

SUBMISSION ON Water Quality Targets

13 December 2023

To: Manawatū-Whanganui Horizons Regional Council

Name of Submitter: Horticulture New Zealand

Supported by: Vegetables New Zealand Inc, Potatoes New Zealand Inc,

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OVERVIEW

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Our submission

Horticulture New Zealand (HortNZ) thanks Manawatū-Whanganui Horizons Regional Council for the opportunity to submit on the Freshwater Quality Targets and welcomes any opportunity to continue to work with Manawatū-Whanganui Horizons Regional Council and to discuss our submission.

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

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

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

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 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.



Executive Summary

Horticulture is an important industry in the Horizons region. There is the nationally significant Specified Vegetable Growing Area in Horowhenua¹, and in the Ohakune growing area, the root crops grown supply New Zealanders with produce from February - November complements the Pukekohe growing hub's growing season.

HortNZ do not believe enough information has been made available to understand the implications of these water quality targets. There is no social or economic impact information to help provide the community with an understanding of the consequences of the targets.

HortNZ believes it is the community's view on what targets to set outside of the minimum required under the NPSFM. Proceeding with targets based solely on 'blue sky' visioning processes is not adequate direction from a community to set all plans towards. Community set those ambitions based on no information or idea of the consequence and thus have not had the ability to reflect on what trade-offs or compromises they are willing to accept before confirming a target.

There needs to be greater clarity on the target attributes state, social impacts and consequences with the associated level of the target attribute state, and the impact and distribution of the economic and social impacts over the region associated with the design of the limits. For example the reductions required, how they are to be achieved, what is required of community and the timeframes improvement will be achieved and then seen with understanding of any lags. There is consequences of being more ambitious and it is critical the community have full understanding of their options, and consequences. HortNZ sees the use of Freshwater Farm Plans as being one tool that can help achieve

HortNZ believes there needs to be a longer timeframe to achieve the targets to allow for technology development and the cost to be spread over a longer timeframe.

There needs to be active community discussion about areas where the water quality is already close to, or exceeds the national bottom lines in its natural state.

¹ Quashed 13 December 2023 - On basis the Ministers consultation process with Mana Whenua was lacking. Evidence around the vulnerabilities importance and need to provide for vegetable production was accepted and not challenged.

Submission

1. Horticulture in the Horizons region

The Horizons (Manawatū-Whanganui) region is an important part of the national food production system. The region is host to a diverse range of primary production which includes both the fruit and vegetable sub-sets of horticultural production.

There is approximately 4,000 ha of horticultural land in the region, approximately 3,647 ha of which is planted in vegetables². Horticultural crops include potatoes, broccoli, lettuce, onions, peas, silverbeet, carrots, asparagus, cauliflower, cabbage, pumpkin and kiwifruit. The tables below outline type of crops grown and ha in the fruit and vegetable sub-sets of Horticulture.

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

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

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

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

Within the Horizons region is the nationally significant Specified Vegetable Growing Area (SVGA), Horowhenua³. This area is recognised for its role and importance in production of fresh vegetables for the national food supply network.

The combination of soil and climate are important factors in an area being suitable for vegetable production. The National Policy Statement for Highly Productive Land (NPS HPL) recognises that Land Use Classes 1, 2 and 3 are a valuable resource and need to be prioritised for use in primary production and protected from inappropriate development.⁴ While this NPS is helpful for recognising the limited resource that is highly productive land, the other factor that defines an

² [freshfacts-2020.pdf](#)

³ Page 36 [National Policy Statement for Freshwater Management 2020.pdf \(environment.govt.nz\)](#)

⁴ Page 7 [National Policy Statement For Highly Productive Land 2022 \(environment.govt.nz\)](#)

area that is suitable and used for commercial vegetable production is the climate and ability to cultivate and produce vegetables. Some crops, such as those grown in Ohakune, require a cooler temperature

1.1. Horticulture in the Northern Horizons region

Ohakune in particular, has an important role extending the seasonal availability of crops such as carrots, parsnip and brussel sprouts. This areas climate works in compliment with other vegetable production areas in the country to ensure fresh vegetables are available year-round. While not included in the official SVGA it is important to note the Ohakune production area has a lot of synergy with the Pukekohe area in particular, with some growers having operations across both regions for this purpose. Much of the freshwater used in vegetable production in this area is taken from water sources, such as rivers and used to support operations.

1.2. Horticulture in the Southern and coastal areas of the horizons region

The Horowhenua is a nationally recognised vegetable production area⁵. Most of the growers freshwater in this area is sourced from groundwater via metered bores. The predominant type of production is commercial vegetable production, including asparagus, leafy greens, brassicas, potatoes and onions. There are also small amounts of fruits and other vegetables produced here.

Through Rangitikei and Whanganui there are process vegetable producers, asparagus, kiwifruit and berryfruits.

1.3. Freshwater quality impacts in horticultural production areas

It is the view of HortNZ and growers that the current One Plan is an interim plan, and that the next generation plan is an opportunity for Horizons Regional Council to work closer with the horticultural community and industry to create a plan that enables production activities to occur while addressing freshwater quality concerns.

Growers have been making progress on the uptake of good practices - particularly in Horowhenua - where most growers have the EMS (NZ GAP add on). While growers in the horizons region have faced ongoing challenges with regulation affecting their ability to operate, they have opted to proactively made progress towards addressing environmental impacts.

The practice adoption has been tracked through Horticulture NZ's Growing Changes project has been highlighted throughout the current Plan Change 2 process⁶. HortNZ believe Freshwater Farm Plans (FWFP) and the use of industry programmes to support the uptake of Best Management Practices (BMP) will be fundamental to achieving improvements in water quality outcomes in the region.

Water quality improvements from growers' actions outlined in the Growing Change project are likely being seen, LAWA indicates that water quality is likely

⁵ Horowhenua is one of the two Specified Vegetable Growing areas identified in the NPS FM 2020

⁶ [Freshwater Farm Plans | Horticulture New Zealand – Ahumāra Kai Aotearoa \(hortnz.co.nz\)](https://hortnz.co.nz/freshwater-farm-plans)

improving⁷. It will be necessary to understand how far changes and understanding of current grower practice, driven through FWFP uptake and grower supported research such as Sustainable Vegetable Systems (SVS)⁸, will contribute to an improvement or lessening of impact.

1.3.1. IRRIGATION

Water takes for irrigation of horticultural crops are used to supplement rainfall. Irrigation is used more frequently in the summer months when rainfall is lower, and typically less through the winter months. Irrigation of crops is matched to crop demand and it is important to note that over irrigation of a crop can be as problematic as underwatering a crop. Many factors influence how much water a crop will require, including type of crop, stage in growth cycle, climatic conditions etc⁹. Generally growers work within their local climate and environment to ensure crops receive adequate water to produce a marketable yield.

1.3.2. POST-HARVEST WATER REQUIREMENTS

Growers need to work within food safety and market requirements to ensure produce is safe and fit for human consumption¹⁰. Part of food safety frameworks which are incorporated into commercial accreditation programmes such as NZ GAP is the requirement to test water for contaminants such as e. coli. It is important water used to wash produce is of a quantity and standard to ensure produce is clean and safe for consumers before it makes it to market. In addition to water testing and food safety processes within an operation, produce sold through retailers and markets is subject to random testing to provide consumers confidence that the produce they purchase has been grown and produced in a way that it is safe to eat.

2. National direction and food security

The Paris Agreement speaks to a 'fundamental priority of safeguarding food security' and action in a manner that does not threaten food production. Food security is a nationally important issue which needs to be addressed at a strategic level. We have a national food producing system that relies on growing vegetables and fruit in pockets of highly productive land (HPL), with good climate and access to freshwater.

The Horizons region plays a critical role in the national domestic supply of fruit and vegetables. The Horowhenua area is recognised for its productive capacity. The soils and climate provide an ideal climate for growing horticultural crops. Māori have had a long history of cultivation, with evidence of cultivation and gardening around settlement sites across the Manawatū-Whanganui area, particularly in Horowhenua and Whanganui. This helped to support a robust pre-colonial economy with crops being traded with other communities outside the

⁷ <https://www.lawa.org.nz/explore-data/manawat%C5%AB-whanganui-region/river-quality/lake-horowhenua/arawhata-at-hokio-beach-road/>

⁸ [Working with the industry on Sustainable Vegetable Systems \(SVS\) · Plant & Food Research \(plantandfood.com\)](#)

⁹ [CHAPTER 2: CROP WATER NEEDS \(fao.org\)](#)

¹⁰ [2019-07-24-Guidelines-for-Fresh-Produce-Food-Safety-2019-WEB.pdf \(hortnz.co.nz\)](#)

region¹¹. Horizons still maintains a high degree of crop diversity with a climate that is ideal for growing a wide range of horticultural crops¹².

The price of NZ grown fresh fruit and vegetables has been steadily increasing prior to these weather events¹³. This can be attributed to labour shortages, increased costs in compliance, increased costs of horticultural supplies as well as freight and energy costs¹⁴. The increase of energy costs directly impacts the cost of production in New Zealand of fresh produce. Consumers are price driven, and the consequence of high production costs of New Zealand produce, is that retailers will look to importing produce, or substitutes to meet consumer expectations of price. 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.

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 with availability of fresh New Zealand grown produce being impacted by the recent rain events¹⁵, and Cyclone Gabrielle causing damage to key horticultural growing areas such as Pukekohe, Northland, and The East Coast regions of Gisborne and Hawkes Bay¹⁶.

While the Horizons region was not directly impacted by these events, this puts pressure on growers in less-impacted areas to fill the supply gap created by large scale disruption in other key growing areas. Many growers in the region have pointed out that in previous years they have experienced more localised weather and climate related events which has caused significant disruption to their operations¹⁷, and the pressure has been on other areas to ensure there is a continued supply of fresh produce to support the population.

2.1.2. CARBON LEAKAGE AND RISK TO LOCAL HORTICULTURAL INDUSTRY

Without reliable and secure access to freshwater, and plans that accept the need for horticulture to occur, domestic horticultural production is put at risk.

The price of NZ grown fresh fruit and vegetables has been steadily increasing prior to these weather events¹⁸. This can be attributed to labour shortages, increased costs in compliance, increased costs of horticultural supplies as well as freight and energy costs¹⁹. Uncertainty regarding freshwater supply can cause further stress and risk to production, further impacting supply and cost.

Consumers are price driven, and the consequence of high production costs of

¹¹ [Heritage resources: Heritage \(doc.govt.nz\)](#)

¹² [NIWA ManawatuWanganui Climate WEB.PDF](#)

¹³ [Fruit and vegetables drive up annual food prices | Stats NZ](#)

¹⁴ [Food prices are up, but the cost to grow it has skyrocketed | Stuff.co.nz](#)

¹⁵ [Auckland storm event 9 May 2023 rapid analysis \(knowledgeauckland.org.nz\)](#)

¹⁶ [Cyclone Gabrielle's impact on the New Zealand economy and exports - March 2023 | New Zealand Ministry of Foreign Affairs and Trade \(mfat.govt.nz\)](#)

¹⁷ [NIWAsts66.pdf](#)

¹⁸ [Fruit and vegetables drive up annual food prices | Stats NZ](#)

¹⁹ [Food prices are up, but the cost to grow it has skyrocketed | Stuff.co.nz](#)

New Zealand produce, is that retailers will look to importing produce, or substitutes to meet consumer expectations of price.

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.

In order to grow efficiently and effectively at a commercial scale, there are unique soil, climatic and environmental factors needed. This is why areas such as Horowhenua and Ohakune are horticultural hubs.

2.1.3. NATIONAL DIRECTION AND SUPPORT FOR HORTICULTURE

The recognition of SVGA is one facet of the concern at a national level about the risk to local horticultural production. This provision has been quashed on the basis of insufficient consultation with iwi. The decision to quash the provision was not because the issue of the supply of fresh vegetables and food security were not important. The Court has directed the Minister to reconsider whether there should be an exemption from the NPS FM 2020 for vegetable growing areas in Horowhenua and Pukekohe and, if so, what form such exemption should take.

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

Minister Parker's letter to Regional Council sent in April 2023 sought information about how vegetable growing is being provided for in NPSFM plans.

The recently released National and Built Environment Act select committee report has recommended the NBA must provide direction on enabling supply of fresh fruit and vegetables²⁰. While this legislation has been repealed, the recognition of the vulnerability to our domestic food supply and the role of horticulture being recognised as critical for supporting the health and needs of the population is unchanged.

In addition, the Aotearoa Horticulture Action Plan seeks to provide a framework to grow the value of the horticulture industry to \$12 billion by 2035²¹. 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 vegetable production is provided for when developing the NPSFM 2020 plans. Social and economic impacts assessments would provide Horizons Regional Council with understanding of how these will impact rural production. It is important to understand how the different industries will be affected i.e. the dairy sector will be impacted differently from the pastoral sector and then again from horticulture. Even within horticulture, the different subsets will be impacted in very different ways.

²⁰ [404 Not Found - New Zealand Parliament \(www.parliament.nz\)](http://www.parliament.nz)

²¹ [Growing together 2035 - Aotearoa Horticulture Action Plan \(February 2023\) \(mpi.govt.nz\)](https://mpi.govt.nz)

If the ultimate higher purpose is to improve water quality in the areas there are many ways that this can happen. HortNZ advocates for the following approaches:

- multi-contaminant
- whole of catchment
- through use of FWFP
- social and economic impact assessments to identify consequences

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, to 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 TAS 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.

In our view, Te Mana o te Wai concept must be viewed in an integrated way, rather than a strict binary hierarchy. We consider that Te Mana o Te Wai is achieved when all three elements of the hierarchy are in balance, achieving the balance is guided by the six principles.

Fundamental to Te Mana o te Wai is understanding the relationship between the environment and people is inextricably linked. Communities are dependant on the environment and the environment is reliant on communities to keep it in a state that ensures it can continue to sustain people. An imbalance occurs when only one of these is considered and provided for without consideration of the other.

The first hierarchy creates the limit of resources that are available to be used this could be expressed as a load of contaminants that can be assimilated by the receiving environment, or as the volume and timing of abstractions. The main issue with this concept has been how the first hierarchy is satisfied. In our view the minimum obligation to the first hierarchy is satisfied if:

- a) maintain is achieved, or
- b) in places below the bottom-line (and where an exception is not provided) water is improved to at least the bottom lines.

This interpretation is consistent with “maintain and improve” concept within the RMA. We are concerned that Horizons are incorrectly interpreting the obligation to the health of water to mean they must keep improving quality and flow regimes beyond these minimums without regard to the other matters. This undermines rather than supports sustainable management.

Modelling and analysis needs to consider more than ecosystem health and cultural attributes. Have your mitigations been tested to see if the level of ambition is realistic? Has the community had full information about what the consequences? HortNZ understands advice has been received from independent technical and science consultants, such as Cawthorne Institute, but the recommendations on WQT has not considered social and economic impacts in their assessment and recommendation nor has the community been given full understanding of what is required to achieve the current WQT in the proposed timeframe.

3. Proposed freshwater quality targets

HortNZ is concerned that consultation on the freshwater quality targets has been released without all of the information the community need to have full understanding and make an informed submission. There is some key information that we believe is required by the public to make informed submissions and choices about the freshwater quality targets. From this basis it is premature of HortNZ to pass comment on the target with an absence of the economic and social impact information. HortNZ’s understanding of the NPSFM 2020 is that in order to set Target Attribute State (TAS), Councils are required to work out what is needed to make this achievable²² - for example modelling the mitigations required to achieve the TAS like converting all landuse to bush. There should not be ambitious TAS without information and understanding of what limits need to be in place to achieve these. The community need to have full understanding of the interrelationship between all of the layers of policy and the consequences these will have in terms of impact on their life and environment.

With that said, from what we can see, HortNZ is uncomfortable there are targets being set that are above the minimum required under the NPSFM2020. HortNZ is also concerned there is a 30 year timeframe to achieve the draft targets - This could be extended to 100 years with interim targets set at 10 year intervals. This would give the community the ability to implement smaller incremental changes and have these embedded into practice, rather than one significant change that, the consultation information indicates, will not achieve the targets.

In our view, the One Plan and its process has been expensive and stressful for growers. There needs to be acceptance that horticulture, particularly commercial vegetable production, is an important part of the Horizons region and its communities, and realistic pathways in place to enable vegetable production to occur. Growers have been proactive and supportive of FWFP adoption and development. HortNZ is concerned that the NPSFM 2020 plan being developed

²² 3.10 & 3.11 NPSFM

is using the One Plan as a blue print and not genuinely reflecting the needs of the community.

The next generation plans have more limited avenues of appeal, so it is critically important that the public have full understanding and awareness about the freshwater quality targets, and natural consequences that will occur to achieve them **before** a draft is developed. HortNZ believes an absence of economic impact information - even a high-level indication of impacts is an unacceptable omission. The affordability and impacts on the local economy and communities is one of the fundamental pieces of information that inform whether targets set are achievable and in the community interest. HortNZ does not believe this is what is intended by the government when they indicated to council's that not having information was not a reason to delay consulting. HortNZ feels Auckland Council have set a good example in terms of providing the public with consultation documents that clearly outline the NPSFM plan processes, and how the different mechanisms inform and relate to one and other²³.

HortNZ also believes that there should be clear information setting out the current or baseline state, the minimum target required and the proposed targets to make it clear when a target is more ambitious than the minimum required. A single table comparing all three would provide a clear picture about what is being consulted on. Again, economic and social impact information that outlines the consequences of both the minimum and proposed ambitious target to help provide the community with understanding around the scale and impacts of the changes required. Finally, a range of options for dates and timeframes to achieve the targets - both the minimum and the more ambitious should be presented. For example, modelling the changes required over a 30-year period, 50-year period and 100-year period to provide the community with understanding about the level of changes and how they could be achieved over different timeframes.

Generally, HortNZ believes the maximum achievable water quality would be at a level that reflects the natural water quality coming out of the bushline before any production activities occur. Any water quality targets set that exceed this level of water quality would be akin to asking the community to improve water quality beyond its natural state.

Hort NZ has some key concerns regarding process

- How the target number has been set - many are more ambitious than the minimum level of required
- Absence of social and economic impacts of the specified targets
- 30 year time frame is too short to achieve targets. We view this as an interim timeframe due to the short duration.
- Lack of transparency

²³ [Setting our direction for improving freshwater in Tāmaki Makaurau / Auckland | AK Have Your Say \(aucklandcouncil.govt.nz\)](https://aucklandcouncil.govt.nz/ak-have-your-say/setting-our-direction-for-improving-freshwater-in-tamaki-makaurau/)

- The NPSFM 2020 requires councils to provide modelling and information to support TAS and limits about what mitigations will be required to achieve TAS.

For these reasons HortNZ considers the information provided leads us to believe the freshwater quality targets are overly ambitious and unreasonable and we cannot support this.

Hort NZ Seeks:

- Further consultation when economic and social impact information has been completed
- Modelling and information to explain what actions and mitigations are required to achieve the proposed targets
- For very ambitious targets, a longer time frame with 10 year intervals
- Clear information about the current state, minimum target required, baseline, and proposed target so it is clear to the community what level of ambition they are agreeing to
- Recognition of horticulture and domestic food production as values in FMU vision statements
- Clear opportunity for community to understand consequences and tradeoffs of proposed targets and the ability for the community to make changes

Listed below are each of the Horizons FMU’s that HortNZ is making specific comment on. The comments for each FMU are to be considered in addition to the above general comments.

3.1. Water Quality Targets, Reductions and Actions

3.1.1. WATER QUALITY TARGETS

It was difficult to easily find information which identified what the numbers associated with the pictorial maps are.

This suggests that the targets and timeframes are too ambitious and unreasonable. HortNZ suggests that the targets should be in line with the minimum required by the NPSFM with required meaningful improvement within a generation (25-30 years) and if a higher level of ambition is desired to provide a longer term time frame, for example 100 years.

No economic and social impact information has been provided. This is an important piece of information that helps the public understand the impacts of the targets and if they are realistic. The consultation material indicates that in some cases, even with double the standard activities occurring (SLUI), then in some cases the targets will not be reached. Arguably this points to a significant economic, social and financial impact of a target. Particularly in cases where the proposed target exceeds the minimum required, and your consultation material indicates the targets will not be achieved with all possible mitigations put in place,

then it is likely it will have a significantly negative impact on primary production and that should be explicit. This speaks to both the target and timeframe being unreasonable and overly-ambitious.

HortNZ would like information on social and economic impacts to be made available and consulted on before a draft plan is released. We believe this is a fundamental piece of information that will inform the feasibility of plans. There is concern the community will be accepting targets that may undermine the ability for any primary production to occur by stealth. It is very difficult to change drafts compared with comments and influence the development of a plan before this point, and it would be important to understand the full impacts of the targets to provide informed comments.

We are concerned with the way the engagement material has approached the regional value of Domestic Food Supply.

We think there is a place for narrative attributes to be included in the plan for the value of Domestic Food Supply. These should cover water quality and quantity and reflect current state and a move towards a recognised priority for production systems that provide the domestic supply of fresh fruit and vegetables and maintain food security for New Zealanders.

Provisional water quality targets are best considered when all of the environmental outcomes have been developed. The draft outcomes for Irrigation and Cultivation and Domestic Food Supply are confusing or not included.

Objective 10: is a broad 'use of freshwater' objective that sets out that freshwater is available in sufficient quantity and suitable quality, after providing for the matters in Objectives 1 to 6, to:

- a) Provide water to support the social, economic and cultural wellbeing of people and communities, including for commercial and industrial use; and*
- b) Support domestic fruit and vegetable supply; and*
- c) Meet the reasonable needs of livestock; provided that*
- d) All water abstracted is used efficiently.*

The use of water is not only about abstractions and the quality and quantity of water taken, but is also about provision within the discharge limit to provide for these activities.

An objective to *support domestic fruit and vegetable supply* should be a standalone outcome.

Objective 16: A place holder is included for Specified Vegetable Growing Areas and no environmental outcome specified. We recognise the SVGA provision has been quashed but that decision does not diminish the importance of this FMU for vegetable production and domestic supply, which should be recognised.

3.1.2. SCALE OF REDUCTIONS REQUIRED

As expressed in the consultation documents, predicting contaminant reductions is a complex task with many uncertainties. Models give us an idea of the direction

and size of the steps we might need to take to meet water quality targets, but they do not guarantee the outcome. The concern with using modelled data is that incorrect or inflexible regulatory responses can be made based on modelling that do not achieve environmental outcomes sought compromising or foreclosing other outcomes or opportunities.

The technical nature of the modelling and the lack of sufficient translation in the consultation material to enable non-scientists to understand the modelling does not assist the community with being able to provide meaningful feedback. Notwithstanding this point, the map graphics do identify that the scale of reductions required for the four presented contaminants is significant to meet the provisional target states.

There must be balanced consideration of environmental outcomes when setting target states. They can be ambitious but not unachievable or unreasonable when all outcomes are considered. We do not support going beyond default target states as prescribed in the NPSFM where the outcomes are unachievable.

It is not possible to provide informed feedback on the scale of reductions relative to the proposed target states based on the information presented to the community. As previously identified, there is no economic or social impact information which is critical to inform the decision making process. Without this information the consultation process itself is flawed and it would be injudicious for the Council to move the freshwater planning process forward.

3.1.3. POTENTIAL ACTIONS

We agree that mitigations will need to happen at a catchment scale, beginning at the higher end of the catchment where production activities begin. Without this the cumulative impact of activities on freshwater are not addressed and freshwater quality targets will not be achieved.

The consultation material identifies that Horizons has modelled various urban and land management practices (**actions**) to understand how communities can close the gap between the current state and the target state of freshwater. Importantly it is noted that there are some effective actions that are yet to be modelled but are being explored. It is reiterated that the provisional targets, reductions and actions are proposed in the absence of economic and social modelling results, and social impact assessment, as stated above, without this information the consultation process itself is flawed and it would be injudicious for the Council to move the freshwater planning process forward.

It is stated that the provisional actions alone will not be enough to reach provisional water quality targets in many rivers and streams across the region. We agree that with time additional actions and new innovations might assist but we do not support going beyond default target states as prescribed in the NPSFM and effectively setting up a freshwater planning framework that might fail the freshwater bodies and the community.

4. Draft Visions

The long-term vision for freshwater must be developed with communities and tangata whenua about their long-term wishes for waterbodies and freshwater ecosystems. In the Horizons region this the vision needs to include freshwater to support horticultural production and production of crops to support domestic consumption²⁴. The vision for freshwater encompasses more than just the freshwater quality targets and allocation frameworks, the visions reflect what a community and iwi feel is important to them and the freshwaters needs in their area.

It was noted at some of the Roadshow events that HortNZ, and growers in FMU where there is horticulture had submitted previously on what they thought needed to be included in the vision for their FMU, yet could not see themselves reflected in the draft vision. The key thing with the visions are that they are reflective of the community. The visions in this sense, may not be straightforward from a planning perspective, but they are intended to provide a vision of what the community values for freshwater. HortNZ notes that some specific bullet points relate to trout and hydroelectricity and cannot see why freshwater to support horticulture cannot be included given the submissions from the community.

Listed below are each of the Horizons FMU's that HortNZ is making specific comment on. The comments for each FMU are to be considered in addition to the above general comments.

4.1. Manawatū FMU

4.1.1. DRAFT VISION, VALUES AND ENVIRONMENTAL OUTCOMES FOR THE MANAWATŪ FMU

The following long term vision has been developing through the engagement process:

- 1: The FMU is managed in accordance with Te Mana o te Wai objectives and policies*
- 2: The Manawatū River becomes a source of regional pride and mana*
- 3: The Manawatū FMU and estuary are returned to a healthy condition*
- 4: The habitats of indigenous species are restored, and indigenous species can migrate naturally within the FMU*
- 5: The diversity and abundance of indigenous fish species is improved*
- 6: Land use practices minimise discharges of nutrients and other contaminants to water bodies*
- 7: Land management will minimise the extent of accelerated soil erosion, including where impacted by climate change*
- 8: The impact of water takes in managed in a manner that is responsive to climate change*
- 9: Waterways are safe, accessible and provide for swimming and other recreational uses*

²⁴ 3.3 NPSFM 2020 - [National-Policy-Statement-for-Freshwater-Management-2020.pdf \(environment.govt.nz\)](#)

10: The ongoing relationship and connection of mana whenua to waterbodies and wai tapu is provided for

11: Waterways provide good and accessible food resources

12: Where the health and well-being of the Manawatū FMU is provided for, use of the land and water resources continues to underpin the economic prosperity of the Region

13: The habitat of trout is protected and restored, where this does not adversely impact the habit of threatened species

HortNZ supports the long term vision for freshwater in the Manawatu FMU which sets appropriate goals. However, the vision could be improved by extending recognition of economic prosperity to also a vision that has regard to domestic food supply and maintaining food security for New Zealanders as follows:

*12: Where the health and well-being of the Manawatū FMU is provided for, use of the land and water resources continues to underpin the economic prosperity of the Region **and its contribution to domestic food supply and maintaining food security for New Zealanders***

Pursuant to the NOF process, the engagement has applied the compulsory values of Appendix 1A to every FMU, the other values listed in Appendix B (including Irrigation and Cultivation) and has then reconfirmed a long standing value the region has held relating to its national role in domestic food supply as follows:

Regional values

Domestic food supply

Water quality and quantity is suitable for irrigation and wash water for domestic food production.

The freshwater value of Irrigation and Cultivation and Domestic Food Supply apply to the Manawatu FMU.

As noted in the explanation of draft environmental outcomes, every value must have one or more environmental outcomes linked to it. Where a value describes a particular thing the region's communities care about, the environmental outcome articulates what success looks like in providing for that value. The environmental outcomes also link to the long-term visions - when the outcomes are achieved, the vision is achieved.

No specific environmental outcome has been proposed for the values of Irrigation and Cultivation and Domestic Food Supply that apply to the Manawatu FMU. We propose as follows:

- *Fresh water is of a suitable quality for irrigation and supports the production of food and fibre and associated processing.*
- *Sufficient water is available, and sources are resilient to climate change effects.*
- *Water quality and quantity is suitable for irrigation for domestic food supply.*

- Water quality and water quantity allocation frameworks make sufficient provision for appropriately located domestic food production.
- The quality and quantity of water used for domestic food production is resilient to climate change.

4.1.2. TARGETS, REDUCTIONS AND ACTIONS FOR MANAWATU FMU

HortNZ notes that there is consumptive water takes to support the Mangahao Power scheme. This diverts water from the upper reaches of the Mangahao and Tokomaru Rivers to the lower reaches of the Manawatū River via the Mangaore stream²⁵. HortNZ would like to better understand how much water is taken, whether there is an ability to change the Mangahao to a non-consumptive take and the impacts on the natural state of the Mangahao, Tokomaru and Manawatū rivers from the water diversion. HortNZ supports hydroelectricity generation as communities are reliant on electricity for day-to-day life, but are mindful that many land based primary production activities are being focused on to achieve water quality targets and believe hydroelectricity options need to be explored further, including consideration of impacts, ceasing consumptive takes and transition to non-consumptive schemes.

4.2. Rangitīkei-Turakina FMU

4.2.1. DRAFT VISION FOR RANGITĪKEI-TURAKINA FMU

HortNZ is concerned that by stating 2055 as a target timeframe within the draft vision will create confusion and difficulty for community to set a longer timeframe for water quality targets. HortNZ would prefer no mention of time frame in a vision to remove competition between an expectation set in a vision and the targets set to achieve the vision.

HortNZ seeks to have recognition of the role of a freshwater body and its need to support communities and production activities to occur, within the limits of that freshwater body unit. Emphasis needs to be given to water-efficiency and activities that have low-environmental impact as well as activities that support the human health needs of the population.

HortNZ seeks inclusion of the following:

‘That the waterbody is able to support production activities within its limits, with particular recognition of horticulture which supports the production of food for human health needs.’

4.2.2. DRAFT WATER QUALITY TARGETS FOR RANGITĪKEI-TURAKINA FMU

HortNZ has concerns that the draft vision developed, has been done so on the basis of community consultation, but excluded community feedback.

HortNZ notes that there is consumptive water takes to support the Tongariro Power scheme. This involved damming the Moawhango River and Mangiao Stream to create Lake Moawhango. Water upstream of the dam is diverted via

²⁵ [Manawatū Freshwater Management Unit 2023 \(arcgis.com\)](https://arcgis.com)

tunnel to the Rangipō dam and eventually into the Tongariro River in the Waikato Region²⁶.

HortNZ would like to better understand how much water is taken, whether all of the consumptive takes for hydro-electricity in the Rangitikei-Turakina FMU is for the nationally significant Tongariro Power scheme, or is some of the consumptive takes for other schemes.

HortNZ supports hydroelectricity generation as communities are reliant on electricity for day-to-day life, but are mindful that many land based primary production activities are being focused on to achieve water quality targets and believe hydroelectricity options need to be explored further, including consideration of impacts, ceasing consumptive takes and transition to non-consumptive schemes or how hydro-electricity generators can contribute to supporting work to achieve targets.

HortNZ believes fresh healthy fruit and vegetables produced locally for domestic consumption supports human health needs and is of equal importance to supporting our communities as reliable electricity

HortNZ recognises there is a Water Conservation Order (WCO) in place for the Upper and Middle Rangitikei River and recognise the correlation between the requirements of the WCO and the general better levels of water quality in this FMU. HortNZ also recognises this WCO may require higher levels of water quality in the areas of the River relating to the WCO than is required under the NPSFM 2020²⁷

There is a lack of information to provide understanding for what the targets will mean for those in the Rangitikei-Turakina FMU when implemented.

4.3. Whanganui FMU

4.3.1. DRAFT VISION FOR WHANGANUI FMU

The Whanganui FMU vision was developed later than the other FMU in the Horizons region. HortNZ is supportive of having conversations with all of community, including iwi when developing visions, but are mindful that there does not seem to be any reference to freshwater to support horticultural production.

In a transition to a low-emissions economy, and as Māori, iwi and hapu consider what direction they would like to go with their land and business interests, it is important that primary production and horticultural production is

'That the waterbody is able to support production activities within its limits, with particular recognition of horticulture which supports the production of food for human health needs.'

²⁶ [Rangitikei-Turakina Freshwater Management Unit 2023 \(arcgis.com\)](https://arcgis.com)

²⁷ [Water Conservation \(Rangitikei River\) Order 1993 \(SR 1993/15\) \(as at 19 February 1993\) - New Zealand Legislation](#)

80% of allocated water is allocated to hydro-electricity. HortNZ understands some of this is to support the nationally significant Tongariro hydro-electric scheme, but not all of the water being used and allocated is solely for this scheme.

Electricity is fundamentally important to our communities. However, so is a communities need to live, eat, and sustain itself.

HortNZ would like to better understand how much water is taken, whether all of the consumptive takes for hydro-electricity in the Whanganui FMU is for the nationally significant Tongariro Power scheme, or is some of the consumptive takes for other schemes.

HortNZ supports hydroelectricity generation as communities are reliant on electricity for day-to-day life, but are mindful that many land based primary production activities are being focused on to achieve water quality targets and believe hydroelectricity options need to be explored further, including consideration of impacts, ceasing consumptive takes and transition to non-consumptive schemes or how hydro-electricity generators can contribute to supporting work to achieve targets.

4.4. Kai Iwi

4.4.1. DRAFT VISION FOR KAI IWI FMU

HortNZ is concerned that by stating 2055 as a target timeframe within the draft vision will create confusion and difficulty for community to set a longer timeframe for water quality targets. HortNZ would prefer no mention of time frame in a vision to remove competition between an expectation set in a vision and the targets set to achieve the vision.

HortNZ seeks to have recognition of the role of a freshwater body and its need to support communities and production activities to occur, within the limits of that freshwater body unit. Emphasis needs to be given to water-efficiency and activities that have low-environmental impact as well as activities that support the human health needs of the population.

HortNZ seeks inclusion of the following in the Kai Iwi FMU vision:

'That the waterbody is able to support production activities within its limits, with particular recognition of horticulture which supports the production of food for human health needs.'

4.5. Waiopahu

4.5.1. DRAFT VISION FOR WAIOPEHU

HortNZ believes there needs to be inclusion of horticulture in the draft vision for Waiopahu and specific reference to the importance of the Horowhenua horticultural production area as nationally significant and this is why it is included as one of two Specified Vegetable Growing Areas (SVGA) listed in the NPSFM 2020²⁸. While the Judicial Review decision 13 December 2023 has quashed CI

²⁸Pg 36, [National-Policy-Statement-for-Freshwater-Management-2020.pdf \(environment.govt.nz\)](#)

3.33 and Appendix 5 of the NPSFM relating to the SVGA, this has been done on the basis that the Ministers consultation process with iwi was inadequate. During the appeal and review process evidence supporting the need and vulnerability of vegetable production was presented, this has not been challenged. We accept that without the SVGA it is not longer an option for Council to set the TAS below the bottom lines in the Horowhenua SVGA. However the level of ambition in these catchments should still be set at a level that meets at least the minimum requirements of the NPSFM, and does not compromise the supply of fresh vegetables for New Zealand. In addition to setting the level of ambition and time frame for achieving the TAS, the domestic food supply value is important for the design of the limit, to ensure provision is made within abstraction and discharge limits for water abstractions and discharges to support the supply of vegetables for the domestic market.

