SUBMISSION ON

Canterbury Land and Water Plan

PC7

Friday 13th September, 2019

TO: Environment Canterbury
NAME OF SUBMITTER: Horticulture New Zealand

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Introduction

Horticulture New Zealand (HortNZ) thanks Environment Canterbury (Canterbury Regional Council/ the Council) for the opportunity to submit on the proposed Plan Change 7 (PC7) and welcomes any opportunity to work with the Council and to discuss our submission.

HortNZ also wish to thank the Council for establishing a Growers Working Group to assist in identifying the issues. While HortNZ and growers were involved in identifying the issue, we did not 'hold the pen' in drafting the proposed provisions. HortNZ were able to provide feedback to the Council on the proposed Commercial Vegetable provisions through the Resource Management Act 1991 (RMA) schedule 1 consultation process. We were not schedule 1 party for any of the other many provisions proposed within PC7. While we were very pleased to have the opportunity to provide feedback through schedule 1, we were disappointed that the issues and concerns we raised through this process have not be clarified by the notified provisions, s32 assessment or supporting technical information.

We would also like to take this opportunity to point out the lack of readability of PC7 and supporting documentation. While we acknowledge that RMA documents can be complex, it is our view that no effort has been made by the Council to present the proposed changes in a form that could be properly understood by the general public. This is a significant hurdle for many potential submitters. The PC7 documents would not meet the Government style guide[1] or readability tests[2]. It is acknowledged that the style guide quoted is a central government tool, however, local government should hold themselves to the same standard as only 16% of New Zealanders have a high level of reading ability. PC7 required an exceptional reading and comprehension ability to work through. For this reason, HortNZ prepared a summary flow diagram of the proposed commercial vegetable production provisions. It is enclosed at Attachment A to assist other submitters and decision makers.

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.

Submission structure

1. Background to HortNZ
2. HortNZ's RMA involvement
3. Horticulture in Canterbury
4. HortNZ's overall submission and high-level relief sought

   Attachment A: Summary Flow Diagram of proposed PC7 Commercial Vegetable Production Provisions.

   Attachment B: Summary of plan structure sought by HortNZ for Commercial Vegetable Production.

   Attachment C: HortNZ's specific submissions on PC7, including reasons and detailed relief sought.

[1] https://www.govt.nz/about/about-this-website/style-and-design/the-govt-nz-style-guide/#how-we-write
[2] https://www.digital.govt.nz/standards-and-guidance/design-and-ux/content-design-and-management/how-to-write-for-the-web/plain-language/

1. 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 New Zealand commercial fruit and vegetable growers, 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:

Industry value	**$5.7bn**
Fruit exports	$2.82bn
Vegetable exports	$0.62bn
Total exports	**$3.44bn**
Fruit domestic	$0.97bn
Vegetable domestic	$1.27bn
Total domestic	**$2.24bn**

For the first time New Zealand's total horticultural produce exports in 2017 /2018 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).

2. 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 grower's interests both in an environmental and sustainable economic production sense.

3. Horticulture in Canterbury Region

There are approximately 386 horticultural operations in the Canterbury Region.

They grow a wide variety of vegetable and fruit crops including: yams, carrots, courgettes, leeks, cabbage, pumpkin, squash, sweetcorn, potatoes, lettuce, broccoli, cauliflower, silverbeet, spring onions, celery, leafy greens, salad greens, herbs, beans, onions, peas, brussel sprouts, tomatoes, capsicum, asparagus, cucumber, apples, pears, nectarines, peaches, apricots, plums, feijoas, blackcurrants, raspberries, strawberries and cherries.

Growing vegetables on a large scale all year round, like growers do in Canterbury, can be challenging. The produce is delicate and susceptible to weather events. Despite this, fruits and vegetables are grown in all 10 Canterbury Water Zones.

4. HortNZ's Overall submission on PC7 and relief sought

HortNZ recognises the significant challenges in putting in place a land and water management regime within the framework of the Canterbury Water Management Strategy, which seeks to maximise opportunities for the environment, economy and communities within Canterbury, but at the same time ensuring alignment with the mandatory directives of the Resource Management Act 1991 (RMA) and higher order planning instruments such as the National Policy Statement for Freshwater Management 2014 (updated 2017) (NPSFM). HortNZ therefore wishes to acknowledge the considerable work of the OTOP Zone Committee, the Waimakariri Zone Committee and the Council in developing the extensive recommendations underpinning PC7.

HortNZ generally supports the direction of PC7, particularly the intention to provide a workable consenting framework for Commercial Vegetable Growing. However, HortNZ believes that the framework developed by the Council and included in PC7 for Commercial Vegetable Growing is fundamentally flawed as it:

1. Fails to provide clarity as to what is and what is not Commercial Vegetable Production.
2. Does not equitably provide a permitted activity status for Commercial Vegetable Production in Canterbury compared to other Farming Activities.
3. Does not acknowledge the fundamental inefficiencies and ineffectiveness of OVERSEER and Farm Portal as tools for calculating N Budgets for Commercial Vegetable Production.
4. Provides no clarity as to the evidence required to demonstrate a Commercial Vegetable Baseline Growing Area and fails to acknowledge that the baseline area is linked to a historic period in time that growers will not legally be required to hold records from 2020.
5. Does not adequately consider the growth in Commercial Vegetable Growing in Canterbury since the baseline period (2009-2013).
6. Does not adequately provide for Commercial Vegetable Production to meet the vegetable consumption demands of a growing population, and indeed prohibits this.
7. Is inconsistent with recent government essential freshwater policy announcements, in particular the newly proposed provisions for Commercial Vegetable Production within the proposed National Environmental Standard for Freshwater Management.

As a consequence of this, PC7:

1. Compromises the ability of Cantabrians and New Zealanders to access fresh local vegetables at affordable prices.
2. Does not represent the most appropriate plan provisions in terms of s32 of the RMA
3. Does not give effect to the Canterbury Regional Policy Statement and other higher-order planning instruments;
4. Inconsistent with the objectives and policies of the Canterbury Land and Water Regional Plan; and
5. Contrary to the RMA, in particular Part 2.

4.1 Background

The Commercial Vegetable Production sector has evolved considerably over the last three decades. Before that it was characterised by there being a plethora of relatively small-scale businesses producing a wide range of summer and winter leafy greens, root vegetables and other crops which were basically sent into the auction market on the day of harvest and sold for whatever the price was on the day. These businesses were predominantly run and staffed by family members.

As the supermarkets gained dominance in the local market, they started to demand year-round supply of high-quality produce which they found increasingly difficult to source from the auction market. Sourcing it directly from the producers was restricted by the relatively large number of producers so they progressively set about forming relationships with growers who they knew and trusted to supply them with the quality and quantity of produce which they required.

A number of the entrepreneurial growers very quickly recognised that there was more profit to be made post production, so they moved further up the value chain to take control of the processing, packaging, storage and marketing of their produce to both the local and export markets.

The commercial vegetable production businesses are characterised by being individually very large businesses that incorporate the full range of activity from growing through to marketing of their produce. Being fully integrated involves very significant investment in land, infrastructure, growing and harvesting plant and machinery, processing sites and equipment, storage sites and equipment and such ancillary services as freighting capability etc.

As part of this development they have also developed considerable intellectual property across the full range of production, processing and marketing of their produce.

Because both the local and international markets require very consistent quality and year-round supply, growers have had to expand the area that they grow in across New Zealand to meet this requirement. Growing in New Zealand must be seen in the context of our nationwide food producing network. Decisions made in Canterbury will impact this.

4.2 The nature of the land and environment required

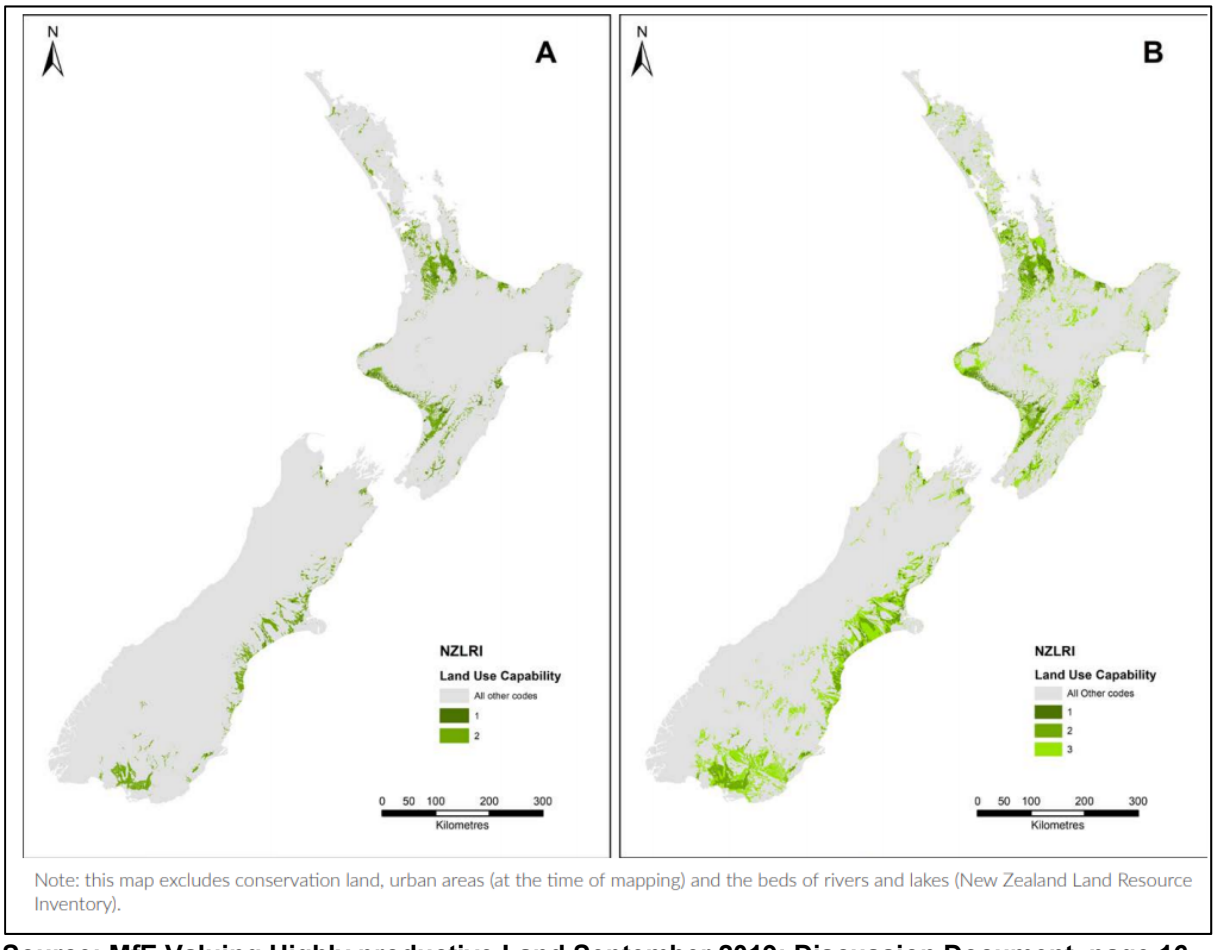
The type of soil in which growers prefer to grow are deep, free draining soils. These soils are relatively limited in abundance across the Canterbury Region and across New Zealand. This is demonstrated in Figure 1 below.

Soil underpins New Zealand's agriculture, horticulture and forestry and contributes to healthy ecosystems by helping to clean water, cycle nutrients, store carbon and grow plants and animals. Creating new soil is a slow process and can take hundreds to thousands of years, which effectively makes soil a non-renewable resource in our lifetimes. Protecting soil is essential for food security and a sustainable future. The importance of our soil resource and the current issues faced are recognised by the Government in the proposed National Policy Statement for Highly Productive Land to improve the way highly productive land is managed under the Resource Management Act 1991.

There is an extensive range of crops which are grown in Canterbury. Some which are very frost sensitive and some of which require considerable winter chilling. Some crops can be grown continuously in the same land and some crops require considerable periods before it can be grown in the same ground again to avoid disease pressure. This means that the total area of land which is used for growing in any one year will be less than the total foot print of vegetable production land.

The Commercial Vegetable Production sector tends to operate at about half the land owned by the business and half which is leased both long and short term. However, some growers operate solely on leased land. Access to the right amount of suitable soils on a lease basis is a serious issue for this sector.

Figure 1: Distribution of New Zealand's land Use Capability Classes (A) 1 and 2 and (B) 1, 2 and 3



Note: this map excludes conservation land, urban areas (at the time of mapping) and the beds of rivers and lakes (New Zealand Land Resource Inventory).

Source: MfE Valuing Highly productive Land September 2019: Discussion Document, page 16

Parts of Canterbury have top quality soils and mild climatic conditions that are vital, but increasingly hard to come by. Other factors that limit access to quality growing environments include; land ownership, District Plan zoning, access to water, access to labour, transport networks and previous land use (such as housing). Access to this type of growing environment needs to be enabled to ensure New Zealanders have fresh affordable food.

All these factors mean that suitable growing land is limited and therefore Canterbury growing operations often grow across multiple water zones or catchments in order to meet demands. This is a common practice.

Access to suitable land is being threatened by the lack of relocation and expansion opportunities available in proposed PC7.

4.3 The footprint of the sector

In total, commercial vegetable production occupies 0.003% of the total area of the Canterbury Region. Vegetable production is hard work, labour intensive and is a highly productive use of relatively small land parcels, in the right locations.

The location of where vegetables are grown in New Zealand has changed significantly over the years. This is due to a variety of factors, including the increasing ability to chill and transport food, as well as developments in packaging and processing to suit market demand. While the majority of vegetables were grown near main centres 40-50 years ago, there is now more of a reliance on large food production hubs - such as Pukekohe, the Horowhenua and Canterbury - to feed New Zealand's various population bases.

Since the Canterbury Land and Water Plan 'Baseline Period', there has been significant change in the location of growing, and total land area planted in commercial vegetable crops. As can be seen in the below table, the maximum area planted in Onions during the Baseline Period (2009 – 2013) was 870.2ha in 2012. This had increased to 1062.5ha planted in onions by 2018. Figure 3 shows the increase in potato growing area in Canterbury since the baseline period. This has increased by 1,093.9ha since 2013 and 24 new growing operations have established in Canterbury during this time. Part of the reason for this increase is population increase and therefore increase demand, but also growers have relocated from other growing regions such as Pukekohe, as they have been displaced by urban growth pressures.

Figure 2: Land area (ha) planted in Onions in Canterbury 2007-2018

onions NEW ZEALAND INC
An integrated industry

AREA PLANTED - HECTARES								2014		2015		2016		2017		2018	
	2007	2008	2009	2010	2011	2012	2013	Brown	Red	Brown	Red	Brown	Red	Brown	Red	Brown	Red
Northland/Auckland	1.3	1.5	1.7	2.3	2.8	2.5	2.5	2.0	0.7	1.7	0.8	1.4	0.7	1.5	0.8	1.8	0.7
Pukekohe	3,164.0	2,496.0	2,711.0	2,835.0	2,744.0	2,358.0	2,285.0	2,141.7	418.6	1,688.5	272.5	1,896.2	411.5	1,762.5	465.7	1,744.4	477.7
Waikato/Bay of Plenty	25.0	614.0	576.0	549.0	661.0	960.0	1,052.5	588.5	32.0	971.7	123.6	927.8	89.0	904.8	49.0	1,007.2	80.0
Gisborne								0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Hawkes Bay	621.4	638.0	584.5	656.0	714.0	728.6	732.0	667.0	37.5	710.0	49.0	762.0	51.0	819.5	42.7	636.8	47.0
Wanganui	1.0	2.0	Nil	Nil	Nil	Nil	Nil	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Taranaki to Manawatu	186.3	156.0	169.0	259.0	258.0	241.0	256.0	201.5	3.5	144.5	4.5	169.5	3.0	92.5	0.5	72.5	1.5
Horowhenua	189.0	74.0	69.5	81.0	93.0	99.0	106.0	77.1	19.9	72.5	17.0	74.0	15.4	69.2	10.6	72.4	10.6
Marlborough/Nelson	14.0	22.0	34.0	29.5	41.9	40.5	33.5	19.2	12.5	21.0	14.0	23.5	16.5	17.5	12.5	17.5	13.0
Canterbury	750.0	674.0	681.6	707.0	748.6	870.2	771.2	682.9	29.1	779.9	23.7	751.4	32.1	933.7	22.2	1,030.5	32.5
Total	4,952.0	4,677.5	4,827.3	5,118.8	5,263.3	5,299.8	5,238.7	4,379.9	553.8	4,389.8	505.1	4,605.8	619.2	4,601.2	604.0	4,583.1	663.0
Processing (all areas)					70	40	40	42.0		0.0		10.0		22.0		25.0	
*Onions intended for processing are not included in the area planted figures																	

Source: Onions NZ

Figure 3: Land area (ha) planted in Potatoes in Canterbury 2009-2018

Year	Area	Hectares	New Growers
2009	Canterbury	4981.90	3
2010	Canterbury	6034.45	5
2011	Canterbury	5814.20	2
2012	Canterbury	5548.40	2
2013	Canterbury	5281.55	2
2014	Canterbury	5300.80	3
2015	Canterbury	5205.10	2
2016	Canterbury	5512.80	5
2017	Canterbury	6051.77	6
2018	Canterbury	6375.45	8
Total		**56106.42**	**38**

Source: Potatoes New Zealand

More recently, the 2010 and 2011 Canterbury earthquakes have seen a relocation of growing further from the fringes of Christchurch City and other town centres across Canterbury. Growing land was displaced by the need for replacement housing. Displacement of growing land occurred after District and City Plan re-zoning, therefore much of the relocation is outside of the proposed baseline period (2009-2013) In addition to urban growth, displacement has also resulted from an increase in rural lifestyle subdivision within the rural zones where rural areas have seen a proliferation of 'rural lifestyle subdivision', creating significant reverse sensitivity issues for growers. This means that in recent years, growers had to relocated their operations to new locations within Canterbury in order to continue to feed Cantabrians and New Zealanders.

Furthermore, there are proposals for fruit and vegetable growing to become future land uses in the Christchurch Earthquake Red Zones. PC7 would not enable this.

Growers also need flexibility to potentially move to less environmentally sensitive locations.

The proposed National Environmental Standard for Freshwater Management includes a baseline period for commercial vegetable Production of 2013/14 to 2018/19 farm years. Using this baseline would largely address the above concerns.

These factors need to be taken into consideration for PC7 if the Council wants Cantabrians and New Zealanders to retain access to affordable fresh fruits and vegetables in Canterbury and across New Zealand. PC7 must enable commercial vegetable growing and also fruit growing.

4.4 Fruit Production

Fruit growing has a low environmental risk as they only use water in dry times to ensure a harvest crop and do not use nitrogen fertiliser. Therefore, fruit growing should be provided

for as a low intensity farming activity (such as proposed in the Waikato) and be enabled to operate and expand without excessive limitations.

It is not effective nor efficient to require fruit growers to go through costly consenting processes when they do not have the environmental impacts on water that other farming activities have.

4.5 Food security and the role for Canterbury Region

As discussed above, the vegetable production in Canterbury is an important contributor to the wider role that Canterbury plays in domestic food supply and meeting export demands. Canterbury accounting for 47% of national productivity of Carrots & Parsnips, 46% of the potato crop and 16% of lettuce[1]. Horticultural production also contributed to the economic wellbeing of the region and national GDP.

Population growth not only increases demand on housing supply, it also generates and necessitates an increased demand on food supply. There is a general assumption that New Zealand is the land of plenty and we will always have enough locally-grown food to feed our population, supplemented by imported food where there is demand. But as demonstrated above, things are changing fast. Prime fruit and vegetable growing land is being squeezed by rapid growth. Increasing urbanisation places additional pressure on, and competition for, the natural resources and infrastructure also critical for growing fruit and vegetables.

Current projections around New Zealand's expected population increase and annual food volumes available for consumption in New Zealand show that domestic vegetable supply will not be able to sustain our future population consumption needs.[3] When supply is short and demand high, prices are subject to wide variations. This can make healthy food unaffordable for many New Zealanders and often hits vulnerable communities the hardest.

Already many New Zealanders, are struggling to meet the recommended daily intake of 3 plus vegetables and 2 plus fruit a day. In 2016/2017, only 38.8 percent of New Zealand adults and 49.8 percent of children met the recommended daily fruit and vegetable intake.[4] Those living in the most deprived neighbourhoods were less likely to meet the recommended intakes and were more likely to be obese.[5] A 2008/2009 study showed that Maori females were significantly less likely to meet the required intake than non-Maori females.[6]

There is no doubt that the New Zealand Commercial Vegetable Production sector provides an essential service to the country by supplying vegetables to our predominantly urban population throughout the year at an affordable cost. Their ability to provide this service is predominantly driven by the availability of the right soil types in the required climate zones which are situated in the Canterbury regions. The alternative source of these vegetables

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[3] Horticulture New Zealand. (2017). *New Zealand domestic vegetable production: the growing story*. http://www.hortnz.co.nz/assets/Media-Release-Photos/HortNZ-Report-Final-A4-Single-Pages.pdf

[4] Ministry of Health. (2017). Annual Data Explorer 2016/17: *New Zealand Health Survey*: https://minhealthnz.shinyapps.io/nz-health-survey-2016-17-annual-data-explorer/_w_e9a07e83/_w_aa03fb73/_w_320818d4/_w_26fa6ce8/_w_f50ad45f/_w_dbba0f02/#!/explore-indicators.

[5] Ibid.

[6] Ministry of Health. (2012). *A focus on Maori Nutrition: Findings from the 2008/09 New Zealand Adult Nutritional Survey*. Wellington: Ministry of Health.

would involve significant transport costs internationally which would result in the price required to be paid for them to be too high for the majority of consumers.

Food security, fear of the unknown, and threats of trade wars are why countries all over the world, particularly those with growing populations and a food trade deficit, are starting to develop their own food supplies, even when it is expensive to do so due to lack of natural resources. Meanwhile, in our own backyard, our own farmers and growers are battling increasing compliance and urban disapproval. If New Zealand wants to be a nation of healthy people with a secure food supply, then we cannot take our food supply and our food produces and the environments in which they grow for granted anymore.

The Canterbury region's population is projected to grow by, on average, 0.9 percent a year between 2013 and 2043, which is higher than the average national growth rate of 0.8 percent a year[7]. Canterbury's population will increase from 560,000 to 730,000 between 2013 and 2043, with nearly half of that growth occurring between 2013 and 2023. Canterbury's growth contributes 14 percent of the national growth rate, and sees it maintaining 13 percent of New Zealand's population as the second most populous region. This equates to the need for an additional 600ha (approximately) in Canterbury for vegetable growing to meet the demand from Canterbury population growth.

Natural increase is projected to account for one-third of Canterbury's growth, with net migration contributing the remaining two-thirds. Canterbury's overall fertility rate (1.9 births per woman) in 2009–13 was lower than the national average (2.1 births per woman). Net migration is projected to make a significant contribution to Canterbury's projected population growth, particularly with natural increase likely to reduce over the projection period.

PC7 needs to provide a framework to allow for an increase in fruits and vegetable growing to at least meet the demand that will be generated by population growth.

4.6 Nitrate management

HortNZ have concerns about the ability to accurately assess nutrient discharges from horticultural systems, specifically the deficiencies in OVERSEER to model horticultural crops and the uncertainty that exists about the reliability of N-Check and the on-going recognition as an N-Budget tool for the life of this plan. HortNZ support an assessment of the N loss rate within an Assessment of Environmental Effect for a commercial vegetable growing operation when expanding an operation into a new area, but do not see any benefit in undertaking N budgets annually as part of a Farm Environment Plan audit. Due to the considerable inaccuracies within OVERSEER, this would be inefficient and ineffective.

There is much uncertainty around the current science that has informed both OTOP High Nitrogen Concentration Areas and Waimakariri Nitrate Priority Areas due to a lack of data that significantly impacts confidence in the modelling outcomes. Due to this there are concerns with the measured versus modelled data – some areas correlate well but for a number of others they appear to be an order of magnitude out. Both the nitrate sub-zones and long-term nitrate reductions are therefore not based on robust science.

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7 http://archive.stats.govt.nz/browse_for_stats/population/estimates_and_projections/SubnationalPopulationProjections_HOTP2013base/Commentary.aspx

HortNZ support the use of Farm Environment Plans at good management practice and believe that environmental gains will be achieved through this method for management of crops, regardless of an N budget.

4.7 Recognition of the industry led initiatives to improve practice and achieve environmental outcomes

HortNZ strongly supports recognition of industry led initiatives to improve practice and achieve environmental outcomes. Such initiatives include (but are not limited to);

- Farm Environment Plans
- Good Management Practice
- NZGAP[8], EUROGAP, and GLOBALGAP accreditation
- HortNZ Erosion & Sediment Control Guidelines for Vegetable Production (2014)
- A Code of Practice for the Management of Greenhouse Nutrient Discharges (2007) and A Growers' Guide to The Management of Greenhouse Nutrient Discharges (2007)
- HortNZ Vegetable Washwater Discharge Code of Practice

The above, and more, can be found at: http://www.hortnz.co.nz/our-work/natural-resources/GoodManagementPractice.

4.8 Water allocation priority in times of restriction for root stock protection and crops for human consumption

HortNZ support an environmental flow regime that includes a minimum flow, an allocation limit and partial restrictions.

Security of water supply is vital for food production and domestic food supply. HortNZ believes that the impact of poor planning decisions could be catastrophic on the productive capability of nationally significant production land and threaten food security. As identified in Section 3 above, a wide variety of fruits and vegetables are grown in Canterbury and this is important to the National food supply network.

The provision of this water is very important for the horticulture growers because of the inability to move the crops in times of drought or provide an external food source to maintain farm viability.

Therefore, HortNZ seeks that the environmental flow regime provides a water allocation priority in times of restriction for root stock protection and crops for human consumption, similar to the priority given to stock water.

Rootstock is part an underground part of a plant from which new above-ground growth can be produced. This is demonstrated in Figure 4 below:

[8] http://www.newzealandgap.co.nz/

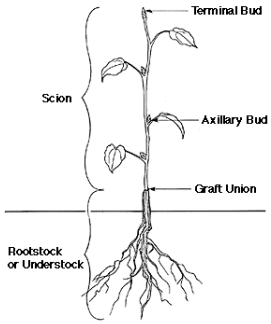


Figure 4: Plant rootstock

There is no alternative to water for the survival during drought periods. No water means plants die. This results in lost income and constraints on food supply to market for a number of years. There are potential long-term effects on productive capacity with growers giving up and walking away from former productive units. If the water is not there, there is little compelling reason to replant rootstock with no security for survival and economic return. Potential consequences include less productive rural land use or lifestyle use with incomes for resident's sourced offsite and loss of onsite rural employment opportunities.

Also, crop survival water is essential for hydroponic green houses. These operations would be devasted within 24hrs should they lose access to water. These potential economic impacts are not only felt by growers and the horticultural industry, but also on consumers who face increased prices as a result of reduced supply. Impacts also flow on to the local community, not just as consumers, but as employees and recipients of grower contributions to the community fabric (be they social or financial contributions).

Therefore, HortNZ seeks planning provision's that ensure a water allocation priority in times of restriction for root stock protection and crops for human consumption.

4.9 Managed Aquifer Recharge (MAR) and Targeted Stream Augmentation (TSA)

HortNZ supports the principal of MAR and TAR as management techniques to improve the quality and/or quantity of groundwater.

4.10 Water Reliability Standard

HortNZ supports the principal of a reliability standard for water allocation. As discussed above, water is essential for growing fruits and vegetables.

4.11 Reasonable Use Test for water

HortNZ supports the principal of a reasonable use test when renewing a water permit. However, the test must allow for tangible planned water use – i.e. for a young orchard, a reasonable use test should also consider additional water requirements for the trees as they age.

4.12 Recognition of cultural values

HortNZ supports the recognition and consideration of Ngāi Tahu values within the Canterbury Land and Water Plan as proposed. In particular, HortNZ support the proposed

Mataitai Protection Zone, Rock Art Management Areas and the Ashley Estuary (Te Aka Aka) and Coastal Protection Zone. Maori values and opportunities for Maori farming are important to HortNZ and we support recognition and initiatives for both these important matters.

4.13 Land use consent to farm - durations not exceeding 10 years insufficient timeframe

Parts B and C of PC7 recommend that resource consents to farm are granted with durations not exceeding 10 years. The timeframe is recommended as it is considered to be relative to the five-yearly monitoring and ten-yearly plan review cycles. However, in reality and under the Resource Management Act 1991 (RMA) plan review process[9], a plan review will not be completed within the 10-year timeframe recommended. The RMA requires a plan review to be commenced within 10 years, but not completed. Plan reviews take several years to complete under the RMA. They are also subject to Environment Court appeal, which lengthens the process. The reality will be that the plan provisions will not have changed, but consents will have expired.

Therefore, farmers and growers will have land use consents to farm that will expire prior to the plan review process being complete. They will have no choice but to reapply for a resource consent and ECan will then be required to process them under the operative rules, not achieving the outcomes sought by PC7.

Also, farmers and growers will not wait for the land use consent to expire before applying for a new one. Typically, the preparation for the application for a replacement consent will begin 12 to 18 months prior to the expiry with an application being lodged 12 to 6 months prior to expiry to ensure legal security of the ongoing operation. A resource consent application is a costly process. It would be a financial burden and frustration to farmers and growers to have to prepare a land use consent application based on information that could be superseded and therefore requiring amendment to the application because of new information coming to light.

HortNZ cannot see how the Council can be certain that the correct information will be available, and that the reviewed planning framework will be in place, at the time of land use consents renewal to achieve the outcomes desired.

The proposed 10-year expiry for resource consents is inefficient and will be ineffective in achieving the desired outcomes.

A 15-year land use consent timeframe would be more realistic and provide sufficient time for monitoring and the RMA plan review process to be completed.

4.14 Summary of decisions sought by HortNZ

A framework that HortNZ is seeking for Commercial Vegetable Production and Low Intensity Horticulture as follows:

- An objective that clearly states the importance of primary production for human consumption and food security.
- A policy that supports Commercial Vegetable Production.
- A policy that supports Low Intensity Horticulture.

[9] Section 79 of the RMA

- Methods that include:
    - A permitted activity for Commercial Vegetable Production at a scale that reflects actual and potential environmental impacts of the activity.
    - A permitted activity for Low Intensity Horticulture that reflects actual and potential environmental impacts of the activity.
    - Controlled activity for all Commercial Vegetable Production in Canterbury that existed up until the date of notification of PC7.
    - Restricted discretionary activity to accommodate necessary growth required in Commercial Vegetable Production in Canterbury to meet the future demands for feeding Cantabrians vegetables, in line with anticipated Canterbury population growth.
    - A discretionary activity status for new commercial vegetable (beyond the date of notification of PC7), requiring a Farm Environment Plan and that meets the lawful nitrogen loss rate applicable to the location.
    - A non-complying activity status for all other commercial vegetable production.

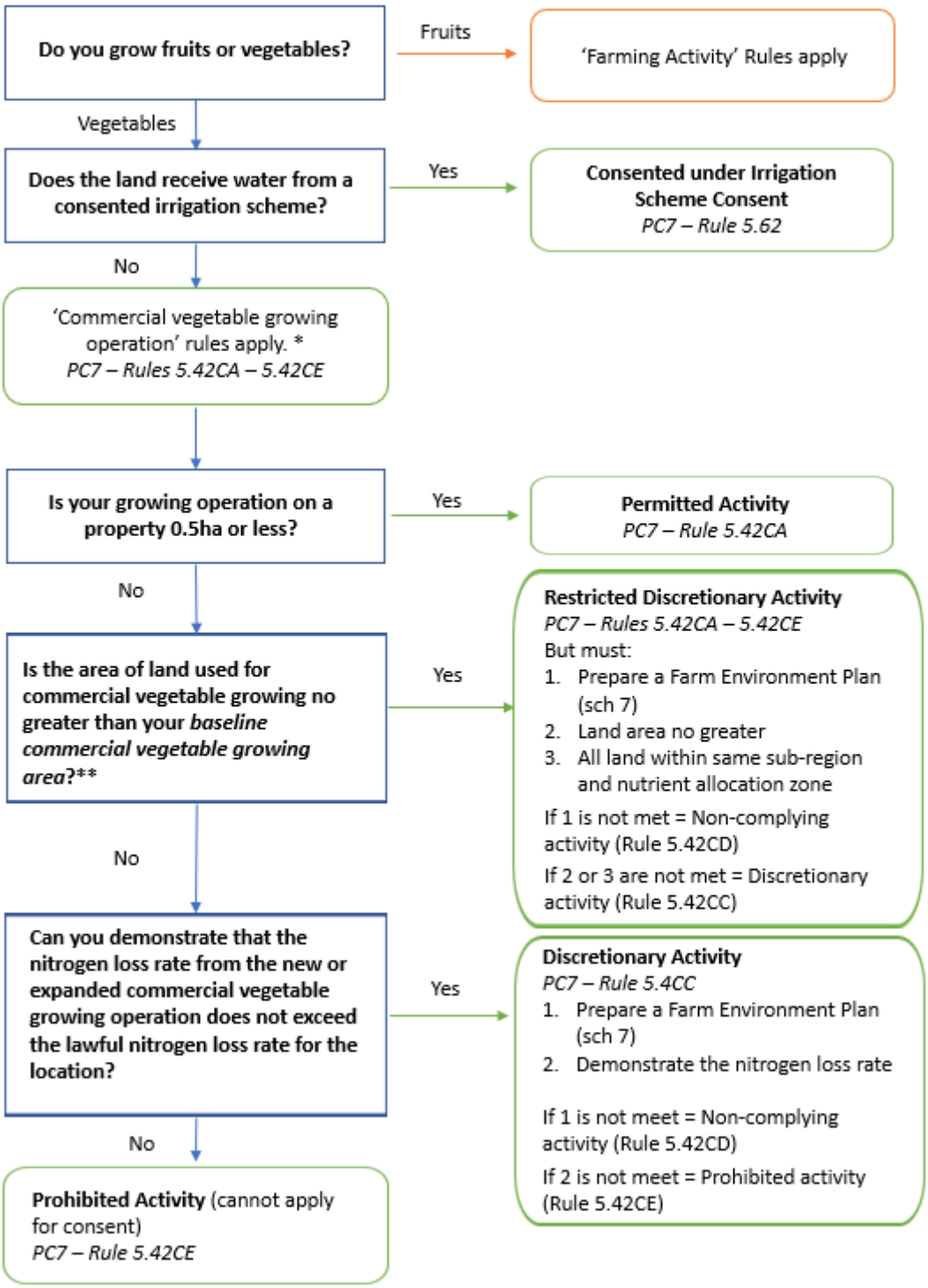
A summary flow diagram of the relief sought by HortNZ for Commercial Vegetable Production and Low Intensity Horticulture methods is enclosed at **Attachment B**. We hope that this will assist other submitters and decision makers in understanding HortNZ's submission points on these matters.

Without limiting the generality of the foregoing, HortNZ's specific concerns together with a summary of the decisions it seeks from the Council are set out in **Attachment C**.

HortNZ seeks the following decisions from the Council:

1. That the decisions sought in **Attachment C** of this submission be accepted; and/or
2. Alternative amendments to the provisions of PC7 to address the substance of the concerns raised in the submission; and
3. All consequential amendments required to address the concerns raised in this submission and ensure a coherent plan.

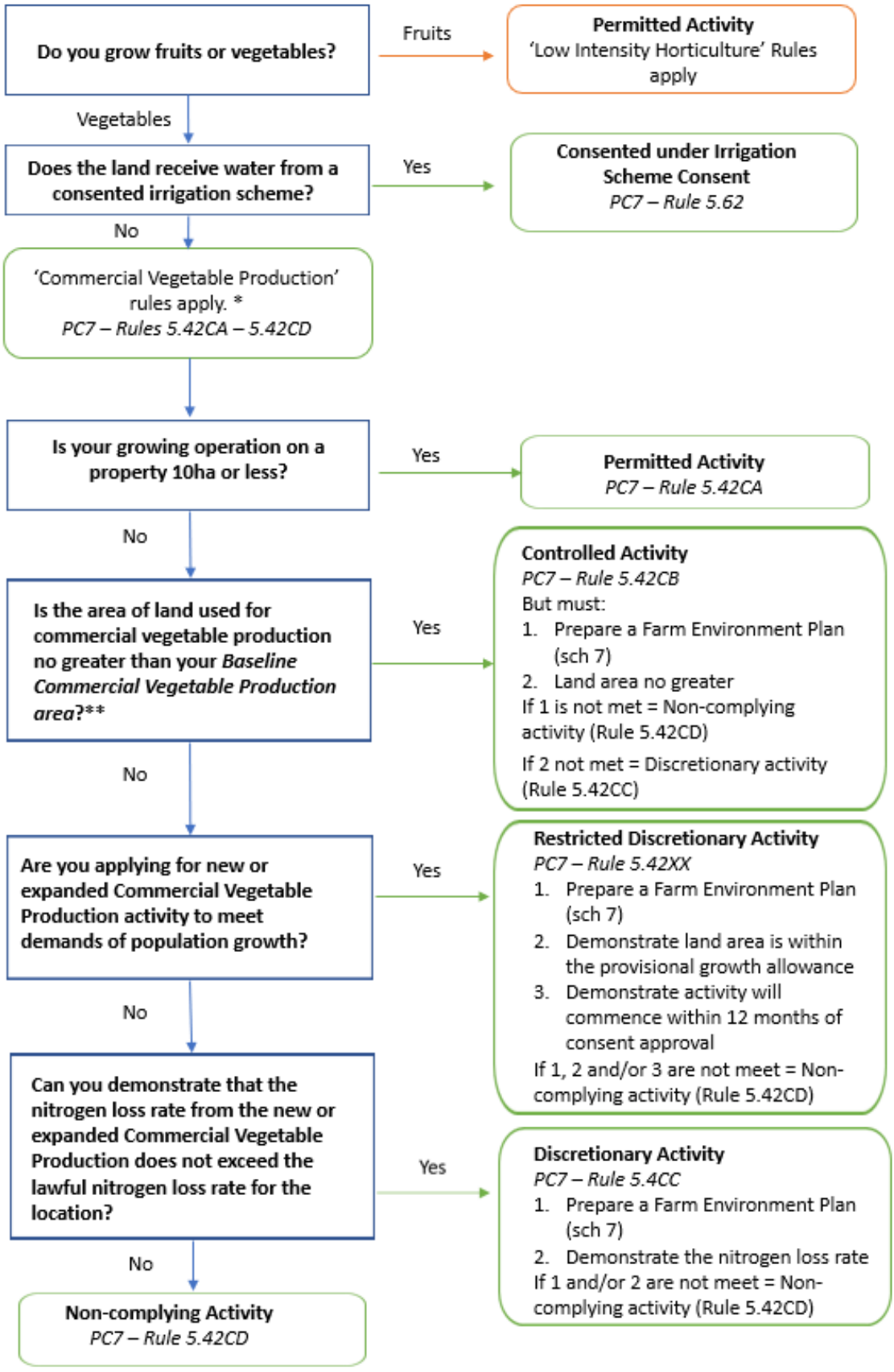
Attachment A: Summary Flow Diagram of proposed PC7 Commercial Vegetable Production Provisions



* Commercial Vegetable growing operation is a sub-set of 'farming activity' and means the growing, for the purpose of commercial gain, of vegetable crops for human consumption, and includes the full sequence of crops and pasture used as part of that rotation.

**Baseline Commercial Vegetable growing area means the aggregated area of land used for a commercial vegetable growing operation in any 12-month consecutive period within the period of 1 January 2009 to 31 December 2013 and under the control (owned or leased) of a single grower or enterprise.

Attachment B: Summary Flow Diagram of Decisions Sought for Commercial Vegetable Production Provisions



* Commercial Vegetable Production is a sub-set of ‘farming activity’ and means commercial production of predominantly vegetable crops for human consumption.

**Baseline Commercial Vegetable Production area means the aggregated area of land used for a commercial vegetable production, including the full sequence of crops and pasture used as part of a rotation in any 12-month consecutive period between 30 July 2017 and 20 July 2019 and under the control (owned or leased) of a single grower or enterprise.

Attachment C: HortNZ's Specific Submissions on PC7

(1) The specific provisions of PC7 that HortNZ's submission related to are:		(2) HortNZ's submission is that:		(3) HortNZ seeks the following decisions from Environment Canterbury (the Council) (Note: amendments sought to the text of Pc7 are shown in tracked changes, with additions shown in underline and deletions shown in ~~strikethrough~~, or to similar effect).
Section and Page number	**Plan provision**	**Support/Oppose (in part or full)**	**Reason**	**Decision Sought**
Section 2 Definitions				
Page 11	*'Baseline commercial vegetable growing area'*	Support in part	This new definition is required to provide clarity for the proposed new Commercial Vegetable Production provisions. However, the drafting as notified leaves a degree of confusion, uncertainty and inequity. While we acknowledge that the baseline period proposed aligns with the baseline period for other Farming Activities, given that it is proposed to apply to historic short-term land lease arrangements, we do not believe that the Council considered the practicalities of providing this information. We also have concerns that growers may have expanded their footprint in recent years to meet the increasing demand for food from the growing population. This has not been accounted for. Given the limited timeframe (5 years) of the baseline period, the definition as notified does not account for crops with a longer rotation such as potatoes (8-10 year) and onions (10 years)	Amend as follows: *'Baseline commercial vegetable ~~growing~~ Production area'* Means the aggregated area of land used for ~~a~~ commercial vegetable ~~growing operation production~~, including the full sequence of crops and pasture used as part of a rotation, in any 12 month consecutive period ~~within the period of 1 January 2009 to 31 December 2013~~ between 20 July 2014 to 20 July 2019 and under the control (owned or leased) of a single grower or enterprise.

			HortNZ would also seek greater clarity on the level of information that would be acceptable for a resource consent application. In the absence of any useful explanation with the proposed plan change provisions and the section 32 report, it is difficult to see how the baseline commercial vegetable growing area would be proven for such a historic time period. HortNZ does not consider the proposed timeframes to be efficient or effective in addressing freshwater outcomes. HortNZ also questions how fair and equitable the proposed timeframes are given the burden of proof that may be required. For consistency with other regional plans and national direction, the term Commercial Vegetable Production is preferred.	
Page 11	*'Commercial vegetable growing operation'*	Support in part	This new definition is required to provide clarity for the proposed new Commercial Vegetable Production provisions. However, the drafting as notified leaves a degree of confusion, uncertainty and inequity. Including the words "*and includes the full sequence of crops and pasture used as part of that rotation"* has created a high level of confusion for farmers who do not consider themselves 'commercial vegetable growers', as growing is not their main source of income, nor their dominant farming type. However, the definition as written is being interpreted as capturing any farming activity that has any amount of vegetables grown on the land at any point. Farmers are left wondering if they need two consents – one for a farming activity and one for a commercial vegetable growing	Amend as follows: *'Commercial vegetable ~~growing operation~~ production'* is a sub-set of 'farming activity' and means~~ the growing, for the purpose of~~ commercial ~~gain,~~ production of predominantly vegetable crops for human consumption~~, and includes the full sequence of crops and pasture used as part of that rotation~~.

			operation. This would be an inefficient approach to managing freshwater outcomes. The confusion has arisen from the inclusion of the words identified above. Removing these words and relocating them in the *'Baseline commercial vegetable growing area'* definition will resolve the confusion. For consistency with other regional plans and national direction, the term Commercial Vegetable Production is preferred.	
Page 11-12	'*Plantation forest or plantation forestry*'	Support	Support the full definition and in particular support subclause c. iv. which excludes trees grown for fruit or nuts from the definition.	Retain as notified.
Page 12	'Vegetation Clearance'	Support	Support the full definition and in particular the retention of clause a.	Retain as notified.
	New definition Low Intensity Horticulture	Support	Include new definition	Insert new definition as follows: <u>Low Intensity Horticulture means fruit, asparagus, vegetables grown under cover, legumes in arable rotations and berries.</u>
Section 4 Strategic policies				
Page 14	Policy 4.6	Support in Part	The importance of rootstock and crop survival water should also be recognised in this policy. The provision of this water is very important for the horticulture growers because of the inability to move the crops (trees/ bushes/ vines) in times of drought or provide an external food source to maintain viability.	Amend the policy as follows: In high naturalness water bodies listed in Sections 6 to 15, the damming, diverting or taking of water is limited to that for a person's or community's stockwater needs, an individual or community's drinking-water needs, <u>an individual or community's rootstock and crop survival water needs</u> and water

			There is no alternative to water for the survival of rootstock or crops during drought periods. No water means plants die. The ability to keep rootstock alive would mean that an orchard may not have a yield in a drought year, but the plants would be kept alive to potentially produce a yield in the following season. If growers do not have access to rootstock survival water and plants die, then it can take more than 5 years for a growing operation to recover. This involves removing dead plants, replanting and then nurturing plants until they fruit, which is typically in the 3rd or 4th year. It is an inefficient use of resources to not provide for rootstock survival water. Greenhouse crops will die within 24hrs of losing access to water.	for the operation and maintenance of existing infrastructure.
Page 17	Policy 4.36A (nutrient management)	Support in Part	It is the view of HortNZ that the policy could more strongly support the activity. As noted in discussion in section 5.5 above, it is our view that in the absence of a policy that recognises the domestic food production values of horticultural activity in Canterbury, we consider the plan change has structural challenges. It is the HortNZ view that the policy must recognises the domestic food production values of horticultural activity in Canterbury is needed to support the proposed commercial vegetable production provisions. Also, the proposed policy must be supported by an appropriate objective. As no objectives were	4.36 A Recognise the particular constraints that apply to commercial vegetable ~~growing operations~~ production (including the need to rotate crops to avoid soil borne diseases and for growing locations in close proximity to processing facilities) and provide a nutrient management framework that appropriately responds to and accommodates these constraints while improving or maintaining water quality by: a. requiring commercial vegetable ~~growing operations~~ production to operate at good management practice; b. ~~avoiding~~ limiting the establishment of a new commercial vegetable ~~growing operation~~ production, or any expansion of an existing

			notified in PC7, a consequential amendment to this plan change will be required to appropriately address this issue. Policy 4.36A(a) – support with consequential amendments. Policy 4.36A(b) should reflect the proposed rule frame work and read as 'limiting' rather than avoiding. The 'avoidance' policy approach is unnecessarily negative and discouraging of an activity that is a critical contributor to the domestic food production system. Policy 4.36A(c) - In order for a growing operation to reduce a nutrient loss, is it possible for a growing operation to offset a nutrient loss rate with increasing land area? How will a resource consent application demonstrate improvements in N budgets, other than to decrease yield and impact domestic food supply and the economic viability of a growing operation? Policy 4.36A(d) raises the question of whether a commercial vegetable production is subset of a commercial vegetable production enterprise or not? Currently some growing operations operate in multiple catchments. Would their commercial growing enterprise default to a discretionary activity (Rule 5.42AB) because their existing operation is across multiple catchments, or would the plan be administered in a way that the enterprise would seek a restricted discretionary activity consent in each catchment (Rule 5.42AA)? This issue needs to be considered in light of this proposed policy and rules 5.42AA and 5.42AB so that there is no confusion or unintended consequences in plan implementation.	commercial vegetable ~~growing operation~~production beyond the baseline commercial vegetable growing area, to locations where ~~unless~~ the nitrogen losses from the operation can be accommodated within the lawful nitrogen loss rate applicable to the new location; c. Recognise the inter-generational domestic food supply values associated with commercial vegetable production. d. requiring commercial vegetable ~~growing operations~~production to demonstrate, at the time of application for resource consent ~~and at the time of any Farm Environment Plan audit,~~ how any relevant nutrient loss reduction set out in Sections 6 to 15 of this Plan will be achieved; ~~d.~~e. constraining, as far as practicable, land rotation of a commercial vegetable ~~growing operations~~production to within the same ~~a single~~ nutrient allocation zone or sub-region; and ~~e.~~ f. requiring a Farm Environment Plan as part of any application for resource consent, and requiring that Farm Environment Plan to be prepared in accordance with Schedule 7 of this Plan.

			It is our understanding that these provisions will supersede the sub catchment regulations, but the activity will still be subject to the sub catchment reductions (as per the assessment criteria). We understand the need to consider what this might mean for a sub catchment, and suggest the policy would be better worded. Policy 4.36A(e) – support.	
Page 18	Policy 4.47 (damming and diversion of water bodies)	Support	Include rootstock and crop survival water also.	Amend to include additional provision to recognise maintaining intakes for rootstock survival water: 4.47 …. <u>f. maintaining intakes for rootstock and crop survival water.</u>
Page 19	Policy 4.99 (Managed Aquifer recharge)	Support	HortNZ supports the principal of MAR as a management technique to improve the quality and/or quantity of groundwater, but also seek that the importance of rootstock and crop survival water is recognised within the policy also.	4.499 …. (d) adverse effects on the availability, quality and safety of human and animal drinking water<u>, and rootstock and crop survival water</u> are avoided; …
Page 19	Policy 4.101	Support	HortNZ support the intent of this policy and consider that the HortNZ industry codes of practice (see section 5.8 above) would be appropriate mitigation to avoid damage or loss of indigenous freshwater species habitat.	Retain as notified.
	New Policy	Support	A new policy to support low intensity horticulture for the reasons outlined in Section 4.4 above. The proposed policy must be supported by an appropriate objective. As no objectives were notified in PC7, a consequential amendment to	4.XX Recognise that low intensity horticulture has a negligible environmental impact and provide a nutrient management framework that appropriately manages this while improving or maintaining water quality.

			this plan change will be required to appropriately address this issue.	
Section 5 Region-wide rules				
Pages 26 to 28	Rules 5.24, 5.26,5.26A, 5.27, 5.28 and 5.28 A (Offal and Farm Rubbish Pits)	Support	HortNZ supports the proposed rules for offal and farm rubbish pits to ensure that potential contamination of freshwater is appropriately managed.	Retain as notified.
Page 29	Note 2 (nutrient management)	Support	The note provides clarification.	Retain as notified with consequential amendments to rule numbering and terms as needed.
Page 29	Rule 5.41 (all nutrient allocation zones)	Support	Consequential amendment is necessary.	Retain as notified.
Commercial Vegetable Growing Operations				
Page 30	Rule 5.42CA	Oppose in part	The region wide permitted activity rules for Farming Activities (Rule 5.41) appear to not relate to commercial vegetable production and therefore the permitted activity provisions of the sub catchments become unavailable to commercial vegetable growing as the proposed Rule 5.42CA supersede these rules. The area of 0.5ha proposed as a permitted activity for commercial vegetable production is inequitable, inefficient and a wholly ineffective rule. The cost of a consenting process to obtain	Amend as follows: 5.42CA The discharge of nutrients from a commercial vegetable growing operation on a property ~~0.5~~ 10 hectares or less in area is a permitted activity.

			consent for a small growing operation that is only slightly larger than 0.5ha will mean that smaller growers cease to operate. HortNZ questions whether a commercial vegetable production can be viable at 0.5ha.	
Page 30	Rule 5.42CB	Oppose in part	A controlled activity status provides more certainty to the industry and for current domestic food supply. A controlled activity also allows existing commercial vegetable production to move into a consented position (where required) as efficiently and effectively as possible. However, we again raise concern that a number of growers have expanded their footprint in recent years and moved locations between catchments due to competing land uses putting pressure on growing operations, and to meet the increasing demand for food from the growing population. This issue is discussed in Section 5.4 above. Therefore, as proposed this rule will not be available to many existing vegetable growers. Also, HortNZ the amendments sought to Rule 5.42CB must be considered in conjunction with the amendments sought to the definition of *Commercial Vegetable Production Area* which alters the baseline period to include all existing growing.	Amend as follows: 5.42CB The discharge of nutrients from a commercial vegetable ~~growing operation~~production that does not meet Rule 5.42CA is a ~~restricted discretionary~~ controlled activity, provided the following conditions are met: 1. A Farm Environment Plan has been prepared for the activity in accordance with Part A of Schedule 7 and is submitted with the application for resource consent; and 2. The aggregated area of land used for the commercial vegetable growing operation is no greater than the baseline commercial vegetable growing area~~; and~~. ~~3. All land that forms part of the commercial vegetable growing operation is located within the same sub-region and Nutrient Allocation Zone.~~ The exercise of ~~discretion~~control is restricted to the following matters: 1. The timing of any actions or good management practices proposed to achieve the objectives ~~and targets~~ described in Schedule 7; and 2. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 3. The commencement date for the first audit of the Farm Environment Plan and methods to address any non-compliance identified as a result

				of a Farm Environment Plan audit, including the timing of any subsequent audits; and 4. Methods that demonstrate how any nutrient loss reductions required by Sections 6 to 15 of the Plan will be achieved; and 5. Reporting of progress made towards any nutrient loss reductions required by Sections 6 to 15 of the Plan, and any actions implemented to remedy issues identified in any audit of the Farm Environment Plan; and 6. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6 to 15 of the Plan if the region-wide rules continue to apply in the sub-region.
	New rule	Support	A new rule is required to provide for expansion of commercial vegetable production to meet demand generated by population growth during the life of this plan. It is anticipated that this would total an additional 600ha across Canterbury to meet demand up until 2030.	Amend as follows: 5.42XX (provisional growth) The discharge of nutrients from a commercial vegetable production that does not meet Rule 5.42CB is a restricted discretionary activity, provided the following conditions are met: 1. A Farm Environment Plan has been prepared for the activity in accordance with Part A of Schedule 7 and is submitted with the application for resource consent; and 2. The cumulative net total of land for provisional growth of commercial vegetable production in Canterbury has not exceeded 600ha. 3. The area of land sought will be in commercial vegetable production within 12 months of consent approval. The exercise of ~~discretion~~control is restricted to the following matters: 1. The timing of any actions or good management practices proposed to achieve the objectives described in Schedule 7; and

				2. Methods to avoid or mitigate adverse effects of the activity on surface and groundwater quality and sources of drinking water; and 3. The commencement date for the first audit of the Farm Environment Plan and methods to address any non-compliance identified as a result of a Farm Environment Plan audit, including the timing of any subsequent audits; and 4. Methods that demonstrate how any nutrient loss reductions required by Sections 6 to 15 of the Plan will be achieved; and 5. Reporting of progress made towards any nutrient loss reductions required by Sections 6 to 15 of the Plan, and any actions implemented to remedy issues identified in any audit of the Farm Environment Plan; and 6. Methods to prevent an exceedance of any relevant nutrient load limit set out in Sections 6 to 15 of the Plan if the region-wide rules continue to apply in the sub-region. 7. Methods to demonstrate the cumulative net total for provisional growth of commercial vegetable production has not exceeded 600ha across Canterbury. 8. Methods to demonstrate that commercial vegetable production will be undertaken on the land within 12 months of the consent approval.
Page 30	Rule 5.42CC	Support in part	Consequential amendments required due to submission point above.	5.42CC The discharge of nutrients from a commercial vegetable growing operation that does not comply with condition 2 ~~or 3~~ of Rule 5.42CB <u>or Rule 5.42XX (provisional growth)</u> is a discretionary activity provided the following conditions are met: 1. A Farm Environment Plan has been prepared for the activity in accordance with Part A of Schedule 7 and is submitted with the application for resource consent; and

				2. The nitrogen loss rate from the new or expanded commercial vegetable growing operation does not exceed the lawful nitrogen loss rate applicable to the proposed location.
Page 30	Rule 5.42CD	Support in part	Consequential amendments required due to submission point below. This non-complying activity status must be supported by an appropriate objective and policy framework. As no objectives were notified in PC7, a consequential amendment to this plan change will be required to appropriately address this issue.	Amend as follows: 5.42CD The discharge of nutrients from a commercial vegetable growing operation that does not comply with condition 1 of Rule 5.42CB or condition 1 or 2 of Rule 5.42CC, is a non-complying activity.
Page 31	Rule 5.42CE	Oppose	The proposed prohibited activity status will have a direct impact on the food security of Canterbury and New Zealand. This proposed rule does not give consideration to the need to expand growing to feed a growing population. There must be provision in this plan to allow commercial vegetable growers to produce enough vegetables to feed New Zealanders. Nutrient discharge from vegetables is negligible at a catchment level. Appropriate management of freshwater can be achieved within the proposed framework without the need for a prohibited activity status. The necessity of food security is discussed in section 5.5 above. In addition, a stronger Objective and Policy framework (as sought by HortNZ) will provide the necessary guidance for consideration of any non-complying activity consent application.	Delete rule ~~5.42CE The discharge of nutrients from a commercial vegetable growing operation that does not comply with condition 2 of Rule 5.42CC is a prohibited activity.~~

Page 31	Irrigation Schemes Note 3	Support	The note provided clarification that a second consent under the Commercial Vegetable Production rules is not required if the activity is already consented under an irrigation scheme consent.	Retain note with consequential amendments to rule numbering and terms as needed.
Page 32	Rule 5.63 and Rule 5.64 (Incidental Nutrient Discharges)	Support	Support consequential amendments that acknowledge new Commercial Vegetable Production rules.	Retain note with consequential amendments to rule numbering and terms as needed.
Page 32	Fertiliser use Note	Support	Support consequential amendments that acknowledge new Commercial Vegetable Production rules.	Retain note with consequential amendments to rule numbering and terms as needed.
Page 36	Rule 5.115 (Small and Community Water Takes)	Support in part	The importance of rootstock and crop survival water should also be recognised in the matters of discretion for this rule.	Amend as follows: Rule 5.115 … The exercise of discretion is restricted to the following matters: 1. The reasonable demand for water, taking into account the size of the community, the number of properties, ~~and~~ stock, and rootstock and crops that are to be supplied, the uses that are to be supplied and the potential growth in demand for water; and …
Pages 52 – 53	Rules 5.191 - 5.193	Support in part	HortNZ supports the principal of managed aquifer recharge and the inclusion of the proposed rules to guide consenting. We seek reference to rootstock and crop survival water within Rule 5.191 matters of discretion.	Amend Rule 5.191 as follows: 5.191 … The exercise of discretion is restricted to the following matters: …. 13. Any adverse effects of the discharge on water quality in the receiving groundwater and any hydraulically connected surface water bodies,

				including the availability, quality and safety of human and animal drinking water, and rootstock and crop survival water; and
Low intensity Horticulture				
	New Rule (Low Intensity Horticulture)	Support	HortNZ seeks a permitted activity status for low intensity horticulture for the reasons stated in Section 4.4 above, and consequential amendments required to notes and rule numbering. The activity status reflects the level of potential and actual environmental impacts of the activity.	Insert new rule 5.42XX The discharge of nutrients from Low Intensity Horticulture is a permitted activity.
Section 8 Waimakariri				
Pages 55 - 59	Introductory narrative (description and figure of Waimakariri Sub-region and Freshwater management units)	Support in part	HortNZ supports the clarification provided by the inclusion of a map, descriptions of the zone and freshwater management units, and a description of 'What this Plan does'. HortNZ seeks an addition to the description of the zone that acknowledges horticultural activities in the zone and their importance to the wider national food security network.	At a minimum amend by including a description of horticultural activities should be included in the Zone description and acknowledgment of the important of produce grown in Waimakariri in being part of the wider national food supply network.
Page 63	8.4.12 (Abstraction of water)	Support in part	The importance of rootstock survival water should also be recognised in this policy. The provision of this water is very important for the horticulture growers because of the inability to move the crops (trees/ bushes/ vines) in times of drought or provide an external food source to maintain viability.	Amend as follows: Avoid flows in surface waterbodies falling below the minimum flows in Tables 8-1 and 8-2 due to water abstraction, by implementing Waimakariri pro-rata partial restrictions on all abstractions except abstractions for stock drinking water, rootstock and crop survival water and community water supply purposes

			There is no alternative to water for the survival of rootstock during drought periods. No water means plants die. It is an inefficient use of resources to not provide for rootstock survival water. Rootstock Survival water is discussed further in Section 5.7 above.	
Pages 64-65	Polices 8.4.17 and 8.4.18 (Transfers of Water Permits)	Support in part	The importance of rootstock survival water should also be recognised in Policy 8.4.18. Rootstock Survival water is discussed further in Section 5.7 above.	Retain Policy 8.4.17 as notified and amend Policy 8.4.18 as follows: 8.4.18 … b. requiring, in over-allocated Surface Water Allocation Zones and except where the water is to be used for community supply ~~or~~, stock drinking water~~,~~ and rootstock and crop survival water that 50 percent of the water proposed to be transferred is surrendered and not re-allocated.
Page 65	Policies 8.4.19 to 8.4.21 (Targeted Stream Augmentation)	Support	HortNZ supports targeted stream augmentation as a method to improve water quality and acknowledges that it should be supported by an appropriate policy framework.	Support
Page 70	Policy 8.4.36 (Consent Expiry and Duration)	Oppose in part	The proposed 10-year expiry for resource consents is inefficient and will be ineffective in achieving the desired outcomes. A 15-year land use consent timeframe would be more realistic and provide sufficient time for monitoring and the RMA plan review process to be completed. This is discussed further in Section 5.9 above.	Amend as follows: 8.4.36 Provide for the regular review and adjustments in progress towards achieving the freshwater outcomes and limits for the Waimakariri subregion, by applying the following common expiry dates to resource consents: a. 1 July 20~~37~~42 for resource consents granted for the use of land for a farming activity;

				b. 1 July 20~~37~~42 for resource consents granted for the discharge of nutrients by an irrigation scheme or principal water supplier; c. 1 July 20~~37~~42 for resource consents granted for the take and use of water; d. 1 July 2047 for any resource consent that replaces an existing water permit that expires after 1 July 2030 and that is affected by the provisions of section 124-124C of the RMA.
Page 70	Policy 8.4.37 (Consent Expiry and Duration)	Oppose in part	The proposed 10-year expiry for resource consents is inefficient and will be ineffective in achieving the desired outcomes. A 15-year land use consent timeframe would be more realistic and provide sufficient time for monitoring and the RMA plan review process to be completed. This is discussed further in Section 5.9 above.	Amend as follows: 8.4.37 Apply the following durations to any resource consent granted after the relevant common expiry date in Policy 8.4.36: a. 1~~0~~5 years for resource consents for the use of land for a farming activity; and b. 1~~0~~5 years for resource consents for the discharge of nutrients by an irrigation scheme or principal water supplier; and c. 1~~0~~5 years for resource consents for take and use of water.
Section 8.5 Rules				
Page 80	Note (Nutrient Management)	Support	The note provides clarification.	Retain note with consequential amendments to rule numbering and terms as needed.
Section 11.5 Rules Selwyn Te Waihora				
Page 104	Note 4 (Nutrient Management,	Support	The note provides clarification.	Retain note with consequential amendments to rule numbering and terms as needed.

	Sediment and Microbial Contaminants)			
Section 13.5 Rules Ashburton				
Page 114	Note 2 (Nutrient Management, Sediment and Microbial Contaminants)	Support	The note provides clarification.	Retain note with consequential amendments to rule numbering and terms as needed.
Section 14 Orari-Temuka-Opihi-Pareora				
Pages 120 - 126	Introductory narrative	Support in part	HortNZ supports the clarification provided by the inclusion of a map, descriptions of the zone, cultural significance, freshwater management units and high nitrogen concentration areas. HortNZ seeks an addition to the description of the zone that acknowledges horticultural activities in the zone and their importance to the wider national food security network.	At a minimum amend by a description of horticultural activities should be included in the Zone description and acknowledgment of the important of produce grown in OTOP in being part of the wider national food supply network.
Section 14.4				
Page 134	Policy 14.4.13	Oppose in Part	The importance of rootstock and crop survival water should also be recognised in Policy 14.4.13. Rootstock Survival water is discussed further in Section 5.7 above.	Amend as follows: 14.4.12 … b. requiring in over-allocated surface water catchments and groundwater allocation zones and except where the water is to be used for

				community supply ~~or~~, stock drinking water, rootstock and crop survival water that a portion of water to be transferred is surrendered that is proportionate to the status of over-allocation in the catchment, up to a maximum of 75%; and …
Page 136	Policy 14.4.22	Oppose in Part	The importance of rootstock survival water should also be recognised in Policy 14.4.22. Rootstock and crop survival water is discussed further in Section 5.7 above.	Amend as follows: 14.4.22 Over-allocation of fresh water in the Orari Freshwater Management Unit is addressed by Timaru District Council demonstrating, on or before 2044, increased efficiency for any replacement of CRC173644, or any variation thereof; and security of supply for community drinking water, ~~and~~ stockwater and rootstock and crop survival water is protected by continuing to reserve a total flow rate of 235 L/s for Timaru District Council community drinking and stock water, in addition to the volumes in Table 14(h), which form part of the environmental flow and allocation regime for Orari Freshwater Management Unit.
Section 14.5 Rules				
Page 148	Note (Individual Farming Activities)	Support	The note provides clarification.	Retain note with consequential amendments to rule numbering and terms as needed.
Section 15A Waitaki and South Coastal Canterbury				

Page 179	Note 2.	Support	The note provides clarification.	Retain note with consequential amendments to rule numbering and terms as needed.
Section 15B Waitaki				
Page 181	Note (Nutrient Management)	Support	The note provides clarification.	Retain note with consequential amendments to rule numbering and terms as needed.
Pages 189 to 196	Schedule 7 Farm Environment Plan	Support in Part Oppose in Part	Support the additions that recognise Commercial Vegetable Production within Schedule 7. Although the term Commercial Vegetable Production should be used. However, HortNZ oppose N budget requirements for ongoing FEP audits and reporting. This is an ineffective and inefficient method as discussed in Section 4.6 above. There is no certainty with the reliability or availability of N Check for the life of this plan. It is also inconsistent with the proposed provisions for Commercial Vegetable Production in the NES - FM Farm environment plans and Good Management Practice are environmental management tools supported by HortNZ.	Consequential amendments to terms as needed. Remove N budget requirements for Commercial Vegetable Production FEP audits, in particular clause 4B.
Page 197 to 199	Schedule 7A Management Plan for Farming Activities	Support	HortNZ generally support the content of the Schedule 7A as proposed and specifically support acknowledgement that a Management Plan can be a Plan prepared in accordance with an industry prepared Farm Environment Plan template that has been certified by the Chief Executive of Environment Canterbury as providing at least an equivalent amount of information and practice guidance contained in Part B. NZGAP is approved as an IOS Accredited Audit Programme.	Consequential amendments to terms as needed.