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Regards Bruce

Submission to Plan change 5 to the Canterbury land and Regional Water Plan

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I wish for my submission to be heard

My name is Bruce Murphy, I currently am a member of the Lower Waitaki South Coastal zone committee and I am a member of the NARG formed in Plan change 3. I am on the Glenavy BOT and am Chairman of the Glenavy Swimming Pool Trust and am proud to be involved in many other community organisations.

I along with my parents Farm in the Glenavy, Waimate, Otaio and Maungati Districts so we are by now fairly familiar with sub regional plans and the community consultation process undertaken before their implementation.

Our farms in the Glenavy District are predominantly border dyked with wide laser levelled borders and many shelterbelts planted along the borders some thing our family has been working towards for over thirty years. The main part of our farm in plan change 5 is in the green zone and has the Whitneys Creek running through it but one of our properties called Glenwai has the Waikakahi stream running through it and is partially in the red zone. Under the operative Land and Regional Plan (LWRP) I believe in the green zone we are currently meeting water quality to the level our community expects but on a personal level we are implementing strategies to improve this and in the red zone we have work to do.

The reasoning behind the development of the Canterbury water management strategy and its focus on the local and catchment scales was that those who understood the realities of each catchment or zone could participate in and contribute to the development of rules that would be applicable to that area.

I believe that there has been a large amount of community consultation and leadership of discussion by our community and Ecan staff has given a clear directive to our zone committee of our community's hopes and aspirations. These expectations were the basis of the ZIP addendum produced in July 2015 by our Zone committee and have been generally accepted by our community. The planning process unfortunately does not in my view support the Zone committee and our community's views.

Our view was that irrigation schemes use audited self management as part of this process that required farmers to have Farm environment plans that meet schedule 7 requirements which is currently already happening in the MGI irrigation scheme. This style of management breeds on farm innovation by cross pollination of experience to improve farming practices and environmental outcomes. Audited self management manages farming practices across a range of areas including nutrient management effluent management irrigation, soils and riparian zones. This management supports the continued improvement of each type of agriculture over time to achieve or exceed GMP agreed on by each industry body in the MGM project this is much broader than modelled nitrate loss.

The portal as on farm tool along side Overseer is supposed to give you guidance as to how you could improve your farming foot print to GMP levels not be the trigger for a consenting framework.

In principle I support the farm portal and MGM but I am deeply concerned that many of the key industry organisations that put it together are giving us information that the proxies used to provide environmental outcomes are not providing the right on farm outcomes. The portal is the key to future direction but needs more time to bed in and until that happens we need to provide an alternative planning pathway for the farmers that the portal does not work for. Ecan staff have told us we see variations of twenty-five percent against expected outcomes when overseer files are run through the portal. Put this beside a thirty percent variation in the overseer program it is hard to see farmers having confidence in these two models giving you real on farm data. This is clearly not the right base in which to set a rule frame work.

This proposed frame work will lead to overwhelming compliance and enforcement burdens on both the farming community and the regional council itself. The amount of work required to review baselines and consents at each update of Overseer or plan change of the Waitaki Nitrogen load limits looks to be untenable.

As we have seen in plan change 3 and part of the plan change 5 process the number dropping out of the Portal and Overseer models representing nitrogen loss is terribly destructive to environmental conversation. It immediately divides the community into the haves and have nots confining the conversation inside the farm gate. We were led to believe that a narrative instead of a number would be the out come of the portal process then we could use in stream testing and science to shape the future environmental footprint of our area.

The proposed streamlined consenting process will still be cumbersome and simply not required for farmers who are members of a self audited irrigation scheme or in a green zone where water quality outcomes are being met. Plan change 5 essentially requires all farms operating at some level of intensity to have a resource consent even to continue their current operations the thresholds of a permitted activity should be changed to a percentage of the property undertaking irrigation or winter grazing if you are not part of an irrigation scheme. It was not the wish of our community to enforce on farmers a huge compliance regime that is expensive.

As part of the planning process it has been signalled that MGI irrigation scheme and other schemes are expected to take up the Nutrient allocation for our catchment and police this, once again at the expense of the farmer. I don't think this is the job of our local director's to monitor and enforce consents that is the job of Ecan if the self audit process has failed. If a farmer is issued a fifteen-year consent to farm it could be potentially in conflict of the irrigation schemes audited management plans leaving the directors in a no win situation.

The direction under this plan is set by Overseer and I understand this is the best tool we have but this does not suit our farming system because we use predominately laser levelled border dyke irrigation. Overseer instantly hammers this process what it does not take account of is the dilution effects rather it focuses on the nutrient losses. As stated by Ecan water scientists there are complex hydrological relationships in irrigated catchments and that irrigation plays a role in increasing ground water flows that help sustain creeks and springs. Science linking the nutrient loads to the effects on the receiving of water has not been demonstrated and overseer is not a ground water transport and mixing model. I believe that irrigation helps the uptake of nutrient uptake by pasture meaning less nitrates leach into the water. We as farmers are custodians of the land and we wish to pass it on to the next generation in better shape than we when took it over, this may come as a surprise to many but the environment is close to farmer's hearts. What we need is clear science proven direction that we can follow and monitor to show what our different styles of agriculture are really doing to the environment. This will allow our community to improve and maintain water quality outcomes.

In summary I support the process of self audited self management FEPs and GMP to maintain and improve our environmental footprint this coupled with in stream water quality testing should set the direction of our community not the burden of a heavily involved consenting process. We need to set out an alternative pathway to the portal until it is a proven tool for agriculture to use. To that end I support the submissions made by Fonterra, Federated farmers, Ravensdown and Waitaki irrigators Collective and the outcomes sort.