

Main Points:

1/ As a foundation member of the Hurunui-Waiaru Zone Committee, I can vouch that it was never intended to capture dryland farming in the 10% rule.

The focus of the CWMS in the early stages was about water, not land use per-se.

10% was about containing the effects of 'intensive irrigation farming', but allowing for some flexibility to work with nature and issues outside the control of the farmer.

There were studies presented to the ZC, (Brown Study) after the effects of the Plan became apparent that even cumulatively, dryland farming did not pose a risk greater than Minor, the RMA test.

2/ Dry land farming is just that, attempts through this plan to define it further is bound to create unjustifiable costs (farm plans etc) and further unintended consequences.

Intensification of a dry land farm would inevitably invoke a consent process that would take care of the intensification issue.

3/ Sedimentation and phosphate are routinely attributed to dryland farming, most likely because dryland farming takes in hill and high country properties where natural processes are hugely responsible for sedimentation. We are told by experts that the majority of phosphate is carried by sediment.

Putting restrictions on these properties will not change the cause of natural sedimentation. However Catchment Board type plans, not environmental plans, would work with and encourage farmers to do work that could reduce natural sedimentation on their properties.

4/ Right through this traumatic saga, which pitted my community's dryland farmers against intensive irrigating farmers through many large and acrimonious meetings, and the countless circular discussion in the ZC, I can't see how this proposed plan change will remove the injustice to dryland farmers, or deal with high polluting land use.

The Regional Council and other submitters have given no justification to impose this definition of a Permitted Activity status on these low impact land uses.

I do know that the Regional Council is determined to capture all producers into a regulatory system. (Stated by senior Managers and Chair)

Much of the content of this Plan Change was 'opportunistic' by Ecan, it is not true that there was agreement in the Zone Committee, or Farmer groups, in fact there was much dissention.

Once captured in this Plan Change, incremental stronger regulatory requirements will undoubtedly follow, harming food and fibre production without any demonstrated benefit to the environment.

5/ It will not be lost on the Panel the similarities with the Fresh Water NPS, and the unacceptable issue of Grandfathering.

There is no logic in creating Rules and Plans that encourage and protect highly polluting land use, as opposed to permitting and encouraging low intensity land use.

This runs counter to all the intent of a raft of current work to improve environmental outcomes, brings no significant environmental benefits and adversely affects food production and the economy.

## Summary of Key issues;

1/ This Plan change was asked for by my community to remove the inequity of the 10% issue on Dry land producers

2/ Dry Land Farming is exactly that, farming without irrigation.

3/ Intensification by increased stock numbers is theoretical and not proven by Ecan officers.

4/ Stock numbers are dictated by a drought prone climate in these catchments, with widely fluctuating stock numbers according to weather conditions.

5/ Further to the above, winter grazing is a red herring, the vast majority of stock are wintered within the same catchment. A dry Land farm can only grow the dry matter allowed by climatic conditions, not a theoretical increase.

6/ Any intensification will automatically require a consent, eg. Irrigation, feed lotting, Poultry etc.

7/ Natural Justice and the RMA demands that NO Rules apply to 'Dry Land Farming'

8/ On partially irrigated farms, only the irrigated portion should be covered by a consent and rules, the balance Dry Land must be able to operate as a permitted activity without rules.

There is no justification to include the entire farm if only a portion is irrigated, the Dry Land balance cannot cause intensified pollution more than minor.

9/ As discussed at the hearing, the risk to the environment is extremely low to allow Dry Land Farming without Rules.

10/ The current great Environmental progress and Land Owner enthusiasm is at great risk if the numerous voluntary initiatives as described at the hearing are over-ridden with unnecessary regulation.