

From: allen@jadegarden.co.nz
To: [Mailroom Mailbox](#)
Subject: PC7 submission
Date: Friday, 13 September 2019 4:30:37 PM
Attachments: [Submission to ECan PC7.docx](#)

Hi Please find attached my submission to PC7.

Allen Lim
Jade Garden Produce
M: 027 282 8567
E: allen@jadegarden.co.nz



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

Name of Submitter: Allen Lim

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

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

- Part A – Omnibus

Background

I grow vegetables on 110 ha of land in various locations around Rolleston, Springston, and Lincoln area. I also have a cucumber growing operation under glass in North Canterbury.

The reason PC7 is required is that PC1 had inadvertently made it illegal for vegetable growers to practice normal crop rotations on lease land. The way PC7 is written at present will have other unintended consequences.

My submission is that:

- Over 80% of vegetables are all sold and eaten locally and are there to meet one of the most basic human needs – sustenance. Without intensification, putting a cap on growing area is the same as putting a cap on population growth
- In the short term, capping the growing area will push grower further out from populated area to find land or shorten supply into markets, either way this will lead to more expensive vegetables
- Requiring consent to increase area will unnecessary increase costs to grower which will need to be passed on if they are to stay viable
- The consumption of vegetables is likely to stay relatively static. If it were to increase dramatically, it would only be for the betterment of the general population and we should not cap the area anyway. I understand this rule was to try to stem the flow of growers who have been squeezed out of growing areas like Pukekohe and are moving their operation down to Canterbury where newly irrigated land from CPW is trying to find higher value crops
- If the reason for capping the area is because Overseer does not work well for vegetables and we must “maintain or improve” water quality, then I think we should exempt vegetables from all such requirements as the vegetable production area is only 3 to 4% of the total. And 3 to 4% is the margin of error for an Overseer budget
- If the reason for the rule is to prevent high leaching vegetable crops – then exclude those crops.
- Capping the area also leads to unsustainable practice. The reason that the unintended consequence in PC1 came about in the first instance is because vegetable production needs to practice crop rotation to avoid soilborne disease.
- An increase in production area does not necessary translate into more production and more leaching – in my case, market size is still the same, the growing operation would become less intensive with increased area, more break crops, better crop rotation, better soil health, and most importantly – sustainable long term.
- Although there are thousands of hectares of highly productive land in Canterbury, there are only pockets of highly productive land that are suitable for **year-round** production of vegetables.
- Any new land must be close to population centres because we deliver vegetables fresh to the markets 3 times a day. Once the growing operation is established, all land has to be close to packhouse as multiple trips are made each day from farm to packhouse
- Finding good land is already difficult enough without further rules
- The rules proposed here is much tougher than what came out of the Essential Freshwaters discussion document
- For glasshouse operations, any increase in growing area should be a permitted activity as there is a high degree of control over nutrient input and any discharge to land is negligible.
- Land swapping, or sharing, should be encouraged without requiring any additional nutrient budget accounting for either party as the arrangement is temporary, total footprint (area and N-leaching

wise) does not change and this is best practice. If we don't do this, we will exhaust the soil's capacity to grow good crops. I cannot emphasize this point enough.

- A possible solution is to draw a line between local supply and export market. Local supply is relatively static as mentioned above. If implemented as a rule, will support the NPS requirement to "maintain or improve" water quality
- To avoid growers all moving into one zone, "local supply" may have to defined as within the south island.

My operation is located_31 Lincoln Rolleston Road, RD8, Christchurch 7678_ and comprises of the following crops and acreage___Spring onion, Pak Choy, Cabbage, leeks, Silverbeet, Globe Artichoke, Kohl Rabe, Daikons, Cucumbers___total area 110 ha outdoors and 2 ha of glass_____

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



Dated: 13/9/19

Address for service:

31 Lincoln Rolleston Road, RD8, Christchurch 7678

Tel: 0272828567

Email: allen@jadegarden.co.nz