

FEEDBACK ON

NPSFM issues and options report to Rural Advisory Panel

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To: Auckland Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) thanks Auckland Council for the opportunity to feedback on the NPSFM issues and options report and welcomes any opportunity to continue to work with Auckland Council and to discuss our submission.

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.

Feedback

1. Horticulture in Auckland

The Auckland region is an important part of the national food production system. Of significance, there is the Pukekohe growing hub which plays a critical role in the domestic supply of vegetables to support the population of New Zealand¹.

There are approximately 7602ha of horticultural land in the region; of this, 4946ha are in commercial vegetable production. In addition, there are 848m² of indoor greenhouse production². There is a large degree of diversity in crops produced, with horticultural operations producing onions, potatoes, kiwifruit, avocado, leafy vegetables, brassicas, lettuce, pumpkin and carrots.

The Auckland region plays a critical role in the national domestic supply of fruit and vegetables. The Pukekohe area, in particular, is recognised for its productive capacity. The unique soils and climate provide an ideal climate for year-round growing. Māori have had a long history of cultivation, with Pukekohe recognised as a key productive area that supported a robust economy with crops being traded with other communities outside the region³. Auckland still maintains a high degree of crop diversity with a climate that is ideal for growing a wide range of horticultural crops⁴.

There are a large number of cross-boundary interactions with Waikato Region where many Pukekohe vegetable growers also have some of their operations located.

2. Policy and resources

2.1. National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land (NPS HPL) came into effect October 2022. The NPS HPL, as currently drafted, is a blunt tool to manage appropriate use of land deemed highly productive (LUC 1, 2 & 3), primarily through the requirement of Councils to map and zone highly productive land, and manage the subdivision, use and development of this land.

Land is a finite natural resource that needs to be managed to meet the needs of people now and those of future generations. In our view, sustainable food production is the primary value associated with this resource.

Highly productive land is made up a combination of natural and physical resources, and these together with social, legal and investment decisions define the potential productive capacity of land.

There are many elements that contribute to the productive capacity of land, but soil type and land availability itself are the key aspects. When land is fragmented, through blanket

¹ [Proposal A4](#)

² [Fresh-Facts-2024---Online-Version.pdf](#)

³ [Heritage resources: Heritage \(doc.govt.nz\)](#)

⁴ [Auckland ClimateWEB.pdf \(niwa.co.nz\)](#)

approaches like large scale retirement of land for riparian buffer strips or urbanisation, it is seldom returned to productive uses.

The values of highly productive land and potential costs and benefits of enabling and/or removing considerable areas of land from productive use should be specifically considered as part of Auckland Council's NPSFM plan development. The impact of losing that land to primary productive use is a matter that should be specifically investigated, and those findings then considered, alongside other relevant matters, before any assumptions or further work on the NPSFM plan development is continued.

HortNZ do not consider it acceptable to support the loss of highly productive land with the approach outlined at the Rural Advisory Panel meeting on 1 November. The National Policy Statement is in place and other options are available to address impacts of erosion and sediment loss. The food security of the region and nation should not be compromised when there are many mitigations that are in place and being developed to address freshwater quality. The Deloitte report on the Pukekohe hub highlights for the relatively small footprint, the Pukekohe hub's horticulture industry economic contribution is \$261 million⁵. The recently commissioned NZIER report and the Deloitte report both speak to the risk to national food supply and cost to consumers if vegetable growing is constrained or caused to shrink due to unavailability of land or poor policy that constrains vegetable production⁶. Consumers will feel the impact of supply decreases in terms of increased costs of fresh produce potentially undermining the nation's health and well-being. Given Pukekohe is one of the major fresh vegetable production areas in New Zealand, any policy or approach that reduces land availability for vegetable production will have a significant national impact⁷.

2.2. Research StoryMap

HortNZ has developed a StoryMap titled 'Fresh produce and freshwater' to provide an overview of how the commercial vegetable production industry manages freshwater quality⁸. The StoryMap highlights research that has been industry-led and funded and how this is then adopted by commercial vegetable growers into their practices. Some of what is outlined is work that has been done in collaboration with Auckland Council as part of the MoU between HortNZ and AC.

This also provides a good basis for what challenges there are when considering appropriate ways to provide for commercial vegetable production in planning processes and the unintended consequence of relying on blanket approaches to solving freshwater issues.

2.3. Industry Assurance Programmes

The Growing Change project is focused on preparing growers for Freshwater Farm plan requirements. HortNZ is using the Environmental Management System (EMS) add-on to the New Zealand Good Agricultural Practice (NZGAP) commercial accreditation programme. HortNZ is strongly in support of using industry accreditation programmes in the roll-out and implementation of Freshwater Farm Plans. For growers, NZGAP is a familiar, trusted and well-used product.

⁵ [Pukekohe Hub | Primary Sector | Deloitte New Zealand](#)

⁶ [NZIER-report-Making-the-economic-case-for-vegetable-production-in-NZ-FINAL.pdf](#)

⁷ [NZIER-report-Making-the-economic-case-for-vegetable-production-in-NZ-FINAL.pdf](#)

⁸ [Fresh produce and freshwater](#)

The catchment report for the Pukekohe Growing Change project, included as Appendix 1, shows great uptake of the EMS as a way for growers to be Freshwater Farm Plan prepared.

As part of the Growing Change project, HortNZ are reviewing industry Codes of Practice. This will include the Erosion and Sediment control guidelines. As part of this, Auckland Council will be reviewing the updated draft guidelines.

There has also been a micro credential developed with Muka Tangata to increase understanding of horticulture and the approaches to mitigating environmental impacts. This will be available to regulators, including Auckland Council and something that would be of benefit to better understand our sector and growers.

2.4. Impact of Rate and Scale of Regulatory Change on Growers

Many growers in the Auckland area have operations that cross-boundaries with other local authorities. It is important to be mindful of the impact of regulation and differences in regulation on growers working across multiple boundaries. Simultaneously, growers are worried about both inconsistent and contradictory regulations they need to manage within their operation as well as the current uncertainty caused by Central Government regulation reform.

Regulation needs to be workable and agile to meet the needs of a wide range of land uses. It should be workable and mean any land user is able to understand what is required of them to address their environmental impacts relevant to the nature, scale and type of operation. HortNZ believes Freshwater Farm Plans are the most appropriate tool to ensure these effects are managed.

3. Riparian Planting Proposal

The 'Issues and Options Report: Riparian Management' paper presented to the RAP has outlined a primary stream and river set back of between 10 - 20m. This could result in the retirement of significant amounts of HPL

Riparian planting is one mitigation is a suite of mitigations that together can minimise and mitigate the effects of erosion and sedimentation from land-based activities. HortNZ does not believe one practice, such as riparian planting, offers the total solution. Rather, landowners should implement mitigations and controls that are appropriate for their activity and property requirements. Other examples of erosion and sediment control options, as outlined in the Erosion and Sediment Control Guidelines below, create a suite of mitigations that can be used to create the right erosion and sediment control plan appropriate to the operation and land.

A report done by Stuart Ford for Waikato District Council on the economic loss of land to setbacks is attached as Appendix 2. While produced for Waikato District in 2018, you can see from this the considerable cost in the context of a horticultural property.

The Erosion and Sediment Control guidelines for vegetable production outline a number of actions a grower can implement to ensure appropriate and effective measures are in place to address erosion and sediment loss from vegetable production.

3.1. Erosion and Sediment Control Guidelines

The Auckland Horticultural sector has a long history of collaboration with the former Auckland Regional Council, Franklin District Council, Waikato Regional Council and many other agencies and specialists on erosion and sediment control practice. That history and collaboration is at risk of being undermined by the options presented in the Riparian Management paper⁹.

The Erosion and Sediment Control Guidelines for Vegetable Production,¹⁰ have provided vegetable growers with a clear national set of guidelines and practices to implement to mitigate their erosion and sediment loss. These guidelines developed out of the collaborate relationships mentioned above and in particular were an extension of the Franklin Sustainability Project¹¹. The guidelines provide a tool-box of methods to achieve erosion and sediment control objectives that retain the resource onsite to support the primary production activity and manage freshwater effects.

The Erosion and Sediment Control Guidelines for Vegetable Production are rightly recognised as good industry practice by regional councils across NZ. They have been embedded in planning regimes based on evidence that hard riparian limits are not the most efficient or effective method for erosion and sediment control for vegetable production.

This is the situation in Auckland where the Independent Hearings Panel confirmed the appropriateness of the Erosion and Sediment Control Guidelines for Vegetable Production as a permitted activity standard in the Auckland Unitary Plan. A method supported by Auckland Council through that process. Auckland Unitary Plan, provision E11 Land Disturbance – Regional: E11.6.3. Standards for Ancillary Farming Earthworks states as follows:

(2) Ancillary farming earthworks must implement best practice erosion and sediment control measures for the duration of the land disturbance. Those measures must be installed prior to the commencement of the land disturbance and maintained until the site is stabilised against erosion.

Note 1

Industry best practice is generally deemed to meet or exceed compliance with:

⁹ [Soil Management in the Franklin District | Waikato Regional Council PVGA](#)

¹⁰ [Soil and Water Management](#)

¹¹ [Franklin Sustainability Project - Agrilink](#)

- *cultivation for vegetable production: The Horticulture New Zealand publication 'Erosion and Sediment Control Guidelines for Vegetable Production' (June 2014) for cultivation;*

Growers need to comply with both permitted activity requirements and horticulture industry assurance compliance with NZGAP, which provides commercial accreditation for standards specified by markets for market access.

We reiterate that the Erosion and Sediment Control Guidelines for Vegetable Production are recognised and applied by regional councils including (Auckland) because they have been developed by science and grower practice and supported by evidence hence passing the statutory tests of the RMA for method effectiveness and efficiency. A primary stream and river set back of between 10 - 20m does not pass these tests and is a fundamental failure in the understanding of the vegetable production system.

3.2. Te Tautara o Pukekohe

HortNZ, PVGA, and mana whenua partners Ngāti Tamaoho, Ngāti Te Ata together are trustees on Te Tautara Trust. The trust formation has been the result of the multi-year ICMP Pukekohe project between mana whenua, growers, industry, and Auckland and Waikato Regional Councils. Initially, \$10 million was allocated to the project; however after the change of Government, 11 projects received a total of \$5.6 million of funding.

Some specific collaborative projects that are of relevance to this feedback are:

- **Integrated catchment approach to sediment management:** working with the Auckland Council Healthy Waters team to use the Freshwater Management tool to identify and then construct erosion and sediment controls across the catchment.
- **Ngāti Tamaoho riparian restoration and planting:** with a focus on the Hingaia wetland, intermittent stream and the Pahurehure inlet; and
- **Ngāti Tamaoho and Ngāti Tiipa cultural indicator and monitoring:** two projects dedicated to the development, implementation and upskilling of local iwi to support freshwater monitoring.

The collaborative ICMP Pukekohe process was focused on identifying ways to improve freshwater quality and provide for vegetable production to continue.

3.3. Opportunities for Auckland Council to Increase Understanding of Horticulture

The Pukekohe Vegetable Growers Association (PVGA) is an active association, and Auckland Council has a standing invitation to present at their meetings. Recently, PVGA has had Andrew Bird providing regular updates. HortNZ encourages Auckland Council to discuss what conversations and opportunities are available within their organisation to engage with growers.

HortNZ and PVGA will work on planning a 'Horticulture Deep Dive' event that includes some visits to growers' property. HortNZ has provided these in the past to various councils, including Auckland Council; however, the Issues and Options paper highlighted

the need for better understanding of our sector across different departments within the Council. We would encourage Auckland Council to work closely with HortNZ and PVGA before developing any policy positions and assumptions, given that there is a demonstrated gap in understanding about our industry.

HortNZ would like to be a part of further stakeholder discussions with Auckland Council and our primary industry groups to ensure Council understand our sectors better.