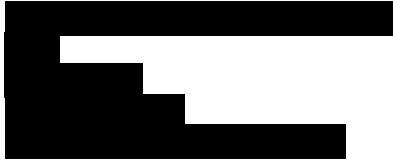


ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 87

Clynelish LTD (Jaimee Coulter)



Submitter Type: Not specified

Source: Email

Overall Notes:

Clause

Are you a trade competitor?

Position

I am a person who would not gain an advantage in trade competition through this submission

Notes

Clause

What are you submitting on? You can submit on specific parts of Plan Change 8 or the whole plan change.

Position

I am submitting on specific parts of the plan change (please detail below).

Notes

Clause

What is your view on the Plan Change 8 or the specific parts listed above? Please select one, if you have multiple views state clearly in the notes box below.

Position

Oppose

Notes

Clause

What decision would you like the Environment Court to make?

Notes

see submission

Clause

Do you wish to be heard in support of your submission? All submissions will be considered by the Environment Court. Please indicate if you wish to be heard in support of your submission.

Position

I wish to be heard in support of my submission

Notes

Clause

Please indicate your choice(s) below. If you do not indicate your intention to call experts, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Environment Court might make.

Position

If others make a similar submission I/we would consider presenting a joint case with them at a hearing

Notes

Clause

Authority to act:

Position

I confirm I have the authority to sign this submission on behalf of the submitter

[REDACTED]

From: jaimee Coulter [REDACTED] >
Sent: Monday, 17 August 2020 10:41 am
To: ORCplanchanges
Subject: Submission Jaimee Coulter ORC Plan Change (Omnibus)
Attachments: Submission_Form_Omnibus_Plan_Change_8 (1) (2).docx

Follow Up Flag: Follow up
Flag Status: Flagged

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Jaimee Coulter
Pemberton Farming LTD
[REDACTED]

SUBMISSION FORM

6 July 2020

Otago Regional Council Omnibus Plan Change - Plan Change 8 (Water Quality) to the Regional Plan: Water for Otago

This form is for making submissions on a change the Otago Regional Council (ORC) has prepared for the Regional Plan: Water for Otago. This plan change is one of two comprising the Omnibus Plan Changes (also known as the Water Quality Plan Change). The Omnibus Plan Change has been called in by the Minister for the Environment under section 142(2) of the Resource Management Act 1991 (RMA).

Plan Change 8 proposes to introduce a range of amendments targeting specific issues or activities known to be contributing to water quality issues in parts of Otago.

NB: Please use a **separate form** if you wish to make a submission on the other part of the Omnibus Plan Change - Plan Change 1 (Dust suppressants and landfills) to the Regional Plan: Waste for Otago.

This submission form includes guidance to aid the submitter. For more information on Plan Change 8, please refer to the Public Notice or further information on the EPA website:

www.epa.govt.nz/ORCplanchanges.

Where to get help preparing your submission

If you have any queries about making a submission or the plan change itself please contact the EPA by phone on 0800 401 673 or by email at ORCplanchanges@epa.govt.nz.

How to make a submission

Your submission on Plan Change 8 must be received no later than **5pm on Monday, 17 August 2020**.

You must also send a copy of your submission on Plan Change 8 to the ORC when you make a submission.

Submissions on Plan Change 8 can be made by either:

1. Using the online submission form on the EPA website under www.epa.govt.nz/ORCplanchanges
All submissions made online will automatically be forwarded to the applicant and the form includes a space to upload any supporting documents;

OR

2. Filling out this form and:

- a. Emailing it and any supporting information to ORCplanchanges@epa.govt.nz (if smaller than 10 MB) with the following subject line: Submission [Your Name] ORC Plan Change (Omnibus); OR
- b. Posting it and any supporting information to: Environmental Protection Authority, ORC Proposed Plan Changes, Private Bag 63002, Wellington 6140; OR
- c. Delivering it in person to the Environmental Protection Authority office on Level 10/215 Lambton Quay.

Submissions made on this form must be forwarded to ORC by either:

1. Emailing it and any supporting information to policy@orc.govt.nz (if smaller than 10 MB) with the following subject line: Submission [Your Name] ORC Plan Change (Omnibus);
2. Posting it and any supporting information to Otago Regional Council (attention Rachel Currie), Private Bag 1954, Dunedin 9054
3. Delivering it in person to Otago Regional Council (attention Rachel Currie), at any of the Otago Regional Council office:
 - Alexandra (William Fraser Building, Dunorling Street),
 - Dunedin (70 Stafford Street); or
 - Queenstown (Terrace Junction, 1092 Frankton Road).

Privacy statement

The personal information you provide on this form will be held by the EPA, 215 Lambton Quay, Wellington. It will be used by the EPA for the purpose of administering the public consultation aspects of the Omnibus Plan Change. Copies of your full submission will be provided to the Environment Court and the ORC, and your address for service may also be provided to other parties in the process. Other than your name, your personal contact information in Part A of this form will not be published on the EPA website.

Your name, the information in Part B of this form, and any attached information will be published on the EPA website, and made available to the Environment Court, the ORC and the public for use in the processing and consideration of the proposed WPPC.

By completing this submission form, you give the EPA permission to use the information for the purpose stated above. You have the right to access and correct personal information held by the EPA. All information held by the EPA is subject to the Official Information Act 1982. Note: If the submitter is a company, full business contact details will be published on the website.

Notes about your submission

Please note, your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission or (part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it is supported only by evidence that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert evidence on the matter:
- it contains offensive language.

Part A

Submitter details

Name of organisation (if relevant):	Clynelish LTD		
Title:	Mr Mrs Miss Ms Dr Other: miss <i>(Please tick the appropriate title)</i>		
First name of submitter:	Jaimee	Surname of submitter:	Coulter
First name of contact person (if different to above):		Surname of contact person (if different to above):	
Home Ph:		Work Ph:	
Mobile:	[REDACTED]		
Email address for service:	[REDACTED]		
Postal Address (or alternative address for service):	[REDACTED]	Postcode:	[REDACTED]

Part B

Submitter Name: _____ **Jaimee Coulter** _____

This is a submission on a matter in relation to which the Minister for the Environment made a direction under section 142(2) of the Resource Management Act 1991. The matter is **Water Plan Change 8**, part of the Omnibus Plan Change prepared by the Otago Regional Council.

If you require additional space for any question(s) please attach further documents or paper to this submission form and clearly state your name and the question(s) you are expanding on.

Are you a trade competitor?

Please select the appropriate option.

I am not a person who could gain an advantage in trade competition through this submission Yes	I am a person who would gain an advantage in trade competition through this submission and am directly affected by an effect of the plan change that adversely affects the environment and does not relate to trade competition or the effects of trade competition
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What are you submitting on?

You can submit on specific parts of Water Plan Change 8 or the whole plan change.

I am submitting on the whole of Plan Change 8	I am submitting on specific parts of Plan Change 8 (please detail below) Specific
The specific parts of the matter that my submission relates to are:	
14.6.1.1 A The total cumulative area of intensive grazing is less than 100ha or 10% Intensive grazing definition Policy 7.D.6 Nitrogen grandparenting for high emitters	

What is your view on Plan Change 8 or the specific parts listed above?

Please select one, if you have multiple views state clearly in the comments box below.

Support	Neutral	Oppose Oppose
The reasons for my view(s) are:		
<p>14.6.1.1- I oppose this as it would force us to farm in a way which is against our environmental and animal welfare standards to break even. Our farm is a total of 170ha with 50ha irrigated. We have hot dry summer with little grass growth and 120 day winter with no grass growth. To supplement this we grow low input lower yielding summer brassicas like Raphno which are drought tolerant and yield higher than grass so we can use less N fertiliser and less irrigation. We must grow a winter crop to feed our stock. We want to grow lower input lower yield rape and kale crops, this means there is less mud, little pugging, lower fertiliser inputs and less chemical usage, the feed is higher in protein (than fodder beet) and there are less animal welfare issues, surface run off & lower stocking rates. If we are restricted to 17ha in total, we will not grow any summer crop and will be at mercy of drought, we will irrigate more, use more N fertiliser on pasture, and grow a high input heavy yielding fodder beet crop on 17ha. This goes complelty against our animal welfare code of ethics and our environmental goals of retiring 2-3ha of wetland and planting 1-2ha of native vegetation. As summer grass is lower yeild we will need every hectare possible so retiring the 3ha we had planned is not an option, also we are only just breaking even so no cash flow for native planting & water testing.</p> <p>7.D.6 This rule targets low emitting sheep and beef farmers and they are penalised for their previous low N leaching which gives them little resilience going forward, high emittors get an easy ride and only need to make some small changes to carry on their normal business. It targets the wrong people and wont actually lessen N leaching or improve water quality as high emittors have little to change.</p> <p>Intensive grazing definition- This should only refer to crops which are grazed during winter May-September. By including summer crops you are taking away any resilience and tools farmers plan to use should they loose some of their water quotas.</p>		

What decision would you like the Environment Court to make?

Approve Plan Change 8	Approve Plan Change 8with amendments	Decline Plan Change 8 Decline
The reasons for my view and/or any amendments I am seeking are:		

14.6.1.1. Delete or amend this policy. It Targets small family farms and wont affect large corporates with big areas. We would rather continue to use overseer and routine water testing so we can see where our issues are and innovate to find solutions to directly affect water quality. If there had to be a limit, we would suggest that 50ha or 10% whichever is larger would be a much more suitable and workable amount, it will still target heavy emmitors but mean family farms can still farm the lower stocking rate more extensive and resilient way. Also summer crops which are planted in spring and grazed over summer should not be included in this area. Summer crops are an essential drought mitigation tool and can be grown in mixes e.g. rape and clover, to eliminate N fertiliser use and lessen irrigation greatly.

7.D.6 Delete this policy. Coucil needs to undertake scientific, economic and social analysis to understand the devastation this woul cause to rural communities. It takes away the ability for farmers to be agile and innovate in times of drought, changing markets,increasing social and environemtal pressures. Farmers need to be inovled in the planning process to get buy in and create meaningful change in their area.

Intensive grazinf definition- Do not include summer brassicas grazed from November- March as these will be a huge drought coping strategy in future, where less N and less irrigation are available.

Do you wish to be heard in support of your submission?

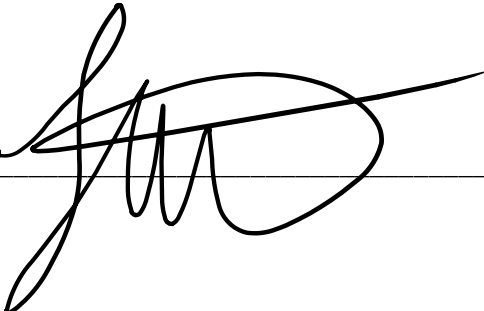
All submissions will be considered by the Environment Court.

Please indicate if you wish to heard in support of your submission

<p>I do not wish to be heard in support of my submission</p>	<p>I wish to be heard in support of my submission YES</p>
	<p>If others make a similar submission, I will consider presenting a joint case with them at the hearing YES</p>
	<p>I intend to call an expert witness(es)</p>
	<p><i>(If you do not tick this box, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Environment Court might make)</i></p>

Authority to Act

I confirm that I have authority to sign this submission on behalf of the submitter

Signature:  _____ Date: 16/8/2020

