

Further Submission on Proposed Variation 1 to the Canterbury Land and Water Regional Plan

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Form 6: Further Submissions in support of, or in opposition to, submission on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 8 of Schedule 1 of the Resource Management Act 1991

Return your signed further submission by 5.00pm Monday 9 June 2014 to:

Freeport 1201 Variation 1 to the Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: Timothy Peter Chamberlain Phone (Hm): 03 3243549
Organisation*: HART Phone (Wk): _____
* the organisation that this further submission is made on behalf of
Postal Address: 565 Lockhards Road, Lakeside Phone (Cell): 0272606674
RD3, Cooston Postcode: 7683
Email: tim@hartscreekfarm.co.nz Fax: 03 3243541
Contact name and postal address for service of person making further submission (if different from above):

Only certain people can make further submissions. Please tick the option that applies to you:

- ☐ I am a person representing a relevant aspect of the public interest; or
☒ I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
☐ I am the local authority for the relevant area.

- ☐ I do not wish to be heard in support of my further submission; or
☒ I do wish to be heard in support of my further submission; and if so,
☒ I would be prepared to consider presenting your further submission in a joint case with others making a similar submission at any hearing

Service of your further submission:

Please note: any person making a further submission must **serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Environment Canterbury**. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: [Signature] Date: 9/6/14
(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.

(1) I support or oppose the submission of: <i>Tim Chamberlain</i>	(2) The particular parts of the submission I support or oppose are:	(3) The reasons for my support or opposition are: <i>See Also see attached sheet.</i>	(4) Support or oppose <i>Support.</i>
Name & postal address of original submission	Submission point reference number i.e. 4.23	Provide reason for support or opposition	Note support or oppose
Ellesmere Irrigation Society Inc c/- C M Barnett, Lakeside, R D 3, Leeston 7683	All submission points of this submitter	The submissions made by this submitter will provide for the desired outcomes for the physical, social and economic environment in an appropriate timeframe and suitable level and type of regulation.	Support

Dear Commissioners.

Thank you for the opportunity to submit on the Te Waihora Selwyn Zone Committees addendum.

I do appreciate the need to have controls on the excess non dissolved nitrogen surplus that is having a detrimental impact on coastal streams and lagoons.

I respectfully contend that the policy as set out in the recommendations rewards those land-users that are currently the worst offenders, and penalize those who have demonstrated it is possible to achieve positive returns in a sustainable context.

While there is some validity in the argument that an equal allocation system would cause hardship and economic disruption, I reject the notion that there is necessarily a direct co-relation between leaching nitrogen and economic performance.

The current policy ‘out for consultation’ serves to disadvantage those who have recognized the need for sustainability and this serves now as a penalty.

Given our knowledge it is intolerable that an individual or farming sector be allocated at no cost to themselves or their farming operation nitrogen polluting rights based on their historical pollution.

- 1. It places no value on low emitting systems.**
- 2. Stifles innovation by allowing the status quo to continue..**
- 3. Minimizes future land use choices of low emitting farmers.**
- 4. Rewards historical pollution.**

I believe the best and fairest way to allocate nitrogen leaching entitlements is an equal per ha allocation over the catchment require high emitting farming systems to purchase above allocation Nitrogen entitlements in a Nitrogen trading scheme.

This would

- 1. Reward low emitters through the potential sale of unused Nitrogen credits**

2. **Place a clear value on Nitrogen discharge or not, giving a clear market basis for farming choices.**
3. **Allow farmers needing to discharge above the average per ha allocation a mechanism to purchase credits meaning they can continue their farming practices as they see fit at a recognized market cost.**
4. **Create a framework for innovation and creativity that simply rewarding historical discharge would not.**
5. **Allow future land use change for historical low emitters of Nitrogen that the current system would not.**

My request is that the Selwyn Irrigation Society proposal be accepted and in addition a trading scheme be created to fairly allocate rights and therefore value different farming systems polluting requirements.

Yours Sincerely

Tim Chamberlain

Harts Creek Farm