

From: [Kelly Deihl](#)
To: [Mailroom Mailbox](#)
Subject: Mr Chips Ltd Submission on Plan Change 7
Date: Friday, 13 September 2019 1:20:30 PM
Attachments: [Mr Chips Ltd Submission to ECan PC7 2019.pdf](#)

To whom it may concern,

Please find attached, Mr Chips submission in relation to Plan Change 7.

Many thanks,

Kelly

Kelly Deihl | Principal Scientist | Environmental Management Solutions Ltd

M: 0274111035 | www.environmentalmanagement.co.nz | A: Level 1, 27 Liverpool Street, Tuakau 2121

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

Name of Submitter: Mr Chips 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:

1. 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.
2. 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.
3. 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.
4. 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. My Chips Ltd consider that under the current proposal Commercial Vegetable Production (CVP) may be unable to provide for a growing domestic population which is likely to have significant economic and social impacts on the region and wider communities. The impacts of restricting land use flexibility amidst a growing population, need to be adequately considered.
5. We have concerns about the 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.
6. It is considered that provisions within PC7 should 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 consider commercial vegetable production to be an essential industry. Land use flexibility is key to running horticultural operations, where rotation of land within the cropping system is essential for soil health and to maintain an environmentally sustainable operation.
7. We 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

8. Where this submission aligns with the PotatoesNZ and Horticulture NZ submissions, I support those submissions
9. Our operation is located in East Tamaki, Auckland and is a potato processing plant that employs over 100 people and processes 40,000kg of potatoes per year sourced from Auckland, Waikato, Hawkes Bay and Canterbury.

We 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 September, 2019

Address for service: 8 Pukekiwiriki Pl, East Tamaki, Auckland 2013

Tel: 0274934425

Email: dacey.balle@ballebros.co.nz

From: [Kelly Deihl](#)
To: [Mailroom Mailbox](#)
Subject: Minor amendment to units within Plan Change 7 to the LWRP Submission - Attention Andrew Parrish
Date: Monday, 16 September 2019 10:31:02 AM

Good Morning,

I have just finished speaking to your team regarding our submission in relation to PC7 for Mr Chips, which was lodged on Friday. Following lodgement, we realised that the description of the Company includes the volume of potatoes processed per annum in kg but should have referred to metric tonnes. I have amended the submission and based upon the advice of your team, attach the amended submission, attention of Andrew Parrish.

Could you please supersede the previously lodged submission with the attached. No other changes have been made to the submission.

If you could please confirm that this is ok, it would be greatly appreciated.

Many thanks,

Kelly

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