

# **SUBMISSION ON Draft Change 5 (Kaituna River) to Bay of Plenty Regional Policy Statement**

16<sup>th</sup> October 2020

**TO:** Bay of Plenty Regional Council

**NAME OF SUBMITTER:** Horticulture New Zealand



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## Introduction

Horticulture New Zealand (HortNZ) thanks Bay of Plenty Regional Council (BOPRC) for the opportunity to comment on the proposed Draft Change 5 (Kaituna River) to Bay of Plenty Regional Policy Statement (RPS) and welcomes any opportunity to work with BOPRC and to discuss our comments.

HortNZ could not gain an advantage in trade competition through these comments.

## Executive summary

HortNZ supports the inserting of the provisions from the Kaituna River Document 'Kaituna He Taonga Tuku Iho – A Treasure Handed Down' into the BOP Region Policy Statement. HortNZ make the below comments for consideration by BOPRC.

## Background to HortNZ

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 \$6.39 billion and is broken down as follows:

<b>Industry value</b>	<b>\$6.39bn</b>
Fruit exports	\$3.5bn
Vegetable exports	\$0.7bn
<b>Total exports</b>	<b>\$4.2bn</b>
Fruit domestic	\$0.88bn
Vegetable domestic	\$1.28bn
<b>Total domestic</b>	<b>\$2.19bn</b>

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. The essential service that horticulture provides has been further highlighted through the Covid-19 response.

HortNZ's purpose is to create an enduring environment where growers thrive. This is done through enabling, promoting and advocating for growers in New Zealand.

## HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.

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.
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- Ensuring that RMA plans work in the growers' interests both in an environmental and sustainable economic production sense.

## Horticulture in Bay of Plenty Region

Horticultural crops cover over 14,000 ha in the Bay of Plenty Region. Growers produce a diverse range of crops – Kiwifruit (over 11,000 ha) is the most predominant crop in this region although other crops such as Avocados (over 2,300ha), Citrus and Berryfruit, contribute to the Bay of Plenty growing region.

The Kaituna catchment area is a significant area for growing as a sub-catchment in the Bay of Plenty Region, with the environment (soils and weather), post-harvest facilities nearby (Te Puke) and the access to Tauranga port contributing to the local Kaituna community and wider Bay of Plenty economy.

HortNZ represent growers in the Bay of Plenty alongside key affiliates to HortNZ including NZ Kiwifruit Growers Ltd, Avocado Industry Council, Te Awanui Huka Pak and Te Puke Fruitgrowers Assn.

## Comments

### 1. Policy KR 2B: Establishing water quality limits within the Kaituna River

HortNZ considers that the approach in the National Policy Statement for Freshwater Management (NPSFM) adequately reflects the overall approach that should be taken to water quality.

HortNZ supports the approach to catchment scale planning as they provide the spatial framework for identifying freshwater values and establishing objectives, targets and limits to provide for the identified values.

HortNZ considers that water quality should be considered as a stand-alone matter and not linked to water takes or quantity. The effects of water quality are a result of land use activities and discharges, not of the water takes. They should be considered as separate matters.

### 2. Policy KR 3B: Using Mātauranga Māori to inform resource management decision making in the Kaituna River

HortNZ considers the approach of Mātauranga Māori and Iwi Management Plans; values, outcomes, limits, policies and rules through RPS and Regional Plans as the appropriate place to inform resource users of the Mātauranga Māori of the Kaituna River catchment for resource management.

The storing of readily accessible Mātauranga Māori information through RPS and Regional plans for resource users (consent applicant's) and Iwi/Hapu to allow timely, cost effective, consistency and better outcomes for the Kaituna catchment.

### 3. Policy KR 4B: Managing groundwater abstraction in the Kaituna River & 2.12.4 Significant Issues affecting the Kaituna River and its tributaries – (1) Water demand is high and could pose a risk for springs and surface water bodies

The statement '*Current consented allocation exceeds region-wide limits in several sub-catchments of the Kaituna River and in the Lower Kaituna aquifer*' (2.12.4 (1)) is not based on current and best knowledge of the groundwater aquifers in the Bay of Plenty Region or the Kaituna catchments.

BOPRC current groundwater allocation method is from a NREM Ground Water Monitoring Report<sup>1</sup> in 2013 states: 'The groundwater allocation is provisionally set at no more than 35% of average annual recharge. This figure is taken from the Proposed National Environmental Standard on Ecological Flows and Water Level (2008)<sup>2</sup>'. I note in the NERM report Map 10 & 11

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<sup>1</sup> NERM Groundwater Monitoring Report Environmental Publication 2013/02 ISSN: 1175 9372 (Print) ISSN: 1179-9471

<sup>2</sup> Proposed National Environmental Standard on Ecological Flows and Water Level (2008) ISBN: 978-0-478-30213-4 (print), 978-0-478-30214-1 (electronic) Publication number: ME 868

shows groundwater level monitoring bores water level in the Kaituna catchment are stable or increasing with none in decline.

HortNZ considers that the best approach being (as with Water quality) NPSFM and the National Environmental Standards (NES) as an overall approach that should be taken to water quantity.

HortNZ supports the approach to catchment scale planning to water quantity as well as they provide the spatial framework for identifying freshwater values and establishing objectives, targets, and allocation regimes to provide for the identified values.

HortNZ suggests the following wording changes:

~~Current consented allocation exceeds region-wide limits,~~ In several sub-catchments of the Kaituna River and in the Lower Kaituna aquifer current water allocation is high. Groundwater across the region should be allocated through national policies (NPSFM & NES) and current and best knowledge of the aquifers at the Kaituna catchment scale.

**4. Policy KR 5B: Enhancing the mauri of the Kaituna River through improved land management practices and Policy KR 9B: Recognising kaitiakitanga in the Kaituna River involves use, development and protection**

HortNZ supports the enhancement of the mauri of all land and communities in the Kaituna catch and wider BOP through industry lead management practice programmes such as Good Agricultural Practice (**GAP**) schemes which provide assurance for the safe and sustainable production, packing and distribution of fruits and vegetables in New Zealand and export markets, for the well being of all.

When looking at environmental offsetting of land, the productive capacity of high productive land should be recognised and maintained for the importance it plays for; the community, region and nation for the healthy food production, economic benefit and social contribution. The proposed National Policy Statement for Highly Productive Land (NPSHPL) demonstrates the importance of considering highly productive land as part of resource management and emphasises that it is important that highly productive land is able to be used for the primary productive land use with the highest productive capacity.

HortNZ support the development of Farm Environment Plans (FEP) through industry lead programmes like GAP for properties to improve land management practices for the enhancement of the mauri of all water in the local Kaituna community, BOP wide and nationally.

**5. Part two; 2.12.4 Significant Issues affecting the Kaituna River and its tributaries; 4 Drainage scheme impacts**

*Mahinga kai, ecosystem health and natural character values are being impacted by drainage scheme modifications especially in the lower Kaituna River area.*

In the Kaituna catchment the changes to the Maketu are for flood protection and land drainage. The policy should acknowledge effects, as well as benefits of drainage schemes and be linked to climate change adaptation planning.

Recent RMA amendment (S61 amended) enables councils to consider climate change budgets and adaptation when developing Regional Policy Statements. Consideration of emissions in resource management decisions is important to enable the transition to a low emissions economy, and a more holistic assessment of resources with Te Mana or Te Wa – and the relationship of Te Hauora o Te Tangata, Te Hauora o Te Taiao and Te Hauora o Te Wai.

**6. Objective 43, 45 & 46**

Objective 43, 45 & 46 have a Monitoring Indicator that states: *'River and Stream flows do not fall below their instream minimum flows due to abstraction of water'*.

The wording 'do not fall below' will drive a binary on/off approach and potentially have a greater effect on meeting these objectives and the values of water (ecological, cultural, recreational, amenity and economic) within the Kaituna River and its tributaries are maintained. HortNZ recommends a flow regime approach instead of a minimum flow approach using abstraction and flow restrictions to achieve outcomes for these values.