

Avril and Peter Thomson

We represent two farms. A 210ha clay downs beef and sheep property at Maramarua in the north Waikato (the Thomson Property) and a 70ha dairy farm at Te Awamutu (the Ferguson property)

The Thomson farm is situated on State Highway 2 and surrounds the School and Rugby Club. Avril and I took over running The Thomson farm 23 years ago. I was previously involved in rural banking and valuation. It is traditionally winter wet and summer dry farm.

The farm has some potential to convert to dairy, or other land uses.

The farm has a nitrogen reference point of 15. A Local dairy farmer has been 'skiting' that they have got their levels to over 50.

The Thomson farm had its ownership frozen, in time in 1972, when my uncle died leaving a life interest in half the farm to my father, with myself and my three sisters being the ultimate beneficiaries. Dad is going well at 90, and has sold us half of his half. At 60 and 62 my wife and I look forward to buying my sisters out in the future.

Capital investment has been limited by the capital structure with banks unwilling to lend to tenants in common.

The farm annually hosts the School Cross Country, the Maramarua Hunt, and a Lions Club IHC picnic day. Between 1946 and 1953 it was home for the Maramarua Golf Club. From 1942 to 1945 it was apparently used as a training ground for little tanks. Would this land use need a Resource Consent under the proposed plan?

The Ferguson farm (Te Awamutu) is owned by my wife and her three sisters through their parent's estates.

I have supervised the 50/50 sharemilkers for the past 15 years. The current sharemilkers are our eldest son and daughter-in-law. Their daughter is the fifth generation on the farm, which has been in the family in excess of 110 years.

It is conservatively farmed as a system 1 dairy farm with an estimated NRP of 32. The large system 5 farm, next door, has always wanted to buy our farm, and they have an estimated NRP of over 60.

Our number one concern - Nitrogen grandparenting.

The comparison between our Ferguson farm and its neighbor is stark. They leach an estimated 30kg/ha more N than we do. The plan, as currently outlined, will reward our neighbors to the tune of \$12,000 of value per ha, based on Taupo catchment valuation of Nitrogen

The situation is greater at Maramarua with 35kg difference between dry stock and dairy farm – how can this be fair? This is an enormous value shift. It may do little to actually reduce N leaching, if it is a problem in these particular catchments. Why should farms that have been conservatively farmed in the past be disadvantaged against the aggressive, high producing, high leaching neighbors, in what has always been a race to expand.

As outlined in our written submission we see big problems with the accuracy of Overseer; using stock units and unreliable rainfall data. This program is a tool but is not up to level of setting regulations.

Farms need nitrogen leaching limits that reflect what the risks are for their soils, and for their sub-catchments. These limits need good science to back them up.

Nitrogen grand-parenting would be like hitting a jelly with a sledgehammer – the results will be unpredictable and certainly messy.

Number two concern - restricting land use change.

Innovation and land use change have been economic drivers of the Waikato for generations. Not all farms are best used for their current use, and not all land within farms is best used.

The level of beauracy required to (legally) make quite small changes appears to be large the way the rules are written. How much will this slow down, or stop sensible land use change that would be both economically and environmentally desireable?

Number three concern - farm environment plans.

Neither of our farms has a FEP. We are concerned that if these are to be audited by WRC or available for inspection then they will become a rule book, rather than a guide and a set of goals.

We have attended two Beef and Lamb workshops on writing these plans and can see merit in the exercise. But in working through the templates at home, the words felt more restrictive and the process stalled.

It is especially chilling to think of trying to follow rules under a time of stress. How much will the extra pressure delay important decisions? We sometimes freeze under pressure.

A sub-catchment approach with technical support, would allow plans to target things that are actually important rather than general catch all rules.

A plan should be a farms personal property, and not available to WRC!!

If Farm Environment Plans are to become a set of farm rules, and a defacto consent to farm, then a low cost, user-friendly, appeals process needs to be put in place.

To conclude

***Many farms have been restricted by historic ownership and have not become 'fully developed'. This is not a bad thing environmentally and should not be punished by this plan.**

***Nitrogen grandparenting will create perverse outcomes within communities, without achieving desired results.**

***Extra layers of paper and words can easily stifle innovations especially on smaller farms.**

***A more sensible approach would be for resources to go into technical support for Sub catchments, to clean up real issues.**

***We know it is not the intention of the Plan to punish people but in its current form that will be the effect.**