

**From:** [Mary Sparrow](#)  
**To:** [Mailroom Mailbox](#)  
**Cc:** [eyrewelldairy@xtra.co.nz](mailto:eyrewelldairy@xtra.co.nz)  
**Subject:** Re: Plan Change 7 to the LWRP Submission  
**Date:** Wednesday, 11 September 2019 3:59:56 PM

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Please find the attached submission from Eyrewell Dairy Limited.

Regards

Mary Sparrow

**SUBMISSION ON PROPOSED PLAN CHANGE 7 TO THE CANTERBURY LAND AND  
WATER REGIONAL PLAN**

Submitter: Eyrewell Dairy Limited  
Chapmans Boundary Road  
Rangiora 7475

Contact: Peter or Kristy Schouten  
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Address for service: as above

**Trade competition declaration**

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

The company I represent is directly affected by the subject matter of this submission

Signed...  ..... Date... 11/09/2019 .....

I do wish to be heard in support of my submission.

**Our submissions are as follows:**

<b>Reference</b>	<b>Oppose/Support</b>	<b>Reason</b>	<b>Decision Requested</b>
Policy 8.4.25 – 8.4.29 Pages 66-68	Oppose	The starting point for reductions is unclear. The Environment Canterbury Farm Portal is not producing consistent results. Baseline GMP loss rate for the purposes of regulation should be a credible number which remains constant throughout the life of the plan. It should not be a moving target.	Until the Farm Portal is providing credible and reliable results, the plan should have an alternative set of guidelines for the calculation of GMP which will provide consistency across all farms.
Rule 8.5.22 – 8.5.29 Pages 80-84	Oppose	The starting point for reductions is unclear. The Environment Canterbury Farm Portal is not producing consistent results. Baseline GMP loss rate for the purposes of regulation should be a credible number which remains constant throughout the life of the plan. It should not be a moving target.	Until the Farm Portal is providing credible and reliable results the plan should have an alternative set of guidelines for the calculation of GMP which will provide consistency across all farms.
Table 8-9 Page 95	Oppose in part	In view of the absence of certainty about the establishment of GMP via the Farm Portal the starting point, the situation for compliance with the reductions required in the Nitrate Priority Area is unclear. It is possible that there are some properties that are performing beyond GMP at the beginning of the period, and it is unfair to expect them to reduce their leaching rate by the full 15% or 5% by 2030 as required under Table 8-9.	Provide that properties with leaching rates of N lower than GMP at the beginning of the period are to be required to reduce their leaching rates only by an amount that will mean that their leaching rate by 2030 is the equivalent of what it would have been if they had been leaching at the GMP rate in 2020. For example: A property leaching 5% below GMP at 2020 would need to reduce its leaching rate by 10% not 15%.