

IN THE MATTER

of the Resource
Management Act 1991
(RMA)

AND

IN THE MATTER

of the Proposed
Variation 5 to the
Canterbury Land and
Water Regional Plan

TO BE HEARD BY

Canterbury Regional
Council

MEMORANDUM
on Behalf of DairyNZ to Hearings Panel for Council Reply Hearing
in relation to Section 42a – Reply Report

9 DECEMBER 2016

Submitter ID: 52271

Introduction

1. DairyNZ wishes to lodge this memorandum regarding our views and concerns in relation to the response and technical evidence presented in the Plan Change 5 Section 42A Officers' Reply Report for the Council Reply Hearing for Canterbury Land and Water Regional Plan.

Comment

2. DairyNZ is thankful for the opportunity to respond to the key issues arising from the Section 42A Reply Report and would like to acknowledge the considerable effort that the Environment Canterbury officials have invested in analysing the significant body of evidence that has been presented to the Hearings Panel.
3. Although recognising Environment Canterbury's commitment to delivering high quality policy outcomes, DairyNZ continue to harbour several serious concerns regarding technical aspects of the section 42 report, and wish to raise the following points in relation to the evidence presented in the Officer's Reply Report.
4. The basis of DairyNZ's evidence was that the proposed nitrogen fertiliser proxy could not do what it claimed to; that is to calculate nitrogen requirements for individual farms, since it assumes a constant base pasture yield. The reply report does not address this evidence at all. This is particularly disappointing as it is DairyNZ's position that this is why an alternative is needed.
5. The reply report states that the alternative N surplus proxy appears to be difficult to apply to cropping. It is our opinion that this conclusion was drawn from an incorrect implementation of Dr Thorrold's evidence for DairyNZ.
6. Dr Thorrold states that the N surplus for a farm is calculated as capping monthly inputs of nitrogen to 50 kg N/ha to pastoral blocks (EIC, para 5.5). However, the "Assessment of the fertiliser proxy proposed by DairyNZ for the Matrix of Good Management" report (Snow and McAuliffe, November 2016, Appendix D of the reply report, Page 3) states "*The literal interpretation of the DairyNZ description is taken and the proxy is applied to cropping blocks in the same manner as pastoral blocks*".
7. Another issue from the Appendix D report is the contention from the authors that the DairyNZ proxy does not take into account inputs from nitrogen fixation or mineralisation. This lack of consideration of all sources of nitrogen, in the authors opinion, will unravel decades of farmer education regarding the importance of assessing all inputs to a farm system.
8. The alternative proposed by DairyNZ does not need to take into account these sources of nitrogen input. These inputs are highly variable (between sites and over time) and cannot be predicted accurately. In fact, Dr Ledgard states in his evidence that not trying to account for legume N fixation is a strength of the N surplus approach (EIC, para 8.1, page 11).

9. The key concerns raised in hearing evidence by DairyNZ regarding the inadequacies of the current Schedule 28 nitrogen fertiliser proxy approach have not been acknowledged and addressed. While the alternative N surplus approach proposed in the evidence of Dr Thorrold for DairyNZ has been challenged in the reply report, it is our expert opinion that it remains preferable to the current nitrogen fertiliser proxy.
10. DairyNZ seeks the Hearing Panel provide for a more detailed and considered resolution to the issues raised in relation to the nitrogen fertiliser proxy used in the Farm Portal.

Concluding comment

11. DairyNZ is grateful for the opportunity to lodge this memorandum to express its concerns before the Hearing Panel for Proposed Variation 5 of the Canterbury Land and Water Regional Plan.

End

Shaun Burkett

Regional Policy Manager

DairyNZ

9 December 2016