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SUBMISSION ON THE NEXT STEPS FOR FRESHWATER – CONSULTATION DOCUMENT
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TO: **MINISTRY FOR THE ENVIRONMENT**

SUBMITTER: **HORTICULTURE NEW ZEALAND LIMITED**

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INTRODUCTION AND OVERVIEW

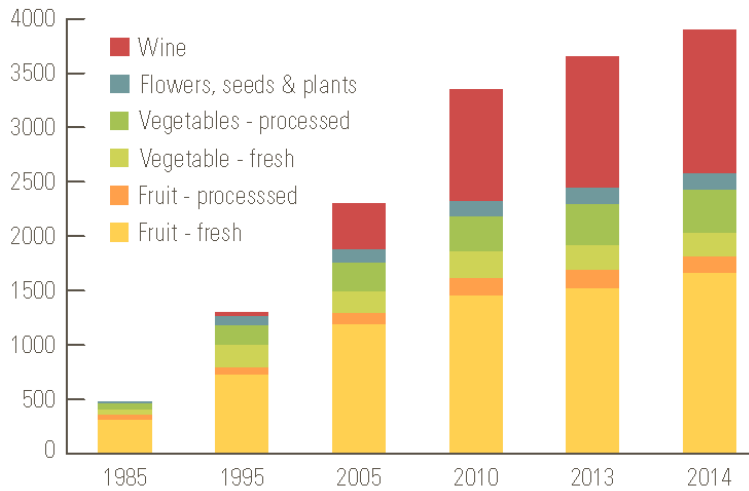
1. Horticulture New Zealand (“Horticulture NZ”) welcomes the opportunity to provide feedback on the Next Steps for Freshwater – Consultation Document 2016.
2. To provide context for its comments, this submission commences with an overview of Horticulture NZ before it turns to considering the four key areas outlined in the discussion document, namely:
 - (a) Freshwater and our environment;
 - (b) Economic use of freshwater;
 - (c) Iwi rights and interests in freshwater; and
 - (d) Freshwater funding.
3. Each section commences with a brief summary of the proposals for that topic area, followed by a discussion of the issues and Horticulture NZ’s recommendations.

HORTICULTURE NEW ZEALAND

4. Horticulture New Zealand (“**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, and now also includes Olives New Zealand.
5. On behalf of its 5,600 active grower members Horticulture NZ undertakes detailed involvement in resource management planning processes as part of its National Environmental Policy. Horticulture NZ also works to raise growers’ awareness of the Resource Management Act 1991 (“**RMA**”) to ensure effective grower involvement in planning processes and resource consent applications. The principles that Horticulture NZ considers in assessing the implementation of the RMA include:
 - (a) Science should underpin the basis of all advocacy;
 - (b) The effects based purpose of the RMA;
 - (c) Non-regulatory methods should also be employed by councils;
 - (d) Regulation should impact fairly on the whole community, make sense in practice, and be developed in full consultation with those affected by it;
 - (e) Early consultation of land users in plan preparation;
 - (f) Ensuring that RMA plans work in the growers interests both in an environmental and “right to farm” sense.
6. Since 1997 Horticulture NZ has been, and continues to be, an active participant in the regional and district planning processes since 1998 and has emphasised expert based involvement since 2005. Horticulture NZ’s investment in this activity is significant. For example, in 2015 between \$1m and \$2m was expended by Horticulture NZ on resource management and environment advocacy work. This included evidence preparation and submissions on more than 48 plans and variations, more than 20 council hearings on decisions, 30 appeal discussions or mediations and 3 Environment Court Hearings.
7. Horticulture New Zealand has also participated in and supported grower involvement in collaborative planning processes at the regional and national level, and now has a science investment programme focussed on delivering better understanding and stewardship of natural resources. As part of this programme we have been involved in 9 regional collaborative planning processes and administer science contracts over a yearly value of \$1million.
8. Horticulture in NZ is a growth industry (see Figure 1 below). Total horticulture merchandise exports in 2014 were over \$3.9 billion, an increase in value of nearly 7 percent on 2013 horticultural produce exports. Four horticulture crops – wine; kiwifruit; apples (fresh & processed); and potatoes (fresh, frozen & processed); were collectively 76% of the value of New Zealand’s horticultural

produce exports in 2014, with wine dominating at close to 34% of the 2014 total.

Horticultural exports – Years to June (\$ million, fob)



Source: Statistics New Zealand

Figure 1 Exports in NZ horticulture over time

9. Increased export values of greater than \$10m were in:
 - Apples (\$61m/+13% on 2013);
 - Avocados (\$59m/+176%);
 - Wine (\$119m/+10%);
 - Other processed fruit (\$13m/+17%); and
 - Potatoes (\$11m/+12%).
10. Other major export crops were onions at \$97m and processed peas (\$80m). Vegetable seed exports, dominated by radish seed and carrot seed, fell \$14m (18%), but at \$66m vegetable seeds are significant exports.
11. Land under horticultural crop cultivation in New Zealand is calculated to be approximately 123,000 hectares.
12. Combined domestic sales value of horticulture products are calculated to exceed \$3.2 billion and exports of \$3.9 billion has the value of New Zealand's horticultural outputs exceeding \$7 billion for the first time.
13. In addition to fruit, vegetables, flowers, seeds and bulbs exported the New Zealand horticultural sector also exported:
 - Natural honey exports of \$187m was an increase of \$42m (29%) on 2013 (2008 \$62.6m). Bees and pollination are an integral part of New Zealand's horticulture.
 - Export of horticultural machinery and components, valued at \$75m (free-on-board), primarily for cleaning, sorting and grading fresh and dried fruit and vegetables were exported in 2014 (\$47.2m in 2008).
 - Income to New Zealand companies in the form of royalties and licence agreements are in addition to these component exports.

14. The key constraints to growth in horticultural production, which are the basis for this submission, remain access to the factors of production - in particular, land and water. Of the 5.5% of land available for production in New Zealand roughly 1/10th was subdivided for lifestyle blocks in the last 15 years. Access to water and land is becoming a key constraint to growth because of competition for versatile land for housing, the availability of water at high reliability, and water quality constraints.
15. Horticulture is a very efficient high value industry. For a comparison, ~50,000 people are employed in the >\$7Bn industry, operating off ~123,000ha. Dairy returns around \$18Bn, employs 30,000 people off a footprint of ~2.5million hectares. Increasingly, iwi based agribusiness is looking to expand into horticulture and Horticulture NZ has supported these groups to do so.

TOPIC 1 - FRESHWATER AND OUR ENVIRONMENT

16. There are five sub-areas to this topic:
- (a) maintain or improve overall water quality;
 - (b) macroinvertebrate community index as a measure of water quality;
 - (c) significant infrastructure and water quality;
 - (d) coastal lakes and lagoons; and
 - (e) stock exclusion from water bodies.
17. Horticulture NZ provides comment on the first four of these proposals below.

Maintain or improve overall water quality

18. The proposals here are two-fold:
- (a) to amend Objective A2 of the National Policy Statement for Freshwater Management (NPSFM) so it applies within a freshwater management unit (FMU) rather than across a region; and
 - (b) to clarify that councils can maintain water quality by keeping quality within an attribute band where it is specified in the National Objectives Framework (NOF) or demonstrating the values for that FMU are not worse off if it is not within the NOF.

Discussion

19. The change to requiring the maintenance and improvement of water quality to be assessed at a FMU level rather than a regional level is supported. The FMU enables assessing on a catchment/sub-catchment which is a more appropriate measure for freshwater than a regional council boundary. However, to ensure that the FMU functions effectively, there is a need to address:
- (a) where there is development in one FMU (such as the Upper Waikato River) that affects or imposes costs on another FMU (such as the Lower Waikato River) there needs to be an ability to transfer responsibility between FMUs to address that issue.
 - (b) cross boundary issues (ie where a FMU or a water body straddles more than one region) there needs to be further guidance as to how such issues will be dealt with. This is particularly in relation to groundwater – a classic current case in point is the Kawa aquifer that straddles the Auckland/Waikato regions where presently there is no strategic management approach to its management.
20. Defining the term “overall” as meaning within an attribute band is strongly supported as this will provide more certainty to councils as to what the acceptable range of water quality is. Horticulture NZ previously had an

experience with Gisborne District Council where the Council interpreted the NPSFM as requiring maintenance of the water quality at the top of an attribute band rather than within that band – which was contrary to the legal advice (copy attached) Horticulture NZ had received on the issue.

Recommendations

21. Further clarification be provided regarding cross boundary FMUs and provision be made to transfer responsibility between FMUs where effects in one FMU may impose costs in another FMU.
22. Retain the definition of overall water quality as meaning within an attribute band.

Macroinvertebrate Community Index as a measure of water quality

23. The proposals here are two-fold:
 - (a) to require the use of Macroinvertebrate Community Index as a measure of water quality in the NPSFM by making it a mandatory method of monitoring ecosystem health; and
 - (b) to work with the Land and Water Forum (LAWF) on the potential benefits of a macroinvertebrate measure for potential inclusion into the National Objectives Framework (NOF) as an attribute.

Discussion and recommendations

24. Horticulture NZ supports both of these proposed changes and notes that the NOF reference group is already considering the inclusion of the macroinvertebrate index into the NOF.

Significant infrastructure and water quality

25. The proposal here is to enable councils or infrastructure owners to request inclusion in the Appendix 3 of the NPSFM (existing infrastructure for the purpose of enabling water bodies to be set below national bottom lines) based on evidence collected through the limit setting process. Any such exemption would be subject to public consultation.

Discussion

26. Horticulture NZ opposes the proposed exemption for infrastructure. In Horticulture NZ's view it is everyone's responsibility to manage freshwater and no specific sector or user should be given a "free pass".
27. There are many cases where infrastructure has an effect on the ability for communities to meet bottom lines. Examples include flood protection schemes, stormwater networks, drainage schemes and road networks. There are almost no water bodies in New Zealand that are not significantly impaired or altered as a result of infrastructure.

28. While the exemption applies only to “significant infrastructure” (which is defined as large built structures like hydro dams or dams that affect river flows/availability of water to downstream uses) it still casts a fairly broad net. It also unfairly transfers the costs of that infrastructure (in terms of water quality/availability) onto the rest of the community.
29. In Horticulture NZ's view to provide an exemption for infrastructure would greatly affect greatly the integrity of New Zealand's freshwater management system. If despite, Horticulture NZ's submission, an exemption is to be provided for, Horticulture NZ suggests that a process similar to that applying to intermittently closing and opening lakes and lagoons (see next section) may be more appropriate.

Recommendations

30. That the exemption for significant infrastructure be removed.

Coastal lakes and lagoons

31. The proposals here are two-fold:
 - (a) to amend the attribute tables in Appendix 2 of the NPSFM so that attributes clearly apply to intermittently closing and opening lakes and lagoons, with the same band thresholds and national bottom lines as lakes; and
 - (b) to provide direction to councils on how to request that, after meeting evidential thresholds, a FMU be included in Appendix 4 of the NPSFM following public consultation.

Discussion

32. Horticulture NZ supports these changes as they provide clarity as to how these water bodies are treated and enables the adoption of realistic timeframes (by inclusion in Appendix 4) in which these changes are to occur.

Recommendations

33. Horticulture NZ seeks that these changes be retained.

TOPIC 2 - ECONOMIC USE OF FRESHWATER

34. There are four sub-areas to this topic:
- (a) technical efficiency and good management practice standards;
 - (b) transferring consents to more efficient, higher valued uses;
 - (c) addressing over-allocation and over-use at least cost; and
 - (d) council funding for freshwater management.

Technical efficiency and good management practice standards

35. The proposals here are three-fold:
- (a) to require councils to apply technical efficiency standards in catchments that are at, or approaching, full allocation of water;
 - (b) where councils have elected to allocate discharge allowances, require them to apply good management practice standards in catchments that are at, or approaching, full allocation of contaminants; and
 - (c) require councils to apply these standards at defined times, for example, at initial limit setting, on consent expiry, and/or on application to permanently transfer consents for water or discharge allowances.

Discussion

36. Horticulture NZ supports the use of good management practices (“GMP”). However, Horticulture NZ does not consider that GMPs should be limited to catchments already past the point of no return. GMP should be a minimum standard applying to all catchments.
37. In terms of technical standards, while Horticulture NZ understands that the intent of introducing such standards are to provide greater consistency between regions and bring greater rigour to the process, Horticulture NZ remains concerned about the use of such standards.
38. In particular, Horticulture NZ considers that the interpretation and implementation of the standard is highly dependent on technical staff at the various councils. It is also dependent on the depth of understanding those staff have of the businesses that use the water and the technical efficiencies that may be able to be applied to those businesses.
39. In Horticulture NZ’s view there is a significant risk that the uneven application of technical standards could create significant commercial barriers for various businesses.
40. While Horticulture NZ supports the use of standards, Horticulture NZ considers that any such standards should be developed nationally with the

involvement of the broader community and all relevant sectors.. Horticulture NZ considers that it is necessary to develop a nationally consistent and rigorous approach to training, implementation, monitoring and reporting as this will be critical to the cost effective implementation of good management practice.

41. It is noted that there is a suggestion that such standards may also apply to urban areas. Horticulture NZ supports the same standards applying to both urban and rural areas (while acknowledging that what are GMP in those areas may vary). In Horticulture NZ's view, to do otherwise would create an unrealistic expectation regarding the cost of freshwater management, and would impose a greater burden on the rural minority.

Recommendations

42. Horticulture NZ seeks that:
 - (a) GMP be applied to all catchments not just those at or close to reaching over-allocation.
 - (b) technical standards be developed at the national level to inform some mandatory requirements.
 - (c) The same requirements (i.e. GMP and any relevant technical standards if these are adopted) also apply to urban areas.

Transferring consents to more efficient, higher valued uses

43. The proposal here is to investigate a package of measures to better enable transfers between users so allocated water and discharge allowances can move to higher valued uses, such as:
 - (a) standardising consent specifications to better enable transfer, such as separating 'take and use' components of a consent;
 - (b) making information available, including public registers of consented and used water and discharge allowances;
 - (c) model plan provisions specifying where and in what circumstances transfers are permitted; and
 - (d) enabling water user groups and nutrient user groups to provide for low cost transfers.

Discussion

44. Horticulture NZ understands that these proposals are the first step towards making permits more transferable by unbundling the take aspects of the water consents from the use aspects. While Horticulture NZ supports the principle of transferability, it considers that any unbundled consents need to be accompanied by appropriate amendments to the priorities provided for non-consumptive use – i.e. hydro, domestic and municipal water supply.

Recommendations

45. Horticulture NZ seeks that unbundled consents only be provided for where they are accompanied by appropriate amendments in the priorities provided for non-consumptive use.

Addressing over-allocation and over-use at least cost

46. The proposal here is to develop guidance on different methods of addressing over-allocation of water quality and/or quantity, if technical efficiency standards and good management practice standards are insufficient.

Discussion

47. No details are provided as to what form this guidance will take or what process will be used to develop this guidance. It is therefore unclear whether councils, other stakeholders and/or the public will get to have a say.

Recommendations

48. Horticulture NZ seeks that further details be provided on the form and process for development of this guidance.

Council funding for freshwater management

49. The proposal here is to increase the ability of councils to recover costs from water users for monitoring, enforcement, research and management.

Discussion

50. No details are provided as to how councils will be able to recover such costs and what considerations will apply in making these decisions.
51. Councils already have the ability to recover actual and reasonable costs associated with monitoring of resource consents under section 36 of the RMA. The method of calculating such charges are normally set out in the long-term plan with the rates to apply for the current financial year outlined in the annual plan.
52. However, because the process for setting charges is under the Local Government Act opportunities for engagement and consultation are minimal. Council practice in engaging with the community of users has been poor in many instances, with often the first direct notification being the increased rates bill. Opportunities for challenge are also limited, with the only real recourse through expensive judicial review.
53. Charging practices lie at the heart of resolving quality and quantity allocation systems. Charging as a whole is a topic worthy of a more extensive review. There is for instance a significant debate about the polluter pays principle, access to public resources and how to fund solutions for resource scarcity / over-allocation in waterbodies at or beyond limits.

54. Research in particular may be difficult to sheet home to an individual consent or sector, and how any such charge is apportioned (flat rate, fixed percentage, or percentage of water take or maximum daily rate) would also need to be considered.
55. Given the potential far reaching effects of such charges, clear criteria should be developed and opportunities for public participation provided. Where charges are set there should also be greater rigour applied with public involvement, and preferentially a right of appeal should be offered to submitters on charging regimes.

Recommendations

56. Further details of the changes be provided, along with clear criteria as to when and how various charges can be imposed, and that before the changes are adopted the public be given an opportunity for input.

TOPIC 3 - IWI RIGHTS AND INTERESTS IN FRESHWATER

57. There are four sub-areas to this topic:

- (a) Te Mana o te Wai in freshwater management;
- (b) iwi and hapū relationships with, and values for, water bodies;
- (c) participation in freshwater decision-making;
- (d) clean, safe drinking water for marae and papakāinga.

Te Mana o te Wai in freshwater management

58. The proposals here are two-fold:

- (a) to include a purpose statement in the NPSFM which provides context about the meaning of Te Mana o te Wai and its status as the underpinning platform for community discussions on freshwater values, objectives and limits; and
- (b) require regional councils to reflect Te Mana o te Wai in their implementation of all relevant policies in that NPSFM.

Discussion and recommendations

59. Horticulture NZ supports the involvement of iwi and hapu in freshwater management decision making and governance of freshwater. However, issues affecting the allocation of freshwater are matters that need to be resolved between the Crown and iwi. This should happen at the national level and should not be delegated to regional councils.
60. Erosion of existing entitlements to settle grievances will create further grievances without a clear, nationally directed process and direct leadership from the Crown.

Iwi and hapū relationships with, and values for, water bodies

61. The proposals here are two-fold:

- (a) that councils must, at the outset of their freshwater planning process, engage with iwi and hapū to ensure all iwi and hapū relationships with water bodies in the region are identified in regional planning documents; and
- (b) councils must, when identifying values and setting objectives for particular freshwater management units, engage with any iwi and hapū that have relationships with water bodies in the FMU.

Discussion and recommendations

Horticulture NZ supports recognition of iwi and hapu values, but notes that there are other values and these must also be identified and considered in the

management of freshwater. These include the national values identified in the National Objectives Framework. Participation in freshwater decision-making

62. The proposals here relate to:
- (a) enabling iwi and councils to agree how to work together;
 - (b) water conservation orders; and
 - (c) implementation support.

Enabling iwi and councils to agree how to work together

63. The proposal here is that the Government will amend the RMA to establish provisions for a new rohe (region or catchment) - based agreement between iwi and councils for natural resource management – a ‘mana whakahono a rohe’ agreement. The mana whakahono a rohe will:
- (a) be initiated by iwi through notice to the councils;
 - (b) be available to all iwi but will not override or replace existing arrangements for natural resource management in Treaty of Waitangi settlements nor preclude agreement of different arrangements under a Treaty settlement;
 - (c) provide for multiple iwi involvement where appropriate and agreed;
 - (d) set out how iwi and council(s) will work together in relation to plan-making, consenting, appointment of committees, monitoring and enforcement, bylaws, regulations and other council statutory responsibilities;
 - (e) include review and dispute resolution processes.

Discussion

64. Horticulture NZ supports the provision for greater iwi involvement in the freshwater area. However, Horticulture NZ remains concerned with the lack of clarity and uncertainty that the current form of such provisions may provide for its members.
65. Significant concerns have been raised recently about the effect of councils requiring cultural impact assessments (CIA) for consent applications. In some instances, the CIA requirements are effectively amounting to an opportunity for veto. There have been significant delays in response to requests for input from mana whenua agencies for consent applicants in some cases. Growers have also been asked to resolve effects beyond the ambit of the consent at times. There have also been some instances of potential commercial conflicts that have arisen in the consenting process. These include incidents where:
- (a) Growers have been asked to support related consents for subdivision and water requirements for that subdivision

- (b) Growers have been asked to delay obtaining a consent until another application has been submitted and accepted
 - (c) Growers have been asked to amend environmental effects not related to the purpose of the consent or the infrastructure.
66. To ensure that the process is clear and transparent for all parties Horticulture NZ requests the following:
- (a) A specified period in which mana whenua agencies can provide input.
 - (b) A restriction on the effects that can be sought to be mitigated, to matters directly related to the consent.
 - (c) Clarification of cost structures for cultural impact assessment.
 - (d) Clarity around how conflicts of interest will be addressed.
67. Horticulture NZ considers that further direction needs to be provided on these matters so that all parties are clear on roles and to ensure the long term acceptability and durability of any such processes.

Recommendations

68. Further clarification be provided around whether and how the proposal would be included in the RMA as well as the matters noted above in terms of the consenting process in particular.

Water conservation orders

69. The proposal here is that the Government will amend the RMA to:
- (a) require water conservation order (WCO) applications to provide evidence of consultation with relevant iwi and have one person nominated by the relevant iwi represented on the Special Tribunal convened to hear the application;
 - (b) require the Special Tribunal for a WCO (and, where relevant, the Environment Court) to consider the needs of iwi/tāngata whenua;
 - (c) require WCO applications to consider any planning processes already underway;
 - (d) allow the Minister for the Environment to delay an application if there will be a conflict with a regional planning process;
 - (e) allow councils to recommend to the Minister for the Environment that a WCO be created over an outstanding water body that has been identified through regional planning, and allow the Minister to consider recommendations under a streamlined procedure.

Discussion

70. Horticulture NZ questions whether it is still appropriate to have WCO's given that they cut across national policy statement processes. The WCO process is also not the most efficient process – given that at the end of the process a national policy statement process still has to be stepped through.
71. If WCOs are to be retained Horticulture NZ considers that:
- (a) WCO applications should also be required to consider any collaborative and transitional collaborative planning processes that are in train;
 - (b) Further “streamlining” and the introduction of yet more Ministerial powers is not appropriate or warranted. Horticulture NZ made detailed submissions as to why further Ministerial powers were not appropriate in its comments on the Resource Legislation Amendment Bill and those same comments apply equally here.

Recommendations

72. Horticulture NZ seeks that:
- (a) WCO applications also be required to consider collaborative and transitional collaborative processes in train; and
 - (b) That the proposal to provide for streamlined Ministerial decision-making of WCOs be removed.

Implementation support

73. The proposal here is that the Ministry for the Environment will facilitate and resource programmes to support councils and iwi/hapū to engage effectively in freshwater planning and decision-making, including collaborative planning.

Discussion and recommendations

74. Horticulture NZ supports the provision of support for collaborative processes but considers the whole community (not just councils, iwi and hapu) should be eligible for such support.
75. Horticulture NZ agrees that currently there are significant shortfalls in support provided by central government to implement collaboration. For example, Horticulture NZ has put developed proposals in front of Government officials in November 2014 to develop training resources and made little progress.
76. Collaborative processes take on average two to three years from start to finish. The community process takes longer because of the uneven skill level in the process and the need to bring all participants up to a base level of understanding. As a bare minimum a training and communications programme should cover:

- (a) Education to the broader community about the importance of good representation in the process, so they select good participants and support them.
- (b) A policy process package to inform participants of what they can expect.
- (c) Some explanation of the science required to make and manage freshwater within limits.
- (d) A list of support agencies they can contact for further independent information.
- (e) An awareness of the tools and mitigations available for the participant's representative sector.

Clean, safe drinking water for marae and papakāinga

77. The proposal here is that the Government will consider if additional funding is required to develop or improve water infrastructure at marae and papakainga.

Discussion and recommendations

78. Horticulture NZ supports this proposal. Horticulture NZ was shocked to discover that a significant number of communities on the East Coast of New Zealand do not have access to clean, safe drinking water on a regular basis. Safe and clean drinking water is a fundamental human right. Access provides the basis to better health and better education outcomes. Poverty can be reduced considerably through access.

TOPIC 4 - FRESHWATER FUNDING

Freshwater improvement fund

79. The Government proposes to retain this fund but to broaden the focus of the funding so that eligible projects will need to meet the following criteria:
- (a) only projects that support users to move to managing within quality and quantity limits will be considered;
 - (b) projects will need to demonstrate that they produce environmental benefits;
 - (c) projects will be considered if the overall public and private benefits are clearly demonstrated to be greater than the public and private costs;
 - (d) irrigation projects will be eligible for funding only commensurate with any environmental benefits that would not be achieved by the funding available from other sources;
 - (e) any legal entity will be eligible for funding;
 - (f) changes in resource use or other business practices, or installed infrastructure, will all need to be sustainable beyond the length of the project without ongoing Government funding;
 - (g) extension programmes will only be funded where there are clearly public benefits and the barriers to success are about adaption and roll out at scale. These projects must continue to meet the initial objectives after the extension funding has stopped;
 - (h) if comparable projects achieve similar economic and environmental objectives cost efficiently, preference will be given to projects that achieve co-benefits, such as improvements in ecosystem health, conservation and climate change;
 - (i) Government funding should reflect the public benefits of each project and be limited to a maximum of 50 per cent of the cost of any project. Other sources of government funding will not count towards the co-funding requirement. Priority will be given to projects with funding sourced from either business or philanthropic funds, in addition to funding sources from local government;
 - (j) the minimum government contribution for projects will be \$250,000. There will be no maximum contribution.

Discussion

80. Horticulture NZ supports the retention of this fund and its broader application. In terms of the specific criteria Horticulture NZ has the following comments:

- (a) Criterion (b) should be amended slightly so that projects which produce or demonstrate that practices are leading to environmental benefits are eligible; and
- (b) In relation to criterion (g), while the restrictions on extension programmes are supported, Horticulture NZ considers and an additional criterion should be added to allow for funding when the legacy effects of intergenerational pollution (the load that follows) require more management from the current generation of farmers.

Recommendations

81. That criterion (b) be amended to read:

“(b) projects will need to produce or demonstrate that they practices are leading to environmental benefits.”

82. That a new criterion (ga) be added to enable funding to be available for addressing intergenerational pollution.

Horticulture New Zealand
22 April 2016