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: Neville Andrew Chalmers
Organisation:
Postal Address: 890 Kong Road
No 4, Ashburton
Phone (Hm): 08 302 6605
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Fax:
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:

- adversely affects the environment; and
- 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: __/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,
□ If others make a similar submission, I will consider presenting a joint case with them at the hearing.
Submission on Proposed
Canterbury Land and Water
Regional Plan

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Freepost 1201 Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8143

Full Name: Neville & Moira Chalmers
Phone (Hm): 03 302 6605
Organisation*: Phone (Wk):
Post the organisation that this submission is made on behalf of
Postal Address: 810 Fords Road
Phone (Cell): 027 688 7666
Parakaka Postcode: 7774
Email: parkfields@familiy.com Fax: 03 302 6602
Contact name and postal address for service of person making submission (if different from above):

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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:
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<td>Support the submission from the Combined Canterbury Pioneers Redevelop Farms at N.Z.</td>
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(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.)

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

To: Environment Canterbury

By: Neville & Andrea Chalmers

On: Proposed Canterbury Land and Water Regional Plan

Date: 5 October 2012-10-04

Contact: Andrea Chalmers
890 Fords Road
RD 4
Ashburton 7774

Phone: 03 3026605
Email: parkfields@farmside.co.nz
General Submission
We are supportive of the Canterbury Water Management Strategy and understand the need of the proposed Land and Water Regional Plan.

However, as farmers, we are concerned about the implications the Proposed LWRP will have on our farming business, the community and New Zealand’s economy.

Overseer
Having listen to Ants Roberts of Ravensdown (actively involved in the updating of Overseer) present a presentation to the Ashburton Zone Committee (25/9/12) on Overseer we have great concerns of the use of Overseer as a nutrient management tool for the Plan. Mr Roberts stated that Overseer should “not be used to set limits” as it calculates what happens in the first meter and does not calculate what happens after that. As arable farmers, we are concerned that presently Overseer cannot handle complex rotations and is not designed to be a “within season” tool. It is a long term modelling tool. Overseers lack of precision (plus or minus 20%) is also a major concern.

Management Tools Available
There must be a management tool available that is farmer user friendly that can assist with crop/stock management planning, and able to cope with mid season changes. Selection of crop rotation is a year round activity and decisions are made upon market demand, availability of seed, climate features etc. With stock, decisions can be made on demand requirements, availability of feed, climatic features. There must be a tool available for farmers to make decisions that will enable them to stay within limits.

Red Areas
We are concerned at the way the Nutrient Allocation Zones were mapped. These zones need to reviewed using a scientific sound and transparent process as non complying status on land–use change in Red Areas has the potential to prevent land-use change which will prohibit the ability to change farm practices to meet changing markets and maintain a viable business.

Time and Financial Factors
While ensuring that farmers stay Proposed LWRP compliant, there must be sufficient time allowed to carry out current farming duties and the ability to ensure financial viability after complaint costs are paid.
SPECIFIC SUBMISSIONS
The headings used are the headings in the draft plan

SECTION 1 INTRODUCTION, ISSUES & MAJOR RESPONSES
1.2.6 Managing New and Existing Activities, page 1-6
Submission
It is stated that when resource consents expire in over-allocated areas, the activity must be assessed as if new, subject to Part 2 of the RMA. It needs to be explicitly acknowledged that Part 104(2A) of the RMA states that the consent authority must have regard to the value of the investment of the existing consent holder.
Decision sought
Include explicit acknowledgement that Part 104(2A) of the RMA states that the consent authority must have regard to the value of the investment of the existing consent holder.

2.10 DEFINITIONS, TRANSLATIONS AND ABBREVIATIONS
DEFINITIONS
Definition of Changed, page 2-5
Submission
The definition has 2 criteria:
1. a resource consent, or increase in the volume of, water for irrigation on a property

The use of additional water does will necessarily result in increased N discharge. Well managed irrigation enables better management of nutrients by facilitating movement of nutrients into the root zone in a controlled manner, by ensuring an actively growing crop to take-up nutrients when they are applied and by enabling drainage to be minimized. Because of the much greater control over water inputs, an irrigated farming system should lose substantially less nutrients than a similarly intensive rain-fed system. Part 1 should be deleted because it has a variable linkage with the matter (N discharge) being addressed.

2. an increase of more than 10% in the loss of nitrogen from land used for a farming activity...

This part of the definition is problematic because it would be too easy to trigger without genuine change of land use. For example, a sheep and beef farmer could trigger it by changing to a greater yielding fodder crop (e.g. kale to fodder beet) or by growing livestock to greater weights. An arable/stock farmer by the crops he grows in rotation ie peas vs grass seed and the ratio of crop vs stock (market dependant). The definition should only be triggered by genuine land use change. This part of the definition would not allow sufficient for adjustments to farm management, which farmers routinely do in response to seasonal conditions, markets etc. Secondly the tool (OVERSEER) used to estimate N discharge is not sufficiently precise (plus or minus at least 20%) to detect a 10% change. Another way to address the issues with this part of the definition would be to focus on genuine land use change e.g. arable to dairy, with the definition triggered when a certain proportion (e.g. 20%) of the land is used for a new land-use. The definition needs to cater for a wide variety of farming systems/programmes and rotations that may extend for up to 10 years.

Part 2 of the definition could be improved by:
- Focusing on a genuine change in land-use (dry-stock vs arable vs dairy vs market gardening etc.), based on a threshold proportion of land area on which the change occurs.
- Extending the baseline for comparison from 2 years to at least 5 years.
Decision sought
1. Delete part 1 of the definition because well managed irrigation enables better management of nutrients than in a rain-fed system.
2. Amend part 2 by focusing on a genuine change in land-use, based on a threshold proportion of land area on which the change occurs (e.g. 20%); or
   - Extend the baseline for comparison from 2 years to at least 5 years.

**NUTRIENT DISCHARGES – REGION-WIDE POLICIES**

**Policy 4.31, page 4-7**

**Submission**
Policy 4.31 requires that the loss of N to water from change in farming activities in an area coloured red be minimised by demonstrating that N loss from the proposed activity, when assessed in combination with the effects of other land uses or discharges, will not prevent water quality outcomes being achieved or that the nitrogen discharges from the property are a significant and enduring reduction from existing levels. However, substantial and enduring reduction in N loss should not be a prerequisite for land use change. (Indeed one definition of land use change is a greater than 10% increase in estimated N discharge.) If for example the change of land use definition is triggered by the use of more water or a change in crop rotation, it should be sufficient to demonstrate no increase in estimated N discharge. Land use change and the benefits that flow from it should not be prevented if there is no net increase in estimated N discharge.

**Decision sought**
Amend the policy to require demonstration that there will be no increase in the estimated N discharge from a property, rather than significant and enduring reduction from existing levels, as follows:

...or the nitrogen discharges from the property are a significant and enduring reduction from do not increase compared with existing levels.

Land use change and the benefits that flow from it should not be prevented if it can be demonstrated that there is no net increase in estimated N discharge.

**Nutrient Allocation Zones, page 4-8**

**Submission**
There is not adequate justification for the nutrient allocation zones given their potential economic impact. Much of the Canterbury Plains is red and within the red areas change in land use will be non-complying. In addition, there are many anomalies within the red zones. For example, between the Rakaia and Ashburton Rivers, the red area runs into the foothills and includes land with 30 m of topsoil over 1-2 m of clay over more than 100 m of alluvial gravel, with no natural water courses running through it.

The approach used to derive nutrient allocation zones is described as an “expert opinion” approach based on “knowledge of nutrient sensitive values” (Section 32 Report, Appendix 6). Description of the process fails to provide sufficient detail to allow examination of the framework or data used in the assessments. There are inconsistencies in the classification of catchments which make it difficult to have confidence that the approach provided a robust and consistent framework for evaluating nutrient allocation zone status.

The nutrient allocation zones, in combination with the nutrient discharge rules, have the potential to severely restrict irrigation development, and therefore the development of water infrastructure, including water storage, contrary to the intentions of the CWMS. The economic impacts of the nutrient allocation zones, in combination with the nutrient discharge rules is potentially huge. There is no analysis of these impacts in the section 32 report.
Decision sought
Review the nutrient allocation zones using a robust and transparent process, based on criteria which recognise that the Canterbury plains is a highly populated working landscape. Provide sound scientific/technical justification for the criteria used and a rigorous analysis of the social and economic impacts of applying nutrient allocation zones.

Policy 4.32, page 4-9
Submission
Policy 4.32 requires that, where there is no industry sector good practice N discharge limit included in the plan by 1 July 2017, then all farming activities in that sector will require a consent. Any proposal will have to demonstrate that it in combination with other land uses and discharges will not prevent water quality outcomes from being achieved or that nitrogen discharges from the property are a significant and enduring reduction from existing levels.
As argued previously, it may well be that introduction of explicit nutrient discharge allowances is not the most effective or efficient way to achieve water quality outcomes, and that other means such as the universal improvement of environmental performance via universal implementation of good management practice is both more effective and more efficient. Therefore the policy should be written to include the possibility of an alternative mechanism, without decreasing the need to achieve water quality outcomes.
Substantial and enduring reduction in N loss should not be a prerequisite for gaining a land use consent. There is no good reason to prevent the continuation of productive land use and the benefits that flow from it if there is no net increase in estimated N discharge.

Decision sought
Amend the policy to allow methods, other than nutrient discharge allowances, which may be more effective and efficient in the achievement of water quality outcomes, as follows:
...where there is no articulated good industry practice nitrogen discharge limit, or credible alternative method, for a particular industry sector ...
Amend the policy to require demonstration that there will be no increase in the estimated N discharge from a property, rather than significant and enduring reduction from existing levels, as follows:
...or the nitrogen discharges from the property are a significant and enduring reduction from do not increase compared with existing levels.
Productive land use and the benefits that flow from it should not be prevented if it can be demonstrated that there is no net increase in estimated N discharge.

NUTRIENT ZONES
Policy 4.34, page 4-9
Submission
Policy 4.34 states that, prior to 1 July 2017, any applicant for a change in farming activity in areas coloured red or within a Lake Zone will have to demonstrate that it, in combination with other land uses and discharges, will not prevent water quality outcomes from being achieved and that nitrogen discharges from the property are a significant and enduring reduction from existing levels.
In addition, substantial and enduring reduction in N loss should not be a prerequisite for gaining a land-use consent. There is no good reason to prevent change in land use, and the benefits that flow from it, if there is no net increase in estimated N discharge. This is especially if we are talking crop rotation or even a slight change in crop/stock ratio, or cattle/sheep ratio. This would then have implications in rotations in following years.

Decision sought
Amend the policy so that it does not require both an absence of adverse effects on water quality targets, and a reduction in N loss, as follows...will not prevent the water quality outcomes of Policy
4.1 being achieved and or show that the nitrogen discharges from the property are a significant and enduring reduction from existing levels.

Amend the policy to require demonstration that there will be no increase in the estimated N discharge from a property, rather than significant and enduring reduction from existing levels, as follows:

...and show that the nitrogen discharges from the property are a significant and enduring reduction from do not increase compared with existing levels.

.... change of definition for “change” which allows types of farms ie arable, arable mix to change rotations and ratios within 20% without needing a “land change consent”.

Change in land use and the benefits that flow from it should not be prevented if it can be demonstrated that there is no net increase in estimated N discharge.

Policy 4.67, page 4-13
Submission
Part (a) states that winter flows are available for extraction to storage, while ensuring ecosystem recovery. Takes storage should not be confined to winter takes but should also be able to happen at other times of the year e.g. during the irrigation season when irrigation is not required. Ecosystem recovery may or may not be relevant, depending on the state of the ecosystem.

Part (b) states that abstraction is for the summer (Oct-Apr) irrigation season, unless specified otherwise. Irrigation may sometimes be needed before October or after April ie for crop establishment in dry periods. There is no need to specify an irrigation season. Seasonal volume limits and flow and allocation regimes are sufficient to ensure efficient use of water and protect environmental values.

Decision sought
Amend part (a) to include the taking of water to storage at other times of the year, as follows:

(a) Winter flows are available for abstraction to storage, while protecting ecosystems ensuring ecosystem recovery, and not precluding takes to storage at other times of the year.

Delete part (b) because there is no need to specify an irrigation season given that seasonal volume limits and flow and allocation regimes ensure efficient use of water and protect environmental values. If the irrigation season must be specified, it should be September to April.

Policy 4.69, page 4-13
Submission
The aim of achieving 80% irrigation application efficiency is a worthy one, but this will not currently be universally achieved. Seasonal volumes are based on 80% efficiency, so if irrigators are less efficient than this, they will not be able to irrigate their full irrigable area for a full season in a dry year. This is a strong incentive to improve efficiency however due to land contour it is not always possible to irrigation by the most efficient means.

Decision sought
Delete the policy or rewrite it state that the efficiency goal will be pursued via the application of appropriate seasonal volumes.

Policy 4.73, page 4-13
Submission
Policy 4.73 requires surrender of a proportion of the allocated water upon transfer unless the transfer is to an irrigation scheme. This is not appropriate for those transfers within a farming business enterprise which will lead to more efficient use of water.

Decision sought
Amend to specify that surrender of water upon transfer will not apply to those transfers within individual farming enterprises which will lead to more efficient use of water within that business.
Policy 4.75, page 4-13
Submission
This policy states that resource consents to abstract water must be given effect to within 2 years unless a longer lapse period is justified. This is too short for a default lapse period. The planning and development of projects through to completion frequently takes longer than 2 years.
Decision sought
Amend to extend the lapse period to 5 years because the planning and development of projects through to completion frequently takes longer than 2 years.

Policy 4.76, page 4-13
Submission
Policy 4.76 states that resource consents for nutrient discharges or water takes in catchments that are over-allocated will generally be of 5 year duration. Short consent durations may lead to sub-optimal environmental outcomes by discouraging investment in effective and efficient (and expensive) infrastructure. Issues related to over-allocation would be better addressed using an appropriate suite of adaptive management conditions.
Decision sought
Amend to remove the direction that resource consents for nutrient discharges or water takes in catchments that are over-allocated will generally be of 5 year duration, because short consent durations may lead to sub-optimal environmental outcomes by discouraging investment in effective and efficient (and expensive) infrastructure.

FARMING
Rules 5.39 – 5.51, pages 5-11 – 5.14
General submissions
1. The heading refers to “farming”. The subject matter is nutrient management. The heading should be changed.
2. It is stated that N loss from the land must be “calculated” using the OVERSEER nutrient model. OVERSEER is useful for estimating trends and progress towards targets but its lack of precision (plus or minus 20%) means that it is not useful for generating absolute values for compliance purposes. National protocols need to be established to ensure consistent and appropriate use of Overseer. Wording throughout the plan should be amended to replace the term calculated with estimated.
3. This section of the plan focuses almost entirely on N loss. This is problematic because N loss may not be the primary issue.
4. The approach focuses substantially on nutrient loss. However, animal welfare and soil conservation matters also need to be taken into account e.g. when considering what land is best suited for winter grazing.

Decisions sought
1. Amend the heading to Nutrient Management, reflecting the subject matter.
2. Develop/adopt a protocol for the appropriate use of OVERSEER, recognising that it is not appropriate for generating absolute values for compliance purposes.
3. Amend wording to replace the term calculated with estimated, in the context of N discharge values generated by OVERSEER.
4. Acknowledge that N discharge may not be the primary issue. Other nutrients such as P may be more significant in an environmental context
5. Consider animal welfare and soil conservation matters alongside N discharge.
Rule 5.39, page 5-11
Submission
Amend wording to replace the term calculated with estimated, in the context of N discharge values generated by OVERSEER. Also amend to state that where OVERSEER cannot model farming practices (e.g. outdoor pig farming), nutrient loading rates will be recorded/reported.

Decision sought
1. Amend wording to replace the term calculated with estimated, in the context of N discharge values generated by OVERSEER.
2. Amend to state that where OVERSEER cannot model farming practices (e.g. outdoor pig farming), nutrient loading rates will be recorded/reported.

Rule 5.42, page 5-12
Submission
Support the rule in concept (it provides for change/intensification of land use) but oppose it in combination with the definition of land use change. Rule 5.42 defines conditions under which change in land use before 2017 is a permitted activity. The rule in combination with the definition of change in land use (10% increase in estimated N discharge) is problematic. Firstly, a 10% change is too small because it will be easily triggered by a variety of factors which are not genuine land use change. Secondly, a 10% change cannot realistically be identified using a tool (OVERSEER) which has an error of plus or minus 20-30%. Amendment of the definition of land use change is needed. Also amend to state that where OVERSEER cannot model farming practices (e.g. outdoor pig farming), nutrient loading rates will be recorded/reported.

Decision sought
1. Amend definition of change in land use by a % change of farm activity or by moving away from a percentage increase in N discharge entirely.
2. Amend to state that where OVERSEER cannot model farming practices (e.g. outdoor pig farming), nutrient loading rates will be recorded/reported.

Rule 5.45, page 5-13
Submission
Oppose
Non-complying activity status is not appropriate for several reasons, as follows:
1. It is very easy to trigger the definition of land use change without genuinely changing land use (via a 10% increase in estimated N discharge or an increase in water use). Crop rotation or increase/decrease stock numbers or mixed stock ratio change could all influence the need of consent without a change of farm practice yet the need of a consent.
2. It is difficult to see how a 10% increase in N discharge can be estimated using a tool with an error, in absolute terms, of plus or minus 20-30%.
3. The process of defining red areas was neither robust nor transparent.

(Items 1 and 2 apply to both red areas and Lake Zones, while item 3 applies to the Lake Zones.) In addition, non complying status is likely to discourage investment farms and water infrastructure with resulting major adverse economic impacts on the regional economy. It also has the potential to pre-empt the collaborative limit setting process as sub-regional plans are developed.
Decision sought
Amend the activity status from non-complying to discretionary. Require an assessment of the activity against the fresh water objectives and policies relevant to the catchment within which the land use change is proposed.
Change the definition of land use “changed” to a % ratio of farm activity.

Rule 5.46, page 5-13
Submission
1. As there is no Schedule 8, how can we support/oppose this?
2. Average annual loss of N must be averaged over at least 5 years, reflecting the fact that OVERSEER is designed to provide average long-term estimates of nutrient flows.

Decision sought
Amend to recognise that there are capacity issues and that it may not be physically possible to comply with Condition 4 by 2017.
Amend Condition 2, and also Conditions 3 and 4, to specify that the average annual loss of N must be averaged over at least 5 years, reflecting the fact that OVERSEER is designed to provide average long-term estimates of nutrient flows.

Rule 5.49, page 5-13
Submission
Oppose this non-complying activity rule for the following reasons:
1. The process of definition of the red areas was neither robust nor transparent.
2. The period over which average annual loss of N must be averaged (3 years?) is too short. It needs to be averaged over at least 5 years, reflecting the fact that OVERSEER is designed to provide average long-term estimates of nutrient flows.

Given the issues listed above, and consequent uncertainty about reliably estimating N discharge and about whether water quality outcomes are met, non-complying activity status is not justified. Discretionary activity status would be appropriate.

Decision sought
Delete the rule 5.49 unless:
1. Definition of the red areas is robust (scientifically sound) and transparent.
2. Average annual loss of N is averaged over at least 5 years, reflecting the fact that OVERSEER is designed to provide average long-term estimates of nutrient flows.
3. Amend activity status from non-complying to discretionary.

FERTILISER USE
Rule 5.52, page 5-14
Submission
Rule 5.52 covers the permitted discharge of fertilizer onto land. Condition 1 states that: There is no fertiliser discharged when there is water ponding on the surface of the land.
The condition should recognize the agronomic need to urgently replace N losses in growing cereal crops in the spring because serious production losses can occur in autumn sown cereal crops if the nitrogen losses caused by heavy winter rains are not replaced when crop discoloration occurs. There may remain minor ponding on the surface of the land but there should not be a discharge issue if the amount of N fertiliser used is no more than the growing crop can use.
Decision sought
1. Amend Condition 1 to read: There is no fertiliser discharged when there is water flowing on the surface of the land.

Rule 5.53, page 5-14
Submission
Rule 5.53 covers the permitted discharge of fertiliser from an aircraft onto or into land. Condition 1 states that: There is no fertiliser discharged when there is water ponding on the surface of the land.
As for Rule 5.52, Condition 1, there may be a need to replace nutrients lost through heavy winter rains when growth begins in the spring season. With the use of nutrient budgets, only the nutrients required will be applied. Minor ponding may still be present when the nutrients need to be applied. It is only the movement of water that may transfer nutrients to another site where they may not be needed.
It should be noted that aerial application is required when the land would be damaged through the use of surface vehicles.
Support Conditions 2, 4 & 5.
Support Condition noting that for aerial fertiliser spreading, Spreadmark as part of “Aircare” is the industry approved qualification.

Decision sought
1. Amend Condition 1 to read: There is no fertiliser discharged when there is water flowing on the surface of the land
2. Retain Conditions 2, 4 & 5.
3. Retain Condition 3, noting that for aerial fertiliser spreading, Spreadmark as part of “Aircare” is the industry approved qualification.

Schedule 2 – Fish Screen Standards and Guidelines, page 16-4
Submission
Due to the nature of open drainage drains, fish screens under 5mm are impractical 2km or less to coast. The majority of these drains run dry prior to Christmas and therefore sustain little fish life.

Decision sought
For drainage drains, fish screens to be 5mm or less.

Schedule 8 – Industry derived Nitrogen Discharges, page 16-14
Submission
The stated intention in Rule 5.46 is that Schedule 8 will be populated with values which define the upper limit for N discharge for farming activities.
The aim of the Farming (nutrient management) rules must be to improve the environmental performance of primary industries. For individuals this must be reasonable given their current performance (some will already be performing at best-practice level) and able to be achieved in a cost effective manner.
Because thinking is evolving along with increased information and improved understanding of relevant processes, flexibility must be retained as to what the values in Schedule 8 represent and how they are to be used. This is crucial in order to deliver improved performance and meet the environmental objectives of this proposed plan.
We believe a key function of Schedule 8 is to provide a definition of good management practice. Any definition of good practice should be based on productive, profitable farms and should include all critical factors relevant to water quality outcomes. It is essential that the definition is not solely focused on N. In some instances this will result in the needless imposition of costly constraints which have no impact on water quality outcomes, because N is not the critical factor influencing those
outcomes. A definition of good management practice must include at least the management of N, P and sediment.

Schedule 8 should:

- Provide good management practice targets.
- Take a systems approach to individual farms and to catchments with inter-related land uses.
- Provide flexibility to allow for the adjustment of farming systems.
- Provide for focus on critical environmental factors (present focus solely on N will not work in catchments where some other factor, such as P, is having most influence on environmental indicators).
- Allow for 90% of farms to be a permitted activity post-2017.

- A Schedule 8 table of rigid limits may not deliver overall improvement in water quality outcomes and would have serious shortcomings, including the following:
  - It would not provide for the complexity of farming systems (depending on how and at what level they are set).
  - It would not provide flexibility to allow for the adjustment of farming systems.
  - There is a lack of sufficiently precise tools for the purpose of assessing compliance (OVERSEER estimates are plus or minus at least 20%).

**Decision sought**

Develop Schedule 8 as outlined in the above submission. Key points are:

- Retain flexibility as to what the values in Schedule 8 represent and how they are to be used because thinking is evolving along with increased information and improved understanding of relevant processes.
- Aim to improve the environmental performance of primary industries - for individuals this must be reasonable and able to be achieved in a cost effective manner.
- Define good practice based on productive, profitable farms.
- Focus on all critical factors relevant to water quality outcomes (at least N, P & sediment).
- Provide flexibility to allow for the adjustment of farming systems.