

## **Further Material pursuant to Memorandum no.4 by**

**Stuart Morrison**

**Submitter #82**

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### **Verbal Submission Outline**

#### **Background**

I have been involved with the policy journey for some time.

Including with Federated Farmers and the Collective. Also I have been a member of the Land Use Futures Board, the Stakeholders Advisory Group, and part of the Land Technical Advisory Group.

I agree with and support the Collective's submission and much of what has been covered by Federated Farmers, DairyNZ and Fonterra.

I would add some supporting comment to these.

#### **Policy Development**

The policy development process within the RMA has not led to the best outcome.

It has been used in a linear fashion where decisions are made on the basis of what is known at the time, then strongly defended against any subsequent change in the original basis or assumptions.

The N target 'sustainable' load is in this category. The 435 t N " requirement" of the RPS appears to trump the higher ranking objective of 4.2 TLI.

The impact of PC10 on those who own, live or work on the land is directly related to the nitrogen target.

I acknowledge that discussion of the target is properly dealt with in an RPS review .

However the impacts are real and currently being felt in reduced property values and diminished futures.

A great deal of submission is around how PC10 should allow for a change given justified concern as to whether the N target inserted in PC10 is the right one.

#### **Science Review**

I fully support the science review and had hoped that it would inform the final form of PC10.

I am disappointed that staff have deemed it so integral to PC10 that it's commencement, indeed even the planning for it, must await the final determination of PC10.

I don't believe the Science Review is contentious and do not consider such action to be in good faith.

Consultation through the STaG process was all about control of N through regulation. Discussion about the role of P was resisted. I did support the integrated framework and the allocation method that was arrived at in the stag process and is now part of PC10.

To properly address water quality is to examine what to do about both N and P.

The RMA process we are engaged in does not deal very well with the consideration of N in isolation as is being attempted, when the complexity of the problem requires that N and P be addressed together.

A science review that examines all relevant factors and, further, informs the policy process in a candid and transparent way is much needed.

I fully endorse Dr Tom Stephen's statement.

With regard to control of P, a position taken by staff is that it will be "extremely difficult" to make a difference, influenced I believe by their concentration on regulating N and the time pressures involved.

At a practical level farmers have taken the lead. Detainment bund mitigation of P was a farmer initiative. Discussion of recent Ngongotaha stream bank erosion is another example. We do not want regulation, rather support and research translated to action.

### **Reference Files**

The reference file methodology maintains the sector allocations over time as Overseer versions change. However this is at the expense of capturing change and innovation at farm level.

Cumulative farm level actions are what is going to make a difference in future and barriers to their expression and uptake must be avoided.

It is my understanding that the reference file system is based on a version of Overseer 6.2 with all updates compared back to this version with differences then expressed as a percentage and applied across the sectors.

Noting the 88% change between versions 5.4 and 6.2 gives little confidence that reliability is yet anywhere near satisfactory, continuing to refer back to version 6.2 unhelpfully gives a permanence to the characteristics of that version.

The alternative outlined by Fonterra is currently being successfully used and is much to be preferred.

### **Future Concerns**

Council have supported the need for certainty.

However working against this, provisions have been added that allow for the pastoral sector to be potentially liable to pick up shortfalls from the incentive fund efforts and the effects any extra urban expansion and imported sewage demands.

### **Compliance**

I add my voice to those asking for the Overseer output being the primary compliance measure.

Nitrogen Management Plans have their use as a tool that demonstrates that a plan has been made and the constraint has been actively examined.