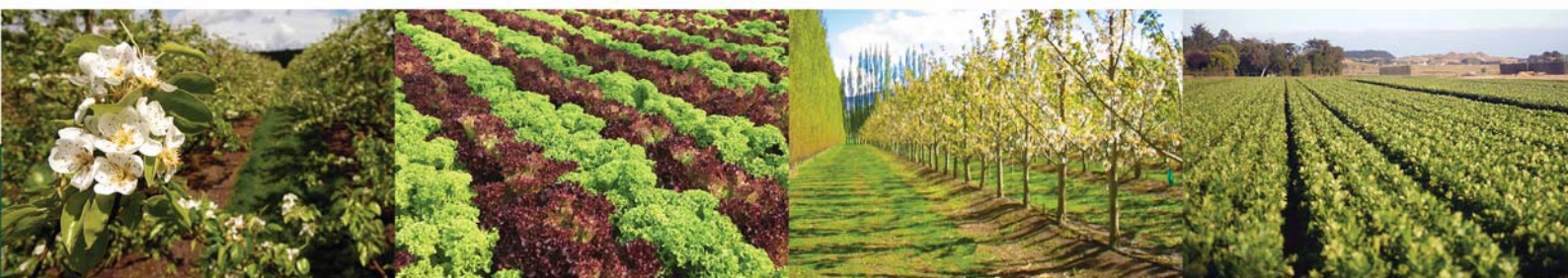


# SUBMISSION ON PC6AA to the Regional Plan: Water for Otago

4<sup>th</sup> November, 2019

**TO:** Otago Regional Council

**NAME OF SUBMITTER:** Horticulture New Zealand



## CONTACT FOR SERVICE:

Rachel McClung  
Environmental Policy Advisor – South Island  
Horticulture New Zealand  
PO Box 10-232 WELLINGTON  
Ph: 027 582 7474  
Email: [Rachel.mcclung@hortnz.com](mailto:Rachel.mcclung@hortnz.com)

## Introduction

Horticulture New Zealand (HortNZ) thanks the Otago Regional Council (ORC) for the opportunity to submit on the proposed plan change and welcomes any opportunity to work with Otago 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 from Council are set out below.

## Background to HortNZ

HortNZ was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.

HortNZ advocates for and represents the interests of 5000 commercial fruit and vegetable growers in New Zealand, who grow around 100 different crop types and employ over 60,000 workers. Land under horticultural crop cultivation in New Zealand is calculated to be approximately 120,000 hectares.

The horticulture industry value is \$5.7 billion and is broken down as follows:

<b>Industry value</b>	<b>\$5.7bn</b>
Fruit exports	\$2.82bn
Vegetable exports	\$0.62bn
<b>Total exports</b>	<b>\$3.44bn</b>
Fruit domestic	\$0.97bn
Vegetable domestic	\$1.27bn
<b>Total domestic</b>	<b>\$2.24bn</b>

For the first time New Zealand's total horticultural produce exports in 2017

exceeded \$3.44bn Free On Board value, 83% higher than a decade before.

It should also be acknowledged that it is not just the economic benefits associated with horticultural production that are important. The rural economy supports rural communities and rural production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

HortNZ's mission is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand to achieve the industry goal (a \$10 billion industry by 2020).

## 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.

The principles that HortNZ considers in assessing the implementation of the RMA include:

- The effects based purpose of the RMA;
- Non-regulatory methods should be employed by councils;
- Regulation should impact fairly on the whole community, make sense in practice, and be developed in full consultation with those affected by it;
- Early consultation of land users in plan preparation;
- Ensuring that RMA plans work in the growers interests both in an environmental and sustainable economic production sense.

## Horticulture in the Otago Region

There are approximately 191 growing operations in the Otago Region. These include a wide variety of both fruit and vegetable crops. Currently the highest concentrations of growers are in the Central Otago and Waitaki Districts. There are growers located outside these areas however.

The combination of soil and climate means that Central Otago is especially suited to growing high quality crops. Stone fruit such as; cherry, apricots, peaches and nectarines, and pipfruits (predominantly apples) are the dominant crops.

Whereas, in the Waitaki District area, a wide variety of fruit and vegetable crops are grown. These include: yams, carrots, courgettes, leeks, cabbage, pumpkin, potatoes, lettuce, broccoli, cauliflower, silverbeet, spring onions, celery, leafy greens, salad greens, brussel sprouts, tomatoes, asparagus, cucumber, apples, pears, nectarines, peaches, plums, blackcurrants, raspberries, strawberries and cherries.

## SUBMISSION

HortNZ understands that proposed PC6AA is the first of two plan changes that will address significant issues with the Regional Water Plan and strengthen the Plan's existing policy framework. This will be done in advance of developing a comprehensive plan review. ORC anticipated that the full review of the Regional Water Plan will be completed, and new planning provisions will be operative, before 1 April 2026.

HortNZ also understands, that as the proposed plan change relates to water and specifically seeks amendments to Policy 7.D.2, Rule 12.C.1.1, Rule 12.C.1.1A, Rule 12.C.1.3 and Schedule 16A. The changes sought in proposed PC6AA took immediate legal effect from the date of notification, pursuant to section 86B(1)(a) and (3) of the Resource Management Act 1991.

The proposed change effectively alters the date in the policy, rules and schedule from 1 April 2020 to 1 April 2026.

HortNZ supports the plan change in its entirety for the following reasons:

- The current rules are ambiguous, unenforceable and uncertain.
- The rules need to be updated to give effect to the NPSFM (2017) (which may be replaced with the NPSFM 2019), and the new Regional Policy Statement.
- Issuing a large number of consents under uncertain and now temporary rules is not appropriate or effective in making environmental gains.
- The proposal avoids burdening the community with unnecessary consenting costs.

HortNZ and local growers would like to work collaboratively with Council on the Regional Water Plan review.

Please do not hesitate to contact us if you have any queries.

## HortNZ's Submissions on proposed PC6AA

Sub pt	Plan provision	Support/Oppose	Reason	Decision Sought
1	Policy 7.D.2	Support	<ul style="list-style-type: none"> <li>The current rules are ambiguous, unenforceable and uncertain.</li> <li>The rules need to be updated to give effect to the NPSFM (2017) (which may be replaced with the NPSFM 2019), and the new Regional Policy Statement.</li> </ul>	Retain as notified.
2	Rule 12.C.1.1	Support		Retain as notified.
3	Rule 12.C.1.1A	Support		Retain as notified.
4	Rule 12.C.1.3	Support		Retain as notified.
5	Schedule 16A	Support	<ul style="list-style-type: none"> <li>Issuing a large number of consents under uncertain and now temporary rules is not appropriate or effective in making environmental gains.</li> <li>The proposal avoids burdening the community with unnecessary consenting costs.</li> </ul>	Retain as notified.