

**From:** [moanadowns@farmside.co.nz](mailto:moanadowns@farmside.co.nz)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Submission from Alps Seed Ltd  
**Date:** Thursday, 12 September 2019 6:20:00 PM

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To: Environment Canterbury  
C/- [mailroom@ecan.govt.nz](mailto:mailroom@ecan.govt.nz)

**Name of Submitter:** Andrew McKay – Alps Seed Ltd

This is a submission on the following proposed plan: Proposed Plan Change 7 to the Canterbury Land and Water Plan.

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:

- Part A – Omnibus
- Part B – OTOP
- Part C – Waimakariri

My submission is that:

- Not all rural production activities are equal in value to the community or equal in environmental effect. The value 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 7. Nor are the effects of climate change considered in maintaining the status quo land use activity mix
- A tailored approach is required for commercial vegetable production if land with high production value is to be realised for its food production purpose, while achieving catchment wide water quality improvements and other environmental benefits in the longer term
- Rural production systems are very diverse with a wide range of fruits, vegetables and other crops being grown across Canterbury. Potato production systems rely on rotations; often enabled by sharing and leasing agreements. The current Canterbury approach has significantly degraded the ability to undertake new leases. Plan Change 7 presents significant further obstacles and requires amendment to avoid wider effects that are most likely unintended
- The assessment process underpinning the proposed Plan Change 7 does not adequately provide for new growing operations to meet future food demand. Existing production is also at threat from the restrictions on movement of activities across property and catchment boundaries
- I have concerns about my ability to accurately assess nutrient discharges from horticultural systems, specifically the deficiencies in OVERSEER to model horticultural crops, and would support a more generic method for tallying nutrient losses. The potato sector is supporting a more accurate “direct measurement” based approach and in my view that is appropriate
- The real water quality improvement come from the practices I adopt to manage discharges from land I manage (often only temporarily). I support requiring all growers to operate at good management practice
- I propose provisions be added to enable existing areas of vegetable growing to move onto different land in a different catchment, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations
- I also support the ability for a group of growers to be able to manage environmental issues collectively to improve the effectiveness of the response to water quality issues. I consider Plan Change 7 should enable collaborative or collective approaches to regulating potato production activities. This has been demonstrated as workable by the irrigation schemes and should not be expressly disallowed
- Where this submission aligns with the PotatoesNZ and Horticulture NZ submissions, I support those submissions

- Our operation is located in Mid and South Canterbury and comprises of the following crops and acreage: **85ha Seed Potatoes comprising of 18 different varieties, providing seed to the process, chipping and fresh market industries. This 85ha of seed potatoes is produced on leased across 8 different farms. It is imperative we lease land as this provides a rotation to limit the effects of soil borne diseases.**
- Plan Change 7 is likely to affect our business in the following ways:
  - Given increased compliance and regulatory costs for our business, reducing areas to that of what we produced between 2009-13, would no longer make our business viable.
  - As our economic margins have been reduced and our fertiliser costs have increased, we are managing nitrogen inputs significantly more accurately than 2009-13. We deep soil nitrogen test paddocks prior to planting and regular leaf test crops to accurately predict nitrogen requirements. It is totally uneconomic for us to apply nitrogen over and above of what the crop requires.
  - For seed potato production we apply between 40kgN/ha (for crops yielding 25-35t/ha) up to 160kg/ha N for crops yielding 60t/ha. We believe we are actually helping farmers dilute the average amount of N applied per ha over there property due to the way we manage our crops and nitrogen applications
  - New technology, research and development, attention to detail around nitrogen usage and water management will provide far greater environmental improvement / enhancement than going back to how we managed crops during the 2009-13 period.
  - Our business is a family business, myself and my wife are both tertiary qualified and have previously both been employed as agronomists. We understand our crops, we understand our soils and know how to manage our nitrogen and water requirements. We provide another option for our lease farmers rotation and assist them in managing nitrogen discharges from there properties. We need to be innovative and not draconian as, given blanket type rules and restrictions without underlying science we have no ability to use our skills and experience in the industry to take our business into the future.

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: Andrew McKay**

**Dated:** 12<sup>th</sup> September 2019

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