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

30 October 2019

Vegetables are essential for the health of our people, our community and the resilience of New Zealand as a nation. There is a growing international theme in literature that diets are inextricably linked to human health and environmental sustainability. Creating environments that foster consumer access to affordable fruit and vegetables is a global priority (Thow et al, 2018).

Vegetables form an essential part of New Zealand’s identity and sense of independence. It is crucial in an island, isolated from the rest of the world, that we can be as self-sufficient as possible. It is reassuring to know that our food security and ability to feed our people doesn’t hang on the whims of international trade and policy outside of our control.

Vegetables New Zealand Inc and Process Vegetables New Zealand advocates for and represents the interests of over 1,100 New Zealand vegetable growers. The vegetable industry is valued at over $500m with over $266m in exports annually (Fresh Facts, 2018).

The industry employs over 5,000 people, occupies some 50,000ha of land and provides critical regional development opportunities from Northland to Bluff, covering all regions.

New Zealand growers supply vegetables to domestic consumers, as well as exporting fresh products to discerning consumers globally.

Vegetable New Zealand Inc (VNZI) and Process Vegetables New Zealand (PVNZ) welcome the opportunity to submit on the Proposed National Policy Statement for Freshwater and National Environment Standard for Freshwater. We hope that our insights assist the decision-makers in understanding the importance of vegetable production. In making a decision both VNZI and PVNZ would be available for a select committee hearing to further discuss our points.

Vegetables NZ Inc and Process Vegetables New Zealand submits that:

General considerations

Dietary changes from current diets to healthy diets are likely to substantially benefit human health, averting about 10.8 – 11.6 million deaths per year, a reduction of 19.0 – 23.6% (Lancet Report, 2019). Unhealthy diets are the largest global burden of disease and pose a greater risk to morbidity and mortality than unsafe sex, alcohol, drug, and tobacco use combined. Because much of the global population is inadequately nourished (i.e. undernutrition, overnutrition, and malnutrition), the world’s diets urgently need to be transformed (Lancet Report, 2019). Globally moving to healthy diets by 2050 will require substantial shifts, including a greater than 100% increase in consumption of healthy foods, such as nuts, fruits, legumes and vegetables (Lancet Report, 2019). The Ministry of Health recommends adults eat at least three servings of vegetables every day (MoH, 2019). The 2018 Health Survey shows only 61% of adults meet this recommendation and only 52% of children eat their recommended daily intake. This view is supported in health data that shows when considering cardiovascular disease, 800 deaths were caused by low vegetable intake in New Zealand in 2017 (IHME, 2017). It should also be noted in relation to expensive imported food, healthier food is the first thing lower income families compromise on in times of hardship, exacerbating existing nutritional deficiency resulting from general lack of money (Cheer et al, 2002). Vegetable production, supporting a diet in fresh nutritious vegetables, is critical for the health and well being of all New Zealanders.

Vegetable growers care for their land, water, people and community. Growing plants require, at certain times in their growing cycle; highly productive land, nutrients, water and climate to produce optimal growth for tasty healthy food. Growing spinach is a good example of getting the timing right with inputs. Spinach taste, colour and crunch is determined by a precise application of fertiliser just before harvest. Without this timed response, spinach yellows very quickly, and can not be sold to the public.

For vegetable growing, water quality issues can be controlled and minimised through risk-based Farm Environment Plans (FEP) based on good management practice (GMP). Vegetables are estimated to contribute less than 1% degradation in water quality and ongoing research and continued best management practices should lower this figure further.

Growers need to be able to grow vegetables to feed New Zealander’s fresh and healthy food, now and in the future. Future growers need a pathway to grow vegetables. The aspiration for any new entrant into vegetable production needs to reflect the passion for growing, rather than how to navigate a consent to grow vegetables. Let vegetable growers be judged on the quality of what they do, not the consent activity of what they do!

Growers believe that changes to the minimum bottom lines for Nitrogen, Phosphorus and Sediment should only be done once:

1. **Scientific research** has been completed to identify the quantitative benefit to fresh water ecology by achieving minimum bottom lines.
2. **Scientific research** has been completed to establish whether the minimum bottom lines are appropriate/achievable on all types of fresh water bodies based on size and location.
3. **Research** has been completed on the social and economic impact, including the impact on domestic food supply, of achieving the minimum bottom lines.

High value jobs and capital in the vegetable value chain are at risk when vegetable production is restricted by catchment limits and land use change restrictions. Covered crops, packhouses, nurseries and processing factories require unfettered access to productive land suitable for their operation. The labour and capital in the vegetable supply chain is tenuously linked to world benchmarks and resources, so can cease if resources are constrained.

To consistently provide New Zealand with healthy and affordable food, we need a National Environmental Standard for Commercial Vegetable Production. It is nonsense to suggest that importing vegetables can feed New Zealand with the world already struggling to feed itself. Food security is vital for our cultural identity.

Growers fully support improving water quality, and many growers already undertake initiatives to do this. The best way for horticulture to achieve better water quality outcomes alongside climate change mitigation is through NZGAP – EMS Farm Environment Plans (FEP). These should be created by the grower and independently audited under our industry’s Good Agricultural Practice (GAP) schemes. Currently 95% of our growers have GAP schemes – with aims for achieving 100%. We need to keep Central and Regional Government out of the prescription of Farm Environment Plans as growers have an intimate knowledge and understanding of their land. Governments role should be to set realistic catchment targets, that can be progressively met.

**Specific consideration:**

1. The NPS and NES for Freshwater directly affects the growers’ ability to grow food.

**Proposed NPS for Freshwater:**

1. Growers fully support maintaining the quality and flows for our water ways, and improving them when they are degraded.
2. Vegetable growers do have plans to improve fresh water. NZGAP – EMS module is being rolled out across New Zealand by the vegetable sector. Vegetable growers consider the best tool for meeting freshwater quality is Good Management Practice via an independent audit of NZGAP – EMS Farm Environment Plan (FEP).

3. Vegetable growing is different to other types of farming. Vegetable rotations need support and measurement tools specific to vegetable growing. Currently no tools exist to test nutrient leaching accurately. Growers will adopt tools and systems when technology specifically meets the outcome required by regulation.

4. Water is essential for river health, and for growing healthy food for our survival and to support the economy. These outcomes must be planned together to ensure realistic outcomes.

5. The timeframes set for achieving outcomes must be realistic. The focus needs to be on planned and progressive improvement in water use and discharges.

6. Growers are active in managing their water use carefully and to reduce discharges.

7. Progress should be monitored through independent audited farm environment plans based on mitigations implemented through good management practices.

8. Decisions must be supported by robust science.

9. It’s not a one size fits all operation. Vegetable growing is:
   i. growing different plants;
   ii. different timings of harvest, rotations;
   iii. different structures for growing, including covered crops;
   iv. owned land and lease land;
   v. broad acre crops;

10. Commercial vegetable production must be enabled as a permitted activity where an enterprise is:
    i. Registered with NZ GAP (EMS)
    ii. Has an approved / audited farm environment plan
    iii. Is operating under good management practise

The following submission is made on Part 3 of the Consultation documents:

**Proposed National Environment Standard for Freshwater**

**Irrigation (reference 34)**

1. Irrigation is necessary to grow fruit and vegetables. Precision irrigation influences nutrient application and limits leaching. The 10ha limitation for the use of irrigation should be removed for vegetable production and low intensity horticulture.

2. Water storage is a critical investment for water quality. Good environmental outcomes are provided with water storage by managing river flow. Water storage will allow rivers to flow at optimal levels at times of high demand in summer.

3. Water storage will improve the survival of plants and vegetables under drought conditions. In drought, many regions can move to a “cease-take” water situation to preserve human and animal water supply. Plants are left to be sacrificed, which is a considerable financial loss to growers. A loss of crop due to drought, and the financial loss of drought, will diminish the supply of fruit and vegetables. Provision in regulation needs to be made to encourage water storage and “survival-water” for plants and vegetables.

4. Water provision in regulation for plants and vegetables could be met with crop rotation and cropping on new land. By ensuring plant health with irrigation, growers can meet the capital requirements (water storage and irrigation schemes) to ensure fresh nutritious food supply to feed New Zealand.

**Land Use Change to Horticulture (reference 36)**

1. Horticulture has a very small footprint in New Zealand. There should be no limitation on changing land use to horticulture provided this is done under the NZGAP – EMS, independent audited FEP.

2. Crop rotation to produce healthy vegetables is vital as it supports the best outcome for the different soil types, climate and disease pressures. There should be no limitation on the same amount of land swapped into vegetables growing and back again.
3. Covered crops need to be included in the discussion for vegetable growing to ensure there are no perverse outcomes that limit their operation or growth.
4. Growers need to replace lost production from high nitrate catchments facing nutrient reduction limits. If a grower has to cease operation in a highly sensitive catchment due to water quality, growers need a NES Freshwater pathway in a new location. Currently the NES Freshwater blocks any degradation of any waterway. Growers propose that, in moving to a new area, would have a minimal effect on the waterway. Under Good Management Practice growers will work within the limits of the catchment. Without a transfer ability, vegetable production will be severely reduced, forcing up the price of vegetables for New Zealand consumers.

**Farm Environment Plan (reference 37)**

1. The aim should be for all New Zealand growers to have a FEP. Growers are signing up to NZGAP - EMS Farm Environment Plans and 75% of Levin vegetable growers have implemented a Farm Environment Plan. The timeline placed on growers getting these plans does not encourage quality plans. In addition, there is an insufficient number of qualified auditors available to assist growers.
2. For catchments deemed to be sensitive, the timeline of 2022 is supported. All other catchments, 2025 should be the target.
3. Growers invite Government to join vegetable growers on the journey to get this done.
4. To make the proposals work, Government should provide resources to growers and Councils, showing a real commitment to making these changes.
5. Growers support the use of NZGAP – EMS. A Farm Environment Plan, showing Good Management Practice. GMP should be used to meet Council limits and measurements. Only general guidance should be given by Councils. Each grower understands the risks of their property and is in a best position to mitigate risks rather than regulatory bodies.
6. Recent GPS placement technologies on farm equipment are showing results for precise nutrient management. This will take time to show continuous improvement.
7. Leadership needs to drive the right outcomes to reduce nutrient emissions. Growers feel this can be addressed with a National Environmental Standard for Commercial Vegetable Production.

**National Environmental Standard for Commercial Vegetable Production (NES CVP):**

Vegetable Growers support a permanent set of regulation, working for different vegetable crops, on different growing systems and different locations throughout New Zealand.

- Without an NES CVP, vegetable growers’ risk being forced to close due to continued inconsistent interpretation of regulation by regional councils. This risks job losses, impacts on local communities and impacts on national food security.

A national planning approach for vegetables needs to consider:

1. Vegetable growers support the development and implementation of a NES CVP.
2. Vegetables are essential for healthy diets and form 50% of the food security requirement for New Zealand.
3. Regional Councils have failed to provide for commercial vegetable production. Vegetable growing should be controlled by vegetable growers. Regulators should only be used to minimise any negative effects of an operation on a community.

The broad principles of an NES CVP are yet to be defined. However, growers suggest the following points:

1. Located on Highly Productive Land
2. Crop rotation is supported
3. Distributed across New Zealand to provide for resilience and seasonal food provision
4. Recognition that export and domestic vegetable growing is integrated, and should be regulated together

5. Support existing growing with the ability to enable expansion for domestic food supply and export
6. Risk-based approach to good management practice and best management practices
7. Additional actions for sensitive catchments
8. Certified and independently audited Farm Environment Plans through a Good Agriculture Practice (GAP) programme

Conclusion

We support the need to protect the quality and flow of waterways. Growers and their communities realise water is essential for river health and for growing healthy food. **Growers support the NZGAP – EMS module to deliver Farm Environment Plans towards Good Management Practices.** Good practices are achievable with planned outcomes measured over a realistic timeframe.

Best for the land, best for the water and best for the people. Growers need to be in the driving seat on what they produce, why they produce it (timing), and where they produce it (disease). They are specialists in what they do. Growers support sustainable vegetable production to meet exacting market standards and exacting environment standards. Growers recommend that vegetable growing is managed appropriately with a national framework of NES CVP.

Water storage and capture will assist in water management and mitigate weather events causing water quality issues. Growers suggest planning strategies to encourage plant survival and water storage, alongside water quality strategies.

This submission is supported by:

1. Vegetables NZ Inc
2. Process Vegetables NZ Inc

References:

2. [https://www.mfe.govt.nz/consultation/action-for-healthy-waterways](https://www.mfe.govt.nz/consultation/action-for-healthy-waterways)
6. IHME (2017) GBD Results Tool.