

30 September 2020

Bay of Plenty Regional Council
PO Box 364
Whakatane 3158

Via email to: rps@boprc.govt.nz

Dear Sir/Madam

Re: Draft Change 5 (Kaituna)

Please find attached a submission from the kiwifruit industry on Bay of Plenty Regional Council Draft Change 5 (Kaituna).

Please do not hesitate to contact us if you require any further information on this submission.

Yours sincerely



Sarah Cameron
Senior Policy Analyst

TO: Bay of Plenty Regional Council

SUBMISSION ON: Draft Change 5 (Kaituna)

NAME: NZ Kiwifruit Growers Inc (NZKGI)

ADDRESS: PO Box 4246, Mount Maunganui South, 3149

1. The kiwifruit industry in New Zealand

The kiwifruit industry is a major contributor to regional New Zealand returning \$1.8b directly to rural communities in 2018/19. There are ~3000 growers, 14,000ha of orchards, 10,000 permanent employees and up to 25,000 jobs during the peak season. Approximately 80% of New Zealand's kiwifruit crop is grown in the Bay of Plenty and the industry is expected to grow its global sales to \$4.5b by 2025 which is an increase from \$3.1b in 2018/19. The projected growth of the industry will contribute significantly to the Bay of Plenty GDP increasing it by 135% to \$2.04 billion by 2029/2030.

2. General comments

Thank you for the opportunity to comment on the Draft Change 5 (Kaituna). NZKGI supports the vision, objectives, and policies of draft change 5 and makes the following comments for consideration.

3. Policy KR 4B: Managing Groundwater Abstraction in the Kaituna River

The consultation document states that most abstracted water is returned back into the catchment either onto land or into water bodies and about two thirds of the discharges of water are to land while the other third is discharged back into water. Looking at council website, NZKGI is unable to find any modelling that supports this assumption. NZKGI would be interested to know what industries are discharging onto land and into water bodies and what the runoff assumptions are per industry.

The document goes on to say that current water allocation exceeds regional wide limits in several sub-catchments of the Kaituna river and in the lower Kaituna aquifer. NZKGI is concerned that the adopted allocation limits that council have used (as used in Plan Change 9) to determine water allocation levels throughout the Bay of Plenty region were considered unnecessary restrictive due to short comings with the technological methodology used. Further evidence of this is illustrated by the large degree of spatial inconsistency in groundwater allocation limits with no clear rationale supporting it.

It is our understanding that freshwater management unit specific sustainable yields are expected to be defined on the basis of detailed groundwater modelling currently in development by council and these will eventually supersede the interim allocation limits through the plan change process that will give effect to the National Policy Statement for Freshwater 2020. This programme of work could have a significant impact on allocation limits in the Kaituna river and see allocation limits be less restrictive.

4. Policy KR 5B: Enhancing the Mauri of the Kaituna River Through Improved Land Management Practices

The document states that consented activities for horticulture (as well as other industries) have a role in promoting the maintenance and improvement of the cultural and ecological health of the river. The industry is unsure by what council means by consented activities but presumes this relates to land use activities and impacts. NZKGI would support a catchment approach rather than a consented approach by way of farm environmental planning as we know that improved farm practices can lead to large reductions in nitrate leaching and sediment loss.

As mentioned, one of the key areas to enhancing the mauri of the river is to adopt best management practices and an example is provided of environmental offsetting where development is allowed in one area of the river if it is offset in another. NZKGI understands environmental offset is defined as an activity undertaken to counterbalance a significant residual impact of a prescribed activity on a prescribed environmental matter and supports this approach and would expect this to be a consent condition with strict monitoring provisions by council. As environmental offsetting is the only example provided of best management practice, NZKGI would be interested to know what other best management practices the council have in mind including how Council determines the offsetting process.

5. Policy KR 6B: Providing for the Protection of Kaituna River's Indigenous, Aquatic, Riparian and Wetland Vegetation and Habitats

The catchment has undergone widespread land use change to enable a range of industries to prosper. The document states that these industries have impacted negatively on the health of the catchment. This is a broad statement to make and generalises all industries as having the same negative impact which is a view NZKGI doesn't support. For example - based on current modelling, the nutrient leaching rate from a dairy farm would be higher than a kiwifruit or avocado orchard. NZKGI would prefer that this statement is reworded to reflect that not all industries have the same negative impact on water quality.

6. Conclusion

NZKGI has a productive and collaborative relationship with council and welcomes further discussion on draft change 5