

Make Submission

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Event Name	Proposed Variation 2 to Proposed Canterbury Land and Water Regional Plan
Submission by	Mr Alastair Studholme
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State concisely whether you support or oppose the provision being submitted on, or wish to have amendments made.

My submission is that: Oppose

Please state your reasons for supporting/opposing/amendments sought

My reason(s) for supporting, opposing or requesting amendments to this specific provision are:

Dear Sir/Madam,

My name is Alastair Studholme I farm a mixed cropping and sheep farm at Coldstream near the coast near the Rangitata River mouth. Our family have farmed here since 1867 and have probably contributed to this zone for longer than any other farming family. Our nitrate leaching levels appear very low, among the lowest in the zone you would think that would be an asset to the zone but the plans under Variation 2 strongly favour high nitrate polluters and restrict our normal business to such an extent that our business is unlikely to survive.

The areas that unfairly favour us and our farming operation are:

Using an historical N baseline.

This policy unfairly treats mixed cropping and sheep farms because we are always in a process of development which means we are likely well above our 2009/13 baseline already because our operations intensify every year. It doesn't account for the N leaching flexibility required in our systems so we can grow crops demanded by markets rather than grow crops dictated to us by leaching levels. This policy of restricting us to lower N leaching than the levels of the dairy and support farms means their farms

will be worth considerably more per hectare than ours which restricts our ability to borrow money to develop our farms and increases our cost of borrowing.

Prohibiting new groundwater takes in the Mayfield Hinds Water Zone:

This zone is only 82% allocated and the actual usage of these allocations is low because a number of these wells were allocated as a backup for when RDR water was less reliable and didnt have storage ponds so dont get much use now. The groundwater is in ample supply especially as it nears the coast where the fall is less so waters path to the sea is slowed. I still have 500ha of dryland that I plan to irrigate with deep wells. My most important business on our farm is our Canola hybridising seed for export which relies on ground being in a one in ten year rotation, if we cant establish new irrigation areas in the next few years this business will end because of it, this will happen to our other rotational crops such as potatoes and peas as well. Prohibiting new water allocations in our area has no scientific basis to it, this has been confirmed to me by Ecans staff who were available to us at the Hinds limit setting meetings.

MAR is a substantial risk to our cropping operations.

MAR is being tried to dilute nitrates leached from dairy and dairy support farms who are polluting our water. It will likely cause waterlogging of our crops down country because our land is flatter so water slows down and rises to the surface where we farm. This will likely cost us lost crops as we mostly grow autumn sown crops here, there is no mechanism in place to compensate us for lost crops.

The use of the Overseer model:

Overseer is a huge undertaking for a mixed cropping farm, While typical dairy farms can calculate their N loss using two blocks our farm requires using more than 70 blocks because of the complexity of our systems. I have experience using Overseer on part of our farm, each block takes 40 minutes with a consultant so mine will take 50 hours (a week) each year and establishing my baseline 2009/13 will take 200 hours (a month). This is a huge cost to impose on someone who has done nothing wrong!

Boundary changes proposed to the nutrient red zone:

These boundaries were drawn up to reflect the nutrient leaching status of the area and shouldnt be changed just to align with the ground water allocation zone.

Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you are seeking.

I seek the following decisions from Environment Canterbury:

I think that Environment Canterbury should stipulate that in order to achieve fairness across farming sectors we should all be allowed to farm to the same N loss level whether we are rising to it or having to lower our leaching to achieve it. This would mean a N loss baseline would not be required and we can all feel we were treated fairly.

I think that new groundwater allocations in the Mayfield Hinds water zone should be allowed and that the zone needs to be divided into smaller sub zones which may have different amounts of water allocation available, The zones only extended from the sea to the hills for some simplicity, they need to reflect the more complex localised nature of groundwater. Particularly near the coast where there appears to be ample groundwater and without the availability of irrigation scheme water this would treat coastal farmers more fairly.

I think Overseer for cropping farmers is too complicated and time consuming and many of us will give up farming because of it, an input based system would be more workable for us based on best practice.

I think Ecan should leave the nutrient zone boundaries where they put them and not change them to align them with the water zone because that's not what they are and will impact seriously on our farming.

Thank you for your time.

I wish to be heard on this submission,

Tick relevant topics