



**TO:** Far North District Council

**DATE:** 21 October 2022

**SUBMISSION ON:** Proposed Far North District Plan

**FROM:** New Zealand Kiwifruit Growers Incorporated (NZKGI)  
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## 1 Introduction

- 1.1 New Zealand Kiwifruit Growers Inc (NZKGI) is a grower advocacy body for New Zealand Kiwifruit Growers. The kiwifruit industry is New Zealand's largest horticultural earner. Kiwifruit exports were worth \$3.6 billion in the financial year 2020/2021<sup>1</sup> and sales are expected to grow to \$4.5 billion by 2025. By 2030 Māori grower revenue is estimated to grow from \$271m to \$638m per year.
- 1.2 Kiwifruit provides the highest per hectare return in New Zealand's primary sector – \$76,722 per hectare for Green and \$177,846 per hectare for SunGold in 2020/21. Just 5% of all producing orchards are greater than 10 ha, with the median orchard being approximately 3 ha in size.
- 1.3 The kiwifruit industry is a major contributor to regional New Zealand returning \$2.25 billion directly to rural communities in 2020/21. There are approximately 2800 growers, 14,000 ha of orchards, 9,250 permanent employees and up to 24,000 jobs during the peak season.

## 2 Kiwifruit Production in the Far North District

- 2.1 As discussed in HortNZ's submission, in 2021/22 there were 128 orchards spread out across 645.31 hectares in the Far North District. These orchards are centred mainly in the Kerikeri Region. Greenfield conversion to kiwifruit orchard continues to increase with large scale developments continuing around Kerikeri.

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<sup>1</sup> Global net kiwifruit sales increased to \$4.03 BN in 2021/22, up 12% from 2020/21.

2.2 The regional contribution from kiwifruit in the Northland region is \$91m, and most of this is within the Far North District Council area. The Northland region contains 13% of the nation's kiwifruit packhouses<sup>2</sup>, and there are around 1,000 seasonal kiwifruit workers in Northland.

### **3 General Comments**

3.1 NZKGI generally supports the submission of HortNZ.

3.2 NZKGI does not disagree with the rules that apply for orchard toilets, the drilling of water wells and pump testing but is of the view that the wording could be improved so that the rules for these activities are clear for growers.

3.3 More specific comments are provided below.

### **4 Management of Pet and Pest Species**

4.1 Policy IB-P9 requires landowners to manage pets and pest species, including dogs, cats, possums, rats and mustelids, to avoid risks to threatened species, including avoiding the introduction of pets and pest species into kiwi present or high-density kiwi areas.

4.2 NZKGI supports HortNZ's submission on this policy i.e. the additional wording proposed around landowners managing pets and pests on their own land. Residents in the district are very protective of the Kiwi population and most see roaming dogs and cats as a real threat. Unfortunately, some don't recognise that their own pets can be a threat to native species. Neighbours need to be aware of landowner's efforts to control pests on their properties and the need to keep their pets on their own properties.

\$518.001

4.3 We note that in some areas pigs are a real threat especially in spring when the pigs will root up whole kiwifruit blocks even during the day. Kiwifruit growers with bush on the boundary have to be vigilant.

### **5 Management of Biosecurity**

4.4 Kiwifruit Vine Health (KVH) is a leading biosecurity organisation dedicated to supporting the New Zealand kiwifruit industry. KVH was developed in December 2010 to lead the industry response to the Psa incursion. Since November 2012 KVH has been the lead organisation responsible for managing all biosecurity readiness, response, and operations on behalf of the kiwifruit industry.

4.5 Part of KVH's role is to partner with industry and the regulatory authorities to control wild kiwifruit on a national scale. The three main reasons for controlling wild kiwifruit are to:

- reduce the chance of Psa emerging in the wild and infecting commercial vines,
- reduce pests and other diseases that may be harboured on wild kiwifruit and potentially spread to commercial vines, and
- protect indigenous biodiversity from invasive wild kiwifruit vines.

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<sup>2</sup> Scarlatti 2021 "Understanding the kiwifruit workforce size, composition and projected growth." NZKGI, Zepri and MPI.

- 6.3 It is important that KVH can identify and remove wild kiwifruit without delay for biosecurity reasons and to protect indigenous biodiversity. To date, regional councils have made appropriate provision for the timely control of wild kiwifruit through their regional pest management strategies. NZKGI therefore supports Rule IB-R1 in relation to 4. “clearance for biosecurity reasons”. S518.002

## **5 Wetland, Lake and River Margins**

- 5.1 Some ponds that store water for kiwifruit irrigation and frost protection have wetland characteristics. We presume that the wetland margin provisions are not intended to capture artificially constructed ponds used for water storage.
- 5.2 We request that the definition of “wetland, lake and river margins” is amended to provide that clarification.

## **6 Orchard Toilets, Drilling of Water Wells and Pump Testing**

- 6.1 NZKGI is of the view that the proposed rules are unclear in relation to orchard toilets, the drilling of water wells and pump testing. NZKGI seeks clarity for these activities which are important for the industry. Additional water wells are likely to be required in the future and pump tests will also be required to support resource consent applications to the Northland Regional Council for groundwater takes. In this light it is important that the rules for growers are clear.
- 6.2 NZKGI understands from communications with the council’s policy planner that orchard toilets, the drilling of water wells and pump testing that are part of agricultural, pastoral, horticultural or apiculture activities are covered by the definition of “farming” activities. These activities are therefore permitted activities in the Rural Production (Rule RPROZ-R7) and Horticulture (HZ-R7) Zones, and discretionary activities in the Horticulture Processing Facilities Zone (HPFZ-R5).
- 6.3 NZKGI does not disagree with the proposed provisions but is of the view that it would assist District Plan users if it was clear that orchard toilets, water well drilling and pump testing are included within the definition of “farming activities”. Otherwise, there may be confusion regarding the rules that apply e.g. water well drilling and pump testing could be considered temporary activities.

## **7 Seasonal Worker Accommodation**

- 7.1 Campgrounds have been used in the past by seasonal workers but moving forward they are not available for Recognised Seasonal Employees (RSEs) because they cannot stay longer than 50 days. Seasonal workers are often required for more than 50 days and the current demand for seasonal accommodation will be exacerbated as the industry grows.
- 7.2 NZKGI supports the permitted and restricted discretionary activity rules sought by HortNZ for seasonal worker accommodation. S518.005
- 7.3 NZKGI’s suggested amendments are shown overleaf. Thank you for considering this submission.



Provision	Support/Oppose	Reason	Decision Sought
Rule IB-R1 - 4. "clearance for biosecurity reasons"	Support	It is important to the kiwifruit industry that indigenous vegetation is able to be cleared as a permitted activity for biosecurity reasons, e.g. KVH needs to be able to remove wild kiwifruit vines within indigenous vegetation.	Retain Rule IB-R1 – 4.
Definition of "Wetland, Lake and River Margins"	Conditional support	The definition is supported on the basis that clarification is provided that artificially constructed water storage ponds are not captured by the definition.	Add a note to the definition of "Wetland, Lake and River Margins" as follows:  <i>"For the avoidance of doubt, artificially constructed water storage ponds are not included within the definition".</i>
Definition of "Farming"	Conditional support	The definition is supported however it would assist if the definition was amended to confirm that it includes orchard toilets, the drilling of water wells and pump testing.	Add a note to the definition of "Farming" as follows:  <i>"For the avoidance of doubt, the definition of farming includes orchard toilets, the drilling of water wells and pump tests."</i>

S518.003

S518.004