



**SUBMISSION**

**12 OCTOBER 2015**

TO  
**Environment Canterbury**

ON  
**Proposed Variation 4 to  
the Canterbury Land  
and Water Regional  
Plan**

BY  
**Beef + Lamb New Zealand Ltd**

# Submission

## 1. Introduction

- 1.1 Beef + Lamb New Zealand Ltd (B+LNZ) welcomes the opportunity to make a submission on the Proposed Variation 4 of the Canterbury Land and Water Regional Plan
- 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 is actively engaged in environmental issues that affect the pastoral production sector.

## 2. General Submission

- 2.1 B+LNZ **supports in part and opposes in part** Variation 4 to the Canterbury Land and Water Regional Plan.

### Decision Sought

- 2.2 **Retain** those parts of Variation 4 that are not the subject of the submissions below.

### 1.0 Definitions

- 2.3 **Community Water Supply**

The insertion of 'and includes' makes the sentence grammatically flawed when followed by 'that also used for...'

#### Relief Sought

Reword sentence to correct grammar.

- 2.4 **Vegetation Clearance**

Item 'c' refers to Biosecurity NZ - an organisation that no longer exists as a specific entity. Alternative wording requested.

Item 'g.' refers to 'exotic'. Department of Conservation and Land Information New Zealand land management activities extend beyond the clearance of 'pest plants' which have a very specific definition, and include non-pest plants and indigenous species that need to be removed to meet conservation management objectives. For example the removal of Pohutukawa trees from areas outside their natural range and where they compromise protection or restoration of indigenous ecosystems. Alternative wordings are requested.

#### Relief Sought

"c. removal of a species ~~listed in the Biosecurity NZ Register~~ of Unwanted Organisms as defined by the Biosecurity Act 1993 and listed on the Unwanted Organisms Register by the Ministry for Primary Industries or the Canterbury Pest Management Strategy"

"g. ~~exotic~~ vegetation clearance by the Department of Conservation or Land Information New Zealand for the purposes of pest management, ecosystem management or habitat restoration or ~~and~~ maintenance of public access."

## 2.5 Earthworks

Item 'a.' refers to '...production land established prior to 5 September 2015.'

The inclusion of a date effectively means that there can be no land use change that would allow good quality production land not currently being used for primary production to be used for this purpose in the future without triggering a non-compliance with the definition. It is unclear why land cannot be cultivated in the future even though it may have been in alternative uses prior to 5 September 2015.

### Relief Sought

a. Cultivation of the soil on production land. ~~established prior to 5 September 2015.~~

## 2. Rules

## 2.6 Stock Exclusion

5.68 3 (c) – The amendment is supported.

### Relief Sought

Retain.

## 2.7 Drainage Water

The inclusion of 'and' in these rules requires both (a) and (b) to be met, rather than just one of the two. Potentially one of the two could be of sufficient significance as to warrant a specific action.

### Relief Sought

5.75 1 (a) produce conspicuous oil or grease films, scums or foams, or floatable or suspended materials; and / or  
(b) produce...

5.77 2. (a) total suspended solids in the discharge does not exceed 50g/m<sup>3</sup>; and or  
(b)....

## 2.8 Take and Use Surface Water

Farm Plans should be required for each individual farm within an irrigation scheme and address the same issues that farms outside the irrigation scheme must address despite adverse impacts resulting from nutrient losses to water may be considerably less those within an irrigation scheme.

### Relief Sought

5.123 1A. 13 Where the water is to be used for irrigation, the preparation and implementation of a Farm Environment Plan in accordance with Schedule 7 to manage the effects arising from the use of the water, for every individual farm within the irrigation scheme, including demonstrating that the farm is at Good Management Practice.

Similarly for 5.128 1A 11

## 2.9 Fine Sediment Removal from Rivers

### Relief Sought

The retention of the proposed addition of Rules 5.146A and 5.146B.

## 2.10 Vegetation in Lakes and Riverbeds

### Relief Sought

Rule 5.163 is amended to match the definition of Vegetation Clearance proposed earlier.

2.11 **Vegetation clearance and Earthworks in Erosion-prone Areas**

Relief Sought

Rule 5.170 (c) is amended to match the definition of Vegetation Clearance proposed earlier.

## 4 Conclusion

B+LNZ thanks ECan for the opportunity to comment on Variation 4.

B+LNZ would not gain an advantage in trade competition through this submission

B+LNZ does not wish to be heard in support of this submission and is happy to discuss the issues raised in this submission.

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