Please find attached my submission on

Variation 3 of the Proposed Canterbury Land and Water Regional Plan-Section 15-
Waitaki and South Coastal Canterbury
I am not a trade competitor for the purposes of the submission but the variation has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I do wish to be heard in support of this submission

Nutrient Allocation Reference Group

I acknowledge the extensive work of the Nutrient Allocation Reference Group in seeking to put forward a consensus agreement on an allocation method for the catchment. While that agreement reflects an agreed decision to try and make the best of what is generally considered a bad solution to nutrient allocation in the catchment, I am concerned that position does not reach an optimal nutrient allocation for the catchment or for optimising or incentivising the management of Nitrogen and other nutrient loss from individual properties.
SUBMISSION
I farm a sheep & beef property in partnership with my wife (Fiona)
It is an easy foothills property mainly arable between 450 metres & 600 metres, 600 Hectares
In the Waiaorunga District.
The property is mainly fine sheep therefore wool and meat production are of equal importance.
The sheep are wintered on crops which is part of our development process to improved
pasture production with new species (Lucerne).
Regarding our environment mitigation activities;
- Trees- shelter belts
- Fenced off sensitive area
- Pasture species
- Fencing according to contour
- Conservation tillage

Re: Nutrient allocation in variation 3 and its impact on this property. To begin with it is an
unknown if you use the figures as they relate to total load.
We have huge ability to lift production (probably double) with a lot less cost financially and
environmentally than irrigation (I believe HDI only has a 30% lift) with huge cost financially and
environmentally. I believe every property has an equal right to an equal N allocation so
ourselves or the next owner whether family or somebody else can lift production, I do not
believe variation 3 allows for that which is a negative to us but also NZinc

My submission relates to all parts of the plan that allocate a nitrogen load for the Wainono catchment
and applies it as a fixed nitrogen discharge limit to my property using a flexibility cap or deriving a
Nitrogen loss baseline

I oppose
- Applying nitrogen baselines as currently calculated
- The current load limit for the Wainono catchment
- Applying a nitrogen discharge limit to my property
- The allocation of nitrogen within the Wainono catchment
- Rule 15.5.2
- Rule 15.5.5
- Table 15(m) 15(n) 15(p)
- 15A

I seek that the Council
- Review the load calculation to focus on priorities for achieving water quality outcomes
- Provide flexibility in the plan to allow for ongoing routine development and flexibility in farm
management
- Provide for future N allocation to low emitters allowing flexibility for ongoing routine
development
- Provide for transition times before allocation framework applies to allow for existing water
consent holders to finish small scale irrigation infrastructure development
- Insert new policy into 15.4 to provide for greater flexibility and transition times and to
recognise the potential of dryland development
- For stable low emitting farming systems extend the years over which the calculation of
nitrogen baselines are derived and provide the maximum discharge from those years as the
baseline
- Adopt modified equal allocation for N
- To separate the Waiaoro-Wainono area into two areas Waiaoro and Wainono
**Reasons for my submission**

Nitrogen Baselines (2009-2013) need to be extended to provide for greater flexibility and recognise variations in existing farm management.

Sheep, Beef and Cropping Farmers develop farms as economic farm surplus allows – this significantly impacts their baseline calculation. These properties are not high nitrogen loss properties but sustainably managed farms with a long term development plan. The current proposed variation severely restricts those farmers in their ability to realise the long term land management plan for their properties and to respond to markets.

The plan unnecessarily and unfairly restricts my ability to farm.

I am concerned that the science and models that have been used to derive the Nitrogen allocation model in the plan have relied on outdated versions of Overseer, incorrect soils information, incorrect use of the “look up tables” and do not provide for changes to incorporate the matrix of good management or updated Overseer and soils data.
<table>
<thead>
<tr>
<th>Specific Provision</th>
<th>Submission Support/Oppose</th>
<th>Decision Sought</th>
<th>Reasons for decision</th>
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</table>
| Policies 15.4.1 – 15.4.17 | Oppose                    | - Amend policies to provide for low level development of existing dryland and properties with small area of irrigation as part of predominantly dryland properties.  
- 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 properties over time.  
- Immediately adopt flexibility cap to dryland farmers up to 15 kg.  
- For stable dryland farming systems where emission exceeds 15 kg N/Ha extend the years over which the calculation of nitrogen baselines are derived and provide the maximum discharge from those years as the baseline. | - Impacts my current ability to farm  
- Impacts on my 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                    | - Amend policies to provide for low level development of existing low emitting properties.  
- Provide for flexibility in current farming system if baseline is above flexibility cap.  
- Increase number of years in calculation of baseline.  
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<th>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</th>
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<tbody>
<tr>
<td><strong>Table 15(m)</strong></td>
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<tr>
<td>• Leave table blank or defer decision on plan change and adoption of table until catchment models have been updated to include new version of Overseer and Matrix of good management and updated soils data</td>
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<td>• That modified equal allocation of the allowable total N load (which can be brought in over a time frame)</td>
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<td><strong>15A South Coastal Canterbury Area</strong></td>
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<td>• That Waihao-Wainono Area be split into two areas</td>
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