

I wish to submit that the nitrogen reference point clause b on page 47 be amended to read as follows. The Nitrogen Reference Point will be established from the average annual leaching loss for up to seven financial years from 2009/2010 including the 2015/2016 year. In the event that records are not available for good reason for this period then a calculation is acceptable for the average nitrogen loss for as many years as possible during the aforementioned time frame. Also the wording in clause f be amended to reflect this change.

My argument in favor of this change is as follows,

The fortunes of farming vary hugely from year to year impacted by such things as climatic conditions, the value of produce, the cost of inputs and sometimes events on farm such as illness, family circumstances and temporary financial constraints to mention just a few. Any of these events can have a very significant effect on how a particular farm was managed for the proposed reference years and therefore can distort the true level of nitrogen loss that would normally occur. It is my submission that the choice of either the 2014/2015 year or the 2015/2016 year is too narrow a reference point and does not provide for natural justice to prevail.

It is a requirement of self employed tax payers that they retain their taxation accounts for seven years. While there will be more work involved in examining seven years of financial accounts I believe that being able to calculate the nitrogen loss over such a period will create a far better outcome for the community and the environment. In reference to dairy farming, the 2014/2015 and the 2015/2016 years were characterized by a severe drop in milk price to well below what is required to enable dairy farmers to maintain their businesses. To deal with this situation most dairy farmers cut back on essential inputs of fertilizer and purchased feed, they also depleted herd numbers and did not keep appropriate numbers of replacement stock. These actions take time to show up in farm performance indicators and therefore using either of these two years as a reference point for nitrogen loss will not give a fair and accurate picture.

I base my comments on my experience having been a dairy farmer for forty years. As a source information I have referred to the DairyNZ Economic Survey 2014-15. This publication analyzes the farm accounts of a large number of dairy farms and refers back up to ten years for comparison. I have also sought comment from dairy farm advisers, other dairy farmers in this area as well as representatives of the main fertilizer companies, my bank and local stock buyers.

Arthur T. Bryan 8/3/2017

ARTHUR T. BRYAN, 974 ROTO-O-RANGI ROAD, RD3, CAMBRIDGE
DO WISH TO BE ABLE TO SPEAK TO THIS SUBMISSION
APPROVE OF THIS BEING DEALT WITH OTHER SIMILAR SUBMISSIONS
SEEK THAT THE COUNCIL ACCEPT THE PROVISION WITH AMENDMENTS
SUPPORT THE ABOVE PROVISION WITH AMENDMENTS AS OUTLINED

Arthur T. Bryan

OTO-O-RANGI@HOTMAIL.COM

073271857

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

MY SUBMISSION IS THAT

Tell us the reasons why you support or oppose or wish to have the specific provisions amended. (Please continue on separate sheet(s) if necessary).

I wish to submit that the nitrogen reference point clause b on page 47 be amended to read as follows: THE NITROGEN REFERENCE POINT will be established from the average annual leaching loss for up to seven financial years from 2009/10 including the 2015/2016 year. In the event that records are not available for good reason for this period then a calculation is acceptable for the average nitrogen loss for as many years as possible during the afore mentioned timeframe. Also the wording in clause f be amended to reflect this change.

My argument in favour of this change is as follows: The fortunes of farming vary hugely from year to year impacted by such things as climatic conditions, the value of produce, the cost of inputs and sometimes events on farm such as illness, family circumstances and temporary financial constraints to mention just a few. Any of these events can have a very significant effect on how a particular farm was managed for the proposed reference years and therefore can distort the true level of nitrogen loss that would normally occur. It is my submission that the choice of either the 2014/2015 year or the 2015/2016 year is too narrow a reference point and just not provide for natural justice to prevail.

It is a requirement of self employed tax payers that they retain their taxation accounts for seven years. While there will be more work involved in examining 7 years of financial accounts I believe that being able to calculate the nitrogen loss over such a period will create a far better outcome for the community and the environment. In reference to dairy farming the 2014/15 and 2015/16 years were characterised by a severe drop in milk price to well below what is required to enable dairy farmers to maintain their businesses. To deal with this situation most dairy farmers cut back on essential inputs of fertiliser and purchased feed. They also depleted herd numbers and did not keep appropriate numbers of replacement stock. These actions take time to show up in farm performance indicators and therefore using either of these two years as a reference point for nitrogen loss will not give a fair and accurate picture.

I SEEK THE FOLLOWING DECISION BY COUNCIL

(Select as appropriate and continue on separate sheet(s) if necessary).

- Accept the above provision
- Accept the above provision with amendments as outlined
- Decline the above provision

(Delete or appropriate and continue on separate sheet(s) if necessary)

- Accept the above provision
- Accept the above provision with amendments as outlined
- Decline the above provision
- If not declined, then amend the above provision as outlined

EN50077 5/7/9-10/16

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

- I wish to speak at the hearing in support of my submissions.
- I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

- If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

- Yes, I have attached extra sheets.
- No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

Signature: Arthur T Bryan

Date: 8.3.2017

ADDITIONAL SHEET TO ASSIST IN MAKING A SUBMISSION

Section number of the Plan Change: **page 47 clause b & f**

Do you support or oppose the provision?

Support

Oppose

Submission

State in summary the nature of your submission and the reasons for it.

Please read the following in conjunction with my submission which I could not include due to space restriction on this form:
I base my comments on my experience having been a dairy farmer for forty years. As a source of information I have referred to the Dairy NZ Economic Survey 2014-15. This publication analyses the farm accounts of a large number of dairy farms and refers back up to ten years for comparison. I have also sought comment from dairy farm advisors, other dairy farmers in this area as well as representatives of the main fertilizer companies, my bank and local stock buyers

Decision Sought

State clearly the decision and/or suggested changes you want Council to make on the provision.

Please refer to the paragraph headed 'MY SUBMISSION IS THAT' which has full explanation but could not accommodate all my text which has necessitated the last section of my submission on this additional sheet

We are currently stranded in the Coromandel due to the weather event and cannot hand deliver this to the Regional Council Office . We have spoken to your office regarding this problem

I am / am not directly affected by an effect of the subject matter of the submission that:

- (a) adversely affects the environment, and
- (b) does not relate to the trade competition or the effects of trade competition.

Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

en150077 5229-10/16

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1 (Continue on separate sheet(s) if necessary).

PAGE 47 clause B and F
Specifically the nitrogen reference point

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

Select as appropriate and continue on separate sheet(s) if necessary.

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

We need to receive your submission by 5pm, 8 March 2017.

YOUR NAME AND CONTACT DETAILS

Full name: Arthur Thomas Bryan

Full address: 974 Roto-o-rangi Road, RD 3, CAMBRIDGE 3495

Email: roto_o_rangi@hotmail.com

Phone: 078271857 Fax: 078271931

ADDRESS FOR SERVICE OF SUBMITTER

Full name: Arthur Thomas Bryan

Address for service of person making submission: 974 Roto-o-rangi Road, RD 3, CAMBRIDGE 3495

Email: roto_o_rangi@hotmail.com

Phone: 078271857 Fax: 078271931

TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)

- I could / could not gain an advantage in trade competition through this submission.
- I am / am not directly affected by an effect of the subject matter of the submission that:
 - (a) adversely affects the environment, and
 - (b) does not relate to the trade competition or the effects of trade competition.

Delete entire paragraph if you could not gain an advantage in trade competition through this submission.