

**BEFORE THE HEARING COMMISSIONERS
AT WELLINGTON REGIONAL COUNCIL**

IN THE MATTER

of the Resource Management Act
1991 ("**the Act**")

AND

IN THE MATTER

of the Proposed Natural Resources Plan for
Wellington Region Hearing Stream One

**STATEMENT OF EVIDENCE BY ANGELA PHYLLIS
HALLIDAY FOR HORTICULTURE NEW ZEALAND**

13 June 2017

QUALIFICATIONS AND EXPERIENCE

1. My name is Angela Phyllis Halliday. I am the Manager, Natural Resources and Environment with Horticulture New Zealand (“HortNZ”). I have been in this role since July 2016 and prior to this I was Advisor, Natural Resources and Environment with HortNZ from April 2014. I have been involved in the Product Development Group for the Matrix of Good Management Project including developing the Industry Agreed Good Management and was the OVERSEER® Guidance Governance Group to develop guidance for the use of the OVERSEER® model in a regulatory context for Regional Councils.
2. Prior to that I was in a compliance role at the Southland District Council which focused on Resource Management and Environmental Health. Prior to this I worked in an Economic Development Agency in Southland in a marketing based role and was a member of the Southland Conservation Board from 2008 – 2010.
3. I have qualifications in science (BSc) with a major in Zoology and a graduate Diploma of Wildlife Management from Otago University. I am currently studying extramurally towards a Masters in Resource and Environmental Planning and have a Graduate Diploma of Environmental Health from Massey University. I am involved with District and Regional Council policy and planning processes throughout New Zealand in both the pre-plan collaborative process and post plan implementation process.
4. In my role at HortNZ I am responsible for managing and implementing HortNZ’s involvement in planning processes at a district, regional and national level.
5. As a result of this role, my qualifications, and previous experience, I consider that I have an understanding of farming systems and the impacts of water related policy decisions from both a farming/growing perspective and a from an environmental health/ecosystem health perspective.

SCOPE OF EVIDENCE

6. This evidence provides a statement about horticulture in the Wellington Region to provide an overview that will be relevant to all hearing streams
7. In preparing this evidence I have relied on the planning assessment by Lynette Wharfe as to how the matters addressed in Hearing Stream One of the proposed Natural Resources Plan (“pNRP”) will affect horticultural operations.
8. Matters addressed in this evidence are:
 - a) Background to HortNZ and its RMA involvement
 - b) Horticulture in New Zealand
 - c) Horticulture in Wellington Region
 - d) Main issues for horticulture

BACKGROUND TO HORTNZ AND ITS RMA INVOLVEMENT

9. 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.
10. On behalf of all active growers HortNZ takes a detailed involvement in resource management planning processes as part of its national environmental policy. HortNZ works to raise growers’ awareness of the RMA to ensure effective grower involvement under the Act, whether in the planning process or through resource consent applications. The principles that HortNZ considers in assessing the implementation of the Resource Management Act 1991 (RMA) include:
 - a) The effects based purpose of the RMA;
 - b) Non-regulatory methods should be employed by councils;
 - c) Regulation should impact fairly on the whole community, make sense in practice, and be developed in full consultation with those affected by it;
 - d) Early consultation of land users in plan preparation;
 - e) Ensuring that RMA plans work in the growers’ interests both in an environmental and economic production sense.

HORTICULTURE IN NEW ZEALAND

11. Nationally, the sector represents 5600 growers producing around

110 crops (focused on producing food for people). Roughly \$2.9 billion in domestic revenue is generated yearly, and another \$3.2 billion of fresh on board value is produced for export.

12. The industry body is committed to continuous environmental improvement, and has spent significant resource on a good management practice program for growers, covering issues of significance to markets and Regional Councils, known as NZGAP.
13. HortNZ manages issues that cover and affect the whole horticulture industry (excluding winegrowers and winemakers).
14. Many of the issues are common between plans, so HortNZ also provides input to policy at the national level, which is focussing currently on matters that affect growers in District and Regional Planning processes.
15. HortNZ is the umbrella organisation for 21 separate product groups covering 110 crops that are outlined in the Commodity Levies (Vegetables and Fruit) Order 2007. Product groups are also levy collecting organisations working on sector specific matters in collaboration with HortNZ which is working on industry specific matters.

HORTICULTURE IN THE WELLINGTON REGION

16. Horticulture in the Wellington region has changed over time with fewer growers and Wellington city itself relying on food mostly grown outside the region. A study carried out for Wellington City Council in 2008 found that Wellington imports 81% of its fresh produce from outside the region.¹
17. The study also identified a reduction in the number of growers from 172 in the early 90's to 76 on our database today. This consolidation of growing operations is not unusual with increasing regulatory requirements, production costs, land prices with urban encroachment and lifestyle changes all being contributing factors to growers leaving the industry.
18. Currently there are approximately 400 hectares of fruit and 130 hectares of vegetables planted in the Wellington region.
19. With New Zealand's increasing population domestic food supply is an issue that HortNZ is concerned about nationally and with the few growers left in the Wellington region a recognition of the importance

¹ <http://wefs.co.nz/sites/default/files/Food%20security%20Wellington.pdf>

of food production and in particular fresh fruit and vegetables would be prudent in the current plan to ensure a sustainable supply of locally grown produce into the future.

MAIN ISSUES FOR HORTICULTURE IN PNRP

20. The main issues for horticulture in Wellington Region are:
- a) Recognition of the importance of food production
 - b) Recognition of the importance of rural production activities
 - c) Recognition of the importance of values as part of the meeting the NPSFM
 - d) Setting of appropriate limits and targets under the NPSFM
 - e) Access to water
 - f) Reverse sensitivity

Recognition of the importance of food production

21. Food production and local food security has been raised as an issue by the Wellington City Council in their Wellington Resilience Strategy.
22. HortNZ's vision is 'Healthy food for all forever' in order to achieve this there needs to be a recognition of the importance of food grown in particular regions not only supply the local market but also support other regions fruit and vegetable requirements as well.

Recognition of the importance of rural production activities

23. HortNZ seeks that there is recognition of rural production activities and that these are enabled through the Plan.
24. Retention of land for horticultural production is important and so policies in the Plan are needed to enable that production.

Recognition of the importance of values as part of the meeting the NPSFM

25. The evidence of Lynette Wharfe sets out concerns with how values are provided for in the PNRP.
26. Values are an important component of the NPSFM. I note that the proposed changes to the NPSFM has an additional Policy AAA1 that includes:
local and regional values identified through engagement and discussion with the community, including tangata whenua, must inform the setting of freshwater objectives and limits
27. While the PNRP does not need to give effect to proposed changes to the NPSFM it would be wise to ensure that the direction set out is incorporated into the PNRP.

Setting of appropriate limits and targets under the NPSFM

28. The Council has made it clear that the setting of limits and targets to meet the NPSFM will be through the Whaitua process with plan changes for specific catchments. HortNZ supports this approach.
29. HortNZ does not support 'interim limits' being set through the PNRP. Prior to limits being set community values need to be assessed in the context of what is happening in the environment at a catchment level and limits/allocation needs to be set with the science support from hydrological and biophysical models that are informed with actual measurements. Whilst there may be some ways of limiting landuse change (as has been explored by other regional councils) this comes with implementation issues and may hinder rather than help the setting of limits and targets under the NPSFM.

Access to water

30. One of the key issues for horticultural growers is access to water. It is critical for the production of food.
31. While not specifically part of this hearing the objective and policy framework is important as to how allocation will occur.
32. HortNZ's policy position on freshwater is attached for your reference.
33. HortNZ's position is that rootstock survival water should be given an allocation in times of drought in order to keep perennial trees in particular orchards alive. Whilst stock drinking water is recognised and provided for under the RMA rootstock survival water is not unfortunately trees that have taken years to grow are not as portable as livestock and therefore HortNZ's position which has been successfully upheld in Hawkes Bay and Tasman is to ensure that this rootstock survival is provided for in allocation regimes during times of lowflow/cease takes.

Regionally significant infrastructure

34. HortNZ is concerned about the elevation in status of local distribution lines to effectively the same status as the national grid. There was significant discussion at the Regional Policy Statement on this matter. HortNZ believes it should be up to Territorial Authorities if specific provisions are to be required for local distribution lines. This issue is much wider than just the infrastructure providers as the land that these lines traverse may be adversely affected by these new provisions Lynette Wharfe's supplementary evidence will address this from a planning perspective.

Angela Halliday

13 June 2017



HORTNZ FRESH WATER POLICY (Approved - HortNZ Board July 2016)

1. Horticultural production in all regions of New Zealand is reliant on reliable supplies of fresh water that are suitable for sustained crop production and post-harvest washing and processing. Water is essential for the production of food.
2. Horticulture NZ's position is that:
 - A sufficient quantity of fresh water is a key driver that will ensure the horticulture industry can continue to operate, expand and prosper.
 - Reliability of supply of water in terms of volume, quality and timing is critical for growers and their production. Generally, reliability must be greater than nine in ten years to support high value horticulture.
 - Water is a resource that needs to be managed on a catchment basis, with any transfer occurring within a catchment, and controlled from within each region.
 - Augmentation of supply from storage or artificial recharge needs to be encouraged, supported by the community, and be a priority in at risk catchments where it can be demonstrated that the net benefit to communities is positive.
 - Consents to take water should belong with the land for which they are issued, not the person. Versatile land should not be alienated from water resources.
 - Consents to take water should not be able to be owned by third parties with no direct relation to land.
 - The transfer of consents to take water should not occur without the approval of all parties with a direct and specified interest in the consent.
 - The permanent trading of water consents away from productive land is not supported.
 - The transfer of water allocated by a consent should be limited to within a Water Management Unit and to land owners and productive uses.
 - Water should be allocated efficiently to productive uses through a reasonable use test.
3. Horticulture NZ acknowledges that:
 - Water is a public resource that must be protected, and its allocation and quality managed within limits at an appropriate level for the catchment or location.
 - The instream and cultural values of water need to be recognised.
 - There are many competing users of water; e.g. domestic, livestock, recreation, industry, energy, environmental, cultural as well as its use for crop irrigation and post harvest washing and processing.
4. Horticulture NZ supports appropriate national and regional planning mechanisms for managing the allocation and efficient use of water (including its measurement) in situations where:
 - It is necessary to manage the resource efficiently and sustainably, based on robust scientific measurement. Regulators must use best practice based on good science when formulating catchment and aquifer allocation.

- The measurement, data collection and reporting requirements are relevant, practical, achievable and necessary.
 - Recognition is given to the need to minimise risk through the allocation mechanism.
 - Regulatory costs are minimised.
5. Where as a result of new planning policy that allocates rights and interests to other parties and there is a negative economic impact on horticultural production then appropriate compensation needs to be provided.
 6. Horticulture NZ advocates there should be no further degradation in freshwater values other than by natural or climatic causes. It supports growers working in catchment based partnerships involving: other users, the community and the regulatory authority for the management of fresh water. It is committed to providing the transfer of knowledge required for growers to demonstrate genuine progress towards achieving appropriate improvement targets.
 7. Horticulture NZ supports the use of appropriate industry and public funding for science to research and develop the required models & tools for growers to use on a catchment basis to achieve the necessary water management and quality targets in consultation with their community, other users and regional authorities.
 8. HortNZ does not support resource rentals (taxes) as a feature of an allocation system, however if they are considered the funds should be spent to mitigate or offset the effects of the activities the rental is generated from. The rental should be time bound, administered efficiently and transparently.

Explanation: the need for simplicity and practicality may preclude the effective implementation of cap and transfer systems. The alternative of resource rentals has been put forward as a more efficient way to manage effects. But the potential for adverse unintended consequences to arise from a rental are high and systems need to be carefully considered in line with the principles in this policy document.

Definitions of terms used in the policy:

Allocation – is the consenting authority's (e.g. Regional or Unitary Authority) formal process of deciding the volume and description of the resource (e.g. from surface water body or ground water aquifer) and then consenting applications within the limit of the resource.

Consent to take water – The right to take and use water as granted through a consent approval process. This is sometimes referred to colloquially as a "permit". (Under the old Soil and Water Act they were referred to as "privileges")

Transfer – changing the description of the place of use of a right to use water from one location to another or one right holder to another. This may be for a part or a whole of the right and can be seasonal, temporary or permanent. All rights to use water describe the name of the holder of the right and the location of the take and use points. If this is to change the right must be transferred to the new owner or point of take and use. Transfers must be approved by the allocating body.

Trading – selling the right to use water either through a formal or informal market. The trade could be for seasonal, temporary or permanent ownership change. Trading is a subset of transfer.