SUBMITTER IDONO

Submission

To:

Environment Canterbury

By:

Grant Family

Including: Grant Pastoral Ltd, Leslie Downs Farming Ltd,

McClelland Dairies Ltd and Jarow Farming Ltd.

On the:

Proposed Canterbury Land and Water Regional Plan

Date:

4 October 2012

Contact:

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EC - CHCH PLAN LWRPI DRAT 654 ACTION 115 09 3 OCT 2012

EC 131860

EC 132339

EC 306854

309706

General Submission.

The Grant Family supports the Submission Federated Farmers of New Zealand has submitted for the Canterbury Land and Water Regional Plan.

The Grant Family farms four properties around South Canterbury with enterprises including Dairying, Sheep and Beef, Dry Stock, Winter Grazing and Cropping. The proposed plan will impact on our business significantly. The main result will be the financial impact of the capping of production. This will have a direct result on the flow of revenue through the local economy e.g. wages paid, development using local firms and contractors.

Two main points of the plan cause us concern.

The first is the capping of nitrogen loss to 20kgs/ha.
We believe this figure is too low. While we understand the use of OVERSEERTM is the tool used for calculating this we have reservations on its accuracy at calculating N losses (plus or minus 20%). For this reason we think the cap of 20kgs would have an undue impact on intensive farming systems.

Decision sought

The increase of the capped N loss figure.

2. The second is the use of the figure of 10% as the trigger for the definition of land use change.

We believe this figure is too low. Most if not all farming systems could go over the 10% threshold simply with seasonal variations or by small advances in management techniques. Also the use of the OVERSEERTM programme to calculate this, with its 20% variation, could produce an inaccurate result. We also think the 10% figure is not an accurate indication of genuine land use change.

Decision sought

The increase of the 10% figure to 25%.

Yours faithfully

Jason Grant.