

**From:** [Ben Howden](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [Simon Johnson](#)  
**Subject:** Orari Catchment Group Plan Change 5 Submission  
**Date:** Friday, 11 March 2016 2:10:11 p.m.  
**Attachments:** [Orari Catchment Group Draft Submission PC 5 4 3 16.pdf](#)

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Please find attached our submission on Plan Change 5. Simon Johnson is the point of contact for any further correspondence;

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Thanks

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**Submitter:** Orari Catchment Group c/- Simon Johnson.....

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

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### **Trade competition**

I could not gain an advantage in trade competition through this submission.

### **Background:**

The Orari Catchment Group is a community group formed as part of the Sub-regional process within the OTOPs Zone, representing the spectrum of community interests (Farming (Arable, Deer, Dairy); Orari River protection group; zone committee members; district council members; Fish & Game; teachers; recreational groups) within the area between the Rangitata River and the Ohapi Creek, including the Orari River Catchment.

### **Hearings**

The Orari Catchment Group wishes to be heard in support of this submission; and would be prepared to consider presenting this submission in a joint case with others making a similar submission at any hearing.

**Submission:**

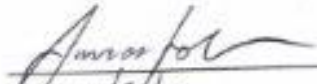
The groups submission is recorded in the following table.

Page #	Policy # or rule #	Name of policy or rule	Support / oppose	Reason	Relief sought
Multiple	Multiple	<b>Farm Portal</b> and all <b>definitions, policies and rules</b> revolving around the use of the farm portal	Oppose	In general the catchment group support the concept and ongoing development of the farm portal modelling system.  <u>Oppose</u> ; Without access to the API modelling tool used in the calculation of the GMP N loss we have been unable to determine what changes have been made to the OVERSEER files and therefore cannot support the proxies. Given this the catchment group are unable to support any definitions, policies or rules that rely on “GMP N loss rates” as calculated using the farm portal. The farm portal should not become fully operative until the accuracy of this modelling has been assessed in depth and proven to be accurate beyond all doubt.	Clarity around “all” the proxies used in the modelling of the GMP loss rate through the farm portal.
3 – 2	Section 2 – How the Plan Works & Definitions	Definition of <b>Good Management Practice Loss Rate</b>	Oppose	The definition of “Good Management Practice Loss Rates” and the reference to the Farm Portal leads to a lack of flexibility.	An option for farms to choose between the use of the GMP loss rate as calculated by the farm portal or an OVERSEER (not farm portal) model prepared by a suitably qualified person with sufficient evidence to support the reason for the use of the OVERSEER modelled GMP loss rate.
3 - 3	Section 2 – How the Plan Works & Definitions	Definition of <b>Winter Grazing</b>	Oppose	The definition provided in the plan is too broad.  The dates specified in the definition relate to time periods where cattle will be located on	<u>Winter Grazing</u> – the intensive grazing of dry stock (cattle, deer, pigs, and sheep) between the period of 1 May to 30 September, where

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				dairy farms (May, August and September). These cattle may be milking during this period and are being fed supplement so are not necessarily "Winter Grazing". There is no mention in the plan about other stock types.	the stock are break fed in-situ forage and root vegetable crops.  Changes: deletion of the word supplement; addition of the word stock (not just cattle) and root vegetable crops.
6 – 11	Schedule 28	<b>Farm Portal Proxies</b>	Oppose	Modelling uncertainties	Schedule 28 to be populated with modelling assumptions once any issues have been resolved

Name: Simon Johnson

Signature:



Date:

10/3/14