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To: [Mailroom Mailbox](#)
Cc: [Hamza, Ali {PI}](#); [Pemberton, Brett {PI}](#)
Subject: Bluebird Foods submission
Date: Friday, 13 September 2019 12:08:42 PM
Attachments: [FINAL Submission to ECan PC71 - 13th Sept.docx](#)

Please see attached submission for the ECan proposal



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To: Environment Canterbury
C/- mailroom@ecan.govt.nz

Name of Submitter: Bluebird Foods Ltd (PepsiCo)

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

We cannot 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

Our 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

Bluebird Foods have concerns about our grower's 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 our view that is appropriate

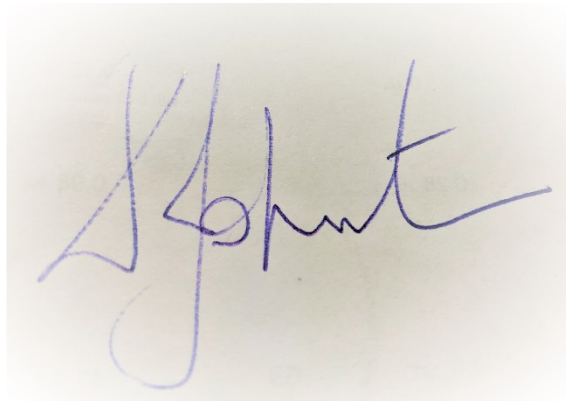
- The real water quality improvement comes from the practices our growers adopt to manage discharges from land that they manage (often only temporarily). Bluebird Foods requires all growers to use good management practice and adopt sustainable farming practices
- Bluebird Foods proposes provisions be 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
- We 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. Bluebird Foods considers 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 Processing plant is located 124 Wiri Station Road Manukau City Auckland. We source around a 1/3 of our total crop requirement from the Canterbury region comprising of excess of 10,000ts grown in this region as well as our full proprietary seed programme that services a large portion of our total processing tonnage around New Zealand
- Plan Change 2 is likely to affect Bluebird Foods in the following ways: severely limiting the ability to supply potatoes to meet growth opportunities within our market (crisp production)

Bluebird Foods wish to be heard in support of this submission.

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

Signature of submitter (e-sign)

A handwritten signature in blue ink, appearing to read 'Debbie Johnston', is shown on a light-colored background.

Dated: 13th Sept 2019

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