

In the matter of: Proposed National Policy Statement for Highly Productive Land

And: **Pukekohe Vegetable Growers Association**

Submitter

And: **Ministry for Primary Industries**

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Submission on Proposed National Policy Statement for Highly Productive Land

Dated: 09 October 2019

1. This submission is on behalf of Pukekohe Vegetable Growers Association (PVGA) in relation to the Ministry for the Environment and the Ministry for Primary Industries proposed National Policy Statement for Highly Productive Land. Pukekohe Vegetable Growers Association will not gain a competitive advantage in trade competition through the lodgement of this submission.
2. The Pukekohe Vegetable Growers Association (PVGA) represents over 250 commercial vegetable growers from as far north as Warkworth and as far south as southern Waikato. Within this area is Pukekohe, a hub for commercial vegetable production (CVP) which significantly contributes to meeting the fresh produce demands of our domestic market. Of note, this area almost entirely meets the domestic supply for carrots, potatoes and leafy greens in October, November and the early part of December each year. Pukekohe is unique within New Zealand as it presents favourable climatic conditions for the growing of these crops, enabling winter production. In the north, crops are constrained by disease pressures, and further south may be subject to frosts. Deloitte's acknowledged the significance of this location in providing for our national fresh vegetable consumption in 'New Zealand's Food Story – The Pukekohe Hub', August 2018 and confirmed that this area contributes to 26% of the nation's value of production of vegetables.

3. Sustainably grown fresh, healthy produce is key to the PVGA, with the majority of its members being inter-generational growers who continue to build upon generations of knowledge and skill, and are continually improving sustainable land management practices through advances in science and technology and evolving industry Good Management Practices (GMP). Sustainable practices are also an essential element of the New Zealand Good Agricultural Practice (NZ-GAP) system, which every grower must be certified by, to supply supermarkets, markets and processors. This certification verifies that growers meet specific criteria and demonstrate their commitment and ability to grow fresh produce in accordance with sustainable and responsible practises.
4. The PVGA (on behalf of its members) acknowledge the need to plan for urban development in a co-ordinated way to avoid urban encroachment on to land considered to be highly productive land, particularly notable in and around Pukekohe. We support the intention to discourage inappropriate use and fragmentation of land that can sustain viable commercial vegetable production operations and on this basis, of the options put forward in the discussion document, support the adoption of a National Policy Statement for Highly Productive Land (NPS-HPL). It is considered that enabling regional councils to reflect regionally specific pressures and situations is the most suitable outcome of the proposed options, in accordance with the Schedule 1 process.
5. The PVGA however, consider that the definition of Highly Productive Land **must take into account all essential criteria that make up a viable production unit**. These criteria include soil type, size, topography, productivity and productive capacity, sustainability (specifically regarding the requirement for rotational cropping to avoid the build-up of soil pests and diseases), suitably consented irrigation water, reverse sensitivity, ability to utilise nutrients, viability and avoidance of biosecurity threat, and natural disasters. Unless all essential elements are in place to enable a viable production operation to be undertaken, PVGA are of the opinion that land use options should not be restricted.
6. The PVGA request that careful consideration is given to the definition of highly productive land to incorporate all other essential criteria that when combined make a viable production unit, with flexibility to take into account property level variation.
7. We do not support the use of the Land Use Capability (LUC) system as an interim measure for determining highly productive land and believe that this is out of date, at an inappropriate scale for the intended use, and often inaccurate.
8. Further consideration is also required as to the potential implications that could arise if land that is classified as highly productive is restricted to productive use but cannot viably support a productive operation. In particular, when looked at in the context of the proposed National Policy Statement for Freshwater Management (NPS-FM) and National Environmental Standard for Freshwater (NES-FW) which are likely to significantly impact on the viability of many commercial vegetable growing operations.
9. The freshwater proposals intend to restrict the ability to utilise nutrients, especially Nitrogen, and over time will also likely reduce access to water for irrigation. Crop nutrient requirements however, are tailored and cannot be adjusted without compromising yield or resulting in an unmarketable crop that is entirely wasted and along with it, all inputs. Neither of the

freshwater proposals currently recognise the specific requirements of the commercial vegetable production sector, particularly in the context of necessary crop inputs and marketable yield. If growers are unable to run viable commercial vegetable growing operations, it would be counterproductive to restrict their land for productive use, as is intended under the proposed NPS-HPL.

10. Failing to consider the cumulative effects of all proposed policies and regulation will, in our view, lead to a reduction in locally grown fresh produce within New Zealand. The combined effect of restricting highly productive land to productive use and at the same time restricting access to essential elements required to grow, is perverse. Commercial vegetable growers stand to lose their equity and their livelihood and at the same time domestic supply will be impacted. If increased importation of fresh produce is required to meet the demands of our growing population, this will also have flow on impacts for our country's carbon footprint.
11. A holistic and co-ordinated approach must therefore be taken when considering national fresh produce security and the PVGA ask that the implications of retaining land for highly productive use in the context of other proposed policies and regulation is addressed. Particularly, we consider that access to essential elements required for land to be considered highly productive (refer point 5), especially water and the ability to utilise nutrients, should be prioritised for highly productive land.
12. Many commercial growers can attest to the growing pressure they face where their productive land adjoins urban development, with reverse sensitivity issues needing to be increasingly addressed. PVGA support the NPS-HPL including provisions to manage reverse sensitivity effects at the rural-urban interface, such as buffer requirements.
13. PVGA would like further consideration taken as to the current resourcing pressures faced by regional and local authorities to undertake the additional mapping requirements for highly productive land, particularly given the resourcing requirements of other proposed legislation (NES – FW, NPS-FM).
14. PVGA consider that the NPS-HPL should address and include incentives which seek to improve the productive capacity of land, for example, transferable development rights in exchange for title aggregation.
15. PVGA support provision for locating infrastructure and activities in a manner that enhance the productive capacity of land.
16. While PVGA have supported a Proposed National Policy Statement for Highly Productive Land through this consultation, our overall view is that a National Environmental Standard specific to Commercial Vegetable Production would be preferable. This will enable a comprehensive, considered approach specific to our industry.



Kylie Faulkner, President of the Pukekohe Vegetable Growers Association