

TO: Ministry for the Environment

DATE: 4 March 2022

SUBMISSION ON: National Environment Standards Drinking Water

FROM: New Zealand Kiwifruit Growers Inc (NZKGI)
Sarah Cameron
Senior Policy Analyst
sarah.cameron@nzkgi.org.nz

1. Kiwifruit industry in New Zealand

Kiwifruit have been grown commercially in New Zealand since the 1930s and are grown in eight regions, however much of New Zealand's kiwifruit (80%) is grown in the Bay of Plenty where the soils are generally deep and free draining. The kiwifruit industry is the biggest sector and largest exporter in New Zealand's horticultural industry making up 38% of total export value¹

Māori growers make up around 10 percent of the industry with 87 percent being based in the Bay of Plenty. In 2021, Māori growers produced 15.7 million trays which is approximately \$165 million of income to Māori growers.

Kiwifruit has been a remarkable success story for New Zealand, delivering enduring and strong economic returns to the New Zealand economy. With exports worth \$3.6 billion in the financial year 2020/2021 and with sales expected to grow to \$4.5 billion by 2025, kiwifruit provides one of the highest per-hectare returns in New Zealand's primary sector – \$76,722 per hectare for Zespri Green (green) and \$177,846 per hectare for Zespri SunGold™ (gold) in 2020/21.

The kiwifruit industry is a major contributor to regional New Zealand returning \$2.25 billion directly to rural communities in 2020/21. This has wide ranging benefits not only in terms of regional employment, but domino effects into rural communities for related services (everything from tractor distributors to farm supplies, cafes and schools).

Not only does kiwifruit significantly contribute to regional and national GDP and provide returns to growers, the industry also has a low environmental footprint and low carbon emissions (0.6 tonnes of CO₂-e per ha per year²).

Across the industry, there are 2,813 growers, 14,000ha of orchards, 9,250 permanent employees and up to 25,000 seasonal jobs during the peak season.

Of the seasonal workforce, 60% are New Zealanders with 57% of these being Māori. The remainder of the seasonal workforce are supported by backpackers and workers from Pacific nations.

2. New Zealand Kiwifruit Growers Inc

New Zealand Kiwifruit Growers Inc (NZKGI) is mandated under the Commodity Levies (Kiwifruit) Order to advocate on behalf of New Zealand kiwifruit growers and does this by representing the commercial and political interests of kiwifruit growers in industry and government decision making.

¹ [Fresh Facts](#)

² Source: Zespri

3. Source Water Risk Management Areas (SWRMAs)

SWRMA 1 is the immediate area around the source water take which for water take from an aquifer would encompass a five-metre radius around the bore head. Most activities would be restricted in this area. NZKGI is unconvinced that a five-metre setback should be required for the following reasons:

1. There should be more importance placed on the water supplier having secure abstraction rather than trying to control activities within the area to ensure the source is safe
2. Most regional plans require that the bore design and headworks prevent the infiltration of contaminants. There are several existing standards preventing the entry of contaminants including protection from interference by stock. Additional setback requirements do not seem necessary given some requirements in regional plans that apply to drilling new bores and the use, maintenance and decommissioning of existing bores. These could be streamlined and strengthened through NZS 4411:2001

It is not clear on the expectation of existing activities within the five-metre radius – where there are vines within the radius, would a grower be required to retire productive kiwifruit vines?

Fertiliser and agrichemical application within the five-metre radius is proposed to be prohibited. Again, NZKGI points out that the importance should be placed on secure abstraction rather than restricting activities within the radius. Consideration should be given to the proposed standards set out in the Freshwater Farm Plan regulations for nutrient management.

In SWARMA 2 areas, fertiliser application of no more than 190 kg/ha yr is proposed with application over this amount requiring a consent. The average application that kiwifruit growers apply is 120 kg/ha yr therefore this standard is supported.

The standards require high risk activities to be banned in SWARMA 2 areas and while kiwifruit is a low impact activity, NZKGI doesn't agree that separate standards should be required to restrict high risk activities. Regional plans already require activities that are deemed to be more than minor require a consent.

4. Groundwater bore

NZKGI supports amending NZS 4411:2001 to strengthen groundwater bore management with reference to the standard in the NES-DW and council plans to be updated accordingly.

If there is an elevated risk of contamination, the bore is of poor quality and/or the bore is no longer in use NZKGI supports bores of these types to be decommissioned. However, poor quality would need to be defined. Considerations should also be given to what constitutes an unused bore. Regulations for measuring and reporting of water takes only apply for takes of over five litres/second) therefore how will Regional Councils know if a bore with a water take under five litres/second is being utilised. There would need to be a reliance on water suppliers registering with Taumata Arowai.

Under s126 of the RMA a resource consent can be cancelled if it hasn't been used for a period of five years, if a bore is not in use – this will be an easy exercise for consent holders but not for those where consent is not required.

Bore heads on kiwifruit orchards are above ground (probably 99%) therefore NZKGI supports above ground bore heads however instead of prohibiting underground bore heads, recommends a consenting pathway for those cases where it is not practicable for an above ground bore head to be constructed.

5. Other comments

NZKGI supports the protections being applied to all water suppliers however asks that MfE consider other water regulations like freshwater farm plans. It may be appropriate to include the drinking water standard requirements in farm plans so a consistent approach can be applied.

6. Horticulture NZ submission

NZKGI generally supports the submission from Horticulture NZ and agrees that the proposed standards are high level and request more detailed consultation so consideration can be given to actual effects