Environment Canterbury
Regional Council
Kaunihera Taiao ki Waitaha

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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
P O Box 345
Christchurch 8140

Full Name: Jeremy Malcolm Francis TALBOT **Phone (Hm):** 03 6159282

Organisation*: Talbot Agriculture. **Phone (Wk):** 03 6159190

* the organisation that this submission is made on behalf of

Postal Address: 219 John Talbot Road **Phone (Cell):** 021 571893

Temuka **Postcode:**

Email: talbot.agri@xtra.co.nz **Fax:** 03 6159286

Contact name and postal address for service of person making submission (if different from above):

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: J M J Talbot **Date:** 5/10/2012

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

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.

Rule 5.52
The use of the Spreadmark scheme is being misused in this circumstance because the SPREADMARK scheme is designed ONLY for pass to pass evenness of spread. SPREADMARK does not test for any border or headland spread pattern nor are the drivers trained in what their boundary spreading parameters are.
Most SPREADMARK trucks would need at least their swath width from a fence or water boundary to keep material clear of a water way due to the spreaders design, eg a 24m swath width would require the driver to drive at least 24m from the boundary. A lot of SPREADMARKcertified trucks have EU designed machines that have been modified in New Zealand have now lost their ability to perform boundary spreading due these modifications. However a lot of FARMERS spreaders now have a headland or boundary spreading device (as required under EU rules since 1995) or the ability to spread on one side only which would allow them to conform to even a 2 or 3 m set back and still not put material in the water. In arable farming where spreading operations follow set wheelmarks , referred to as tramlines, the driving at different wheel spacings is not practical and therefore the SPREADMARK trucks would be non compliant with the objectives set out under the plan.
Therefore the use of the SPREADMARK system is NOT in the best interests of obtaining the outcome desired and would provide an unfair financial gain over other operators who could do more for the environment.

I / We would request that the term SPREADMARK and any terms conditions with it be removed from this rule and replaced with "Operators must the use the best industry practice to keep all fertilizer clear of water ways by at least 5m"

This one simple rule for all will also avoid any confusion over who was doing the spreading making enforcement a far simpler procedure.

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: *(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)*		(3) I seek the following decisions from Environment Canterbury: *(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)*
Section & Page Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
5.94	5.52	Oppose in part	on seperate sheet	On seperate sheet.

Add further pages as required – please initial any additional pages.