

Gay Gibson

From: Lucy Johnson <Lucy.Johnson@synlait.com>
Sent: Friday, 24 October 2014 3:23 p.m.
Subject: Variation 2
Attachments: 20141024191727720.pdf; Variation 2 - Hinds.pdf

Hi Ecan,

Please find a submission on Variation 2 for Synlait Farms Limited.

Many Thanks
Lucy

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Submission on Proposed Variation 2 to the Proposed Canterbury Land and Water Regional Plan

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Submitter ID:

File No:

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 24 October 2014 to:

Freepost 1201 Variation 2 to pLWRP
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: LUCY - JANE ELIZABETH JOHNSON Phone (Hm): _____
Organisation*: SYNLAIT FARMS LTD Phone (Wk): 03 9754521
* the organisation that this submission is made on behalf of
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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: L Johnson Date: 24-10-14

(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.

- ☐ 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

Dear Sir/Madam

Variation 2 Proposed Land and Water Regional Plan.

Synlait Farms Limited (SFL) owns 13 dairy farms in central Canterbury, making it one of the largest dairy farm operations in New Zealand with a total land holding of 4,390 hectares. SFL produced 5.3 million kilograms of milk solids in the 2013/2014 season. SFL estimate that there is currently approximately \$13.8 billion of investment in dairy farms in the Canterbury region with an average size of 219ha (equivalent to c.\$8 million per farm).

SFL has historically been involved in farm development and conversion to dairy, having developed over 4,000 hectares of dry pasture land into dairy farms, purchased over 800 hectares of existing dairy farms and developed a further 700 hectares for dairy support. In March 2014 SFL completed a capital raising transaction which resulted in a decision through the Overseas Investment Office. This transaction was completed for consideration of \$90.7M .

SFL's farms are located in the Canterbury region, one of the world's most productive pastoral dairy regions with access to reliable sources of irrigation water. Irrigation is fundamental to pastoral dairying in Canterbury and SFL has robust access to sufficient water to irrigate all of the farms. In the Lower Hinds catchment SFL operate a 343ha dairy farm. This property is known as 'Waitai' and is located on the coast at Waterton. At the time of conversion a 'mudfish habitat' was developed and extensions to this habitat continue. SFL also manage another 175ha dairy farm on the boundary to Tinwald township, under a contractual arrangement.

The management philosophy has been to maintain high quality infrastructure and as a result SFL's assets are well invested. SFL sets high standards in environmental management and has invested in industry leading systems, processes and infrastructure to manage its environmental footprint. In order to allow further adoption of good practice, capital investment and production efficiencies sound regulation is required to drive such behaviours. Failure to allow this flexibility and ownership of issues may result in little to no environmental gains being made.

New Zealand's dairy industry is internationally recognised for its low cost, pasture based farming system, large-scale processing, innovations in new product development, and farm production technology. Certainty over the planning and regulatory environment in which SFL operate is paramount in maintaining these advantages and financial security to grow international markets opportunities for the industry.

SFL appreciate the opportunity to provide feedback on Proposed Variation 2 to the Proposed Land and Water Regional Plan (LWRP). We note the key following points:

- The importance of irrigation to the economic and social well-being of the region should be explicitly recognised;
- The justifications and science underpinning much of the water quality and quantity framework is weak and has not been strategically peer-reviewed before being adopted into the LWRP.

SFL welcomes the opportunity to work with Environment Canterbury as the Variation 2 is refined. Please find a copy of our submission attached.

Provision	Support / Oppose	Issue	Relief sought
Policies			
Policy 13.4.6	Oppose	The suggested amendment in Variation 2 appears to be over restrictive for the life of the plan.	Add will be left in the river <u>until allocation is at or under catchment limit</u>
Policy 13.4.9	Oppose in part	SFL acknowledge that reductions in nitrogen losses are required to improve water quality in the catchment to an acceptable standard. However we hold concerns with the robustness of the modelling and analysis behind the targets in these policies (overall nitrogen losses reduced by 45% and a load of 3,400 tonnes of nitrogen per year by 2035).	Amend Policy 13.4.9(d) as follows : <i>Reducing overall nitrogen losses by 45<u>30</u> percent in the lower Hinds/Hekeao Plains Area and adopting the use of managed aquifer recharge to augment groundwater and/or surface water <u>catchment scale mitigations.</u></i>
Policy 13.4.12	Oppose in part.	<p>SFL hold concerns with the robustness of the calculation from the nitrate nitrogen groundwater concentration target to a catchment load. We don't consider 3,400 tonnes of nitrogen per year corresponds to the load required to meet the concentration limit.</p> <p>We accept that there will always be data gaps and some assumptions will need to be made in order to progress towards achieving improvements in water quality. However there is too much uncertainty behind the 3,400 tonne target to set it as a firm number in the plan. SFL suggest the plan should set nitrate nitrogen concentration limits instead, as there is certainty in these numbers. This would allow re-calculation of the corresponding nitrogen load to occur easily and as needed as our knowledge increases.</p>	<p>Amend Policy 13.4.12 as follows:</p> <p><i>Improve water quality in the Lower Hinds/Hekeao Plains Area by reducing the discharge of nitrogen from farming activities to achieve a target load of 3,400 tonnes of nitrogen per year <u>70% of the existing catchment load contributed by farming activities</u> by 2035.</i></p>
Policy 13.4.13	Oppose in part	Support the requirement to operate at GMP by 2017 – however note the difficulties in determining what is	Amend Policy 13.4.13 as follows:

		<p>required to achieve GMP loss rates prior to the MGM numbers being available.</p> <p>SFL oppose the reduction regime set out in Table 13(h) and implemented through this policy. Again we accept there is a need for reductions but hold serious concerns for the continuing viability of dairy farming if they are required to achieve up to 45% reductions from GMP nitrogen loss rates.</p> <p>There are serious inequity issues caused by the reduction regime, both in that reductions are only required by dairy and dairy support operations and that they must offset a further increase in nitrogen load generated by the 30,000ha of land use intensification provided for in this policy.</p> <p>The s32 report explains the reductions have been placed solely on dairy and dairy support farms as other land uses cannot sustain such reductions and remain profitable, based on EBIT analysis. It is not appropriate to rely on EBIT alone to determine the impact of such reductions and more thorough modelling and peer review is required.</p> <p>There is a very real threat to the continued viability of our suppliers to operate dairy farms into the future if a 45% reduction is imposed on them.</p>	<p><i>Farming activities including farming enterprises in the Lower Hinds/Hekeao Plains Area, whether or not they are supplied with water by an irrigation scheme or a principal water supplier, achieve a target load <u>calculated as 74% of the existing catchment load contributed by farming activities of 3,400 tonnes of nitrogen per year</u> by:</i></p> <p>(a) <i>Requiring existing farming activities to <u>implement good practices meet good management practice nitrogen loss rates</u> from 1 January 2017, <u>calculated on baseline land uses</u>;</i></p> <p>(b) <i>Requiring <u>a collective reduction in nitrogen loss from farming activities across the Lower Hinds/Hekeao Plains Area for all properties with a nitrogen loss calculation exceeding 25kg per hectare per annum</u> <u>further reductions for dairy farming and dairy support from 1 January 2020, in accordance with Table 13(h); and</u></i></p> <p>(c) <i><u>Determining the extent and timing of nitrogen loss reductions to be achieved on individual farms from 1 January 2020 by:</u></i></p> <p>i) <i>Use of an expert farm systems advisory panel reviewing resource consent applications and any associated Farm Environment Plans and providing independent advice to Canterbury Regional Council about the opportunities for nitrogen loss mitigation given the individual circumstances of each farm.</i></p> <p>ii) <i>Having regard to the following matters in considering the individual circumstances of each farm:</i></p> <p>(1) <i>The nitrogen baseline for the property and</i></p>
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			<p>the level of any reductions already achieved from that baseline; and</p> <p>(2) Any natural or physical constraints to lower nitrogen leaching faced on-farm that are outside of a farmer's control; and</p> <p>(3) The level of investment in farm infrastructure and where a farm might be in the cycle of infrastructure replacement; and</p> <p>(4) The capital and operational costs of making nitrogen loss reductions and the benefit (in terms of maintaining a farm's financial sustainability) of spreading that investment over time.</p> <p>Enabling, by way of resource consent process, land use intensification or changes in land use on a maximum of 30,000 hectares of land, provided the nitrogen loss calculation is limited to no more than 27 25 kg per hectare per year.</p>
Policy 13.4.14	Support in part	Support the enabling of MAR and TSA as methods to achieve outcomes sought by the zone committee. However we want to ensure a thorough assessment of the heightened water table and/or impacts to people are property are assessed and peer reviewed.	See recommendations in rule 13.5.36
Policy 13.4.16	Oppose in part	<p>Existing water consents can only be renewed for rate & volume calculated by method 1 (demonstrated use). Water metering has been implemented fairly recently and taking into account weather cycles and inevitable issues in getting new systems operating properly, it may be a few years yet before irrigators have robust water use records that are representative enough to provide a fair Method 1 annual volume.</p> <p>We suggest Methods 2 and 3 of Schedule 10 should also be enabled, provided irrigation volumes are calculated to</p>	<p>Improve the flows in spring-fed waterbodies and the Lower Hinds/Hekeao to meet economic, cultural, social and environmental outcomes in the Hinds/Hekeao Plains Area by requiring adherence to flow and allocation limits, limiting the volume and rate of abstraction on replacement water permits to reasonable use calculated in accordance with method 1 in Schedule 10 <u>based on existing irrigated areas and rates</u> and prohibiting increased use arising from the transfer of consented volumes of water within surface water catchments and the Valetta Groundwater Allocation Zone.</p>

		<p>reflect the existing irrigation area and rate. This will ensure re-consented volumes do not provide more water than required for the existing use and are calculated in accordance with CRC accepted methods, but do not unreasonably restrict irrigators if their water use records are not representative.</p> <p>Provided well interference and stream depletion effects are acceptable, there is no justifiable reason to restrict the rate of take to demonstrated use.</p>	<p><i>Consider authorising 'actual use' panel to peer review if further allocation would be required on 'demonstrated use'. A similar approach was taken in Rakaia-Selwyn where consents were reviewed between 2006-2012. You have an annual allocation but it can be exceeded if demonstrate the use is required, with certain technological requirements.</i></p>
Policy 13.4.17	Oppose in part	<p>SFL oppose the blanket requirement for adaptive management conditions to be applied on renewal of any groundwater permit that was previously subject to adaptive management.</p> <p>We are not aware than any review of the effectiveness of adaptive management conditions has been undertaken and consider these conditions must be determined to have achieved their intended purpose before they can be imposed again on renewed consents.</p> <p>We suggest the need for adaptive management conditions must be considered in light of the assessment of effects on the groundwater zone and the effectiveness of the previous conditions when the consent comes up for renewal, rather than a blanket policy directive they be re-applied.</p> <p>Apply adaptive management on replacement of GW permits until the time that the Valetta GW allocation zone is no longer over-allocated.</p>	<p>Amend Policy 13.4.17 as follows:</p> <p><i><u>Prior to the expiry date of adaptive management consents in the Valetta Groundwater Allocation Zone, the Canterbury Regional Council shall undertake a review of the effectiveness of adaptive management conditions. Until such time as the Valetta Groundwater Allocation Zone limits in Table 13(f) are no longer exceeded, the effectiveness of, and the need for continuing adaptive management conditions shall be a matter of discretion</u> apply adaptive management conditions upon replacement of any groundwater permits that have previously been subject to adaptive management conditions on the same or similar terms as the pre-existing conditions.</i></p>
Rules			
Rule 13.5.9	Support in part	<p>While SFL accept the overall nitrogen loss to the Upper Hinds Plains area cannot increase, the implementation of a grandfathering regime imposes a rigid system that provides</p>	<p>Confirm if GMP loss rates are intended to apply from 2017. If so, specify this as a condition of the rule so the requirement</p>

		<p>very little opportunity for change.</p> <p>It is unclear if properties that meet the conditions of this rule are required to meet GMP loss rates from 2017. There is no reference to this in the rule, however if condition 3 is taken up and a FEP prepared and implemented, Schedule 7 requires it must include measures to meet the GMP loss rates.</p>	it is clear and upfront.
Rule 13.5.14	Oppose in part	<p>As per Policy 13.4.13, SFL is concerned with inequities in providing for 30,000ha further intensification at a rate of 27kg/N/ha or less. This seems at odds with the strict requirements being placed on existing farms and unfairly requires them to shoulder the burden of this further intensification, potentially at the risk of their business viability.</p> <p>As per comments associated with Rule 13.5.16 it is unclear if the intention of this rule by the Zone Committee or Zip Addendum covers intensification from a permitted activity base. Row B Table 13(i) does not explicitly authorise currently irrigated low leachers that are irrigated making application under this rule.</p>	<p>Amend Rule 13.5.14 as follows:</p> <p><i>The future nitrogen loss calculation for the area of land subject to any application for resource consent made under this rule will be less than or equal to 27 25 kg per hectare per annum for the activity applied for; and...</i></p> <p><i>Clarify if currently irrigated land areas can apply for consent under this rule, as per Table 3(i) Row B.</i></p>
Rule 13.5.15	Oppose in part	<p>While it is a permitted activity if under 20kg/N/ha, farms must also remain within their baseline. While provision for land use intensification has been made through Policy 13.4.13(c) and Rule 13.5.14, an alternative method to enable low nitrogen loss operators to intensify could be to provide a permitted activity limit they may increase to.</p> <p>SFL would encourage the amended definition on nitrogen loss calculation and nitrogen baseline to better reflect the current enforcement of these definitions by Council under the pLWRP.</p>	

		SFL also further encourage the use of a range of nitrogen loss for the property rather than an absolute number. For example it is easy to move 1-2kg through cow weights, seasonal fluctuations and production levels without having a true environmental effect.	
Rule 13.5.16		<p>Currently the Waitai property would be classed as a permitted activity. However the current rules provide a high degree of uncertainty and potential inequality. The reason for this is the requirement to not exceed 20kg and exceed nutrient baseline.</p> <p>The reason for this is rule 13.5.13 allows property less than 5ha to leach 20kg or baseline, whichever is the greater. Further Rule 13.5.14 allows for growth in the catchment. SFL are not against allowing a degree of flexibility for landowners in different parts of the catchment. However if I felt I may exceed by baseline in any given year, which I potentially may not quantify until the end of a production season I may not have been authorised to operate as a permitted activity.</p> <p>In order to ensure a high degree of compliance then landowners currently under 20kg should apply for consent under Rule 13.5.14 to ensure some scope for seasonal variations. This simply restricts other landowners the chance to increase their loss and 'locks up' a resource by one or several parties applying for the remaining 30,000ha that may be left for intensification. I do not believe this is the intention of the rule.</p> <p>This approach could be avoided by allowing a range of losses to occur, seasonally. It is not drastic farm system changes that may cause a non compliance with the nutrient baseline, Rather some subtly alterations around production (milk and grass), cow weights and supplement, to name a few that can increase my losses 1-5kg.</p>	<p><i>Amend Rule 13.5.16</i></p> <p><i>From 1 January 2017, the use of land for a farming activity in the Lower Hinds/Hekeao Plains Area is a permitted activity, provided the following conditions are met:</i></p> <ol style="list-style-type: none"> <i>1. The nitrogen loss calculation for the property does not exceed 25kg per hectare per annum; and</i> <i>2. <u>GMP nitrogen loss rates are being achieved</u> The nitrogen loss calculation for the property, excluding any area of land subject to a resource consent granted under Rule 13.5.14, does not increase above the nitrogen baseline; and either</i> <i>3. The practices in Schedule 24a are being implemented and the information required is recorded in accordance with Schedule 24a, and supplied to Canterbury Regional Council upon request; or</i> <i>4. A Farm Environment Plan has been prepared and is being implemented in accordance with Schedule 7 Part A, and supplied to Canterbury Regional Council upon request.</i> <p><i>If you do not adopt the changes suggested for condition 2 then a further alternative could be to put in place a threshold for a range of numbers from nitrogen losses – 20-23kg for example. Insert a controlled activity rule so the allocation under Rule 13.5.14 is not 'locked up' but the increase is accounted for and managed on a short-term basis.</i></p>

		<p>Further any non compliance with your nutrient baseline is a prohibited activity under Rule 13.5.20, which seems unfair if the landowners aiming to operate under Rule 13.5.16 do so at good practice, through Schedule 24 or FEP.</p> <p>As per Rule 13.5.15. It is unclear if properties which classify as permitted activities under this rule are required to meet GMP nitrogen loss rates and/or further reductions from 2020.</p> <p>Conditions 3 and 4 provide the choice between implementing schedule 24a practices or a FEP in accordance with Schedule 7 Part A. 13.10 requires that in the Hinds Plains area, FEP's shall include measures to achieve the GMP loss rates from 2017 and in the Lower Hinds area, the further reductions from 2020.</p> <p>It is unclear what the intention is here. The rule is open to interpretation and doesn't contain enough certainty.</p> <p>If GMP loss rates are required to be achieved from 2017 by permitted activity farms this should be a condition of this rule, so it is clear and upfront.</p> <p>SFL considers the nitrogen baseline becomes redundant post 2017 as the focus moves to achieving GMP nitrogen loss rates and further reductions from 2020.</p> <p>Matter of discretion 1 gives the consent authority discretion over the 'quality of, compliance with and auditing of the FEP'. Compliance with the FEP cannot be determined at the consent application stage.</p>	
Rule 13.5.17	Oppose in part.	As discussed for Policy 13.4.13 and Table 13(h), SFL oppose the number the nitrogen load target has been set at and	Amend Rule 13.5.17 as follows:

		<p>reduction regime this rule seeks to implement.</p> <p>It is unclear how consents applied for under this rule will be processed, what timeframe they will be granted for and what mechanisms will be used to impose the GMP loss rates and further nitrogen loss rates in Table 13(h).</p> <p>Matter of discretion 1 gives the consent authority discretion over the 'quality of, compliance with and auditing of the FEP'. Compliance with the FEP cannot be determined at the consent application stage.</p>	<p><i>From 1 January 2017, the use of land for a farming activity in the Lower Hinds/Hekeao Plains Area is a restricted discretionary activity, provided the following conditions are met:</i></p> <ol style="list-style-type: none"> <i>1. The nitrogen loss calculation for the property is greater than 20 <u>25</u> kg per hectare per annum; and</i> <i>2. The nitrogen loss calculation for the property, excluding any area of land subject to a resource consent granted under Rule 13.5.14, does not increase above the nitrogen baseline; and</i> <i>3. A Farm Environment Plan has been prepared in accordance with Schedule 7 Part A.</i> <p><i>The exercise of discretion is restricted to the following matters:</i></p> <ol style="list-style-type: none"> <i>1. The <u>content quality of, compliance with and auditing</u> of the Farm Environment Plan; and</i> <i>2. The ability to meet the nitrogen load target for farming activities in Table 13(g); and</i> <i>3. From 1 January 2017 the Good Management Practice Nitrogen Loss Rates <u>to be applied for the baseline land uses</u>; and</i> <i>4. <u>From 1 January 2020, the matters listed in Policy 13.4.13 Any nitrogen loss rates to be applied in accordance with Table 13(h); and</u></i> <i>5. The potential benefits of the activity to the application, the community and the environment.</i> <p><i>.'</i></p>
Rule 13.5.10 and 13.5.18	Support in part.	<p>SFL support the provision enabling farm enterprises as a flexible way to manage nitrogen losses. However we suggest this should be a restricted discretionary activity, reflecting the low level of risk and promoting innovation and flexibility in achieving the target loss rates.</p>	<p>Change Rule 13.5.18 to a restricted discretionary activity, with the following matters of discretion:</p> <ol style="list-style-type: none"> 1. The content of the Farm Environment Plan; and 2. Existing nitrogen and phosphorus management practices to reduce nitrogen loss; and 3. The nitrogen load target for farming activities; and

			4. The potential benefits of the activity to the applicant and the community and the environment.					
Rule 13.5.30	Oppose in part	<p>SFL seek consequential amendments to Rule 13.5.30 to align with our suggested change to Policy 13.4.14.</p> <p>SFL would further consider the suitability of one groundwater allocation zone for the whole catchment. There is benefit in implementing a separate catchment zone towards the coast where the allocation of water and nutrients is likely to have minimal impact of achieving the catchment objectives because of the proximity to the coastal environment.</p>	<p>Amend Rule 13.5.30 as follows:</p> <p>1. <i>If the proposed take is the replacement of a lawfully established take, the annual volume and maximum rate of take has been calculated in accordance with methods <u>1, 2 or 3</u> in Schedule 10 <u>and are based on existing irrigated areas and rates.</u></i></p>					
Rule 13.5.34	Oppose	<p>SFL is concerned the transfer provisions are overly restrictive.</p> <p>The quantification of current water use is a theoretical overstatement to justify an overly restrictive transfer regime.</p>	<p>Amend rule to be non complying.</p>					
Rule 13.5.36	Support in part	<p>SFL ask for the inclusion of some further matters of discretion when assessing these consents, specifically around community consultation, thorough locality assessments for unregistered but active bores, the review of modelled verse reality impacts on raised groundwater levels and flow results..</p>	<p>Retain rule as currently written but add the following matters of discretion or made consent conditions:</p> <p>A specific site assessment is undertaken and workplan identified through community consultation prior to undertaking the trials.</p> <p>The workplan is reviewed after each trial to understand the variance between modelled effects verse the reality and the success of MAR/TSA.</p>					
Tables								
Table 13(g)		<p>SFL seek consequential amendments to Table 13(g) to align with suggested changes to Policy 13.4.12.</p>	<p>Revise the Nitrogen load for Lower Hinds/Hekeao Plains Area to be 74% of the existing catchment load.</p>					
Table 13(h)	Oppose	<p>As outlined for Policy 13.4.13, SFL oppose the reduction regime of Table 13(h).</p>	<p>Amend Table 13(h) as follows:</p> <table><tr><td>Land use</td><td>2025</td><td>2050</td></tr></table>			Land use	2025	2050
Land use	2025	2050						

			<div>Farming activities with a nitrogen loss calculation greater than 25 kg per hectare per year</div> <div>Up to 15%</div> <div>26%</div>
			<div>Farming activities with a nitrogen loss calculation less than 25 kg per hectare per year</div> <div>0%</div> <div>0%</div>
Schedules			
Schedule 7	Oppose in part	<p>The variation amends Schedule 7 to include two additional nutrient management objectives.</p> <p>SFL suggest amendments to these additional matters to provide greater clarity on what situations they apply to.</p>	<p>Amend proposed additions to Schedule 7 as follows:</p> <p>Within the Hinds/Hekeao Plains Area Part B clause 5(a) shall also include the following:</p> <ul style="list-style-type: none"> Achieve the Good Management Practice Nitrogen Loss Rates from 2017—Implement Good Management Practices. <u>In Lower Hinds/Hekeao Plains Area, and for farming activities with a nitrogen loss calculation greater than 25kg per hectare per annum, further reduce the nitrogen loss rate from 2020 in accordance with Table 13(h).</u>
Schedule 24A		<p>Seek clarification on the term ‘replacement’ under (bi) for irrigation management.</p> <p>SFL ask that after September 2013 wind storm a large portion of pivot infrastructure was renewed or rebuilt. Would this be classed as a replacement?</p>	