I submit as follows:
1. I am a grower and what is proposed directly affects my ability to grow food.

**Proposed National Policy for Freshwater**
2. I fully support maintaining the quality and flows of our water ways, and improving them when they are degraded.
3. Water is essential for river health and for growing healthy food for our survival and to support our economy. These outcomes must be planned together.
4. The timeframes set for achieving outcomes must be realistic. The focus needs to be on planned progressive improvement in water use and discharges.
5. I am taking action, to manage my water use carefully and reduce my discharges.
6. Progress should be monitored through independently audited Farm Environment Plans based on risk assessments implementing good management practices.
7. Decisions must be supported by robust science.

The following submissions are made on Part 3 of the Consultation documents

**Proposed National Environment Standard Freshwater Irrigation (reference 34)**
8. Irrigation is necessary to grow fruit and vegetables. Precision irrigation controls nutrient application and limits leaching. The 10 hectare limitation for the use of irrigation should be removed for low intensity horticulture.

**Land Use Change to Horticulture (reference 36)**
9. 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.
10. 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.

**Farm Environment Plan (reference 37)**
11. The aim should be for all growers to have Farm Environment Plans. The time lines 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.
12. To make these proposals work the Government should provide resources to growers and Councils showing a real commitment to making these changes.
13. 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.
Kind regards

Richard Pentreath
Regional Orchard Manager (Hawkes Bay)
Ngai Tukairangi Trust

Personal details removed