

SUBMISSION



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Submission on the Proposed National Policy Statement for Freshwater and National Environment Standard for Freshwater.

Submitted by: New Zealand Plant Producers Incorporated (NZPPI)

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1. Introduction:

- 1.1. New Zealand Plant Producers Incorporated (NZPPI) is the peak industry body for the businesses that propagate and grow plant for forests, ecology, food, wines and amenity plantings. Plant production is also referred to as 'nursery' production.
- 1.2. Our members produce the plants that the grow food that Kiwis eat and export, that regenerate New Zealand's forests, beautify our urban landscapes and are planted by millions of Kiwis in their backyard.
- 1.3. Our industry underpins the success of New Zealand's thriving primary industries, including forestry, horticulture, viticulture and farming.
- 1.4. Employing approximately 4000 people, New Zealand's plant production sector is worth an estimated \$500 million per annum.

- 1.5. The plant production sector has experienced rapid growth over the past 5 years, driven by growth in the plant-based sectors: horticulture, wine and forestry and the demand for landscape, amenity and native plants.
- 1.6. This growth is set to continue as markets and government policies drive a shift in NZ's primary industries to higher value and highly sustainable production systems, which include more horticulture and forests.
- 1.7. The plant production sector is critical in producing forestry and native seedlings to meet the Government's target to plant one billion trees by 2028.
- 1.8. Supplying seedlings for riparian plantings, erosion control and carbon sinks will enable the government and the primary sector to achieve its targets for freshwater quality, climate change and biodiversity.
- 1.9. Our sector is a success story in regional New Zealand and is growing rapidly, providing high skill jobs and career opportunities in the areas that need it the most.
- 1.10. Our submission focusses on three areas of the proposed policies:
 - i) Section 2- Protection of Highly Productive Soils,
 - ii) Section 4 - National Policy Statement on Freshwater management.
 - iii) Definitions

2. General

- 2.1. We support the approach taken to land and water management in the proposed policies. We are pleased to see particular recognition of the value of the plant-based sectors to New Zealand's economic, social and environmental wellbeing.
- 2.2. We are pleased to see recognition of the contribution that horticulture, forestry and the plant-based sectors make to the outcomes for freshwater quality in the National Policy Statement for Fresh Water Management.
- 2.3. The horticulture industry, including plant production, has made significant progress in reducing its environmental impacts and now contributes less than 1% of the degradation in water quality.
- 2.4. We support the submissions of Horticulture New Zealand, the horticulture industry associations, NZ Forest Owners Assn and NZ Winegrowers, particularly around recognition of farm management plans and industry good practice initiatives as an effective long-term, national approach to improving environmental outcomes.

3. Proposals relating to Highly Productive land

- 3.1. NZPPI supports the proposed policies relating to high quality soils and the intention of these policies to safeguard the supply of high quality and nutritious food for future generations.
- 3.2. We agree with the proposal to recognise these areas in regulation by establishing a category of land for cropping, called 'highly productive land'.
- 3.3. **We believe that the categories of production on 'highly productive land' should be extended beyond cropping, to also include plant production,** as it is also a high value activity that is required for future generations and requires land that also fits the definition as highly productive, i.e. flat topography and high-quality soils.
- 3.4. **To ensure the productivity of this land, the policies should recognise the range of factors that make it productive.** Soil factors alone don't make an area productive for a horticulture business. Rather, the productivity of an area relies on the ability to undertake crop and plant production activities (such as irrigating, spraying, distribution, etc).
- 3.5. Unless these activities are also protected, the actual productivity of that land will be affected. For example, if housing was able to be developed adjacent to highly productive land, the productivity of the land may be reduced by restrictions on the activities undertaken on that land requested e.g. by neighbours, through reverse sensitivity.
- 3.6. Another consideration relating to the productivity of land is the need for buildings and infrastructure for growing, handling and distributing plants. This includes glasshouses, sheds, driveways, irrigation infrastructure, etc. **To ensure the productivity of land, the policy and related legislation, must provide for the ability to develop the infrastructure required for plant production.** This requires changes to aligned regulations, such as the Resource Management Act and local government rules that currently restrict building and infrastructure development.

4. Part 3 - National Policy statement on fresh water management:

- 4.1. We support the proposal to strengthen Te Mana o Te Wai- the interlinking of the health of water, people and the environment. This principle supports the production of healthy food and plants for wellbeing and the environment. This approach enables decision making to recognise that food and plants are an essential human health and wellbeing need.

4.2. In addition to food and human wellbeing, we request greater recognition of the ecological value of plants. This recognition will help support the ability to continue to expand the production of native plants for the natural environment and conservation.

4.3. Similarly, the production of amenity and landscape plants should be prioritised. These plants will play a critical role in sustaining the quality of life and the wellbeing of New Zealanders as our population grows and adapts to more intensive housing in new urban areas. Amenity plants will be a critical part of the government's strategy to ensure the quality of life and mental wellbeing of future generations.

5. Protection of wetlands:

5.1. We support the proposed approach to the protection of wetlands. We request a better definition of the types of wetlands that would come under these rules to ensure that they don't unintentionally capture reservoirs and water bodies that have been developed by plant producers for water drainage, or irrigation storage.

6. Intensification:

6.1. Under the proposed policies, expansion of irrigated activities (above 10 hectares) would require a resource consent to assess the impacts of the development on water quality.

We believe that as a low impact activity, the expansion of plant production would have a positive impact on water quality, not only on the land used, but also on the land where the plants are planted. **As plant production is a high value and low intensity activity it should be exempt from the proposed intensification rules.**

6.2. Modern plant production systems have high water use efficiency. This is due to the precise and targeted nature of irrigation systems, which include overhead sprinklers, micro sprinklers and drip irrigation which place water directly and accurately to the plant.

Also, plant production uses a range of slow-release fertilizers which are a recognized best management practice that reduces nutrient runoff. Many operations capture runoff in containment ponds to recycle water and nutrients. **We believe that the policy should establish a definition of container nursery production as a low intensity activity.**

Conclusion

- We support the recognition of farm environment plans and independently audited good practice programmes as an effective national level approach to improving environmental outcomes in the primary sector.
- We agree with the proposal to establish the definition of 'highly productive land', for cropping but we believe that the definition should be extended to include nursery production, as it is also a high value activity that requires flat topography and high-quality soils. Also, nursery production often occurs alongside crop production in areas with high quality soils.
- The policy should establish a definition of container nursery production as a low intensity activity, as it has for fruit production, etc.
- As a low impact activity, the expansion of nursery production has a positive impact on water quality, not only on the land area used, but also on the land where the plants are planted. On this basis we believe that nursery production should be exempt from the intensification rules.
- The productivity of an area relies on the ability to undertake crop and plant production activities (such as irrigating, spraying, distribution, etc). The ability to undertake these activities needs to be protected.
- We support the proposed approach to the protection of wetlands. We would like to see a better definition of the types of wetlands that would come under these rules and have clarity that they don't unintentionally capture reservoirs and water bodies that have been developed for water drainage, or irrigation.

[ENDS]