

My name is John Linton.

I am owner operator of a 368 ha Sheep, Beef and Cropping farm situated on the outskirts of the Wainono Lagoon 2km from the East Coast near Waimate.

I am here to oppose rule 15.5.2, 15.5.5, and 15(M).

The reason for my opposition is on the grounds that these three rules will have a direct negative impact not only on my current farming operation but the future of this farm to come.

Coranmor (my Farm) is currently a 4<sup>th</sup> Generation farm which has been in the family for over 130 years. Each generation has developed and improved the farm economically and environmentally to be in the position it is now.

The first generation purchased the farm back in 1885 with the major development occurring at that time.

The 2<sup>nd</sup> generation developed the farm further with the inclusion of tree belts. This was designed not only for stock protection but erosion counteraction as well. As we all know Phosphorus binds well to soil particles there-fore it is mainly lost through run off (tree belts help this) and wind erosion. (Tree belts slow this process as well)

The 3<sup>rd</sup> generation (myself) was the key to increasing the farms production to the level it is today through irrigation and with the correct water monitoring systems we minimise water run-off.

The 4<sup>th</sup> generation (my son) needs to be able to continue to make this farm productive to make it financially safe. If he is limited to the current rules very simply it would mean the end of a Family farm that started in 1885.

Guy, my son and I have not discussed this lightly with Guy being a Qualified Certified Nutrient Manager/Advisor which includes both Intermediate and Advanced Sustainable Nutrient Management Courses and ongoing Knowledge of Nutrient Management plans and Overseer.

I oppose the Rules and Regulations outlined in 15.5.2, 15.5.5 and 15(M).

On a generational family farm a lot of development is completed out of working capital instead of borrowed money as income dictates. This is the case for Coranmor in terms of irrigation development. This ensures a positive bottom line and safeguards against financial downturn.

The current expectation is for farmers to complete a 4 year baseline from 2009 to 2013.

The average of that then dictates your farms total nitrogen per hectare leaching to water.

On the 1<sup>st</sup> of May 2015 Variation 3 was presented to the public. On 15<sup>th</sup> of April 2015 2 weeks prior Overseer updated to 6.2 from 6.1.3.

Variation 3 came out based on 6.1.3 therefore 2 weeks out of date on presentation. How can we go by Overseer on such a short baseline period when we are constantly seeing changes to the only environmental tool available to us?

At the end of the day it is only an estimation tool and not designed for arable systems

I propose extending the 4 year baseline period for 2 reasons

- 1) To allow existing consented development to finish
- 2) More research to be completed on the attenuation process.

Overseer can only estimate what happens to the bottom of the root layer ie: 60 cms. As stated Overseer was designed for a pasture system – not arable that sees root zones down to 1m. The Attenuation Process is what happens from the bottom of the 60 cm root zone to the water. As it currently stands we have no idea what happens to the Nitrogen, therefore the baseline needs to be extended to allow time for more research into understanding the Attenuation Process.

Lincoln University Professors are currently working very hard on Lysimeter Meters, not only with trial work at Lincoln but trial work on Nga Tahu farms north of Culverden. We need to make sure we are taking into account their findings and allow for these findings to replicate yearly to be accurate for both pasture and arable land uses.

It can be argued that on a cropping situation Overseer is only 60 % accurate therefore to limit farmers to the 2009/2013 baseline based on only 60% accuracy doesn't make me comfortable on decisions that will affect my ability to farm tomorrow and for generations to come.

I think you would agree that by penalising the low emitters that are not causing the issues is counterproductive as to what we are trying to achieve within the community and the long term environmental sustainability of South Canterbury and the Wainono lagoon. There has to be flexibility to capitalise on market demand and trends or we will suffer economically and culturally. An example would be growing a paddock of fodder beet to lift and export off farm, nutrients as well. If the dairy pay out drops which it has and the dairy farmer can't afford to buy feed, is it more beneficial to let the crop rot in order to maintain a low environmental footprint or to bring in cattle from North Canterbury that is starving from the drought? As the plan stands I would be forced to watch the crop rot along with the money invested in it.

For the past 35 years I've been farming at Coranmor, I have had a 180 degree view 24/7 of the Lagoon and have observed its behaviour and not once has a member of Environment Canterbury visited me to discuss the Lagoon. I believe you would agree local knowledge is not only the most reliable knowledge but the most important.

I recommend that flexibility be included within baselines otherwise we strongly look at modified, fair and equal allocation that I believe will positively benefit the environment.

The current Rules and Regulations limits land values. We are witnessing this in other areas of New Zealand. If you're a high leacher you are affecting the environment the most and yet you are rewarded in your property values.

Environment Canterbury was set up to monitor and if necessary cut pollution. Not to devalue land which will be inevitable due to market price driven by the nitrogen leaching status the farm will have. This is what is going to happen under the proposed structure. This is environmentally and morally wrong and will cause more problems for the environment and the next generation.

When discussed at one of our NARG meetings it was stated that the lake has a current TLI of 6.5 and the ideal figure is 6. If Hunter Downs Irrigation goes ahead with no augmentation the level will jump to 7. Possible augmentation could bring it back to 6 (what is proposed as ideal).

It was stated by Ned Norton an Environment Canterbury Scientist that augmentation had a 3 out of 5 chance of succeeding i.e. 60%. This was upgraded at the following meeting to 90% when questioned.

Where is the science behind this?

I am certainly not against HDI bringing development and progress to the area, I am all for it but if augmentation does not work as it states (10 to 40% chance it won't) then the low emitters should not be penalised. This policy does exactly that through only letting flexibility by augmentation working. Lower emitters must have flexibility to farm to market trends and not locked in to a base line.

We as farmers went into this exercise after Tom Lambie advised as to base our decisions on the proviso that Hunter Downs Irrigation Scheme would go ahead and augmentation would take place. I believe that if Hunter Downs Irrigation Scheme does not go ahead we need to come back to the table to re discuss

the Land and Water Management Act. Fair is fair for those planning to be involved in the scheme and for those who are not.

I could be at home today during a very busy time of year for me but felt I needed to be here hoping you will listen and I can make a difference for the next generation farmers.

Thank you for hearing my submission.