
Submitted by: New Zealand Plant Producers Incorporated (NZPPI)

Contact details:
PO Box 3443, Level 5, 23 Waring Taylor Street, Wellington 6011
T: Personal
E: office@nzppi.co.nz

Author: (Chief Executive, 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 2 of the 3 proposed regulations:

i) The proposed National Policy Statement on Freshwater management; and it’s relationship to the protection of Highly Productive Land and soils.

ii) The proposed National Environmental Standard for freshwater.

2. General

2.1. We generally support the approach taken to land and water management in the proposed policies. Like most New Zealanders we appreciate the value of healthy waterbodies and ecosystems.

2.2. We are also pleased to see recognition of the role plant-based sectors provide in maintaining ecosystem services such as food production and plants to restore habitat. Increasing the value of plant production sectors is positive to New Zealand’s economic, social and environmental wellbeing.

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.

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1 Highly productive Land refers to soils of Land Use Capability Class I,II and III.
3. National Policy Statement for Freshwater

3.1. While NZPPI did not submit on the propose NPS for Highly Productive Land (HPL); 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’. But we also think that direction on freshwater needs to recognise the intentions behind protecting this land, by considering water allocation and water quality issues when providing for the utility of HPL.

3.3. We believe that the categories of production supported on ‘highly productive land’ should be extended to include nursery plant production as a low intensity activity. Nursery plant production has a low discharge footprint, and it is an essential activity for the support of other horticultural activities and revegetation initiatives.

3.4. To ensure the productivity of HPL, 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. We support the proposal to strengthen Te Mana o Te Wai in general; but consider that the NPS Freshwater needs to express some recognition for the ecosystem services provided by nursery production and horticultural production more broadly.

3.6. In particular we support the extension of scope for ecosystem health; to the inclusion of terrestrial riparian habitat. This policy change 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 element of human health and wellbeing.

3.7. 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.

Wetlands

3.8. 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.
3.9. We also suggest that method 3.15 be modified in the manner sought by PotatoesNZ; as described in the decisions sought below. The modifications are required to improve the method for identifying wetlands. Without the modifications proposed there will be significant difficulty in implementing the method.

**Decisions Sought:**

3.10. **We support the submission of Horticulture NZ;** in seeking a definition for low intensity activities and seek that nursery plant production be added to the definition.

3.11. **We support the submission of PotatoesNZ (PNZ);** in seeking recognition of plant production systems as an ecosystem service; and an essential need for human health. We consider that the relief sought by PNZ be adopted in the NPS, and that changes to Schedule 1A sought by PNZ be adopted:

3.11.1. Retain and amend the definition of ecosystem services and add text to include ecosystem services in the definition specified in Schedule 1A as follows:

**Ecosystem health**

In relation to a waterbody in an FMU, ecosystem health refers to the extent to which the FMU supports an ecosystem appropriate to the type ecosystem services of a waterbody (eg, river, lake, wetland, or aquifer). There are 5 biophysical components that contribute to freshwater ecosystem health, and it is necessary that all of them are managed. They are:

- **Water quality** – the physical and chemical measures of the water, such as temperature, dissolved oxygen, pH, suspended sediment, nutrients and toxicants.

- **Water quantity** – the extent and variability in the level or flow of water.

- **Habitat** – the physical form, structure and extent of the waterbody, its bed, banks and margins, riparian vegetation and connections to the floodplain.

- **Aquatic life** – the abundance and diversity of biota including microbes, invertebrates, plants, fish and birds.

- **Ecological processes** – the interactions among biota and their physical and chemical environment such as primary production, decomposition, nutrient cycling and trophic connectivity.

In a healthy freshwater ecosystem, water quality, quantity, habitat and processes are suitable to sustain appropriate indigenous aquatic life, as would be found in a minimally disturbed condition (before providing for other values).”
3.11.2. NZPPI also support (with a small amendment) the PNZ relief recommending amendment to the definition for ecosystem services to include essential health needs for communities as follows:

“[…] e) **essential health needs for communities** (e.g. the essential drinking water and sanitation needs of people, the ability of highly productive land to enable food security in relation to food production, and the ability to grow plants to regenerate ecosystems).”

3.11.3. Amend method 3.15 as follows:

“(1) […] **natural wetland** means a wetland as defined in the Act (regardless of whether it is dominated by indigenous or exotic vegetation), except that it does not include:

a) wet pasture or paddocks where water temporarily ponds after rain in places dominated by pasture, or that contain patches of exotic sedge or rush species; or

b) constructed wetlands; or

c) geothermal wetlands […]

(5) Every regional council must, in respect of natural inland wetlands, and may in respect of constructed wetlands,:

a) identify and map wetlands in its region that are:
   a. 0.05 hectares or greater in size; or
   b. known to contain threatened species; or
   c. of a type that is naturally less than 0.05 ha in size (such as ephemeral wetlands or springs); and […]”.

4. **National Environmental Standard for fresh water management:**

4.1. NZPPI is generally supportive of adopting the proposed NES but seeks that:

- There are specific rules that provide for the expansion of nursery production as a permitted activity along the lines of the HortNZ submission as a low intensity activity.
- That commercial vegetable production is provided with a tailored rule suite to allow for growth; to support food security and food production values.
- That the proposed irrigation rule is deleted. We do not consider there is any scientific justification for irrigation being a proxy measure for intensification. Nursery production requires irrigation; and expansions of more than 10ha will be common if the Government target for 1Billion trees is to be reached. But the land use discharges from such nursery production activities are likely to decline (compared to the pre-existing land use activities) given the nature of nursery production.

**Intensification**

4.2. Under the proposed methods, expansion of irrigated activities (above 10 hectares) would require resource consent to assess the impacts of the development on water
4.3. 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, or more broadly the requirement for discretionary consent in Clause 34 should be deleted; or that Clause 34 be deleted in entirety.**

4.4. 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.

4.5. 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.**

4.6. Given the uncertainty and impracticality of modelling discharges from nursery production systems (they are simply not considered in tools such as OVERSEER) we recommend that the implementation of nutrient discharge benchmarks be delayed until tools are available to either measure or model discharges from all systems.

**Decisions Sought:**

4.7. Delete proposed Clause 34 (discretionary irrigation rule) or modify the rule to exempt all horticultural production systems including low intensity production systems such as nursery production, permanent horticulture crops, commercial vegetable production and greenhouse/glasshouse production.

4.8. Retain the options for regulation of horticultural systems that do not propose a nutrient discharge benchmark; and reject any option proposing a nutrient benchmark for horticultural production systems.

**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 (Clause 34 proposed NES).

• 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.