

Farmers for Positive Change (F4PC)

1st April 2019

1. Good morning Morena
2. My name is Graeme Gleeson and with my colleagues here today we are acting together as advocates and spokespeople for **Farmers for Positive Change (F4PC)**:

Rick Burke (Chairperson of F4PC), Rick is an inspirational, enthusiastic leader amongst the farming community who hails from the KatiKati district in the Bay of Plenty.

Bill Garland Bill is a well-known respected successful farmer who has a deep understanding of the farm environment planning process.

James Bailey James is a young intergenerational farmer, a farmer who was the drystock sector representative on the CSG, a farmer who is actively and responsibly walking-the-talk in land use management.

Graeme Gleeson Graeme is a farmer who consciously strives to give a voice on behalf of other farmers who are less empowered and engaged, a farmer who was the drystock sector delegate on the CSG, a farmer who is currently a member of the Essential Freshwater - Freshwater Leaders Group.

3. F4PC as a group appreciate the opportunity to share our submission, messages and viewpoints and invite your critique so you can understand the position we are representing. We are initially pushing back strongly against Plan Change 1 as notified, but as the name of our group suggests we will also endeavour to provide positive solutions to effect change that will make a strong start towards restoring the mana and mauri of the awa, the Waikato and Waipa River and catchments, and so give effect to the Vision and Strategy.

4. F4PC is a farmer group that emerged following Plan Change 1 notification. F4PC is comprised of mixed land use farmers, including sheep and beef, deer, and more extensive dairy farmers, whom have a relatively low environment footprint. F4PC was established to give farmers a loud and strong voice to firstly protest the inequity and unfairness of Plan Change 1 as notified. This is because we have all considered that there appeared to be an underlying intent to purposely restrict opportunity for low emitting land uses to optimize their farming systems within the natural capital of their land and impose attritional costs on these farmers, in order to favour the high environment footprint land users.
5. To get off the back foot and create a position of strength in defense of our own existence and purpose as land users the focus was to immediately look ahead for opportunities to present an alternative solution and pathway that would be more agreeable to everyone. The alternative solution in a nutshell is to address the problems of poor degraded water at its source rather than allow ongoing externalisation. This would be undertaken in an evidential and measurable manner ensuring the state of water quality is improving everywhere thereby restoring the mana and mauri of the awa as a whole.
6. As advocates and spokespeople on behalf of F4PC we bring to the table our own experiences and values which importantly have also been cross-pollinated by discussion, debate and observation with fellow farmers and a wide range of other stakeholders. We know intimately that all farms are uniquely different which is reflective of the heterogeneity of drystock and other mixed land use sectors and so we are very mindful that we must serve this diversity in a pragmatic, rational and justified manner. We also acutely understand that we in a leadership role are accountable to a diverse range of people in our rural communities throughout the Waikato – Waipa River Catchment to deliver outcomes that are fair, equitable and right.
7. With this background, with no disrespect or arrogance, we will strongly articulate messages and viewpoints conflated together about the future direction and pace of travel to give enduring effect to the Vision and Strategy which hopefully resonates well, perhaps with some tweak here and there so we can all get onto the same page.
8. We are strongly advocating therefore for a revised Plan Change 1 with a different framework including some ambitious ‘stretch’ goals and targets, yet importantly tempered by practical reasonableness and doability. It will be from this position we will positively influence and gain

acceptance of land use management change practices that overall will provide improvement to the state of water quality and further lessen the environmental footprint.

9. We have recognised the tension Plan Change 1 as notified created which has positively forced us all to become more engaged in assessing our place and purpose in society, our role as farmers to produce food and fibre, and our role as custodians or stewards of the land and what this means. We have taken on board the new emerging paradigm about land use and values, and how we can embrace and become part of this in an inclusive manner.
10. F4PC are however greatly troubled that the resultant outcome of Plan Change 1 as notified will not be the success that is being sought because in our humble opinion the manner it has been set up will fail to deliver, the outcomes will not ultimately allow for balance and diversity of land use that has a good fit with the natural resource aka the land with respect to versatility and capability, and the water quality in receiving environments will therefore remain seriously at risk, the viability of our farm businesses will also be at risk and our communities will suffer.
11. F4PC are supportive of other submissions notably B+LZN, Waipa branch Deer Industry NZ, the Hill Country Group and King Country River Care
12. To begin today's presentation to you, I will outline the order of speakers and topics. We will present information much of it having only a light touch on the many subjects that will be further explored and examined in the upcoming Block 2 and 3 hearings.
13. James Bailey will examine and give insight into his role as the drystock sector representative on the Collaborative Stakeholders Group (CSG) and how Plan Change 1 came into being what it is.
F4PC believe it is important for you to have an insight into the representative organisation of sectors within the CSG because this manipulated the direction of outcomes that established Plan Change 1 as notified.
14. Rick Burke will give you an understanding into Farmers for Positive Change as a group and its genesis, what the group represents and the issues it has and is confronting with respect to Plan Change 1

15. I will then briefly and hopefully succinctly describe and outline the sector group F4PC represent as a land use, presenting some background information to provide context to the complexities involved to establish a framework that gives effect to the Vision and Strategy.

16. Following on from the introduction I will present to you our concerns about Plan Change 1 we are all collectively confronting and then give you some insight to the solutions we have which we will expand upon in greater detail when we meet again in Blocks 2 and 3 of these hearings.

These are similar concerns you have already heard some detail about from others like B+LNZ, Hill Country Group, King Country River Care and individual farmers. We support their concerns and will conflate them with ours to present some uniformity.

17. Bill Garland will provide you some insight and understanding about farm environment planning gleaned from his own personal practical hands-on experience gathered over a lifetime.

18. I will then close by summarising where our discussion has concluded for today and where we would like to go next.

It is noted we have limited time today to present to you all the material we would like to share with you, so we have arranged if required another time slot to come back Wednesday 10th April

We hope you are willing to join us on this journey and share our enthusiasm

James Bailey – **see separate handout**

Rick Burke - **see separate handout**

Graeme Gleeson - **follows on next page**

Bill Garland - **see separate handout**

Gleeson - An overview of land use by farmers whom F4PC represent

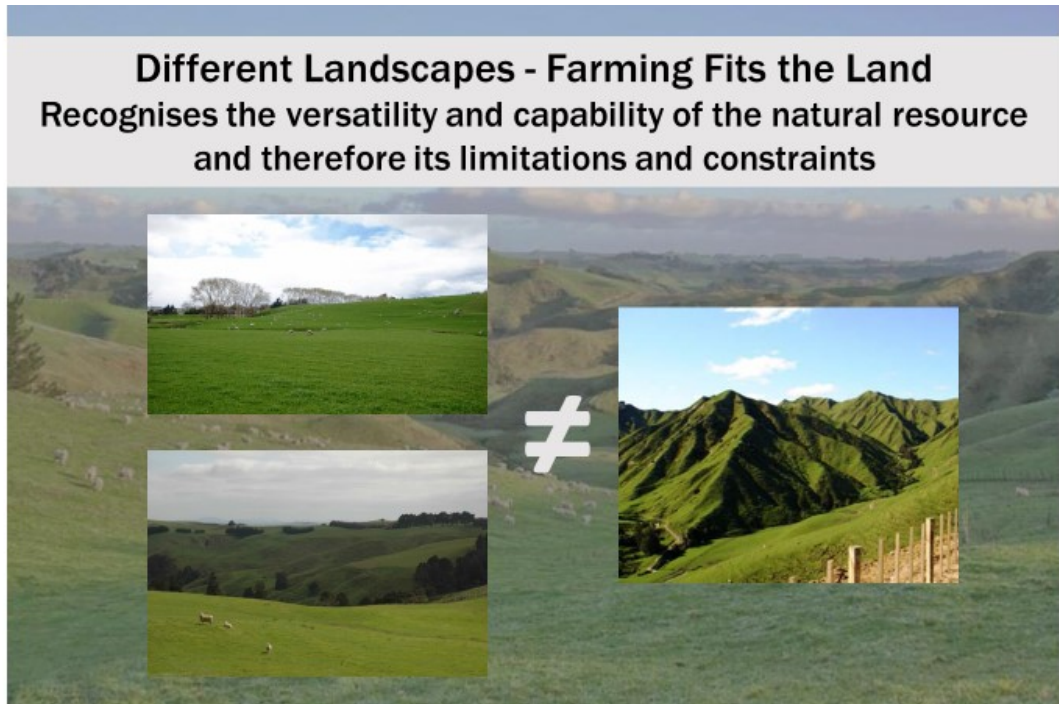
19. Any discussion about land use must firstly become cognisant about the contextual differences of our landscapes which represents the natural resources aka the land and waterways we have for our productive use and how this can differ greatly depending upon the spatial location

slide - complex diverse land use

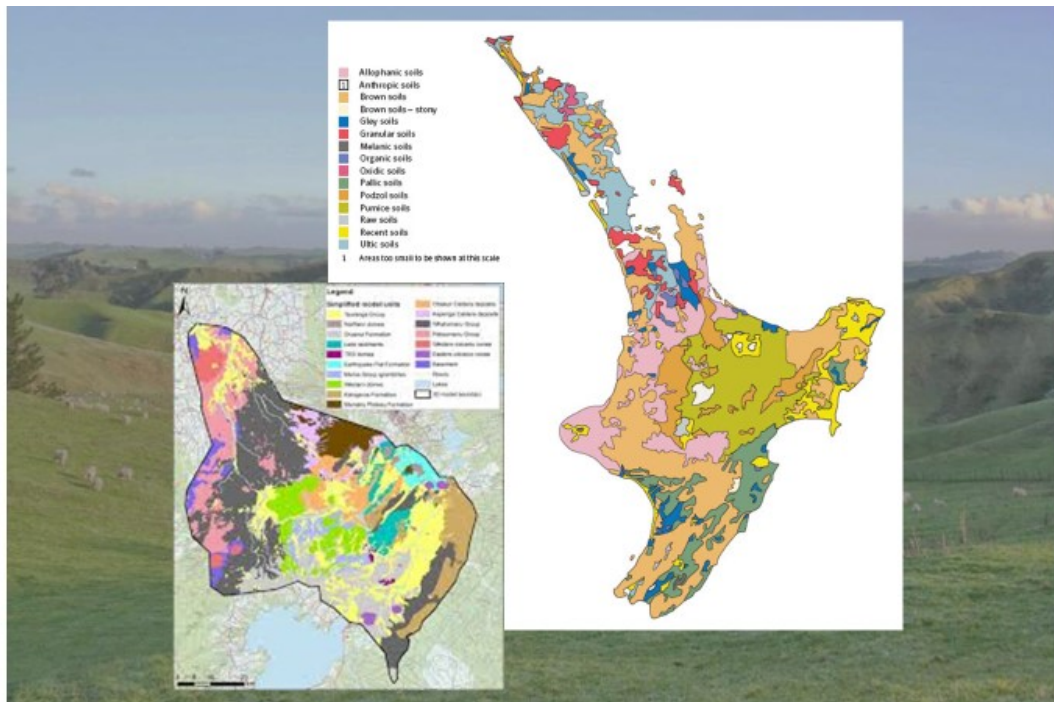
Sheep, Deer, Beef-cattle (mixed) Farm Systems Diverse, Different, Flexible and Complex



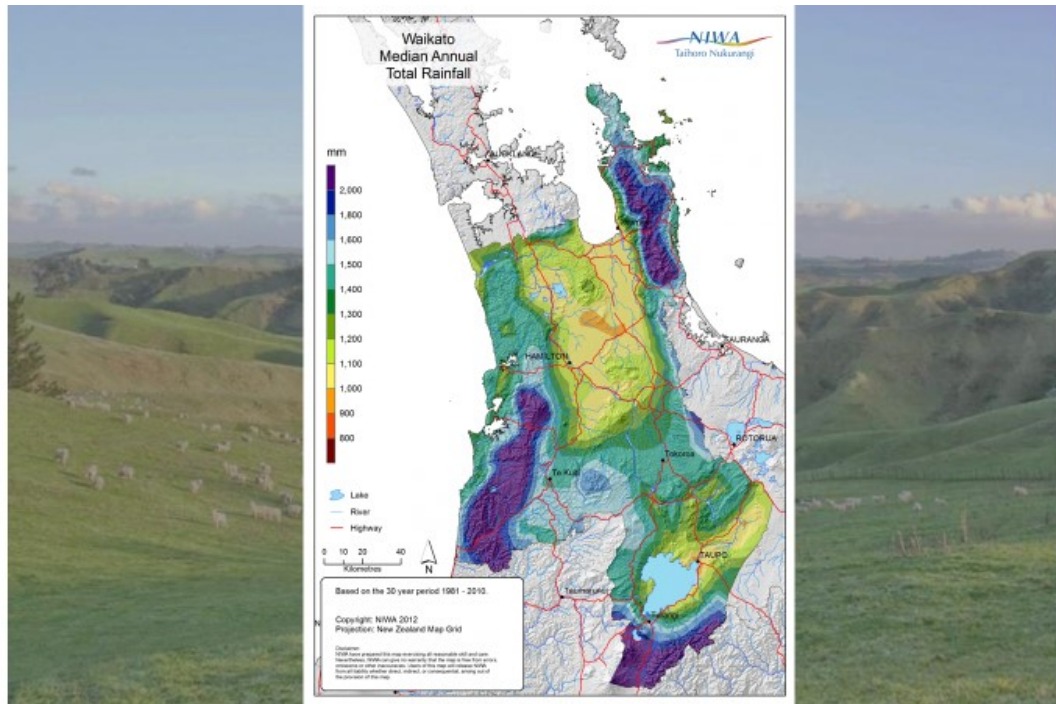
slide – different landscapes



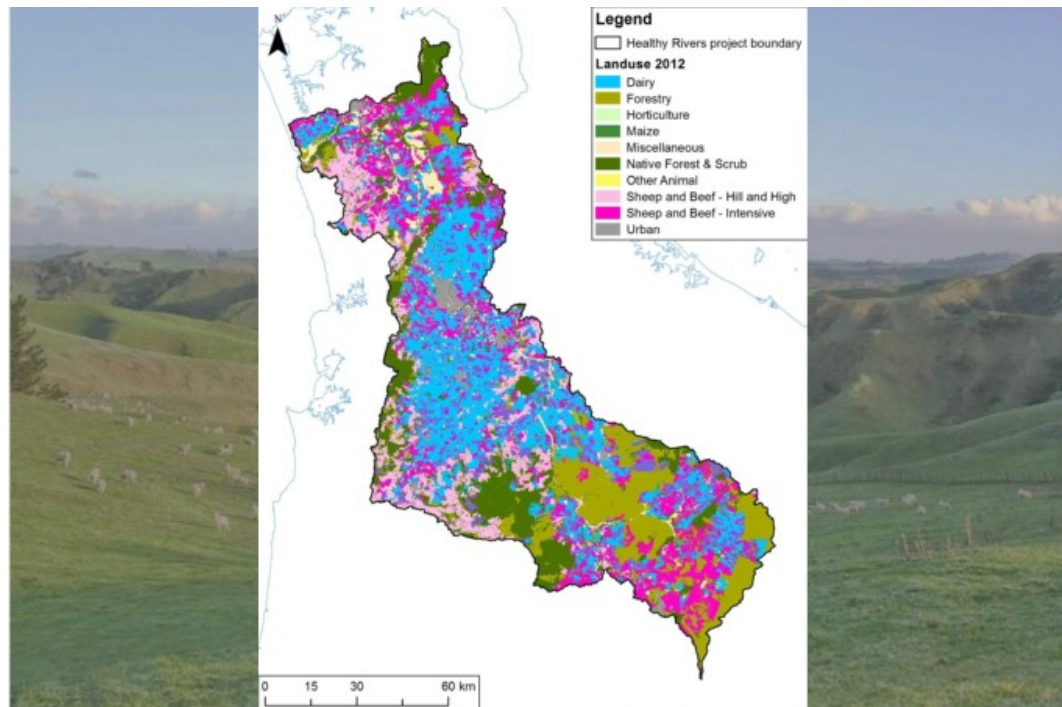
slide – different geology / soils



slide – different rainfall

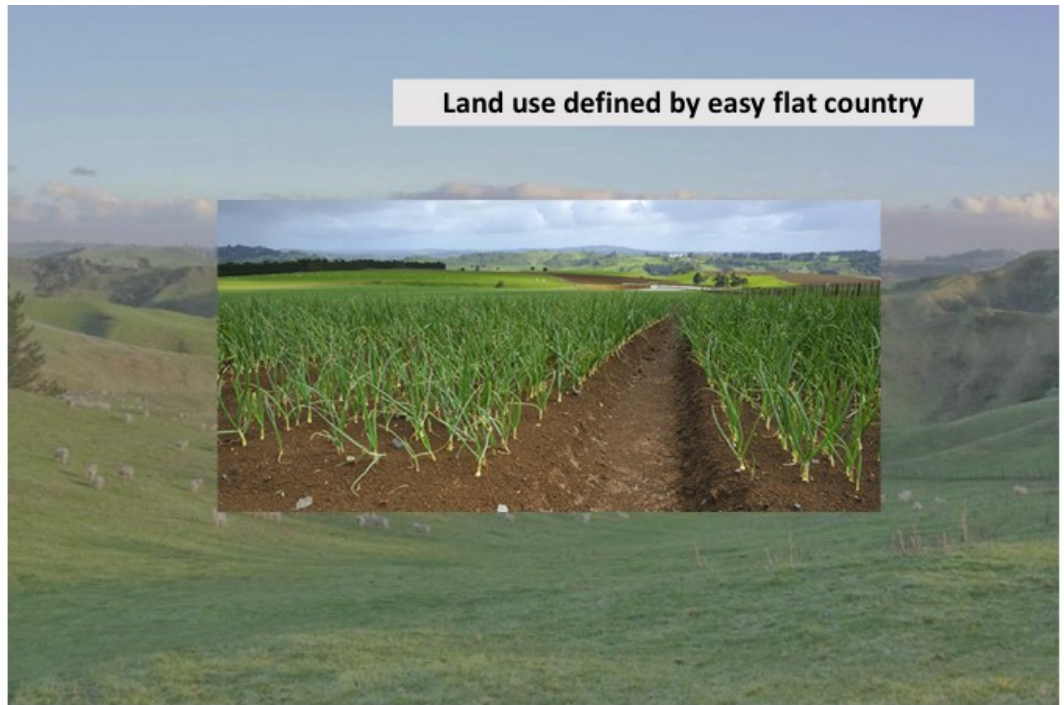


slide – land use map

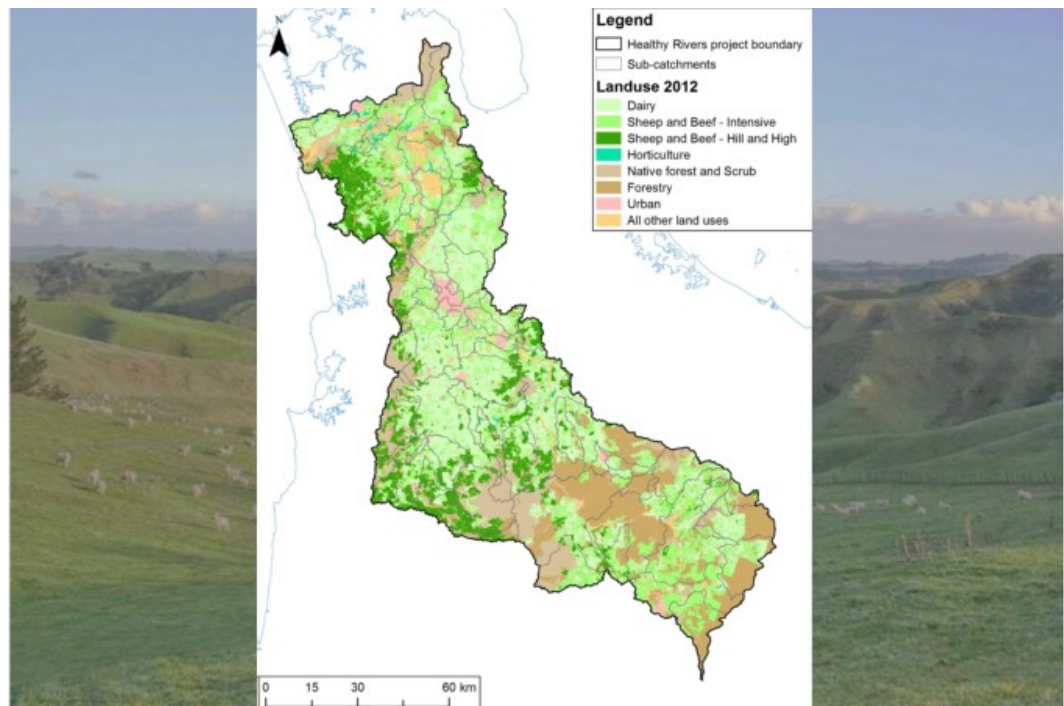


Slide – different land use topography

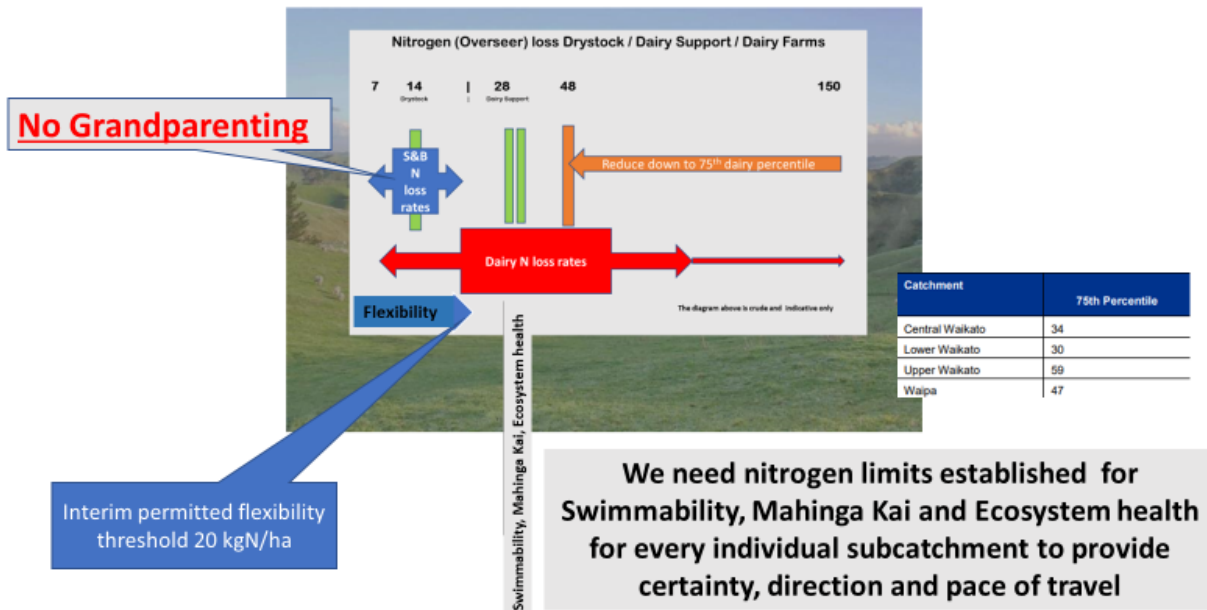




Slide – Land use change 1972 to 2012



slide – a range in N loss



20. It is the contextual difference of landscapes, geology and soils, rainfall distribution and how the land is used that we must be mindful before ascertaining what set or bundle of rules should be prescribed to provide regulatory oversight and management.

Our concerns

21. Interpretation of the Vision and Strategy

There appears to be in our opinion a very narrow interpretation of the V&S which is concerning having a single-minded fixation upon the state of water quality regarding Swimmability and Mahinga Kai attributes and not an integrated balanced view measured across all 13 objectives. If this is not achieved, we consider significant and serious unintended consequences will arise causing undue disruption and polarisation that will perpetuate

- Land users particularly farmers who have a low environmental footprint will disproportionately shoulder the burden of high cost mitigation that in our opinion won't deliver beneficial and measurable improvement in the state of water quality;
- The high contaminant loss land users will profit handsomely from windfall gains taken without consideration from low environment footprint land users;
- Communities will be disrupted economically with associated psychological anguish and anxiety as land users must undergo a series of mitigation actions that ultimately reduce capital investment value, employment opportunity, and will limit intergenerational succession;
- F4PC therefore consider it important that there is the introduction of a new objective to ensure good provision is established for people as a community so giving them resilience and spirit, opportunity to apply adaptive management, and sub-catchment approaches led by communities.

22. A demand for Fairness and Equity

We recognise there must be an effective regulatory approach to sustainable land management and restorative improvement to the state of water quality however, PC1 provides a very rigid prescriptive bluntness one-size-fits-all set of rules

- Preparation of a Farm Environment Plan to be registered
- Compulsory engagement of a Certified Farm Planner and Nutrient Advisor
- Third party Auditing
- Nitrogen Reference Point (Grandparented)
- No Land Use Change
- Livestock Exclusion
- Cultivation restrictions

23. That collectively in return have poor cost – benefit yet will come with a high price, a cost that financially will become embedded into the farm business for many years. It is imperative that costs are not of a magnitude to be crippling, undermining the viability of a farm business particularly so when costs are associated with mitigation actions to reduce contaminant loss that are not aimed directly at source or high risk i.e. critical source areas and poor management practice and / or are losses incurred by other land users that non-associated third-party farms should not be culpable for.
24. We have witnessed considerable land use change and intensification since the early 1990s thereabouts that was unmanaged from a regulatory viewpoint despite legislative power to do so via the Resource Management Act. Had the appropriate foresight, due diligence and placement of precautionary steps occurred this would have ensured limits were applied allowing for any intensification to be right sized and in the right place. To claw back restoratively now the excesses of change and intensification should not be borne in an unfair inequitable manner by those who did not pursue such activity.
25. There cannot be a tradeoff via unders, and overs offset in an endeavour to provide upstream clean water to dilute contaminated water arising further downstream particularly when the tradeoff is secured by a nicely arranged ordered set of rules that impose excessive and unjustified costs upon unrelated third-party land users who are not contributing to excessive contaminant loss without fair and equitable consideration who as a result are then involuntarily forced to capitulate. Is this not brazen unscrupulous theft of opportunity and confiscation of natural resources from land users with a relatively low environmental footprint that is then summarily handed over to those who have created the problems?

26. No certainty of outcomes

No direction and pace of travel to allow for good planning

What comes next?

27. Farming as a business is a long-term proposition, investment decisions cannot be taken lightly so there is a need to undertake good due diligence. The planning cycle can take decades considering that plantation forest pine trees are a 25 – 30-year crop, the genetic advancement in a breeding ewe flock 6 – 10 years and so this slowness to deliver returns is subjected to many varied risks.

Importantly therefore the planning framework must assist communities prepare for future plan changes beyond HRWO Plan Change 1 which is targeting 10 percent improvement of a greater journey of improvement

The threat of afforestation

28. It has become well known that the ultimate mitigation is likely to involve substantial afforestation yet there is no certainty of this except reading background technical information and secondary reports which offer no comfort

This is demonstrated in catchment modelling by Doole – Scenario 1, B+LNZ Tim Cox, and River Iwi Olivier Ausseil plus other published work has identified the same outcomes

A hill country extensive pastoral farm if forced to provide for livestock exclusion will invariably find the cost to be totally unsustainable possibly compelling the land owner to sell up, the sale price will be substantially reduced because the threat of future afforestation will emerge as a real risk and so afforestation becomes the reality as continuing pastoral farming can no longer be economically feasible

29. The inflexibility of the Nitrogen Reference Point

The **Nitrogen Reference Point** plus the **No Land Use Change** rule is allocation in drag. To add further insult this allocation is grandparented with no sunset clause or other alternative allocation framework provided. If during the time of Plan Change 1 everything shuffles along business-as-usual without creating enough impetus of change and therefore fails to get us onto a pathway of restorative improvement that will improve the state of water quality, there is we believe grave danger that grandparenting allocation continues affixed into Plan Change 2 continuing the farce of preferential protection of some land users.

Lack of flexibility – Loss of opportunity – Innovation stifled and hindered

30. Lack of flexibility

Drystock mixed farm systems are developed upon achieving a good fit with the seasonal grass growth curve, the growth is variable within and between seasons which demands flexibility in livestock policies, farm system and management to ensure a good match to make it productively efficient. A rigidly fixed Nitrogen Reference Point will seriously restrict any flexibility to respond to a change in the pasture growth curve which will have dire consequences to the viability of the farm business

31. Loss of opportunity

Drystock mixed farm systems are invariably a mix of enterprises for example sheep, beef-cattle, deer and may also include cash crops or other similar ventures. This provides some security for the farm business against the constant change of market prices. It is the opportunity to adjust the ratio or mix of policies that allows drystock mixed land use farming to remain resilient and adaptive to the forces of constant change.

32. Innovation stifled and hindered

Whenever the entrepreneurial spirit is suppressed then those who seek new innovative ways to do something different will be stifled and hindered

33. The bluntness and inappropriateness of One-size fits-all rules

We don't agree with the usage of blunt generic one-size-fits-all rules because we consider that they will not be efficient and targeted to where we should reduce contaminant loss. Such rules may be easy from a regulatory perspective however they will be stubbornly challenged wherever there is a poor fit with reality. The rigidity of such rules will only propel land users to face off directly against regulation because the imposed cost for little beneficial return leaves little option for anything else. The examples of fencing costs provided to you earlier by Richmond Beetham, farm consultant for BakerAg engaged by the Hill Country Group has clearly shown the exorbitant costs associated with the Livestock Exclusion rule.

34. Solution(s) Providing a Vision of Success (A quick look under the hood)

- **Establish an interim target – year 2050**
 - **Clear line of sight giving direction and pace of travel**
Provide certainty of expectation
Swimmable water at appropriate flow levels (medium flow and below)
 - **The mana and mauri of the awa will be restored**
- **Integrated and balance across the environment, community social and cultural, and economic well-beings**
 - **Let us work on this together as a community**
- **Subcatchment Approach**
 - **Identify over and under allocated subcatchments**
 - **Claw back where over allocated**
 - **No under overs offset**
 - **Flexibility provided to low N loss farm systems**
 - **Pasture growth curve**
 - **Flexibility upper cap** **Overseer / Lookup tables**
- **Livestock Exclusion**
 - **Actionable dependent upon establishing an intensity threshold**
 - **Cattle and / or deer**
 - **18 su/ha** **~1000 kgLW/ha**
- **Farm Environment Plans**
 - **Identification and assessment of the natural resources**
 - **Subcatchment contaminant loss profile**
 - **Critical source areas and pathways**
 - **Individually tailored mitigation actions identified**
 - **Risk management and mitigation**
 - **Nutrient budget / Nitrogen Reference Point / Overseer**
 - **Good management practice**
 - **NZ Farm Assurance Program (operable NZ wide and audited)**

