BEFORE THE HEARING COMMISSIONER APPOINTED BY THE GREATER WELLINGTON REGIONAL COUNCIL

IN THE MATTER	of the Resource Management Act 1991 (**the Act**)
AND	
IN THE MATTER	of hearing of submissions on Proposed Change 1 to the Regional Policy Statement

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INDUSTRY STATEMENT BY MICHELLE KATHLEEN SANDS FOR HORTICULTURE NEW ZEALAND

14 August 2023

INTRODUCTION

Qualifications and experience

1. My name is Michelle Kathleen Sands. I am the Manager of Strategy and Policy with Horticulture New Zealand (HortNZ). I manage HortNZ's Environment team, which is involved in national, regional and district planning processes across New Zealand. I have worked for HortNZ since 2018.

2. I hold a Bachelor of Science Honours from Victoria University (1995). I have over 20 years of post-graduate experience in environmental management. During this time, I have worked in local government, the voluntary sector, research, consultancy and currently for the horticulture industry.

3. My experience includes developing catchment scale water quality models. I led the water quality assessments, including the development of catchment scale water quality models, used to inform the assessments of environmental effects for Transmission Gully, Puhoi to Warkworth and Warkworth to Wellsford. I developed catchment scale water quality and hydrological models to inform the Greater Wellington National Policy Statement for Freshwater Management (**NPSFM**) limit setting process in the Ruamahanga and Porirua catchments.

4. My experience includes providing expert witness testimony on water quality and quantity issues at council hearings, Board of Inquiry and Environment Court.

5. I lead HortNZ's involvement in national water policy, in particular providing input into the development of the NPSFM National Environmental Standard for Freshwater and the National Freshwater Farm Plan regulations.

6. I lead HortNZ's policy response on climate change matters. I am a steering Group Member of He Waka Eke Noa.

7. 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.

8. While I am a qualified hydrologist and a water quality scientist, I am not appearing in the capacity of an expert in this hearing. My role in this hearing is as HortNZ's representative and advocate.

Purpose and scope of evidence

9. My evidence explains:

   (a) The importance of recognising food security as a value in both climate change mitigation and adaptation planning.

   (b) The importance of enabling low emissions land use as part of climate change mitigation

   (c) In the context of natural hazards policy, treating highly production land as an intergenerational asset and protecting it for land-based primary production to benefit current and future generations.

Overview of Horticulture New Zealand

10. HortNZ is the industry good body for the horticulture sector, representing growers who pay levies on fruit and vegetables sold either directly by growers to customers or through a post-harvest operator, as set out in the Commodity Levies (Vegetables and Fruit) Order 2013.

11. HortNZ is affiliated with the following local growers associations: the Pukekohe Growers Association, the Waikato Fruit Growers Association, and the Waikato Asparagus Growers Association. Alongside these local associations, several Product Groups representing specific product categories are also affiliated to HortNZ, for example: Vegetables New Zealand Incorporated, Potatoes NZ, Onions NZ and NZ Kiwifruit Growers Incorporated.

Key concerns with the proposed Plan Change

12. HortNZ is largely satisfied with the recommendations in the section 42a report, which recognise food security and support low emissions land uses

13. We seek greater recognition of highly productive land and food security within the natural hazards provisions and consider these provisions very important as Wellington Regional plans to adapt to a changing climate.

HORTICULTURE IN THE WELLINGTON REGION

14. In the Wellington region there are 154+ ha of vegetables, a small area of indoor crops and 1,261 ha of fruit (noting that this includes 832 ha of wine grapes and 181 ha olives, crops which HortNZ does not represent).[1]

15. Within the region, the majority of growing in the region is located in the Wairarapa and Otaki.

16. In the Wairarapa: predominately apples and pears, small areas of other fruit trees, and outdoor vegetables. There is also vegetable seed growing in the Wairarapa. The growing of pea plants and pea straw in the Wairarapa were banned following the discovery of pea weevils in 2016/17; this ban was lifted in February 2020.

17. In Otaki: predominately outdoor vegetables and indoor crops.

18. There is very little growing occurring in the Porirua City, Upper Hutt City, Lower Hutt City and Wellington City areas.

Potential for horticultural land use in Wellington

19. Within the region, Land Use Class (LUC) 1-3 soils – which are generally the most suitable for horticulture – are concentrated around the plains of the Wairarapa and Otaki.[2] This has been identified in the Wellington Regional Growth Framework.

20. With the predicted effects of climate change, there is a suggestion in the Wairarapa Food Story report that the climate in the Wairarapa may mirror Hawkes Bay (a predominant horticultural area) by 2040.[3] This report

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[1] https://www.freshfacts.co.nz/files/freshfacts-2021.pdf

[2] https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/lri_luc_main/421,406,404

[3] Wairarapa Food Story Group: Wairarapa Food Story, available at https://wairarapafoodstory.nz/wp-content/uploads/2018/09/Food%20Story%20LR.pdf .

highlighted a '*shared belief was that the Wairarapa could be the food bowl for Wellington*'.

21. While ultimately, external factors, such as the market and availability of water, will determine if/how much growth in horticulture occurs in the Wairarapa, there is the potential for growth.

FOOD SECURITY

22. Food security is a nationally important issue that must be addressed at all meaningful levels.

23. While New Zealand is a net food exporter, many of the vegetables and some of the fruit that we grow are only for domestic food supply. It is also noted:

24. Over 80 per cent of vegetables grown in New Zealand are for domestic consumption.[4] For most vegetable crops, the domestic market is the primary market, but many growers produce export crops within their rotations for practical (soil health) and economic reasons. New Zealand also plays a role in exporting fresh vegetables to the Pacific Islands.

25. Some fruit crops grown in New Zealand have a predominately export focus – for example, it has been estimated by NZIER that 95% of kiwifruit and 83% of apples are exported.[5] These crops also supply the local market, and some fruit crops are grown predominately for domestic supply such as citrus and summer fruit.

26. New Zealand has a national food-producing system that relies on growing vegetables and fruit in pockets of highly productive land, with a good climate and access to freshwater. A sustainable, year-round supply of produce for New Zealand is only possible if the different growing regions work in conjunction to ensure that seasonality and other variables, such as diseases and weather, do not interrupt that supply.

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5 NZIER, 2019. Farm share of retail prices. Analysis of domestic farmer margins in a globalised world.

27. The Natural and Built Environment Bill includes matters that the national planning framework must provide direction on. One of these matters is:

> *(58)g enabling supply of fresh fruit and vegetables.*

CLIMATE CHANGE AND NATURAL HAZARDS

28. An integrated approach to climate change mitigation and adaptation is important. In 2050, NZ aims to be net zero for carbon emissions and to remain at new zero for every year thereafter, including in a future with a changed climate.

29. Horticulture is the lowest emissions form of food production. Climate change policies should enable land use change to lower emissions activities.

30. New Zealand is geographically isolated and relies on domestically produced fresh fruit and vegetables for food security.

31. Future generations will depend on horticultural production on highly productive land, as they seek to maintain a secure supply of low-emissions food.

32. Highly productive land may become more flood-prone with a changing climate. This increased risk highlights the need to reduce emissions and to manage the natural hazard risks to highly productive land.

CLIMATE CHANGE MITIGATION PROVISIONS

33. In the HortNZ submission, we sought policies that enable land use change to lower emissions activities, and specifically enable land use change to horticulture.

34. We are largely satisfied with the recommendations of the Section 42a report in particular, we support:

    (a) The proposed reframing of policy Policy CC.5 – the regional plan must include provisions '*that support reductions in emissions*'.

    (b) Method CC.5, which connects to the plan change required by Policy CC.5 mentions in the s42A

amendments '*taking into account change in agricultural land use …*'.

(c) Policy FW.8 – refers to '*low emissions'* land uses.

35. We also seek recognition of the importance of enabling land use change to low-emissions land uses in the following methods:

(a) Method CC.8 - we seek the inclusion of low emissions land use change explicitly.

(b) Method 48 – to be addressed in the freshwater topic; HortNZ has a submission seeking lower emissions land use change be noted, in relation to a review of water allocation.

NATURAL HAZARDS

36. Highly productive land is often located on flood plains. This natural resource has taken thousands of years to develop and should be treated as an intergenerational asset.

37. Food security and the ability of New Zealanders to continue to produce fresh fruit and vegetables in a changing climate, is a matter that should be considered in natural hazards planning.

38. Cyclone Gabrielle highlighted the vulnerability of New Zealander's supply of fresh fruit and vegetables to natural hazards. It is important that food security is a value considered in natural hazard decision-making.

39. The objective of the National Policy for Highly Productive Land is:

> *Highly productive land is protected for use in land-based primary production, both now and for future generations.*

40. In the HortNZ evidence presented by Ms Levenson on the integrated management topic, she discussed why the RPS should consider the NPS HPL in the RPS.

41. In the Natural and Built and Environment Bill system, outcomes include:

In order to promote the well-being of both present and future generations,

highly productive land is protected—

(a) for use in land-based primary production; and

(b) from inappropriate subdivision, use, and development.

42. Regarding natural hazards policy, the relevant part of this outcome concerns protecting highly productive land for land-based primary production.

43. We recognise that the Regional Policy Statement is being developed under the RMA. However, the policy direction provided in the Natural and Built Environment Bill provides a clear direction of travel. In my view, the Regional Policy Statement should be seeking to provide an enduring framework and should look to these future frameworks and align where there is scope to do so.

44. The specific natural hazard provisions sought by HortNZ are discussed in the Ms Landers Planning evidence.

Michelle Kathleen Sands

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