31 October 2019

By email: consultation.freshwater@mfe.govt.nz

SUBMISSION: ACTION FOR HEALTHY WATERWAYS

1. Market Gardeners Ltd (MG Marketing) welcomes the opportunity to provide a submission on the Action for Healthy Waterways.

2. MG Marketing is a grower-owned co-operative. It provides procurement, marketing, forecasting, sales and distribution services to over 500 growers across New Zealand.

3. The proposed Action for healthy waterways affects a large number of growers MG Marketing works with.

4. MG Marketing fully support the intent of the policy, including quality and flows of New Zealand waterways and improving them when they are degraded.

5. MG Marketing supports the development of a freshwater policy that is evidence based and underpinned by sound science.

6. MG Marketing does, however, want to see outcomes planned together with the horticulture industry. The timeframes set for achieving the outcomes everyone wants to achieve must be realistic and there should be a focus on planned progressive improvement in water use.

7. Irrigation is necessary to grow fruit and vegetables. MG Marketing is concerned restrictions to precision irrigation for fruit and vegetable growers will negatively impact much needed growth. It is well documented that there is an increased requirement for healthy and affordable food for New Zealanders and restricting growth will have an adverse impact on the access of fresh fruit and vegetables. The 10 hectare limitation for the use of irrigation should be removed for low intensity horticulture. It is also important to note that fruit trees improve water quality.

8. MG Marketing’s submission with regard to Land Use Change to Horticulture and Farm Environment Plan is aligned with Horticulture New Zealand.

9. Land Use Change to Horticulture
a. We need to feed New Zealand. 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 an independently audited Farm Environment Plan.

b. Crop rotation to produce healthy vegetables is supported. There should be no limitation on the same amount of land swapped into vegetables and back again.

10. Farm Environment Plan

a. The aim should be for all growers to have Farm Environment Plans. The timelines placed on growers getting these plans does not encourage quality plans. In addition, there are not enough suitably qualified consultants available to assist growers. For catchments that are deemed sensitive then the timeframe of 2022 is supported but for all other catchments 2025 should be the target.

b. To make these proposals work the Government should provide resources to growers and Councils showing a real commitment to making these changes.

c. Good Agricultural Practice (G.A.P) programmes should be used to provide the system for independent audited Farm Environment Plans. Only general guidance should be given by Councils, with the plans being adapted to the circumstances on each property based on a risk analysis and the identification of what actions will cause the most impact.

Yours faithfully

MARKET GARDENERS LIMITED

Ellery Tappin
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Personal details removed