

Tabled at Hearing 12/12/2016.

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 the Fertiliser Association of New Zealand
to Hearings Panel for Council Reply Hearing
in relation to Section 42a – Reply Report**

9 DECEMBER 2016

Submitter ID: 51972

Introduction

1. The Fertiliser Association of New Zealand in combination with its member companies Ballance Agri-Nutrients Ltd, and Ravensdown Ltd wishes to lodge this memorandum regarding our views and concerns in relation to the response and technical evidence presented in the Section 42A Officers' Reply Report for the Council Reply Hearing for Canterbury Land and Water Regional Plan, Plan Change 5.
2. The Fertiliser Association and our member companies wish to provide comment and feedback with the view to being helpful in raising broad considerations that we believe will ultimately assist in more successful implementation of the Canterbury Land and Water Regional Plan and more readily arrive at the desired environmental outcomes while providing for social, cultural and economic wellbeing.

Comment and feedback

3. The Fertiliser Association is grateful for the opportunity to review the S42A Officer Reply Report, and acknowledges the complexity of the issues being dealt with.
4. It is noted that the Officer Reply Report has responded with views and recommendations in relation to the use and application of the FARM PORTAL and Fertiliser Proxies to be applied. The recommendations are based on the evidence supplied in the appendices of the Officers Reply Report and accordingly the report does not recommend adoption of the alternative fertiliser proxy methods recommended by the primary industry.
5. The practical implications of the use and application of the Good Management Practice nitrogen loss values derived through this recommended process remains a key concern to the Fertiliser Industry.
6. The industry wishes to raise brief points of consideration in relation to the evidence presented in the Officer Reply Report. In so doing, it is acknowledged by the primary industry that no perfect solutions are available or presented. The appendices of the Officers Reply Report identify some of the perceived short comings in the alternative Fertiliser Proxy method based on nitrogen surplus as presented by the primary industry. However, important considerations remain, in that the Fertiliser Industry considers that:
 - a) The AgResearch report in Appendix D contains incorrect information, relating to cropping farms, because the proposed N surplus proxy was incorrectly applied for crops with a 50 kg N / month cap applied which was only intended for pasture N application.

(A further, more recent consideration, is the substantial change in N loss and N product estimates in Overseer 6.2.3 compared to earlier versions, which will impact on all of the data and conclusions for both the original and alternative N surplus proxy for crop farms.)

This incorrect information calls into question the findings and conclusions in this report relating to crops or farms including crops.

- b) More significantly the S42 Reply Report as a whole, has not adequately addressed the significant issues raised in the Hearing evidence by Dr. Alister Metherell and other expert witness, including Dr Stuart Ledgard and Dr Bruce Thorrold in relation to the proposed N and P fertiliser proxies.
 - c) While no perfect solutions exist, the option presented by the primary industry, despite its shortcomings, remains far preferable to the proposed approach.
7. The Fertiliser industry remains concerned that unless the significant issues with the currently proposed approach are acknowledged and addressed, the implementation of the Proposed Plan Change will be seriously compromised and unworkable for some farms which are operating at auditable Good Management Practices, but unable to meet the required N loss values, not because of a failing in their farming systems, but due to vagaries in the Farm Portal fertiliser proxies – as identified in the evidence lodged.
8. The Fertiliser Association seeks the Hearing Panel provide for a more detailed and considered resolution to the issues raised in relation to implementation of the Farm Portal approach.

Concluding comment

9. The Fertiliser Association 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



Greg Sneath

Executive Manager

The Fertiliser Association of New Zealand

9 December 2016

