

8 July 2019

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Dear Andy

## **Reply to the GMP Implementation Working Group recommendations**

On behalf of the Council I would like to thank you and the GMP Implementation Working Group - and the supporting technical group - for your work. We acknowledge the considerable time and effort that has gone into developing the recommendations.

Council has been briefed by you, as the Chair of the Working Group, and by Environment Canterbury staff on these recommendations and the reasons for them.

While Environment Canterbury has to work within the current plan framework, we do see real value in the Working Group's recommendations and we will incorporate those recommendations into both short-term solutions and to inform part of our longer-term GMP strategy. I have noted below our response to the recommendations around the nitrogen fertiliser proxy and the irrigation proxy.

### **Recap**

In 2018 the Environment Canterbury council determined that PC5 of the Land and Water Regional Plan would become operative from 1 February 2019. It was also agreed that a Working Group would be convened to consider implementation issues and concerns with the nitrogen fertiliser and irrigation proxies.

At a regional level we know that the majority of farmers are taking the actions required to meet their GMP requirements. From the initial approximately 3000 farming land use consents required, less than 500 remain outstanding. There is now a work programme in place to focus on outstanding land use consents. We agree that at farm level, more guidance is needed on defining GMP on-farm.

The Working Group has spent the last six months considering the nitrogen fertiliser and irrigation proxies in Schedule 28 and investigating options for consideration by the Council and your subsequent recommendations are wide-ranging. It is important that we discuss these with you. I would therefore like to invite the Working Group to a meeting in the coming weeks (details to be confirmed with you), both to acknowledge your valuable contribution over a shared lunch, and to respond to the recommendations. Environment Canterbury staff would also like to share details of the future GMP work programme we are developing as a result of your recommendations.

## **Feedback**

In this letter, I will address the recommendations from the Working Group on the use of the nitrogen fertiliser and irrigation proxies, as noted below.

### **Nitrogen fertiliser proxy**

Council agrees with the Working Group that the nitrogen fertiliser proxies can contribute to nitrogen loss rate figures that are erroneous.

We have considered your recommendation and propose to proceed as follows:

- Council is required to retain a Farm Portal that reflects the requirements of Schedule 28 of the LWRP. Disabling the proxies would only be possible via a plan change to amend Schedule 28 of the LWRP. The nitrogen fertiliser proxies in the Farm Portal cannot therefore be 'disabled'.
- However, the LWRP does already contain an 'alternative pathway' rule framework (see below) that allows an application for consent to be made and an 'Equivalent GMP Loss Rate' to be calculated, in circumstances when the Farm Portal generates an erroneous loss rate number.
- As is already allowed for, in such cases the N proxy is not used (i.e. it is 'disabled' for that case) – as recommended by the Working Group.

Environment Canterbury recognised early on in the process that there were issues with the nitrogen fertiliser proxy, and we have already taken steps to overcome these via the 'alternative pathway', including:

- Making available a separate tool that can be used by farmers to calculate an 'Equivalent GMP Loss Rate'. Although not a straightforward option, this tool applies all the proxies in Schedule 28 to a farmer's Overseer budget, except for the nitrogen fertiliser proxies.
- The development of procedures by Consents staff, to ensure applications made via the 'alternative pathway' rule framework, continue to meet GMP expectations for fertiliser use. These procedures include scrutinising fertiliser inputs in a farmer's Overseer budget and, where appropriate, manually adjusting application rates to reflect GMP standards (for example, applying fertiliser at rates that match crop requirements).

We recognise these solutions do not fully address the Working Group's concerns regarding the nitrogen fertiliser proxies. However, they enable us to work within the planning limitations we face while applying pragmatic alternatives in the short term and developing longer-term work programmes, including developing a suite of crop-specific fertiliser guidance as per the Working Group's recommendation.

### **Irrigation proxy**

As noted above, Council has an obligation to retain a Farm Portal that reflects the requirements of Schedule 28, and changes to remove or disable the irrigation proxy from Schedule 28 and the Farm Portal can only occur via a plan change.

Issues with results from using the irrigation proxy are less clear cut than the N proxy. We see merit in the 'Irrigation GMP Table' prepared by the Working Group and will undertake further work to understand both the planning and practical implications of the proposed irrigation standard. This will form part of the future work programme that we are developing.

### **Next steps**

We will now be focusing over the next 6 months on supporting the current approach to GMP working with relevant parties and developing the future longer-term work programmes informed by the Working Group's recommendations. The future work programmes will be wide-ranging and include the use of Overseer, on-farm GMP guidance and future planning, which we look forward to sharing with the Working Group at our upcoming meeting. We would expect the future work programme work to commence in earnest early 2020 and inform the next Council annual plan.

As I noted at the start, there is significant value in the Working Group's recommendations, and on behalf of the Council I can assure you we remain committed to engaging with industry, Nga Rūnunga, interested parties and our community to address any ongoing issues with the current approach, and to inform our future direction.

Yours sincerely

A handwritten signature in black ink that reads "Steve Lowndes". The signature is written in a cursive, slightly slanted style.

Steve Lowndes  
Chair

Cc Members of GMP Implementation Working Group and the supporting technical group – via  
Andy Pearce