



Submission on Proposed Canterbury Land and Water Regional Plan

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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

EC 2301158 REC 105697

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: Mark Andrew Saunders Phone (Hm): 03 3025928
 Organisation*: WAIOTO FARM Ltd Phone (Wk): 0274 354322
* the organisation that this submission is made on behalf of
 Postal Address: 1076 Frasers rd R.D.8 Ashburton Phone (Cell): _____
7778 Postcode: 7778
 Email: penrie@extra.co.nz Fax: _____
 Contact name and postal address for service of person making submission (if different from above): _____

Trade Competition

Pursuant to 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
- I am not directly affected by an effect of the subject matter of the submission

Signature: Mark Saunders Date: 5/10/12
(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,
- I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

(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 & Pg Number	Sub-section/ Point	Oppose/support (in part or full)	Reasons	
	Overseer 6	oppose	Lack of flexibility of model to accurately assess the nutrient management losses and effects of grazing winter fodder crops	
			- Look up table approach blanket treating soil types to certain leaching targets irrespective of management techniques.	-ability for farmers to submit soil moisture data and possibly lysometer information to demonstrate there effects.
			- The targeting of Nitrogen losses whilst Phosphate , sulphur and Potassium are applied and leach in varying amounts on farmland.	
4-7 4-8	Policy 4.30 – 4.33 and associated planning maps		<p>How were the nutrient allocation zones page 4-8 derived?</p> <ul style="list-style-type: none"> o What type of information was used to justify and differentiate between the nutrient allocation zones? o Is the data scientifically robust and collected over a number of years? o What parameters have been used to determine the water quality? o What water quality outcomes have been used to determine when a catchment becomes orange or red? o Is there a long term baseline for all areas where a downward trend has been observed? Is this the basis for a red zone? o Water quality monitoring toward the coast in a catchment should not determine the status of the whole catchment. Instead further investigation should be undertaken upstream to see where the change from; meets water quality outcomes to either at risk or not meet water quality outcomes is occurring. o This is a very important part of the LWRP and farmers need to be confident that the science used to differentiate the 	ECAN to provide justification to the public as to how the nutrient allocation zones were decided upon to ensure they are scientifically robust

			zones is robust and fully justified, especially given the consequences of being within a red zone.	
16 - 13	Schedule 7		Farm Environment Plan Clarification is sought on what is deemed by 'appropriate professional qualifications'. Most farmers with a university degree would qualify under this wording.	A definition of 'appropriate professional qualification' is required as it relates to Schedule 7. With our advice that a Farmer with an appropriate professional qualification should be able to author their own FEP

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