

SUBMISSION ON

Taranaki FMU Surveys

24 October 2023

To: Taranaki Regional Council

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Survey Responses

Our submission

Horticulture New Zealand (HortNZ) thanks Taranaki Regional Council for the opportunity to submit on the Taranaki FMU surveys and welcomes any opportunity to continue to work with Taranaki Regional 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 fruit, 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.



Survey Questions

1. Objective - Te Mana o Te Wai

Q. 1.1 To what extent do you agree or disagree with this objective to give effect to Te Mana o te Wai? Please tell us more:

SOMEWHAT DISAGREE

Water is essential to food production which is critical for local food supply and healthy diets. Growers have to take the water from the land in order to grow the fruits and vegetables that we all eat.

Producing fresh fruits and vegetables to support the health of New Zealanders falls under the second hierarchy of Te Mana o Te Wai - to prioritise the health needs of people. Thus, with respect to Objective 5, waterbodies will never be able to behave completely naturally so long as people depend on them for their life-giving capacity. This objective seems impractical and should be deleted.

Clause 129 of the Natural and Built Environment Act (NBEA) calls for the National Planning Framework to enable the supply of fresh fruits and vegetables. This recognition shows the importance of fresh produce for the health of New Zealanders and directs all councils to consider their supply in policies and plans.

Q. 1.2 Are there any specific parts of the objective that you disagree or agree with?

We recommend deleting Objective 5 and adding a new objective to support human health through a resilient domestic food supply and enabling the production of fresh fruits and vegetables.

2. Draft Long Term Visions

Q. 2.1 To what extent do you agree or disagree with the aspirations being set for the FMU through the long-term vision? Please tell us more:

SOMEWHAT DISAGREE

HortNZ seeks that there is a vision to actively support the transition to low emissions land use, rather than just being responsive to current and future effects of climate change. HortNZ notes that the vision should support the use of highly productive land for food production.

The National Policy Statement for Highly Productive Land has one objective, being:

Objective: Highly productive land is protected for use in land-based primary production, both now and for future generations.

There are nine policies to achieve the objective. Policy 2 is particularly relevant to the matters considered here.

Policy 2: The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.

Policy 4 of the NPSFM states that freshwater is managed as part of New Zealand's integrated response to climate change. HortNZ supports a long-term vision that provides for climate change and transition to low emissions land use and acknowledges highly productive land.

We seek that freshwater management in the Taranaki FMUs (where food production is present) is designed so the FMUs will:

- Support human health, through enabling the supply of fresh fruits and vegetables;
- Support the health of wider environment through climate change mitigation and adaptation; and
- Support the community social and economic well-being through recognising the importance of highly productive land for primary production.

Q. 2.2 Are there specific aspirations you feel strongly about?

Food production in general should be uplifted to support food security and a local supply of fruits and vegetables, which are essential for community health and well-being. We support aspirations for mahinga kai and ask that food production in general is similarly recognised. We support recognition of the current and future effects of climate change, particularly through support for low-emissions activities like horticulture.

Q. 2.3 Are there any additions you would make to these aspirations to make them more relevant to the FMU?

Add: Innovative and sustainable land and water management practices support food production. Low-emissions land uses are supported, including the production of fresh fruits and vegetables on highly productive land.

3. Draft Environmental Outcome of Mahinga Kai

Q. 3.1 Overall, to what extent do you agree or disagree with the draft mahinga kai environmental outcome?

STRONGLY AGREE

We agree with desired outcomes for mahinga kai. We seek similar recognition for the importance of food cultivation in general, to cover the fruit and vegetable growing that sustains the region.

4. Draft Environmental Outcome for Irrigation, Cultivation, and Production of Food and Beverages

Q. 4.1 Overall, to what extent do you agree or disagree with the draft irrigation, cultivation and production of food and beverages environmental outcome?
Please tell us more:

STRONGLY AGREE

We agree that reliable and suitable freshwater quality and quantity is critical for the production of fresh fruits and vegetables within the FMU. This outcome is strongly supported, although the phrasing seems to suggest that vegetables are not included in the category of "food". We propose the alternate wording:

Irrigation, cultivation and the production of food, especially fruits and vegetables, within the FMU are sustainably provided for by suitable and reliable freshwater quality and quantity.

Taranaki has 26 commercial fruit and vegetable growers with a combined growing area of 236 ha, including kiwifruit, avocados, berries, brassicas (broccoli, cabbage, cauliflower), sweet corn and capsicum.¹ Fourteen growers are located in the Volcanic Ring Plain FMU, four in Coastal Terraces, one in Northern Hill Country, three in Southern Hill Country and four in Waitara. Taranaki Regional Council noted in a May 2023 letter to Minister David Parker that the Volcanic Ring Plain, Waitara and Patea FMUs are particularly well-suited to future vegetable production.²

While the horticultural industry is small in Taranaki, the region has the climate, soil and rainfall to support a range of horticultural activity. Venture Taranaki reports showed that there are 207,000 hectares of Taranaki land suitable for horticulture. The 2022 report "Branching Out Blueprint: Grains, Legumes and Vegetables" highlighted possibilities to work vegetable rotations into existing farm systems in the region to provide greater local food supply and diversify the rural economy.³ There are growers looking to expand in avocados and kiwifruit, and these businesses provide employment opportunities for the community. Apata, a major packhouse and specialist provider for kiwifruit, has actively looked for expansion opportunities in South Taranaki.

Volcanic soils in Taranaki are versatile and free draining, making them ideal for future horticultural expansion. Warming temperatures with climate change will make the region more suitable for crops like kiwifruit. Read more in Venture Taranaki's

¹ Fresh facts 2023. Accessed online <https://unitedfresh.co.nz/assets/site/images/images/Fresh-Facts-%E2%80%93-Online-version-2023.pdf>

² Taranaki Regional Council. "Approach to provide for vegetable production when implementing National Policy Statement Freshwater Management 2020". May 2023.

³ Accessed online <https://www.venture.org.nz/assets/Uploads/Grains-Legumes-Vegetables-Blueprint-Final.pdf>

“Branching Out Blueprints” for avocados, kiwifruit, grains, legumes and vegetables, which highlight the opportunities for horticulture in the region.

Enabling horticulture in Taranaki looks like plans and policies with smooth consenting pathways for crop rotation,⁴ greenhouses, orcharding activities (including frost fans and audible bird scaring devices) and ancillary activities.

5. Draft Environmental Outcome for Commercial and industrial use

Q. 5.1 Overall, to what extent do you agree or disagree with the draft commercial and industrial use environmental outcome?
Please tell us more:

STRONGLY AGREE

HortNZ supports suitable and reliable freshwater for commercial and industrial use. Water is used by horticultural businesses for frost fighting, crop washing, post-harvest and food processing. Some of these activities, including greenhouses, sometimes fall under the category of commercial and industrial use.

6. Target Attribute States

Q. 6.1 Overall, to what extent do you agree or disagree with the principles for setting target attribute states?
Please tell us more:

STRONGLY AGREE

Overall, we are very supportive of these principles, particularly Principle 1 and 2 as drafted. They are well-matched with the NPS-FM. For Principle 3, it is important that outcomes are assessed when deciding approaches to meet target attribute states. This gives communities the opportunity to understand the trade-offs between level of ambition they seek for their outcome. For some communities, maintaining the state of the water may be enough to meet their desired outcome. We also seek recognition of Policy 4 of the NPS-HPL to have an integrated response to climate change (in terms of mitigation and adaptation, not just looking to future impacts) through freshwater planning. We recommend the following amendments to Principle 3:

Principle 3: When identifying and assessing **outcomes and** target attribute states, identify the **limits/actions/approaches/mitigations** that would be required to achieve improvements at each National Objective Framework band. **Freshwater limits are designed to contribute to an integrated response to climate change.**

⁴ Taranaki Regional Council. “Approach to provide for vegetable production when implementing National Policy Statement Freshwater Management 2020”. May 2023.

Q. 6.2

What is important for the Council to consider when setting target attribute states for the FMU?

It is important for Council to consider whether approaches to achieve target attribute states are pragmatic and targeted to reflect outcomes.