

TO: Bay of Plenty Regional Council

SUBMISSION ON: Draft Regional Land Transport Plan

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1. The kiwifruit industry in New Zealand

The kiwifruit industry is a major contributor to regional New Zealand returning \$2 billion directly to rural communities in 2019/20. There are ~3000 growers, 14,000 hectares of orchards, 10,000 permanent employees and up to 25,000 jobs during the peak season. The industry is expected to grow its global sales to \$4.5 billion by 2025 which is an increase from \$3.1 billion in 2018/19.

2. Kiwifruit in Bay of Plenty

The Bay of Plenty 2019 season produced 124 million trays and contributed \$1.5 billion to the Bay of Plenty economy. Europe, Japan and China are the region's biggest export markets taking about 75 per cent of the crop. Approximately 80% of New Zealand's kiwifruit crop is grown in the Bay of Plenty. In the 2019/20 season there were 8,095 permanent employees and 16,426 seasonal employees.

3. General comments

Thank you for the opportunity to submit on the Regional Land Transport Plan (RLTP) for the Bay of Plenty region. NZKGI makes the following general comments:

- NZKGI greatly appreciates the relationship and collaboration between the industry and council
- While the RLTP provides a good snapshot for the region, it seems one of the key outcomes is to move private vehicle use to public transport, walking or cycling. This is reflected in the investment programme
- While NZKGI is supportive in mitigating climate change effects, the methods to do so must be practical and realistic. The Bay of Plenty roading network (practically the wider Tauranga area) is congested. There would need to be an enormous uptake of people moving from vehicles to alternate methods of travel to make a difference to emission rates. Further to this, congestion means productivity and economic loss as people wait in traffic
- The RLTP key target areas relate back to 2020 baselines and yet these are not mentioned in the RLTP which makes it difficult to compare.

4. Route Resilience and Security

Target: Reduce the average number of hours that sections of National or Regional strategic routes are closed on an annual basis to be less than 60 hours per year by 2030

There are currently on average 85 hours of road closures per year on the network and it is not clear in the RLTP how a reduction of 25 hours within nine years will occur or what existing roads have been identified to reduce risk. Further to this, under Appendix 3 - Key Performance Indicators - there are no indicators noted for resilience and security.

The Ministry for the Environment climate change projections for the Bay of Plenty region predict that sea level rises, and extreme weather events, will impact on the roading network. Coastal roads and infrastructure will face increased risk from coastal erosion and inundation, increased storms and sea-level rise¹. A report by Local Government NZ [Vulnerable: The quantum of local government infrastructure exposed to sea level rise](#) found that the Bay of Plenty is a high priority region in regards to length and value of roads exposed to sea level rise. A one metre sea level rise would result in 115km of roading being permanently inundated. The report set out a number of recommendations:

- Highlight exposed infrastructure for council members and public consideration
- Improve coordination with stakeholders to prioritise “lifeline” roads and associated infrastructure
- Perform research and analysis to determine options for priority roads
- Engage with both central government and private businesses to address alternatives and costs; and
- Ensure planned levels of service and suitability of location are included in long-term planning.

NZKGI submits that while climate change is considered in the NLTP, solutions to mitigate the repercussions are missing. NZKGI supports an aggressive and coordinated approach to address the recommendations to ensure the ongoing connectivity of the roading network. As appendix one shows, the roading network is of significant risk by 2070 with coastal inundation.

Roads are a vital part of the region’s transport network. Most of the regions kiwifruit is transported by truck to the Port of Tauranga resulting in 31,000 truck movements therefore the importance of enabling efficient freight movements to and from the Port is essential. However to ensure industry resilience in the event the Port of Tauranga is closed (earthquake, fruit fly etc) fruit will be shipped via Gisborne Port (a few hundred thousand trays are currently sent from Gisborne Port). This port is considered the alternative to Tauranga as it is not possible to load charter ships from the Port of Auckland and Napier Port is congested with apple exports. Eastland Port (owner of Gisborne Port) has now commissioned a cool store at the port that could be used as a buffer store in a crisis.

Delays on the network result in reduced economic efficiency and lead to economic loss. The kiwifruit industry is a high growth industry that increases growth and production year on year resulting in increased truck movements.

There are ~16,500 seasonal employees in the Bay of Plenty over the harvest period. Having a passenger rail service from Omokoroa to Paengaroa would provide a much-needed public transport network for these workers to get to work on orchards and in packhouses however

¹ <https://www.mfe.govt.nz/climate-change/likely-impacts-of-climate-change/how-could-climate-change-affect-my-region/bay-of>

consideration should also be given to extending the passenger rail service to Katikati. Consideration of flexible public transport routes and schedules (whether road or rail) during peak harvest season should be a consideration.

5. Economic Prosperity

Target: Maintain or improve travel time predictability, from a 2020 baseline, for freight movements on the primary freight network (road and rail) inter-peak by 2030.

One of the KPIs under this target, is to increase regional contribution to national gross domestic product above 2020 levels. The kiwifruit industry is a major contributor to the Bay of Plenty region with \$1.5 billion contributed to the region's economy in 2019/20. The industry has the highest returns in the primary sector and is forecast to expand significantly in the years ahead.

Another KPI is to increase freight on rail. The industry trucks fruit to the Port from within the Bay of Plenty because of the short haul nature of the trips. There is only one packhouse in the Bay of Plenty that has a rail head (Apata) and this has only been used once. It is more cost effective and time efficient to truck rather than rail.

6. Environmental Sustainability

Target: Reduce carbon emissions from the transport sector by a minimum of 25 percent by 2030, from a 2020 base, on the path to net carbon zero by 2050.

The kiwifruit industry is committed to reducing emissions. Zespri is working to understand the contribution the industry makes to climate change as an industry as well as exploring the opportunities to reduce impact:

- Zespri's industry carbon mitigation milestone is to be carbon positive to its retailers by 2030
- Zespri invests more than \$1 million per year in understanding more about climate change
- Postharvest facilities continue to invest in electric forklifts which have zero emissions
- Investment by Zespri in hybrid fleet vehicles
- EV charging is available at Zespri

It is worth noting that shipping is Zespri's most significant industry emissions source, accounting for ~43% of total supply chain emissions.

7. Healthy and Safe People

Target: 40 percent reduction in deaths and serious injuries, from 2020 levels, by 2030 on the region's road network.

According to the RLTP, the western Bay of Plenty district has the highest number of deaths across the region – 73 from 2015-2020 which occur mainly on state highways.

NZKGI understands that certain transport activities receive crown grants and are therefore not a consideration under the RLTP however the delays in progressing Takitumu North Link (Te Puna to Omokoroa) are resulting in unnecessary deaths, serious injuries and congestion. While NZKGI understands that all land purchases have not been completed which is causing the delay this stretch of road is one of New Zealand's most unsafe and its high accident rate is a major contributor to death statistics. Once completed the objective of the road is to:

- Reduce the severity of road crashes, particularly head-on, intersection and run-off-road crashes
- Improve safety for local residents and the community who live and travel along this route
- Develop and implement appropriate safety solutions
- Align the safety solutions for the State Highway 2 Tauranga to Waihi project so that they are consistent with the State Highway 2 wider northern corridor (Pokeno Mangatarata) safety project.

State Highway 2 is a major freight network for packhouses from Katikati to Tauranga transporting kiwifruit to the Port. There are seven packhouses on State Highway 2 (or on side roads) which house both permanent and seasonal workers. Because of seasonal accommodation limitations, some workers travel along State Highway 2 from Katikati or Tauranga (or further) to work. NZKGI strongly supports an integrated approach with Western Bay of Plenty Council and Waka KoTahi to prioritise construction of this road.

8. Other comments

NZKGI submits that a progressive approach is required to meet the impacts of climate change and growth demands. With the economic return that the industry provides to the region, and employment opportunities, the industry is eager to see an approach that protects the climate while also enabling growth to prosper.

Appendix one

Reference: NLTP

