

Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE	
Mailed to	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
Faxed to	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i>
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS		
Full name Pat Dunn –Southern Fresh Foods LTD		
Full address 461 Bruntwood Road Cambridge		
Email patdunn@southernfresh.co.nz	Phone 021 228 4046	Fax 07 823 4390

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Southern Fresh Foods LTD		
Address for service of person making submission PO Box 45 Hautapu Tamahere 3451		
Email patdunn@southernfresh.co.nz	Phone 07 823 0967	Fax 07 823 4390

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<input checked="" type="checkbox"/> I could not gain an advantage in trade competition through this submission.
<input type="checkbox"/> I am directly affected by an effect of the subject matter of the submission that:
(a) adversely effects the environment, and
(b) does not relate to the trade competition or the effects of trade competition.
Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

*Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1
(continue on separate sheet(s) if necessary.)*

3.11.5.5 b 3.11.5.5f 3.11.5.5g 3.11.5.7

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(select as appropriate and continue on separate sheet(s) if necessary.)

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

MY SUBMISSION IS THAT

*Tell us the reasons why you support or oppose or wish to have the specific provisions amended.
(Please continue on separate sheet(s) if necessary.)*

Please see separate 3 sheets

I SEEK THE FOLLOWING DECISION BY COUNCIL

(select as appropriate and continue on separate sheet(s) if necessary.)

- Accept the above provision
- Accept the above provision with amendments as outlined below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

Amend as follows:

See on attached Sheets

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

I wish to speak at the hearing in support of my submissions.

I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

Yes, I have attached extra sheets.

No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature



Date

8/3/17

Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

Waikato Regional Council Healthy Rivers Plan Change 1 - Submission

Southern Fresh Foods - Background

1. Southern Fresh Foods is a grower and processor of specialty produce, and is based in Bruntwood Road.
2. Southern Fresh Foods commenced trading in 2000 after having been involved in the floriculture industry for over 20 years prior. Southern Fresh Foods commenced by exporting premium baby vegetables to the top-end UK restaurant trade. Local demand for these products evolved quickly and a solid local customer base has been established.
3. SFF soon recognised the rapidly expanding baby salad industry, and concentrated on the food service industry as well as on processors supplying the retail trade. The product range quickly expanded to include herbs to become NZ's leading player supplying fresh specialized salads and gourmet vegetables to the food service sector.
4. SFF grow 100% of all its fresh products products in the Waikato.
5. Our growing range currently includes around 40 different crops including:
Baby Vegetables – Orange Carrot, Purple Carrot, Yellow Carrot, White Carrot, Fennel, Turnips, Red Beetroot, Chioggia Beetroot, Gold Beetroot, White Beetroot, Leeks, Watermelon Radish, Baby Cauliflower.
Salads – Mesclun (6 different leaves), Baby Spinach, Rocket, Lettuce, Baby Lettuce, Cos, Baby Kale, Land Cress, Mache, Pea Tendrils
Herbs – Basil, Coriander, Fennel Fern, Italian Parsley, Mint, Rosemary, Oregano, Thyme, Lemon Balm, Chives, Edible Flowers
6. SFF currently have cropping land of approximately 550 acres for production, of which a large part of this area is leased.
7. The main block has large factory facilities for processing and packaging the products.
8. SFF currently employ approximately 100 full-time staff. Because of the all-year-round nature of the business, the labour required remains constant with increase of temporary staff during certain peaks in demand.
9. SFF harvest every week of the year, and plant most crops every week of the year, with approximately 10 crops being planted twice per week all year round.
This means Southern Fresh Foods currently plant up to 2600 batches per year (a batch ranging between 0.05ha to 3ha of bed) on 12 blocks of lease land.
There is no other known operation in the world with the multitude of crop planning complexities like this.
10. SFF have invested heavily in buildings, process equipment, machinery, wells and irrigation equipment, with approximately \$12million having been invested thus far.
11. SFF 2016 Business Plan –
The five-year plan for Southern Fresh Foods is to increase turnover by 100% by 2020 which means increasing cropping land from 550 acres to approximately 900 acres – with total group turnover of \$30 million.

Submission

1. Rule 3.11.5.5b(Schedule B) Nitrogen Reference Points (NRP) - Oppose

Concerns regarding the economic effects resulting from the restriction of nitrogen for future development.

If in the future, after NRP was set, Southern Fresh Foods decided to grow a higher nitrogen-requiring crop such as potatoes, the plan change does not allow for this. Therefore Southern Fresh Foods would be restricted in what future crops can be grown. Allowance for such scenarios needs to be provided for.

Secondly, as Southern Fresh already operate a low nutrient input system, a further reduction of NRP over specified periods will result in reduced yield, and in turn, a reduction in staff. This will have a potentially severe negative economic impact on the business and our local community from loss of employment from Southern Fresh Foods. NRP reduction by entity should be removed from the Plan and replaced with "NRP per crop reduced 10% over 10 years to a level that is an industry accepted standard for each specific crop grown – e.g 70/kg per ha for lettuce."

2. Rule 3.11.5.5b(Schedule B) Overseer - Oppose

The plan needs to provide for the establishment of an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems from OVERSEER.

As Southern Fresh Foods plant most of their crops every week of the year and over 10 crops are planted twice per week all year round. This means Southern Fresh Foods plant up to 2600 batches per year (a batch ranging between 0.05ha to 3ha of bed.) spread across 12 blocks of lease land – OVERSEER does not have the ability nor capability to model nitrogen for this level of complexity.

3. Rule 3.11.5.5f & Rule 3.11.5.5g - Oppose

Southern Fresh do not agree that operations capable of demonstrating clear decreases in existing diffuse discharges when changing use of land should be required to undertake an application for a non-complying activity resource consent. They should be provided for as a restricted discretionary activity.

This rule would severely restrict economic growth and employment opportunities in the Waikato region by jeopardising prior planned production expansion into the local and export markets. (Already SFF have spent large amount of funds on Export investigation and marketing with New Zealand Trade and Enterprise at Asian food shows working with new customers).

4. Ref 3.11.5.7 – Oppose

Southern Fresh opposes the non-complying activity status for land use change to commercial vegetable production. This rule is unworkable and unfair for commercial vegetable production on the following basis –

- In many situations, vegetable production's NRP is less than dairy farming.
- Commercial vegetable production does not produce E.coli such as dairy and livestock farming.
- Sediment is not an issue with many vegetable growers due to their land type requirements.

On the basis of the above points, we believe vegetable production has less discharge effects than dairy or livestock and should not be given specifically harsher rules than other land use activities.

The plan must enable opportunities for commercial vegetable producers to increase their footprint onto dairy, cropping or livestock properties if it can be demonstrated that there will be no increase in discharge contaminants – new land usage should be provided for as a restricted discretionary activity and should not be regarded as a non-complying activity requiring a resource consent .