

FURTHER  
SUBMISSION

# Further Submission: Freshwater Planning Instruments - Proposed Otago Regional Policy Statement

3 February 2023

**To:** Otago Regional Council

**Name of Submitter:** Horticulture New Zealand

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# OVERVIEW

## Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Further submissions on behalf of HortNZ

## Our submission

Horticulture New Zealand (HortNZ) made a submission on the Proposed Otago Regional Policy Statement - Freshwater and welcomes any opportunity to continue to work with Otago Regional Council and to discuss our submission.

The details of HortNZ's further submissions and decisions we are seeking from Council are set out below.

# HortNZ's Role

## Background to HortNZ

HortNZ represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit, and vegetables. The horticultural sector provides over 40,000 jobs.

There is approximately, 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. 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.

# Further Submission

1. Horticulture New Zealand's (HortNZ) further submissions are contained in the attached table below.
2. HortNZ represents commercial fruit and vegetable growers in the Otago Region, so represents a relevant aspect of the public interest.
3. HortNZ is not a trade competitor and could not gain any advantage in trade competition through this further submission.
4. HortNZ wishes to be heard in support of its further submissions.
5. If others make similar submissions, HortNZ will consider presenting a joint case with them at the hearing.

## Further submission on behalf of HortNZ on Proposed Otago Regional Policy Statement: Parts considered to be a Freshwater Planning Incident

Submitter	Sub #	Plan Provision	Support/oppose	Reason	Decision sought
Kāi Tahu ki Otago	FPI030.047	GEN - General submission	Support	The RPS needs to incorporate mana whenua views on freshwater as part of Te Mana o Te Wai	Adopt
Kāi Tahu ki Otago	FPI030.048	GEN - General submission	Support	Integrated management is a fundamental requirement	Adopt
Fish and Game	FPI037.068	GEN - General submission	Support in part	Would like to include recognition and provision for the way people connect with their local environment to provide fresh produce by way of harvesting fresh water for irrigation.	Adopt with inclusion of reference to harvesting of water for primary production.
Dunedin City Council	FPI001.051	GEN - General submission	Support	It will be important to undertake both mitigation and adaptation, and therefore refer specifically to both throughout the RPS.	Adopt request.

Green Peace Aotearoa + 1259 supporters	FPI008.002	GEN - General submission	Oppose	Plant based food production in Otago is a small by footprint but critical part of the domestic food supply system and export contributor. Plant growth and plant based food production is not possible without a number of inputs, with nitrogen essential. Nitrogen application matched to crop demand and to best practice is necessary for successful horticultural production and manage nutrient discharges..	Reject
Green Peace Aotearoa + 1259 supporters	FPI008.003	GEN - General submission	Oppose	Plant based food production in Otago is a small by footprint but critical part of the domestic food supply system and export contributor. Plant growth and plant based food production is not possible without a number of inputs, with nitrogen essential. Nitrogen application matched to crop demand and to best practice is necessary for successful horticultural production and manage nutrient discharges..	Reject

Green Peace Aotearoa + 1259 supporters	FPI008.004	GEN - General submission	Oppose	Plant based food production in Otago is a small by footprint but critical part of the domestic food supply system and export contributor. Plant growth and plant based food production is not possible without a number of inputs, with nitrogen essential. Nitrogen application matched to crop demand and to best practice is necessary for successful horticultural production and manage nutrient discharges..	Reject
Green Peace Aotearoa + 1259 supporters	FPI008.005	GEN - General submission	Oppose	Plant based food production in Otago is a small by footprint but critical part of the domestic food supply system and export contributor. Plant growth and plant based food production is not possible without a number of inputs, with nitrogen essential. Nitrogen application matched to crop demand and to best practice is necessary for successful horticultural production and manage nutrient discharges..	Reject

Green Peace Aotearoa + 1259 supporters	FPI008.006	GEN - General submission	Oppose	Plant based food production in Otago is a small by footprint but critical part of the domestic food supply system and export contributor. Plant growth and plant based food production is not possible without a number of inputs, with nitrogen essential. Nitrogen application matched to crop demand and to best practice is necessary for successful horticultural production and manage nutrient discharges..	Reject
Green Peace Aotearoa + 1259 supporters	FPI008.007	GEN - General submission	Oppose	Hort advocates for plans that enable landuse change to respond to climate change. Regenerative farming maybe one land use option but there will be others including a move to plant based protein production to reduce emissions.	Reject
Green Peace Aotearoa + 1259 supporters	FPI008.018	GEN - General submission	Oppose	Plant based food production in Otago is a small by footprint but critical part of the domestic food supply	Reject



				system and export contributor. Plant growth and plant based food production is not possible without a number of inputs, with nitrogen essential. Nitrogen application matched to crop demand and to best practice is necessary for successful horticultural production and manage nutrient discharges..	
Green Peace Aotearoa + 1259 supporters	FPI008.019	GEN - General submission	Oppose	Plant based food production in Otago is a small by footprint but critical part of the domestic food supply system and export contributor. Plant growth and plant based food production is not possible without a number of inputs, with nitrogen essential. Nitrogen application matched to crop demand and to best practice is necessary for successful horticultural production and manage nutrient discharges..	Reject
Dunedin City Council	FPI001.048	GEN - General submission	Support	HortNZ supports carrying through content already agreed upon through	Adopt

				previous RPS process unless there is a compelling reason to do so.	
Contact Energy Ltd	FPI027.001	GEN - General Submission	Oppose	The proposed ORPS needs to balance all NPS including NPS-FW, NPSET, NPSREG and NPSHPL.	Ensure that all relevant NPS are provided for in the pORPS-FPI.
Kāi Tahu ki Otago	FPI030.049	GEN - General Submission	Support	HortNZ supports appropriate use of Te Reo through the document and to correct language that does not conform to orthographic conventions and place names reflect traditional names normalised through pORPS.	Adopt
McArthur Ridge Vineyard Ltd	FPI041.014	GEN - General Submission	Support	HortNZ supports greater policy direction for landuse change to support low emission primary production	.Adopt
Fish & Game	FPI037.006	SRMR - Significant Resource Management issues for the region	Support in part / Oppose in part	HortNZ agrees there are a number of different values that could be included in well-beings that may have or not have been specified.	Reject

QLDC	FPI046.001	SRMR - Significant Resource Management issues for the region	Support	HortNZ Notes the efficiency of horticultural production and need to enable land use change to respond to climate change.	Adopt
Silver Fern Farms Ltd	FPI020.009	SRMR - Significant resource management issues for the region	Support		Adopt
Federated Farmers of New Zealand	FPI026.017	SRMR - Significant resource management issues for the region	Support	Support the recognition primary production as economic contributors to the region	Adopt With inclusion of reference to primary production
Fish & Game	FPI037.009	SRMR - Significant resource management issues for the region	Oppose	The NPSFM requires wider consideration of impacts. There are many factors not specified.	Reject
OWRUG	FPI043.026	SRMR - Significant resource management issues for the region	Support	Consistent reference to a sector helps readers understanding of the document.	Adopt

Silver Fern Farms Ltd	FPI020.012	LF-VM Visions and Management	Support	Enable land use conversions to support innovative approaches to food productions or changes to more sustainable types of production.	Adopt
Ravensdown Ltd	FPI017.005	LF-VM - Visions and Management	Support	Enable more sustainable and innovative approaches to land use and food production.	Adopt
Ravensdown Ltd	FPI017.006	LF-VM - Visions and Management	Support	Enable landuse conversion to more efficient and less environmental impact forms of production	Adopt
OWRUG	FPI043.002	LF-VM - Visions and Management	Support	Food and fibre sector need to be supported with reliable and secure access to freshwater through water storage and allocation.	Adopt
Ravensdown	FPI017.007	LF-VM - Visions and Management	Support	Support efficient users of water.	Adopt
Federated Farmers of New Zealand	FPI026.025	LF-VM - Visions and Management	Support	Enable landuse conversion to more efficient and less environmental impact forms of production	Adopt

Ravensdown Ltd	FPI017.008	LF-VM - Visions and Management	Support	Food production should be actively supported in the interests of food security	Adopt
Federated Farmers of New Zealand	FPI026.026	LF-VM - Visions and Management	Support	Enable landuse conversion to more efficient and less environmental impact forms of production	Adopt
Director General of Conservation	FPI044.008	LF-VM - Visions and management	Support	Land and water management practices that improve resilience to the effects of climate change are to be encouraged through the RPS.	Adopt
Federated Farmers New Zealand	FPI026.035	LF-FW - Freshwater	Support	Support the deletion of LF-FW AER7	Adopt
Silver Fern Farms Ltd	FPI020.023	LF-FW - Freshwater	Support	Support the deletion of LF-FW AER7	Adopt
OWRUG	FPI043.075	LF-LS - Land and Soil	Support	Retain as notified	Adopt
Dunedin Cirty Council	FPI001.038	LF-LS - Land and Soil	Support	Retain as notified LF-LS-P18	Adopt
Kāi Tahu ki Otago	FPI030.041	LF-LS - Land and Soil	Support	Retain as notified	Adopt

QLDC	FPI046.026	LF-LS - Land and Soil	Support	LS-LM-M11 retain	Adopt
Ravensdown Ltd	FPI017.015	LF-LS - Land and soil	Support		Adopt
QLDC	FPI046.027	LF-LS - Land and Soil	Support	Retain as notified	Adopt
Contact Energy Limited	FPI027.015	LF-WAI -O1 - Te Mana o te Wai	Oppose in part	HortNZ seeks that the objective to improve where degraded is retained	Reject submission to replace 'improved' with 'preserved.'
Contact Energy Limited	FPI027.019	LF-VM-O2 Visions and management	Oppose in part	The submitter seeks changes to the visions for the Clutha Mata-au FMU including addition of recognition of food production but limited by discharge of nutrients. The submitter also seeks that the Clutha Hydro scheme is protected which is inconsistent with the NPSREG.	Recognise and provide for the Clutha Hydro Scheme as set out in the NPSREG. Amend proposed 5C to 'food production in the area is supported.'
Contact Energy Limited	FPI027.024	LF-FW-O8	Oppose in part	The submitter also seeks that the Clutha Hydro scheme is protected which is inconsistent with the NPSREG	Recognise and provide for the Clutha Hydro Scheme as set out in the NPSREG

Contact Energy Limited	FPI027.026	LF-FW-P7	Oppose in part	The submitter also seeks that the Clutha Hydro scheme is protected which is inconsistent with the NPSREG	Recognise and provide for the Clutha Hydro Scheme as set out in the NPSREG
Meridian Energy Ltd	FPI016.018	LF-FW new provision	Support in part	The submitter seeks provision for off-stream storage of surface water where storage will give effect to the objectives and policies on this RPS.	HortNZ supports use of off stream storage.