

21 OCT 2019  
10.41 PM

06139

To: Horizons Regional Council

Email to: [submissions@horizons.govt.nz](mailto:submissions@horizons.govt.nz)

Post hard copy to Private Bag 11025 Manawatū Mail Centre, Palmerston North 4442.  
Deliver your submission to Horizons' office at 11-15 Victoria Avenue, Palmerston North.

Name of Submitter: Tony Parlato- for Parlato Farming Co (2008 Ltd)

This is a submission on the following proposed plan: Proposed Plan Change 2 – Existing Intensive Farming Land uses.

I could not gain an advantage in trade competition in making this submission.

The specific provisions of the proposal that my submission relates to are:

- Policy 5-8 Management and regulation of intensive farming land-use activities affecting groundwater and surface water quality
- Policy 14-3 Good management practices
- Policy 14-5 Management of intensive farming land uses
- Policy 14-6 Resource consent decision-making for intensive farming land uses
- Rules 14.1 Agricultural Activities

My submission is that:

- Not all rural production activities are equal in value to the community or equal in environmental effect. The values of vegetable growing (including potato production) for domestic food supply and security and the ability to feed people in the future is not reflected in proposed Plan Change 2.
- Nor does the Plan Change 2 adequately address the effects of climate change in maintaining the status quo land use activity mix for essential food production. The Plan Change fails to recognise the value of the Horizons-Manawatu region as a food source for the whole of New Zealand.
- A tailored approach is required for managing commercial vegetable growing land with high production values to realise its food production purpose, while achieving catchment wide water quality improvements and other environmental benefits in the longer term. This means retaining access to these unique soils and the natural resources which support them.
- Rural production systems are very diverse with a wide range of fruits, vegetables and other crops being grown across Horizons-Manawatu regional. Potato production systems rely on rotations; often enabled by sharing and leasing agreements. The existing approach in the Horizons-Manawatu region has significantly reduced the ability to undertake new leases. We are concerned that Plan Change 2 will introduce further obstacles and requires amendment to avoid wider effects that are most likely unintended
- The assessment process underpinning the proposed Plan Change 2 does not adequately provide for new growing operations to meet the future food demands. Existing production is also at threat from the restrictions on movement of activities across artificial zone and catchment boundaries.
- I have concerns about my ability to accurately and reliably assess nutrient discharges from horticultural systems, specifically the deficiencies in OVERSEER to model horticultural crops, and would support a performance-based method for tallying nutrient losses related to horticultural management practices. The potato sector is supporting a more accurate "direct measurement" based approach and in my view that is appropriate for the industry.
- The real water quality improvements come from the practices I adopt to manage discharges from the land I manage (often only in temporary rotations). I support requiring all growers to operate at good management practice.

- I propose provisions be added to incentivise and enable existing areas of vegetable growing to move onto suitable land in a different catchment across the region, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations as they are available.
- I strongly support the ability for a group of growers to be able to manage environmental issues collectively to improve the effectiveness of their response to water quality issues. I consider Plan Change 2 should enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigation schemes and should be expressly provided for in the Plan.
- Where this submission aligns with the Potatoes NZ and Horticulture NZ submissions, I also support those submissions.
- My operation is located in Moutoa Horowhenua and comprises of the following crops and acreage:  
Vegetable crops  
and intensive livestock

Plan Change 2 is likely to affect my business in the following ways:\_it is likely to hinder my business by limiting production.

I wish to be heard in support of this submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Signature of submitter: Tony Parlato

Dated: 21 October 2019

Address for service: 1029 Foxton Shannon Road, RD13, Foxton

Tel: 0274462346

Email: tonyandamber@xtra.co.nz