Tabled @ Hearing 23.11.1

BEFORE THE HEARING COMMISSIONERS
AT CHRISTCHURCH

IN THE MATTER	of the Resource Management Act 1991 (**"the Act"**)
AND	
AND	
IN THE MATTER	of the Environment Canterbury (Temporary Commissioners and Improved Water Management) Act 2010
AND	
IN THE MATTER	of the hearing of submissions on the Proposed Canterbury Air Regional Plan

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STATEMENT OF EVIDENCE BY ANGELA PHYLLIS HALLIDAY FOR HORTICULTURE NEW ZEALAND

23 NOVEMBER 2015

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QUALIFICATIONS AND EXPERIENCE

1. My name is Angela Phyllis Halliday. I am the Advisor, Natural Resources and Environment with Horticulture New Zealand ("**Horticulture NZ**"). I have been in this role since April 2014.

2. Prior to that I was in a compliance role at the Southland District Council which focused on Resource Management and Environmental Health. Prior to this I worked in an Economic Development Agency in Southland in a marketing based role and was a member of the Southland Conservation Board from 2006 – 2008.

3. I have qualifications in science (BSc) with a major in Zoology from Otago University and a graduate Diploma of Wildlife Management. I am currently studying extramurally towards a Graduate Diploma of Environmental Health at Massey University. I am involved with District and Regional Council policy and planning processes throughout New Zealand in both the pre-plan collaborative process and post plan facilitation process.

4. In my role at Horticulture NZ I am responsible for implementing Horticulture NZ's wider resource management and research programme.

5. As a result of this role, my qualifications, and previous experience, I consider that I have an understanding of farming systems and the impacts of air related policy decisions from both a farming/growing perspective and a from an environmental health/ecosystem health perspective. In this evidence I have tried to outline the issues regarding air resource management and primary production from an industry perspective in relation to Canterbury.

BACKGROUND TO HORTICULTURE NEW ZEALAND AND ITS RMA INVOLVEMENT

6. Horticulture NZ was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.

7. On behalf of all active growers Horticulture NZ takes a detailed involvement in resource management planning processes as part of its national environmental policy.

Horticulture NZ works to raise growers' awareness of the RMA to ensure effective grower involvement under the Act, whether in the planning process or through resource consent applications. The principles that Horticulture NZ considers in assessing the implementation of the Resource Management Act 1991 (RMA) include:

- The effects based purpose of the RMA;
- Non-regulatory methods should be employed by councils;
- Regulation should impact fairly on the whole community, make sense in practice, and be developed in full consultation with those affected by it;
- Early consultation of land users in plan preparation;
- Ensuring that RMA plans work in the growers' interests both in an environmental and economic production sense.

HORTICULTURE IN NEW ZEALAND

8. Nationally, the sector represents 5,600 growers producing around 110 crops (focused on producing food for people). Roughly $2.9 billion in domestic revenue is generated yearly, and another $3.2 billion of fresh on board value is produced for export.

9. The industry body is committed to continuous environmental improvement, and has spent significant resource on a good management practice programme for growers, covering issues of significance to markets and regional councils, known as NZGAP.

10. Horticulture NZ manages issues that cover and affect the whole horticulture industry (excluding winegrowers and winemakers).

11. Many of the issues are common between plans, so Horticulture NZ also provides input to policy at the national level, which is focusing currently on matters that affect growers in District and Regional Planning processes.

12. Currently Horticulture NZ is involved in the development of Air Quality Plans in Auckland, Northland, Wellington, and Southland and has previously been involved in plans developed in Northland, Auckland, Waikato, Bay of Plenty, Taranaki, Gisborne, Hawkes Bay, Horizons One Plan, Nelson, Tasman, and Canterbury.

13. Many of the same issues are addressed in Regional Air Plans across the country and Horticulture NZ focuses on those issues of significance for growers such as agrichemical and fertiliser use, outdoor burning, and indoor heating of greenhouses. Reverse sensitivity issues and how these are managed, (particularly through complaints from rural lifestylers) are a key concern for growers.

14. Horticulture NZ is the umbrella organisation for 21 separate product groups covering 110 crops that are outlined in the Commodity Levies (Vegetables and Fruit) Order 2007. Product groups are also levy collecting organisations working on sector specific matters in collaboration with Horticulture NZ which is working on industry specific matters.

15. The two key vegetable product groups for the Canterbury region are the Process Vegetable Product group and the Fresh Vegetable Product Group (Vegetables NZ).

HORTICULTURE IN THE CANTERBURY REGION

16. With over 16,800 ha of production, Canterbury is the third largest horticultural sub region in New Zealand. It is particularly significant for vegetable production, with the main crops including onions, peas, potatoes, pumpkin, green beans, carrots and broccoli. There is also significant fruit production with the main crops being blackcurrants, berry crops, apples and grapes for wine production.

17. There are 497 registered vegetable growers in the Canterbury region, and 54 fruitgrowers.

18. Generally speaking the 2012 figures for the year ending 30 June indicate that Canterbury production was approximately: 5,700 ha of potatoes, 4,200 ha of peas and beans, 1,000 ha of onions, 255 ha of sweetcorn, 323 ha of brassicas, 823 ha of carrots, 29 ha of asparagus, and 23 ha of lettuce. "Other" vegetable crops comprised 651 ha.

19. The approximate total hectares planted for vegetable cropping in Canterbury in 2012 was around 13,048 ha.

THE SIGNIFICANCE OF CANTERBURY'S HORTICULTURAL PRODUCTION TO NEW ZEALAND HORTICULTURAL PRODUCTION.

20. Horticultural production in New Zealand makes up roughly 8.3% of total fresh on board export value, with the main

categories for export being in wine, kiwifruit and apples. Onions, other fresh vegetables and potatoes are also significant contributors to a total export value in 2010 of over $3 billion.

21. Equally important to note are the contributions to domestic food supply and domestic food production with approximately the same value again from horticultural production in terms of domestic value ($2.9 billion).

22. Canterbury domestic vegetable supply is integrated with approximately 9 other vegetable production nodes across the country. These are all interrelated parts of the domestic food supply chain.

23. Horticulture root crops and/or process vegetables may be used in arable cropping rotations. Therefore, a regulatory regime that ensures business flexibility for horticultural and arable growers is important to the sector.

MAIN ISSUES FOR HORTICULTURE UNDER THE PROPOSED AIR REGIONAL PLAN

24. The main issues for horticulture in this ~~catchment relate to landuse flexibility and the uncertainties that arise from the proposed rules. These issues may adversely affect the ability of growers to change crops to meet market demand or lease land to plant crops due to the potential of such crops to impact on the OVERSEER® limits proposed~~ region are covered in the evidence of Ms Wharfe.

Matrix of Good Management (MGM)

25. A number of submissions seek that the provisions in the Regional Air Plan link into requirements for Farm Environmental Plans and Good Management Practices to address water quality issues in the region.

26. Horticulture NZ has been involved in the development of the Matrix of Good Management ("**MGM**").

27. The focus for the MGM project has been on vegetable and arable cropping rotations. Fruit crops and viticulture are not currently included due to their lower nitrogen leaching profile so they are not seen as a high priority. ~~Indeed some of the crops (such as blackcurrants) cannot be modelled in OVERSEER at all and surrogate crops need to be used (~~

28. Therefore while there are advantages to having only one Farm Environment Plan applying to all activities undertaken on a property it may be sometime before that can occur.

29. However there is the potential for good management practices relating to air quality to be codified into Best Practices for Air Quality Management and so provide a benchmark of practices that will assist in achieving the outcomes sought in the Proposed Regional Air Plan.

Outdoor Burning

30. Being able to burn material such as crop residue is important to horticulture growers in Canterbury. Generally residue from horticulture crops is not burnt standing. Often the residue will be incorporated back into the soil but that is not always possible, so burning needs to occur to remove residue so other crops can be planted. Growers may also grow arable crops which need to be able to burn standing residue (stubble).

31. One crop residue that needs to be burnt is the perennial Globe Artichoke. The plant, once it has finished producing for the season, is cut back the base to allow it to regrow for the next season.

32. Globe artichoke is in the same family as thistles -except much bigger. The base of the plant can be more than 10cm in diameter and the height getting close to 2m making it impossible to incorporated back into the ground.

33. The way growers deal with it is to manually cut the plants back at the base, leave it to dry, then gather into a pile and burn in the open paddock.

34. The other reason growers need to burn plant material is for disease control as it can be the best way to contain a disease.

35. Provisions for outdoor burning for biosecurity purposes are also important for growers in the event of an incursion of unwanted organisms that need to be destroyed through burning.

36. Horticulture NZ has sought changes to the provisions to ensure that there is a flexible but responsible framework for undertaking outdoor burning activities.

Agrichemical use

37. Having adequate and robust provisions for agrichemical use in the Regional Plan is important for growers.

38. Horticultural growers both use agrichemicals and can be adversely affected by the use of agrichemicals by others. Therefore for growers it is important to ensure that the planning provisions provide for safe and responsible use. A key part of this is understanding how agrichemicals work and move and the potential for adverse effects.

39. Horticulture NZ was a founding member of the NZ Agrichemical Education Trust (NZAET) in 1990 and continues to take an active role to ensure that agrichemical use is adequately provided for. Mr Matt Dolan, Executive Officer for NZAET has prepared evidence for this hearing in support of the submissions made by Horticulture NZ.

40. The planning evidence of Lynette Wharfe sets out the changes that Horticulture NZ seeks in respect of the agrichemical provisions.

Fertiliser use

41. Being able to apply fertiliser is an important part of a growing production system. It is recognised that there can be dust effects arising from fertiliser use so Horticulture NZ supports the use of best practice to minimise the potential for creating adverse effects.

42. The Fertiliser Association Code of Practice for Nutrient Management addresses managing fertiliser applications to minimise dust. Horticulture NZ supports the Code of Practice as best practice for fertiliser use.

Greenhouse heating

43. There are growers in Canterbury who heat greenhouses to grow crops. Generally coal is used and growers are located outside the urban areas. However Horticulture NZ is concerned about the combining of Clean Air Zones which could impact on growers located within the urban buffer areas. Some growers who were located in urban clean air zones have relocated. Horticulture NZ seeks to ensure that those growers outside the urban clean air zones are able to continue operation.

Reverse sensitivity

44. Potential complaints from rural lifestyler's is a continual concern to growers. As rural residential living has increased and spread out of the urban areas the potential for complaints has increased. Complaints about dust, smoke and agrichemical spraying are addressed in the Air Plan. Horticulture NZ seeks that the Plan includes strong policies to ensure that the potential for reverse sensitivity complaints is avoided. Enabling rural activities that discharge to air is a key component of ensuring that there is clear recognition of the types of activities that are to be anticipated in rural areas.

Biosecurity

45. Managing the disposal of unwanted organisms that are found in NZ is an important issues for growers. Unwanted organisms are those that are detected in NZ and need to be eradicated, such as Painted Apple Moth, Queensland Fruit Fly, or PSA, such as was found in kiwifruit in recent years. Response to an incursion is managed by Ministry for Primary Industries under the Biosecurity Act and may involve the need to remove and burn vegetation and crops, or to spray. In such an event, time is of the essence to manage the risk of spread of the unwanted organism so it is important that the Regional Plan enables destruction of material as a permitted activity.

46. Horticulture NZ has sought that provisions in the Plan enable such actions in the event of a Biosecurity incursion of unwanted organisms. It should be noted that the emergency provisions in the Biosecurity Act only override the RMA in the event of an emergency being declared by the Minister. Most incursions are declared by the MPI Chief Technical Officer and in such events the emergency provisions do not apply. So it is important that removal and destruction of material can occur in short time frames.

47. Thank you for the opportunity to present this evidence for Horticulture NZ.

Angela Halliday

23 November 2015