

From: [Kevin Teahen](#)
To: [Mailroom Mailbox](#)
Cc: [Akria \(Yabby\) Yabuuchi](#)
Subject: JPNZ submission PC7
Date: Friday, 13 September 2019 4:27:27 PM

To Whom it may concern,

Please find the attached submission on proposed Plan Change 7 to the Canterbury Land and Water Regional Plan (PC7),

Submitted on behalf of Akria Yabuuchi, CEO.

Kind Regards

Kevin Teahen

Agricultural Manager

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Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

Clause 5 First Schedule, Resource Management Act 1991

To: Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan
Environment Canterbury
PO Box 345
Christchurch 8140
By email: mailroom@ecan.govt.nz

Name of submitter:

1. Juice Products New Zealand
Address: 67 Sheffield Street
P.O. Box 2124
Washdyke
Phone: 03 687 4170
Contact: Kevin Teahen
Email: kevin@jp-nz.com

Trade competition stated:

2. Juice Products New Zealand could not gain an advantage in trade competition through this submission.

Proposal this submission relates to is:

3. This submission is on proposed Plan Change 7 to the Canterbury Land and Water Regional Plan (PC7).

Wish to be Heard:

4. Juice Product New Zealand wishes to be heard in support of this submission.
5. Juice Products New Zealand would be prepared to consider presenting a joint case with others making similar submissions at the hearing.

Background:

Juice Products New Zealand is a vegetable and fruit processor for juice and puree products sourcing raw materials from local Canterbury growers.

The business has been in operation since 2008 in the Washdyke area and employs 35 fulltime staff and 40 seasonal staff, while also stimulating the local economy through engaging other support business.

Juice Products has made considerable investment in the area over this time and continues to do so moving forward, with \$7 million dollars of capital expenditure earmarked for future expansion plans in near future.

The main product produced is in carrot juice concentrate for export markets, along with developing beetroot markets and current investigation into green vegetable products

Juice Products New Zealand currently sources material from contracted growers who are all NZGAP or GlobalGAP certified and look to use latest production technologies to engage in good management practices.

Juice Products New Zealand wishes to develop the business over the coming years with expansion of the facility which will require expansion of raw material requirements, of which Juice Products New Zealand wishes to do so in a sustainable, environmentally and socially responsible manner while also remaining competitive in the market place.

Reasons for Submission and discussion points by Juice Products New Zealand:

Concerns over:

- Not all rural production activities are equal in value to the community or equal in environmental effect. The value of vegetable growing; including carrot production for domestic and export food supply including food 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 of land use activity mix
- Policy 4.36A sp(a): We agree commercial vegetable growers should operate at Good Management Practises, but have concerns about the ability to accurately assess nutrient discharges from horticultural systems, specifically the deficiencies in OVERSEER to model horticultural crops and this needs to be looked at to ensure the figures reflect the cropping system its regulating accurately.
- Policy 4.36A sp(b): Avoiding the establishment or expansion of existing grower vegetable operations and 5.42CB around baseline data span, sub region and nutrient allocation zone restrictions, we have concerns this will have wider implications in allowing food production to meet demand as populations increase and restrict larger rotation gaps to aid in being sustainable in production when needed.
- We propose provisions be added to enable existing areas of vegetable production to move onto different land in different catchments, to account for crop rotation, leased land arrangements and to enable growers to move to less environmentally sensitive locations.
- We support other submissions which align with our concerns

Signature of submitter :

Date: 13/09/2019