
From: Anita Murrell <anita.murrell@pork.co.nz>
Sent: Wednesday, 14 January 2015 3:42 p.m.
Subject: V2 pLWRP Further Submission
Attachments: Further Sub V2 Canterbury LWRP Jan 2015.docx

Please find attached a further submission on Variation 2 to the proposed Land and Water Regional Plan from NZPork.

Kind regards,

Anita Murrell

Environmental Advisor

New Zealand Pork

Level 4, 94 Dixon Street, PO Box 4048, Wellington, 6140, NZ

T: +64 4 917 4752 M: +64 29 220 3300

E: anita.murrell@pork.co.nz

W: pork.co.nz | nzpork.co.nz |

[f](https://www.facebook.com/NZPork) /NZPork [@NZ_Pork](https://twitter.com/NZ_Pork) [@NZPork](https://twitter.com/NZPork)



DISCLAIMER: This electronic message together with any attachments is confidential. If you are not the intended recipient, do not copy, disclose or use the contents in any way. Please also advise NZPork by return email that you have received the message and then please destroy. NZPork is not responsible for any changes made to this message and/or any attachments after sending by NZPork. We use virus software but exclude all liability for viruses or anything similar in this email or any attachment.

FURTHER SUBMISSION TO CANTERBURY REGIONAL COUNCIL ON SUBMISSIONS TO PROPOSED VARIATION 2 TO THE PROPOSED CANTERBURY LAND AND WATER REGIONAL PLAN

TO: Environment Canterbury
PO Box 345
Christchurch 8140
New Zealand

SUBMITTER: NZ Pork Industry Board

CONTACT DETAILS:

NZPork
Anita Murrell
New Zealand Pork
PO Box 4048
WELLINGTON 6140

Email: anita.murrell@pork.co.nz

Phone: 04 917 4752

Mobile: 029 220 3300

NZPork has an interest in the proposal that is greater than the interest the general public has.

NZPork wishes to be heard in support of this further submission. If others make a similar submission, we will consider presenting a joint case with them at a hearing.

I am authorised to act and represent NZ Pork in making this submission.



Anita Murrell
15 January 2015

I support/oppose the submission of:	The particular parts of the submission I support or oppose are:	Support/oppose	The reasons for my support or opposition are:
Horticulture New Zealand C14C/197145-02	4.4 – Add a new policy: The nitrogen baseline for a property or enterprise can be reassessed where it can be demonstrated that the 4 years 2009-2013 do not accurately reflect the nature of the operation.	Support	The submitted policy would allow for consents gained during the baseline period to be assessed as if the activity is fully operational, as well as allowing for rotational farming systems. This approach is fairer and more equitable across different agricultural systems.
	4.7 – Add a new policy and rules to enable transfer of nitrogen discharge within and between enterprises and farms within the same freshwater management unit.	Support	It is important to maintain flexibility of land use, particularly with regard to rotational farming systems which may utilise leasehold land or acquisition of more land to lower overall stocking rate.
	5.8 – Amend rule 13.5.17	Support in part	The matrix of Good Management is not due to be codified in the plan until October 2016, therefore farmers may only have two months to comply with loss rates that are currently unknown. All references to GMP loss rates should be deleted until outcomes from the MGM project are known and can be assessed.
	8.1 – Amend Schedule 7 Farm Environment Plan	Support in part	The matrix of Good Management is not due to be codified in the plan until October 2016, therefore farmers may only have two months to comply with loss rates that are currently unknown. All references to GMP loss rates should be deleted

			until outcomes from the MGM project are known and can be assessed.
Dairy NZ C14C/197209-02	3 – Definition: Good Management Practice Nitrogen Loss Rates	Support	The Matrix of Good Management Practice and associated loss rates are not defined nor due to be codified in the plan until October 2016. As such, they cannot currently be included in rules or used as a compliance measure. All references to GMP loss rates should be deleted and included by way of a schedule 1 process once known.
	7&8 – Rule 13.5.15	Support	The guidance note for measuring compliance with rules relating to nitrogen baseline currently has no legal effect. The intent should be codified in the plan.
Fonterra Co-operative Group Limited C14C/197218-02	3 – Definition: Good Management Practice Nitrogen Loss Rates	Support	The Matrix of Good Management Practice and associated loss rates are not defined nor due to be codified in the plan until October 2016. As such, they cannot currently be included in rules or used as a compliance measure. All references to GMP loss rates should be deleted and included by way of a schedule 1 process once known.
	7&8 – Rule 13.5.15	Support	The guidance note for measuring compliance with rules relating to nitrogen baseline currently has no legal effect. The intent should be codified in the plan.

Federated Farmers of NZ, Combined Canterbury Provinces C14C/197303-02	Rule 13.5.15	Support	The assessment of compliance and application of any rules referring to the nitrogen baseline are inequitable, with development during the baseline period allowed for dairy enterprises only. It also unfairly constrains farming activities that operate on a rotational basis.
Beef & Lamb New Zealand Limited C14C/197250-02	Amend Definition – nitrogen baseline	Support	It is inequitable to treat one type of farming, dairy, differently to all others.