

**BEFORE THE HEARING COMMISSIONER APPOINTED BY THE BAY OF
PLENTY REGIONAL COUNCIL**

IN THE MATTER of the Resource Management Act 1991
(the Act)

AND

IN THE MATTER of hearing of submissions on Proposed
Plan Change 5 (Kaituna River) (PC5) to
the Regional Policy Statement

**STATEMENT OF EVIDENCE OF SARAH CAMERON FOR HORTICULTURE
NEW ZEALAND**

15 September 2022

INTRODUCTION

Qualifications and experience

1. My name is Sarah Cameron. I am a Senior Environmental Policy Advisor at Horticulture New Zealand (HortNZ). I am involved in HortNZ's national, regional, and district planning processes across New Zealand. I have been in this role since 2 May 2022.
2. I have over four years of experience in environmental policy. During this time, I have worked for the horticulture industry. I am an associate member of the New Zealand Planning Institute.
3. Since beginning my role at HortNZ, I have met with growers across New Zealand to better understand their horticultural operations and how resource management issues impact them.
4. I have led involvement and consultation on the development of the National Policy Statement for Freshwater Management (NPSFM) and National Environmental Standard for Freshwater (NESFW) and Freshwater Farm Plans (FW-FP).

INVOLVEMENT IN THE PROCEEDINGS

5. When I joined HortNZ in May 2022, I took on Policy oversight for the Bay of Plenty region and the role of HortNZ lead in these proceedings.
6. In preparing my evidence I have read:
 - (a) The Kaituna He Taonga Tuku Iho report
 - (b) Overview report on submissions
 - (c) The evidence of the HortNZ team

PURPOSE AND SCOPE

7. HortNZ is the industry body for the horticulture sector, representing growers who pay levies on fruit and vegetables sold either directly or through a post-harvest operator, as set out in the Commodity Levies (Vegetables and Fruit) Order 2013.
8. HortNZ is affiliated with two key product groups representing growers within the Bay of Plenty region: New Zealand Kiwifruit Growers Incorporated and Avocados New Zealand. These product groups have their own commodity levies.

- (a) My evidence describes the horticulture sector in the Bay of Plenty and a summary of HortNZ's position on Plan Change 5.

HORTICULTURE IN BAY OF PLENTY

9. Kiwifruit is the biggest horticulture producer in the region with 11,053 hectares (over 80% of New Zealand total). The average orchard size being 3.3 hectares (green) and 3.8 hectares (gold)¹.
10. The kiwifruit industry in the region generates 7,506 fulltime equivalent jobs and 19,474 seasonal jobs. Full time employment is expected to grow to 25,091 by 2029/30².
11. Kiwifruit plays a major role in national and Bay of Plenty Gross Domestic Product (GDP). The GDP from kiwifruit for the region in 2020/21 was \$1.78b4 and is expected to grow to \$2.04b by 2029/30⁵.
12. The second biggest hort producer in the region, the New Zealand avocado industry value eclipsed \$227m in the 2020-21 season, with \$167m delivered by avocado exports and \$60m in sales in the New Zealand market. 54% (2,198 hectares) of New Zealand's avocado production came from the Bay of Plenty region in 2020³.
13. The lower Kaituna catchment includes the major growing area of Te Puke and has significant kiwifruit orchards. The soils in the catchment support high yielding orchards.
14. In the lower Kaituna, there is an estimated 801 kiwifruit orchards and a small number of avocado orchards.
15. The area covered by the Kaituna catchment represents a substantial proportion of the total area in horticulture in the Western Bay of Plenty.
16. Several post-harvest facilities are situated within the catchment.

ENVIRONMENT OF KAITUNA

17. Horticulture, like all food systems, is dependent on natural resources. The region is the main producer of kiwifruit and avocados because of the favourable soils, water availability and climate. The key advantages of soil fertility, water availability, and climate create what is referred to as

¹ <https://www.zespri.com/content/dam/zespri/nz/annual-reports/Zespri-Annual-Report-2021-22.pdf>

² NZKGI/Zespri Regional Contribution Brochure

³ <https://industry.nzavocado.co.nz/about-us/annual-reports/>

versatile, or highly productive, land. The lower Kaituna is a nationally significant source of versatile land.

Soil

18. The lower Kaituna has an unusual proportion of its land being of very high value for primary production. Almost all the land outside urban areas fits within Land Use Capability Classes 1-3. These soils are recognised as those with the most productive potential and versatility for food production.⁴
19. Significant protection of this land has been regulated within district and regional planning tools due to pressures from urbanisation. Aside from their productive value, soils also provide ecosystem services.
20. The draft National Policy Statement on Highly Productive Land proposes to require councils to plan to manage this land for its productive capacity and recognise its value.

Water

21. Reliable, good quality water is fundamental to growing. Horticultural production requires significant investment, and it is commonly accepted that water reliability in excess of 95% is required to sustainably provide for these investments. In recent years with rain deficits, soil moisture levels have meant that irrigation becomes necessary.

Climate

22. The Bay of Plenty Bay has over 2000 hours of bright sunshine per year. The warm, sunny climate along with the highly productive soils and continued access to reliable irrigation water, makes the catchment a key growing area.

CHANGE 5

23. Kaituna He Taonga Tuku Iho – A Treasure Handed Down (Kaituna river document) was a requirement of the Tapuika Claims Settlement Act 2014.
24. The Kaituna river document's purpose is to promote the restoration, protection, and enhancement of the environmental, cultural, and spiritual well-being of the Kaituna River and its tributaries. This document was prepared in consultation with iwi, hapū and the wider community.

⁴ https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/Iri_luc_main

25. The Bay of Plenty Regional Policy Statement (RPS) must recognise and provide for the vision, objectives and desired outcomes of the Kaituna river document.
26. For the most part HortNZ supports Change 5. However, HortNZ does not agree with the statement in significant Issue 2.12.4(1) that “allocation exceeds water quantity limits in several sub-catchments of the Kaituna River, and in parts of the underlying groundwater resource”.
27. Hort NZ suggested changes to Significant Issue 2.12.4(1) as follows: ‘Current consented allocation exceeds water quantity limits, In several subcatchments of the Kaituna River and in the Lower Kaituna aquifer current water allocation is approaching the peak of what would be suitable for freshwater outcomes. 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.’
28. It is our understanding that freshwater management unit limits are expected to be defined based on detailed groundwater modelling currently in development by council. This will eventually supersede the interim allocation limits through the plan change process that will give effect to the National Policy Statement for Freshwater 2020. This programme of work could have a significant impact on allocation limits in the Kaituna river.
29. HortNZ has sought an amendment that still recognises water allocation is approaching the peak of what would be deemed acceptable in terms of achieving freshwater outcomes. Providing accurate information in the significant issues is critical as this will have implications for the implementation of the objectives and policies, particularly proposed Policy KR 4B Managing groundwater abstraction in the Kaituna River.
30. HortNZ engaged Pattle Delamore Partners to assist HortNZ with providing evidence for the hearing. In their evidence, Simon Greening and Blair Thornburrow conclude that it is premature and detrimental for council to conclude that groundwater in the Kaituna catchment is over allocated.

CONCLUSION

31. For the most part HortNZ supports Change 5, however, I consider Significant Issue 2.12.4 as currently drafted will have a detrimental effect on existing and current water users. If groundwater limits were set that take a lead from the RPS, then no further allocation could be granted to prospective groundwater users, and furthermore, existing allocation may need to be phased out.

32. I support the recommendations of the HortNZ expert team including the recommendations of Simon Greening evidence suggested rewording of 2.12.4 (appendix B).

Sarah Cameron

15 September 2022

