To whom it may concern,

Re: Action for Healthy Waterways

Villa Maria has been on a sustainability journey since the 1990s. Being environmentally responsible is inherent in the long-term view we take of the wine industry, which is why we were a founding member of Sustainable Winegrowing New Zealand (SWNZ), the accreditation scheme established by New Zealand Winegrowers in 1997.

SWNZ advocates a holistic, continuous improvement approach to environmental management. Members are audited to ensure they meet international standards in a number of areas, including water efficiency and quality. The introduction of SWNZ has been highly successful in upholding the reputation of New Zealand wine as being sustainably produced, with 97% of New Zealand’s vineyard area being accredited.

As a family owned New Zealand business, Villa Maria supports the intent of the Action for Healthy Waterways proposals to manage water for the long term health of our environment, our communities and our businesses. However as with all changes to regulatory standards, care needs to be taken to ensure there are not unintended adverse impacts. Villa Maria supports the submission by New Zealand Winegrowers on the Action for Healthy Waterways consultation. In addition, we would like to emphasise the points below.

1. The National Environment Standard for Freshwater provide for the recognised industry programmes such as SWNZ to provide an accreditation system to satisfy the requirements of a Freshwater module of a Farm Plan, with SWNZ auditors approved for certification purposes. This approach utilises the framework already in existence, prevents duplication and would manage costs, both for vineyard operators and for regional councils. We believe that New Zealand Winegrowers can work with the Ministry for the Environment and Regional Councils to form a strong partnership to achieve the water management objectives for Action for Healthy Waterways.

2. We are concerned that the proposals indicate a shift to a more prescriptive approach to resource management, which regulates for the worst case scenario rather than allowing outcomes based management with discretion for land managers to act according to the specific aspects of each waterway and the surrounding land.
3. The additional consent requirements are proposed to come into force in 2020, however many Regional Councils will not have their Freshwater Management Plans in place until 2025. This increases the risk of a more conservative approach to issuing consents which could result in land development being unnecessarily restricted. Given the low input and low water use of vineyards we submit that increases in irrigation areas be a permitted activity for viticulture where the take of water is currently authorised and the nutrient loss from the irrigated area is less than 10 kg N/ha per year.

4. We are concerned that the 2025 deadline might be challenging for Regional Councils to have their Freshwater Management Plans finalised. This in turn could result in uncertainty in the requirements for Freshwater modules for Farm Management Plans.

5. With regards to the upcoming National Environmental Standards for Wastewater we would ask that any end of pipe limits set for infrastructure operators take into account land treatment and sensitivity of the receiving environment to the discharged contaminants. We are concerned that prescriptive limits might be set based on worst case scenarios which could have significant impact on current practices, without evidence of any detrimental impact.

We hope that you find this feedback helpful. We would be happy to input further as the approach to freshwater is developed. If you have any questions regarding the information and feedback provided please contact me on fabiany@villamaria.co.nz.

Yours Sincerely

Executive Director