

**From:** [Andy Hayes](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Fwd: Plan Change 5 Submission  
**Date:** Tuesday, 15 March 2016 7:47:16 p.m.  
**Attachments:** [11031601.PDF](#)

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Hey Ecan,

Could you please contact me to see if my submission to PC 5 will be submitted. I sent it to [mailroom@ecan.govt.co.nz](mailto:mailroom@ecan.govt.co.nz) last Friday instead of the correct above email address. As you can see above my submission was emailed in on Friday 11th March.

You can contact me to discuss this..

Thanks

Andy Hayes

----- Forwarded message -----

**From:** **Andy Hayes** <[andyisspecial@gmail.com](mailto:andyisspecial@gmail.com)>

**Date:** Fri, Mar 11, 2016 at 3:23 PM

**Subject:** Plan Change 5 Submission

**To:** [mailroom@ecan.govt.co.nz](mailto:mailroom@ecan.govt.co.nz)

Attached Submission form

Cheers

Andrew Hayes

## 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:** Andrew Hayes **Phone (Hm):** 03 4360 831  
**Organisation\*:** \_\_\_\_\_ **Phone (Wk):** \_\_\_\_\_  
\* the organisation that this submission is made on behalf of  
**Postal Address:** 316 Hayes Rd, Haka Valley **Phone (Cell):** 021 0264 1052  
Rd Kurow, North Otago. **Postcode:** \_\_\_\_\_  
**Email:** andyisspecial@gmail.com **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:**  **Date:** 11-3-16.

(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



My name is Andrew Hayes. I farm in the Hakataramea Valley. Under the current LWRP my farm is in an orange zone which means water quality outcomes are at risk of not being met. I am currently the only dairy farmer in the valley. The farm is 90% irrigated from the Waitaki River.

I am currently on the Lower Waitaki South Coastal Zone Committee. However I was not on the Zone Committee when the ZIP addendum was passed and I feel I have missed my chance to have any input through this process.

I am the Chairman of Haka Valley Irrigation Ltd. This company irrigates 1200 hectares in the Hakataramea Valley using all Waitaki River water. The company's current water take consent has an attached nutrient discharge allocation expiring in 2020. As one of the three shareholders in the company I am subject to many consent conditions e.g FEPs, flow metering, water supply agreements.

Haka Valley Irrigation Ltd is a member of Waitaki Irrigators Collective (WVIC). I support Waitaki Irrigator Collectives submission. I don't believe I need to repeat their submission point by point, however here are simply my personal views:

#### Reasons for my Submission:

- I oppose the plan as I believe ECAN has forgotten the main point of this plan is to maintain or improve regional water quality standards.
- This plan will not improve or maintain regional water quality standards.
- The use of Overseer and the Farm Portal should only be used for high nutrient emitters. Not an extensive farmer with 30 hectares of winter feed.
- The entire Waitaki Valley and its tributaries are restricted to its intensification because of its lack of water. This by itself works as a tool to control the level of intensification.
- It should be compulsory for all current and consented water takes to go through the nutrient budget/Overseer model process. They will need a Nutrient Discharge Allowance (NDA) and have to provide an audited FEP on request by ECAN. I believe this will be a more realistic first step approach ECAN can take to improve water quality i.e Best method in locating high risk Farms. At the same time ECAN can also promote Good Management Practice guidelines through all farms.
- I believe all farmers should eventually be required to fill out an FEP as they ask the farmer what on their farm is causing effects to their on farm water quality. This is where water quality will be improved!!!!
- Eventually ECAN will use the FEP's as a tool to monitor potential environmental risk by auditing. Grades of C and D will set off alarm bells!!
- The proposed plan requires too much compliance for non offenders. I believe ECAN will not have the resources to monitor/police all this farm information.
- The current plan has no more intensification allowed in the Hakataramea Valley. I believe there is still room for intensification without effecting water quality. This can be through water storage and Waitaki River water coming into the Hakataramea Valley.