

From: [Lucy Johnson](#)
To: [Mailroom Mailbox](#)
Cc: [Lucy Johnson](#)
Subject: FW: Message from "RNP0026737EF811"
Date: Thursday, 10 March 2016 6:59:22 p.m.
Attachments: [20160310225949882.pdf](#)

Hi Ecan,

Please find attached my submission on Plan Change 5 of the LWRP.

Thanks
Lucy

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

From: scanner@ricoh.co.nz [<mailto:scanner@ricoh.co.nz>]
Sent: Thursday, 10 March 2016 11:00 p.m.
To: Lucy Johnson <Lucy@puratafarming.nz>
Subject: Message from "RNP0026737EF811"

This E-mail was sent from "RNP0026737EF811" (MP C3003).

Scan Date: 03.10.2016 22:59:49 (+1300)
Queries to: scanner@ricoh.co.nz



Submission on Proposed Plan Change 5 to the Canterbury Land and Water Regional Plan

FOR OFFICE USE ONLY

Submitter ID:

File No:

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 11 March 2016 to:

Freepost 1201 Plan Change 5 to LWRP
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: LUCY JOHNSON Phone (Hm): _____
Organisation*: PURATA FARMING LTD Phone (Wk): _____
* the organisation that this submission is made on behalf of
Postal Address: PO BOX 99, DARFIELD Phone (Cell): 0274592303
Postcode: 7541
Email: lucy@puratafarming.nz 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: L Johnson Date: 10-3-16
(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 your submission in a joint case with others making a similar submission at any hearing

[illegible]

Dear Sir/Madam

Plan Change 5 - Canterbury Land and Water Regional Plan.

Purata Farming Limited (PFL) owns 13 dairy farms in central Canterbury, making it one of the largest dairy farm operations in New Zealand with a total land holding of 4,390 hectares. PFL produces on average around 5.3- 5.5 million kilograms of milk solids. SFL estimate that there is currently approximately \$13.8 billion of investment in dairy farms in the Canterbury region with an average size of 219ha (equivalent to c.\$8 million per farm).

PFL re-branded from the Synlait Farm Group in February 2015. PFL has historically been involved in farm development and conversion to dairy, having developed over 4,000 hectares of dry pasture land into dairy farms, purchased over 800 hectares of existing dairy farms and developed a further 700 hectares for dairy support. In March 2014 FL completed a capital raising transaction which resulted in a decision through the Overseas Investment Office. This transaction was completed for consideration of \$90.7M .

PFL's farms are located in the Canterbury region, one of the world's most productive pastoral dairy regions with access to reliable sources of irrigation water. Irrigation is fundamental to pastoral dairying in Canterbury and PFL has robust access to sufficient water to irrigate all of the farms.

The management philosophy has been to maintain high quality infrastructure and as a result PFL's assets are well invested. PFL sets high standards in environmental management and has invested in industry leading systems, processes and infrastructure to manage its environmental footprint. In order to allow further adoption of good practice, capital investment and production efficiencies sound regulation is required to drive such behaviours. Failure to allow this flexibility and ownership of issues may result in little to no environmental gains being made.

New Zealand's dairy industry is internationally recognised for its low cost, pasture based farming system, large-scale processing, innovations in new product development, and farm production technology. Certainty over the planning and regulatory environment in which PFL operate is paramount in maintaining these advantages and financial security to grow international markets opportunities for the industry.

PFL appreciate the opportunity to provide feedback on Proposed Plan Change 5 to the Land and Water Regional Plan (LWRP). We note the key following points:

- The importance of irrigation to the economic and social well-being of the region should be explicitly recognised;
- The justifications and science underpinning much of the water quality and quantity framework is weak and has not been strategically peer-reviewed before being adopted into the LWRP.
- The drivers behind Farm Environment Plans and the nutrient management framework is becoming very explicit which creates a number of issues for land owners – any changes to science and policy frameworks adds continued cost to update these through the need of formal plan changes processes and also limits innovative solutions and a more top down leadership approach which limits healthy engagement and ownership between stakeholders.

PFL welcomes the opportunity to work with Environment Canterbury as Plan Change 5 is refined. Please find a copy of our submission attached.

Provision	Support / Oppose	Issue	Relief sought
Policies			
4.11	Oppose	Has the Council set the Progressive Implementation Programme on which landowners can gauge the duration of the consents. A 5 year term is not long to implement sound reduction strategies, see value in the cost of the consent process which in my experience is no less than \$20K for potentially only 5 years.	Make available to Implementation Programme and better streamline processing to limit costs on consent applicants.
4.34	Oppose	Focus on the adoption of Industry Good Management Practices for the duration of this plan, as modelled losses are a by-product of sound management practices.	(c) Take out the word modelled and add in GMP's alongside nutrient loss
4.36	Oppose	To better fit with our submission point for Rule 5.44	(b) remove management plans and change to GMP
4.38B	Oppose in part	Not clear on what would be deemed a 'change to farming' activity – is this a total change to the farm activity (dryland to irrigation) or cultivating a paddock to a different pasture species. There is also potential that updating information could cause concerns around accuracy and ensuring the most up to date information is utilised.	Clarify what is meant by a change.
4.41B	Oppose in part	Amend (e) as you proposing to use actual data into a long term programme based on averages. Also would appear there may be some descriptions left off the circumstances where this condition may apply.	Remove (E) or clearly outline when you may be looking for actual data to be used by stating these circumstances.
4.41A	Oppose in part	Concern with the subjective nature of B and availability of competent advisors operating in this space. Normal practice would be a person preparing a budget has a training programme and the information is reviewed by a more senior manager before release. This is no different than the preparation of a consent application	<i>Look to have nutrient budgets peer reviewed internally as the mark for competence than the subjective nature of the current wording.</i>

		where a consultant may prepare the AEE but it is reviewed by a Director or Principal. My concern is we may be placing the wrong emphasis on expertise based on the author which is very subjective.	
Rules			
Rule 5.43A	Oppose in part	<p>PFL support the need to rationalise the workload for small land owners however it would be better if there was a condition added to the rule which stated "Good Management Practices are met".</p> <p>This gives Ecan some mechanism to encourage good management across a large cumulative land area and provide an improvement process should less than desirable actions be undertaken due to the scale and productivity base to fund improvements from.</p>	<p>Add a condition which state: <u>"Industry Good Management Practices are implemented on these land areas".</u></p>
Rule 5.44A	Oppose in part	<p>Remove condition 5 which requires a Management Plan to be prepared in accordance with Schedule 7A. This adds an extra layer of unnecessary cost and a better approach within the duration of this plan would be to have Industry GMP's being applied to such land areas.</p>	<p><i>Amend condition 5 to state:</i> "Industry Good Management Practices are implemented on these land areas".</p>
Rule 5.44B	Oppose in part	<p>Remove condition 3 and make this a matter of control to help better manage the workload and expertise available.</p>	<p>3. Delete ...reserves control over the following matters: 10. <u>The quality of the Farm Environment Plan, including whether it has been prepared or reviewed by an Accredited Farm Consultant</u></p>
Rule 5.46A	Oppose in part	<p>The portal is first generation and contains a number of generic rules, notably for fertiliser use and irrigation, to generate a properties GMP Loss Rate. As a result, a property can have adopted the relevant GMP's but its average GMP Loss Rate may be being exceeded. The purpose of the MGM project was to implement GMP</p>	<p>Amend Condition 2 to state <u>Until 30 June 2020, the nitrogen loss calculation for the farming enterprise in the red, lake or orange zones does not exceed the nitrogen baseline, and from 1 July 2020 if it exceeds the Baseline GMP Loss Rate the property has adopted the relevant industries Good Management Practices.</u></p>

		(actions happening on-farm) and this needs to be recognised.	
Schedules			
S 28	Oppose	<p>Concern over the numbers and assumptions within the portal. The application of irrigation and nutrient data. There is a risk that we rush the portal out and due to potential inaccuracies people become disillusioned with the process and system. For the life of this plan concentration should be given to the implementation of Industry Good Management Practices, raising awareness, lifting the performance, growing our technical expertise to service these requirements and building relationships with Ecan Land Advisory Officers that can help partner with land owners to achieve well rounded environmental and community spirited outcomes.</p>	<p><i>Hold of using the portal at this stage until more refinement can be undertaken and adopt the Industry Good Management Practices.</i></p>
S7	Oppose in Part	<p>Wishing to seek clarity on 2i around public access road to maintain rivers, streams and drains. What exactly are you deeming a public access route or access routes – is this just a farm track on private land or is this an unformed public road.</p> <p>I have concern over how this information may be used in the public arena going forward.</p> <p>Management Area – Irrigation and Effluent. It may not be appropriate that all team members are trained and competent in managing these areas of the farm system.</p>	<p>Better clarify what is meant by public access routes or access routes?</p> <p>Management Area 5 Irrigation Management and (4) Effluent Include the word <u>appropriate</u> staff are trained...</p>