

From: [Matt Harcombe](#)
To: [Mailroom Mailbox](#)
Subject: RE: B+LNZ submission to var3
Date: Tuesday, 26 May 2015 12:20:09 a.m.
Attachments: [20150525 Variation 3 ECAN Submission B+LNZ.docx](#)

As per previously advised below please find attached Beef + Lamb New Zealand's submission to variation 3

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-----Original Message-----

From: Matt Harcombe
Sent: Monday, 25 May 2015 4:50 p.m.
To: mailroom@ecan.govt.nz
Subject: B+LNZ submission to var3

Hi there

I have prepared a submission on behalf of beef+lamb New Zealand and am trying to send Fromm laptop. I am unable to connect to my network on my mobile.

While I realise this will be a late submission when I am able to send this I will email as soon as I can connect to a network

Am sending an email in advance of lodge the formal submission later on this evening

Kind regards

Matt Harcombe
Beef + Lamb NZ
0274305037



SUBMISSION

25 May 2015

TO:
Canterbury Regional Council

ON:
Variation 3,
Canterbury Land and Water Regional Plan

Section 15 – Waitaki and South Coastal Canterbury

BY:
Beef + Lamb New Zealand Ltd

We wish to be heard in support of our submission

We are not a trade competitor

Contact for service

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3. Specific Submissions

Submission

1. Introduction

1.1 Beef + Lamb New Zealand Ltd (B+LNZ) welcomes the opportunity to make a submission on the Proposed Variation 2 of the Canterbury Land and Water Regional Plan (Variation 3).

1.2 B+LNZ is an industry-good body funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand. Its mission is to deliver innovative tools and services to support informed decision making and continuous improvement in market access, product positioning and farming systems.

1.3 B+LNZ are actively engaged in environmental issues that affect the pastoral production sector.

2. Submissions applying to the whole plan change

2.1 B+LNZ **supports** the overall vision of Variation 3 to achieve good water quality outcomes and to give effect of the intent of the recommendation of the Nitrogen Reference Allocation Group by trying to provide flexibility, adopt maximum caps, and to recognise that different soil types pose different risks for the loss of Nitrogen.

2.2 B+LNZ **opposes in part** Variation 3 to the Proposed Canterbury Land and Water Regional Plan.

Decision Sought

2.4 **Amend** Variation 3 as necessary to give effect to B+LNZ's submissions across objectives policies and methods including:

- I. Reconsider how the variation gives effect to the recommendations of the Nitrogen Allocation Reference Group
- II. Amend soils data and recalculate the load and allocation based on correct data
- III. Provide greater flexibility to low Nitrogen loss activities in the allocation method – including providing a permitted activity (with adoption of FEP) to all activities with a Nitrogen baseline below 15kgN/Ha. This can be achieved over time through providing for a transition state between current baseline and future state.
- IV. Calculate Nitrogen baseline using maximum year over a 5 year rolling average
- V. Recalculate total catchment load based on achieving water quality outcomes in the receiving environment – only use the latest version of Overseer to inform relative progress towards achievement of individual Nitrogen discharge limits
- VI. Delay hearing submissions on the plan until the adoption of a region wide variation that incorporates new information determined by the matrix of good management.

Reasons for opposing the variation in part

- i. Despite the work of the Nitrogen Reference Allocation Group (NARG) to reach a consensus allocation method that meets the needs of both farmers and water quality in the catchment, there are significant problems with the way that this agreement has been interpreted into the objectives policies and methods. Despite their efforts, using incorrect information and a previous version of Overseer, the allocation method recommended by the NARG is far from optimal for sheep and beef farmers in the catchment.
- ii. There is significant concern that the soil data that has been used to calculate and allocate the Nitrogen is incorrect. Soil data should be amended and the nutrient load recalculated based on correct soil data.
- iii. There is significant concern with how Overseer has been used in both determining and allocating the Nitrogen load. The concern is that the use of Overseer has not been to inform catchment based modelling but has been relied on to determine the catchment load. This is not sufficiently linked to achieving desired water quality outcomes in the receiving environment. In addition the variation does not provide for incorporating new versions of Overseer that will, as a result of the way Overseer has been used in the variation, significantly alter the understanding of the catchment load, the allocation of that load and the information on which the NARG made recommendations to adopt an allocation method, and impact on our relative understanding of land owners ability to reach the discharge limits.
- iv. The wisdom of restricting land use to current use needs to be considered when it can result in highly productive land being effectively locked in to particular land uses. This is none more so for low nitrogen loss activities identified in this plan change. Locking in a particular land use will prevent optimizing social, community, economic and production outcomes. There is huge potential for increasing dryland production in Canterbury with only minimal effect on overall catchment Nitrogen load. Beef + Lamb New Zealand consider that the proposed allocation method adopted in variation 3, significantly constrains land use in the catchment with little or no link to achieving a desired water quality state.
- v. The significant part of the approach is that it occurs over a timeframe that allows transition from the current position, to a long term stable system, balancing nutrient reduction with impacts on economic and social impacts. There is often a perception that all limits must be met immediately, however by providing sufficient time for farmers to adjust, it is possible to achieve the water quality outcome the community wants. This also includes recognising within the allocation method that significant transition periods and adaptive management will provide flexibility for lower emitters to continue to undertake progressive development of their properties to optimise land use, respond to markets and adopt new pasture species and technologies into their farming systems. Overseer will always be "catching up" to these adapting farming systems and mitigations and management techniques will not be accounted for, nor will specific actions or pasture or crop types.

3. Specific Submissions

Specific Provision	Submission Support/Oppose	Decision Sought	Reasons for decision
Policies 15.4.1 – 15.4.17	Oppose	<ul style="list-style-type: none"> • Amend policies to provide for development of existing dryland and properties with small areas of irrigation • Provide for flexibility in current farming system if benchmark is above flexibility cap. • Increase number of years in calculation of baseline. • Provide for more allocation to dryland/low N emission properties over time. • Immediately adopt flexibility cap to up to 15kg N/Ha • For stable dryland farming systems where emission exceeds 15kgN/Ha extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline • Provide for incorporating updated Overseer versions, soils data and MGM 	<ul style="list-style-type: none"> • Impacts ability to farm • Impacts on flexibility of current and future land use • Will not necessarily achieve desired objectives of water quality • Actions of farmer to manage nutrients more important than focus on allocation of nitrogen • Suggested amendments provide greater flexibility in farming system to allow sustainable development • Numbers adopted and notified in the plan are too reliant on previous versions of Overseer, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes
Rule 15.5.2 – 15.5.5	Oppose	<ul style="list-style-type: none"> • Amend policies to provide 	<ul style="list-style-type: none"> • Impacts my current ability to farm • Impacts on my flexibility of current and future

		<p>for development of existing dryland and properties with small areas of irrigation</p> <ul style="list-style-type: none"> • Provide for flexibility in current farming system if benchmark is above flexibility cap. • Increase number of years in calculation of baseline. • Provide for more allocation to dryland/low N emission properties over time. • Immediately adopt flexibility cap to up to 15kg N/Ha • For stable dryland farming systems where emission exceeds 15kgN/Ha extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline • Provide for incorporating updated Overseer versions, soils data and MGM 	<p>land use</p> <ul style="list-style-type: none"> • Will not necessarily achieve desired objectives of water quality • Actions of farmer to manage nutrients more important than focus on allocation of nitrogen • Suggested amendments provide greater flexibility in farming system to allow sustainable development • Numbers adopted and notified in the plan are too reliant on previous versions of Overseer, are not corrected for changes in soil knowledge and are predicated on knowledge of existing loads, not achieving water quality outcomes
15.1 Definition	Oppose	<ul style="list-style-type: none"> • Amend definition of Nitrogen Baseline to maximum of a five year period and calculated over a 5 year rolling average 	<ul style="list-style-type: none"> • Provide greater operating flexibility in existing farming systems
Table 15(m)	Oppose	<ul style="list-style-type: none"> • Amend table 15(m) to incorporate decisions 	<ul style="list-style-type: none"> • Provide for updated data and further version changes in Overseer

		sought in this submission by leaving table (M) blank to incorporate updated data when available and to provide for greater flexibility for low N loss activities	<ul style="list-style-type: none">• Provide for flexibility for low N loss activities below 15kg N/ha
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