

Gay Gibson

From: Victoria Lamb <Victoria.Lamb@beeflambnz.com>
Sent: Monday, 9 June 2014 4:56 p.m.
Subject: V1 pLWRP Further Submission
Attachments: v1-Variation_1_draft_Submissions_in_response_2014_06_06.pdf

Categories: Purple Category

Dear Sarah,

Please find attached Beef + Lamb New Zealand's submission on Variation 1 to the Canterbury draft Land and Water Regional Plan.

Kind regards

Victoria

Victoria Lamb | Senior Environmental Policy Advisor

beef + lamb new zealand

level 4, wellington chambers, 154 featherston street, wellington 6011, new zealand

po box 121, wellington 6140, new zealand

ddi 04 474 0806 | mobile 027 687 5690 | website www.beeflambnz.com



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

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Submitter ID:

File No:

Form 6: Further Submissions in support of, or in opposition to, submission 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 further submission by 5.00pm Monday 09 June 2014 to:

Freepost 1 201 Variation 1 to the Proposed Canterbury Land and Water Regional Plan
 Environment Canterbury
 P O Box 345
 Christchurch 8140

Full Name: Victoria Lamb Phone (Hm): _____
 Organisation*: Beef + Lamb New Zealand Phone (Wk): 04 474 0806
* the organisation that this further submission is made on behalf of
 Postal Address: P O Box 121 Phone (Cell): 0276875690
Wellington Postcode: 6011
 Email: victoria.lamb@beeflambnz.com Fax: _____
 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: 09/06/2014
(Signature of person making submission or person authorised to sign on behalf of person making the submission)
 Please note:
(Full information contained in a submission under the Resource Management Act 1991, including names and addresses for service, remains public information)

1. I support /oppose the submission of:	2. The particular parts of the submission I support or oppose are:	3. The reasons for my support or opposition are:	4. Support or oppose
Te Runanga and Te Runanga O Ngai Tahu, P O Box 13 046 Christchurch 8141	3. POLICIES Replace policies 11.4.6 to 11.4.17 with the following... <i>3. Reduce the loss of contaminants from farming activities into the catchment by:</i> <i>(a) Excluding livestock from all waterways, including drains; and</i>	The total exclusion of stock from all waterways in hill and high country, where stock are extensively farmed e.g less than 18su/ha, will make it impossible to farm significant areas of Canterbury. Stock require access to waterways for drinking, and on occasion to cross from one side of a waterway to the other e.g. when being mustered. Providing reticulated water is impractical, given the large areas involved. Fencing all waterways to exclude stock in hill and high country will create animal welfare issues as stock require access to drinking water at all times, including when reticulated supplies are frozen in winter. The exclusion of stock from lowland waterways is supported.	Oppose in part
	4. <i>(a) By 1 July 2016 include by way of a plan change a schedule of maximum nitrogen loss rates for farm activities on soil types within the catchment, which farming activities must comply with by 2022;</i>	The determination of maximum nitrogen loss rates based on the natural capital of particular soils, rather than farm activity (for which the LUC approach used in Horizons and proposed for the Tukituki provides an effective and workable proxy) is the most equitable and sustainable approach to nitrogen loss reduction. It avoids rewarding those with high nitrogen losses or penalising low nitrogen losses, based on current use, providing for the critical land use change flexibility that will be needed to meet future production challenges. It also recognises that some soils have low productive capabilities such as classes viie and viii, whilst others have high productive capabilities such as class I, and provides for greater nitrogen losses for better soils and less on less productive soils.	Support
New Zealand Pork P O Box 4048 Wellington 6140	11.4.12(a)	The current wording only provides for new or upgraded dairy facilities when the same provisions should apply to all farming operations. It is inequitable to treat one type of farming differently.	Support

<p>Fertiliser Association of New Zealand P O Box 11 519 Manners Street Wellington 6142</p>	<p>3.</p>	<p>FANZ note that using just Overseer to identify mitigation actions for phosphorus loss could require costly mitigations that provide no benefit or miss significant mitigation opportunities. P loss, being closely associated with sediment loss from hill country requires an alternative, more whole of property or catchment based approach that identifies specific contributors to sediment and P loss. The less direct relationship between P and its loss to water does not lend itself to a number based approach in the way that nitrogen does. A more risk based approach is required for the management of P bound to sediment.</p>	<p>Support</p>
	<p>7. d.</p>	<p>The sheer number of nutrient budgets and Farm Environment Plans, and the requirement for these to be prepared or approved by suitably qualified persons, within the time frames proposed, makes meeting the target dates unachievable. As a result farmers will trigger consent requirements. This will result in unnecessary costs and work for both the farmers and Canterbury Regional Council. It needs to be remembered that Canterbury and the Selwyn Te Waihora Zone are not the only ones requiring or proposing to require OVERSEER® nutrient budgets and Farm Environment Plans. Other zones and other Regional Councils are doing likewise. Consequently there will simply not be enough appropriately qualified persons to undertake all the work needed in the timeframes specified. Farmers should not be penalised if the resourcing needed to meet the time constraints are not achievable through no fault of their own.</p>	<p>Support</p>
	<p>7. k.</p>	<p>Where a farmer is continuing to farm at low nitrogen loss levels, there is no reason to require the cost associated with annual review of OVERSEER® nutrient budgets. Focus is better targeted on high N loss activities, as the more significant cause of current water quality issues.</p>	<p>Support</p>

<p>North Canterbury Province of Federated Farmers of New Zealand P O Box 20448 Bishopdale 8543 Christchurch</p>	<p>3. Water Quality – Policies 11.4.12 to 11.4.16 and Rules 11.5.6 to 11.5.13</p>	<p>The proposed approach focusses on managing outcomes in a balanced way</p>	<p>Support</p>
	<p>4. Nitrogen Baseline</p>	<p>Use of nitrogen baselines rewards and benefits those whose impacts on water quality have historically been greatest, whilst penalising those whose farming systems are either naturally low Nitrogen loss or have already addressed their nitrogen losses. Including the impacts of consents already granted should not be restricted to dairy farming operations, rather it should apply to all equally.</p>	<p>Support</p>
	<p>5. Land Drainage</p>	<p>The proposed alternative approach to the management of drainage systems will be more responsive to cultural concerns and more effective.</p>	<p>Support</p>
	<p>6 Stock Exclusion – Hill and High country</p>	<p>The submission that exclusion of stock from all waterways should not apply in hill and high country is supported. The total exclusion of stock from all waterways in hill and high country, where stock are extensively farmed e.g. less than 18su/ha, will make it impossible to farm significant areas of Canterbury. The very low stocking rate applied in hill and high country makes the impact of animals on water quality very low. Stock require access to waterways for drinking, and on occasion to cross from one side of a waterway to the other e.g. when being mustered. Providing reticulated water is impractical and given the large areas involved, potentially damaging to the environment. Fencing all waterways to exclude stock, in addition to being prohibitively expensive to the point of making farming uneconomic, will create animal welfare issues as stock require access to drinking water at all times, including when reticulated supplies are frozen in winter. The exclusion of stock from lowland waterways is supported.</p>	<p>Support</p>
	<p>9. Water Storage</p>	<p>The current wording of policy 11.4.32 needs to ensure that all the</p>	<p>Support</p>

		matters covered under s104 of the RMA can be considered.	
	10. Definitions	The current wording of the definition of intensive winter grazing is faulty. All grazing results in the removal of vegetation and depending on the definition, damage to vegetation. Nor does it identify the degree of exposure of bare ground or pugging. Depending on the fodder crops or pasture type, the removal of the upper parts of the plants will inevitably expose some level of bare ground.	Support
	11. Schedule 24 (Farm Practices)	Following the general approach of the RMA, and in order to reflect the need to tailor approaches to the particular circumstances of a particular farming operation, a more effects based approach is preferred.	Support