Submission on Proposed Canterbury Land and Water Regional Plan

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 5 October 2012 to:
Freepost 1201 Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
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Trade Competition

Pursuant to Clause 6 of Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

a) adversely affects the environment; and
b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

☐ I could not gain an advantage in trade competition through this submission; or
☐ I could gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

☐ I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.
☐ I am not directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Signature:
Date: 5/10/2012

Please note:
(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

☐ I do not wish to be heard in support of my submission; or
☐ I do wish to be heard in support of my submission; and if so,
☐ If others make a similar submission, I will consider presenting a joint case with them at the hearing.
<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-12</td>
<td>5.42</td>
<td>Oppose</td>
<td></td>
</tr>
<tr>
<td>5-12</td>
<td>5.43</td>
<td>Oppose</td>
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<td>5-12</td>
<td>5.44</td>
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<td>5.45</td>
<td>Oppose</td>
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</tbody>
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Add further pages as required – please initial any additional pages.
Additional Information to Submission on Proposed Canterbury Land and Water Regional Plan

We support the ECAN proposed Land and Water regional plan in principle. We view ECAN’s intent of future development, utilising our water resources, while maintaining our improving or lowland streams and water bodies quality as essential for the long term viability of our region.

We have some recommendations to ensure that the proposed plan is more workable and does not completely stall short term economic activity:

<table>
<thead>
<tr>
<th>Sec 5.</th>
<th>Page 12</th>
<th>5.43 to 5.45</th>
<th>Oppose</th>
</tr>
</thead>
</table>

1. Impact of Oversee

We have some concerns with the requirements to obtain a resource consent if nitrate leaching increases by more than 10%, or irrigation area is increased. Our concerns are based on:

- Setting benchmarks over a very short period of time with atypical weather patterns.
- While we acknowledge and support the use of Oversee as the tool of choice for the future we view regulations based on tight interpretation as too ambitious while Oversee, and the science it is built on, are in the early stages of development, and as acknowledged by the developers, Oversee has a significant margin of error of +/- 30% and does not embrace all technologies, eg, Eco-N in high rainfall environments.

2. Land Use Intensification For Current Low Leaching Farms

The plan unfairly discriminates against farmers who over the monitoring period have been low N-leaching properties, or those who have farm practice change leaders in reducing N leached. During the transition phase of the plan while we wait for the regional zone committee recommendations on acceptable leaching (look up tables), these farms are going to be severely impeded in either land use intensification, or sale options.

- They will not have flexibility to make subtle changes in farm programs in a timely manner. Changes in crop rotation options could be badly affected.
- They will have difficulty in consenting irrigation development, particularly those outside schemes who have group consents.
- Their farms will be devalued due to the associated uncertainty.
For this significant sector of Canterbury agriculture, improvements in productivity, farm succession, and profitability in the short term will all be unduly impeded by the rules outlined in the Land and Water Regional plan.

Recommendations:

To resolve this situation we suggest that the PLWRP be amended:

1. Farmers leaching below a realistic prescribed level to have the discretion to alter their farm program and allow for them to complete development as long as their nutrient losses do not exceed the prescribed level and they submit a farm environment plan with their consent application.

2. The prescribed level should be an interim step set by ECAN in consultation with industry good bodies based on good science, e.g., Dairy NZ, FAR, Beef and Lamb, AgResearch, Lincoln University, within the next 2 months to avoid the confusion and uncertainty that currently exists with the proposals.

We acknowledge that this may result in a short term lift in nutrient leaching from our regions, however with growing good practice, driven by these initiatives, this potential increase will be more than offset by the fast technology adopters who will react to the rules quickly. We have full confidence that the proposed LWRP will reduce the levels as planned in the medium to long term.

3. Professional Capacity and Training

NZIPIM acknowledge the time limitation of professional’s who can complete the audits, environmental plans and nutrient budgets. If the intention of PLWRP is to be a collaborative approach, as professionals we need the time and resources to spend with clients to showcase integrated farm systems and best practice and how these impact their farm program, sustainability and profitability. That skill set is one farm management consultants are trained in. For the PLWRP to be endorsed and adopted by farmers we need to have the time and resources to do this well. Just writing out reports and nutrient budgets without analysing system impacts and “what if” scenario’s will not educate farmers, but encourages a box ticking mentality. This will slow the adoption process of technology and management necessary to achieve the successful outcome of less nutrient losses from the Agricultural sector of Canterbury.

We recommend resourcing to be allocated for up skilling farm management consultants, creating “bridges” to train young graduates to achieve credibility with farmers and consideration of multiple layers of practice change techniques to achieved desired outcomes. ECAN can leverage their resources in this regard by collaborating with the industry good bodies, NZIPIM, Universities and CRI’s.
We note that the plan requires nutrient management plans be submitted by 31\textsuperscript{st} August, following a 30\textsuperscript{th} June year. The resources required to do this job properly are going to be unrealistic. Realistic time frames for these logistics, while ensuring the outcomes as discussed above are achieved will be required. We recommend at least 6 months be allowed for submission.

The senior Canterbury NZIPIM members are prepared to appear in support of these recommendations if required.

Jeremy Savage  Chairman NZIPIM Canterbury/Westland
Wayne Allen  President NZIPIM New Zealand
Andrew Macfarlane  Ross Polson
Phillip Everest  Hugh Eaton
Anton Nichols  Hayden Robinson