Please find attached our submission.
Thank you.
Submission on Proposed Variation
3 to the Proposed
Canterbury Land and Water
Regional Plan

Return your signed submission by 5.00pm Monday 25 May 2015 by:
• Email: mailroom@ecan.govt.nz (subject heading: Submission on Proposed Variation 3 to pLWRP)
• Post: Freepost 1201
  Variation 3 to pLWRP
  Environment Canterbury
  PO Box 345
  Christchurch 8140

Full Name: Kelly Bennett (NZDFA-SCNO Branch Chair)  Phone: 03 6929982
Organisation*: New Zealand Deer Farmers’ Association – South Canterbury North Otago Branch
* the organisation that this submission is made on behalf of
Postal Address:  273 McLean Road  Phone (Cell): 0274 394 215
  21 RD Geraldine
Email: veledereextra60.02 Fax:
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: [Signature]  Date: 25 May 2015
(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 this submission in a joint case with others making a similar submission at any hearing
Submission on Proposed Variation 3 to pLWRP from the New Zealand Deer Farmers' Association – South Canterbury North Otago Branch

The South Canterbury North Otago Branch of the New Zealand Deer Farmers’ Association welcomes the opportunity to provide a submission on the Proposed Variation 3 to the Proposed Canterbury Land and Water Regional Plan.

General Comments:

The New Zealand Deer Farmers’ Association (NZDFA) is a voluntary subscription funded incorporated society representing the regional and national interests of approximately 1400 financial members and an estimated 70% of farmed deer. NZDFA expresses a political and functional view on behalf of all deer farmers and for industry good. It is governed by a national Executive Committee and has a strong regionally based Branch network of 20 autonomous groups.

The South Canterbury North Otago (SCNO) Branch of the NZDFA represents the national and regional interests of over 300 deer farmers in the wider area of South Canterbury of which approximately one third are likely to be in the land area affected by the proposed Variation 3. SCNO has a long association with Environment Canterbury (ECan) in the approaching environmental and land care challenges and implementing solutions in this sensitive environment (there have been many deer industry national environmental award winners from SCNO, the branch was instrumental in the development of the industry's 2003 and 2012 Landcare Manuals and the branch participated in a Sustainable Farming Fund project examining the use of nitrogen in high country to develop native tussocks). Our farmers take particular pride in farm stewardship and regard their responsibilities under ECan regional policies seriously.

While deer farming is a relatively new and small primary industry in New Zealand (the first licence to farm deer was issued in 1970), the New Zealand industry is the world’s largest exporter of venison and deer velvet and arguably the biggest producer of deer velvet. The industry’s resource is predominantly based in the South Island (over two thirds of the national herd) with Canterbury having the largest herd size (30% of the national herd). The region also serves as the major collection, grading and processing hub for velvet, is a significant venison processing region and has industry-leading deer stud specialisation.

Deer farming systems are based on the annual production of venison, velvet and deer co-products; as such they share many similarities with sheep and beef systems and can be focused on breeding or finishing, and located in fertile plains or South Island high country areas. It is estimated that about 70% of deer farms are actually mixed livestock (sheep, beef or dairy grazing) and arable cropping can also be incorporated.

SCNO acknowledges that the proposed Variation 3 has been developed over a substantial consultative process with considerable technical support and advice. SCNO does not have the expertise to peer review the supporting technical information and accepts these were undertaken in good faith. SCNO is however dismayed that the development of the nitrogen allocation levels has taken place seemingly in the absence of any input from deer farming interests. As SCNO views the nitrogen allocation “framework” as unfairly penalising low nitrogen emitters it is hard to support the proposed Variation 3 despite the aims and intended outcomes being highly laudable.

At the very minimum SCNO would like to engage further with ECan to better understand the rationale for the nitrogen allocation framework and urgently requests further consultation with deer farmers and other drystock (sheep and beef) farmers, given that many of our members run integrated multispecies systems, prior to the decisions Variation 3 being formulated.
### Specific submission points:

<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/Point</th>
<th>(2) My submission is that: (Include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)</th>
<th>(3) I seek the following decisions from Environment Canterbury: (Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand.)</th>
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<tbody>
<tr>
<td>15.1, pg 15-4</td>
<td>Seeking Amendment</td>
<td>The definition for “Maximum cap” refers to Table 15(m) which covers Nitrogen Flexibility cap limits. The correct table should be Table 15(n). Amend reference to “Table 15(n)” from the original “Table 15(m)” in the definition for Maximum cap.</td>
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<td>15.4, pg 15-5</td>
<td>Support subject to clarification</td>
<td>The exclusion of intensively farmed stock from (open) drains is consistent with treatment with other open water bodies and Variation 1 (Selwyn Te Waihora). As has been noted previously in other areas of Canterbury, exclusion of extensively farmed stock is not practical nor will it likely result in meaningful reductions of contaminants where stocking rates are low. Clarification of the definition of intensively farmed stock is as per the Decisions Version of the Proposed Land &amp; Water Regional Plan, namely: 1. cattle or deer grazed on irrigated land or contained for breakfeeding of winter feed crops; 2. dairy cattle, including cows, whether dry or milking, and calves, whether on irrigated land or not; or 3. farmed pigs</td>
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<tr>
<td>15.4, pg 15-5 and 15.5, pg 15-10</td>
<td>Oppose in current form</td>
<td>The policy to require “all farming activities to operate at good management practice or better” is aspirational but practically hard to verify. Clarification of how ECAn will require all farming activities to operate at GMP or better is sought.</td>
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<td></td>
<td>15.5.2 condition 5</td>
<td>If a farming activity is operating above maximum limits for nitrogen, then it may be possible for ECAn to monitor adherence to “GMP or better” through consent conditions and requirements. However for farming activities that are permitted it will be extremely difficult to verify adoption of GMPs (or better), particularly for industries that do not have any current commercial requirements to monitor environmental performance. Verification implies an additional cost (over and above undertaking any GMP including retaining records) and it is unclear who would bear the cost of verification. SCNO opposes requirements that place extra costs on low nitrogen emitters and prefers that all farming activities operating above maximum caps be required to operate at GMP or better. This may require re-drafting to take into account high nitrogen emitters in the Hill Area or Morven Sinclairs Area.</td>
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<tr>
<td>Section &amp; Page Number</td>
<td>Sub-section/Point</td>
<td>Oppose/support (in part or full)</td>
<td>Reasons</td>
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<td>15.4, pg 15-5 and 15.5, pg 15-11</td>
<td>15.4.4(b)</td>
<td>Support subject to clarification</td>
<td>The use of a Farm Environment Plan (FEP) that incorporates nutrient budgeting and GMPs is a useful method to demonstrate actions to minimise off-farm environmental impacts. The deer industry supports the use of Beef + Lamb New Zealand’s “Land and Environment Plan” (LEP) Level 2 for use in Canterbury deer farms (as approved by ECan). SCNO does have concerns about the available expertise to provide LEP level 2 services to deer farmers (and drystock farming in general). The deer industry and B+LNZ are currently supporting workshops to introduce LEPs to farmers and consultants but the potential demand for LEPs across several regions in New Zealand may create delays for farmers being able to provide an approved FEP to ECan. The text of Rule 15.5.3 also appears to contain a typographical error as it refers to “Rule 15.4.2” rather than “Rule 15.5.2”. Amend the text of Rule 15.5.3 so that “Rule 15.4.2” is amended to read “Rule 15.5.2”.</td>
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<td>15.5.3</td>
<td></td>
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<td>SCNO would like clarification that where deer farms may be required to provide FEPs, they are not penalized or disadvantaged if they are unable to immediately access appropriate (including being knowledgeable about deer systems) and qualified service providers.</td>
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Clarification of how ECan will require all farming activities to operate at GMP or better is sought. In particular the requirements in Schedule 24b for annual review of a nutrient budget (using OVERSEER) may be interpreted in variety of ways (e.g. self-review or audited, re-running OVERSEER), and would practices for grazing and cultivation be subject to farm inspections?

Further if "low nitrogen emitters" are operating at or below the flexibility caps outlined in Table 15(m), how does the requirement to operate at GMP or better improve environmental outcomes?

SCNO would not support all farming activities having to operate at good management practice or better if this imposes additional and high costs on the farming business when these businesses are operating at or below maximum caps.
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<td>15.5, pg 15-10</td>
<td>15.5.2 condition 1(c)</td>
<td>Oppose</td>
<td>The “flexibility” cap of 5 kg N/ha/year for the Hill Area, as stated in Table 15(m), is arbitrary and excessively restrictive. SCNO notes that the flexibility cap is much less than the default trigger threshold (≤10 kg N/ha/year) for Sensitive Lake Zone farms. While Rule 15.5.2 states that farming activity may have a nitrogen loss calculation that does not exceed the greater value of either 5 kg N/ha/year or the nitrogen baseline calculation, the implication that no further increase in nitrogen loss rate is permitted effectively restricts further development of farming activity in hill country. Hill country area is often under developed and can include some topography that is amenable to intensification (which may in turn allow less productive land to be retired). This is alluded to in the Environment Canterbury Technical Report R14/110 (“Process and outcomes of the Nitrogen Allocation Reference Group (NARG) for the South Canterbury Coastal Streams area”) on page 10 but the un-tested assumption in the report is that such change could be done within the 5 kg N/ha/year flexibility cap (or nitrogen baseline rate). A maximum nitrogen loss rate based on the flexibility cap or historic (typically low) baseline may not allow farmers to increase productive capacity and/or productivity, which can in turn greatly affect the economic viability of the farming activity and farming business if (international market) product prices remain low. In the Technical Report R14/110 it is unclear why the NARG determined that 5 kg N/ha/year was “appropriately low” (page 9). The following assumptions around intensification of small areas within the hill country area are simply that – assumptions. This is acknowledged on page 10 “…implications for hill country farmers, and whether the implications are manageable as assumed...has not been investigated in detail...This may be a subject for further discussion...”. Given that the NARG did not include any deer farming interests and that SCNO has not been</td>
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Seek that the Hill Area flexibility cap be set at 10 kg N/ha/year [consistent with the Waiau-Wainono Plains Area without any augmentation and regional Sensitive Lake Zones]

Urgently seek further discussion between drystock/hill country farmers and ECan planners/technical advisors to identify if the implications for the 5 kg N flexibility cap or baseline loss rate are manageable and if more investigation is required (as stated in Technical Report R14/110).
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<td>15.4, pg 15-6</td>
<td>Nutrient User Groups</td>
<td>Support in principle but seeks clarification.</td>
<td>SCNO considers the establishment of collaborative groups to be a sensible approach to resource management in principle. Clarification is sought around treatment of individual businesses that choose not to be part of any established Irrigation Scheme or newly formed Nutrient User Group and in particular that they are not disadvantaged by being outside of such groups.</td>
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