansion, the EB4 demonstration pathway and ERP2 settings will enable that. Horticulture can simultaneously reduce emissions, support domestic food production, increase export value and strengthen regional economies, but these outcomes will only be achieved if the resource management and policy settings needed to support expansion are in place.