

3. Thank you for the opportunity to submit on the Waikato Regional Council's Proposed Plan Change 1 (PPC1)

We are dry-stock landowners in the Waikato catchment.

We are 3rd generation farmers in the Matahuru Valley and have been farming in the valley for 30 years (Fraser since he was 16). Our father has been here for 70 years and his father before him! Although we have only owned land ourselves for 10 years Fraser has been farming with his father, as a sole trader under a share-farming arrangement for 20yrs prior to us purchasing land. We have bought cows and sheep off Fraser's parents as time and savings (and debt servicing) has allowed.

We own 480ha of mostly hill country land, as well as owning 58ha of flats at the bottom of the valley, which will take all our working lives to pay off – incidently we have fenced the creek on the flats off from stock and put in a water reticulation system voluntarily 3 years ago, with no financial assistance from the council (when we applied for funding we were told that funding had run out for the year).

We run a 65:35 ratio of cattle and sheep, and typically 75-80% of our income is from cattle. For 3 generations we have been breeding stud Angus and Hereford cows specifically for the hill country. We sell service bulls to both the dairy and beef industries by way of 2 annual on-farm bull sales. Breeding cows are ideally suited for the hills and if we were to lose the ability to farm cows on the hills our financial viability would be lost – although the PC1 would allow for sheep, sheep only eat fresh grass and the gullies would not be cleaned up by the sheep – when fresh grass feed is low the cows do a beautiful job of eating out gullies, keeping these areas largely weed- free. Our cows are bred for the hills. We only feed grass, and silage (around calving time) made from our surplus grass (consumers world-wide want grass fed beef). Our ability to adjust stocking rates and types depending on the market's needs would also be removed, decreasing our business viability.

We are farmers by choice, but it's also part of our family's culture. We love the land and consider it a privilege to farm the land, make a living off it, at the same time as looking after it. We could have intensified production more than we already have (we still have two 100acre paddocks as we love the mustering) – it's not all about the money, but we have to make money to pay the mortgage! Water quality is important to us as our own water is spring water, and our stock drink from this water as well. We have been swimming in the creeks for years as do all our children and we have NEVER had any adverse health effects.

As hill country farmers we believe we have been unfairly represented in the Collaborative Stake holder Group - hill country farmers have 5% of the vote and yet we manage 43% of the waterways in the Waikato and Waipa catchments! And when you look at the water quality under hill country management it is of a high quality!

The WRC's summary of the proposed rules says "the proposed plan has been developed using a collaborative process involving community and sector representation which has ensured that those who are most affected by the changes have been at the table developing the policy..."

The above statistics do not reflect the WRC's statement!

Of the 24 CSG seats 10 are representing community and Maori interests – only one is held by sheep and beef, and yet as I've said hill country farmers manage 43% of the water in the catchment. No-one else's incomes, livelihoods and communities will be affected in any way close to what ours, as hill-country farmers will be! This is a very bad start!

From here, we recommend greater representation for hill country/ dry stock farmers and greater acknowledgement of the scientific evidence already available (as it relates to hill country water quality), with future plan change implementation representative of the facts.

The proposed plan changes will have a huge affect on our ability to farm and we believe the burden proposed on hill country farmers is out of proportion for not only any gains likely to be seen, but also our environmental footprint.

We have huge concerns about the mandatory fencing that would apply to our farm and business.

We estimate a cost of between \$150 000 and \$180 000 to fence of all our permanently flowing waterways (not including a water system, as a mitigation measure for those streams above 15 degrees and impractical to fence) likely to be another \$110,000) on our main 480ha block and our biggest concern with that is that we believe any gains in water quality from this huge requirement will at best be minute!

We actually have concerns about erosion and sediment discharge in the fencing off of the steeper areas of our farm. We believe greater deterioration to the water quality will occur than already exists, unfenced.

Those fencing/water costs alone will impede our ability to continue with a profitable business (enough to pay the interest, small amount of principal and fertiliser costs annually, and draw a wage, on average less than the average Waikato income per household average (1.))

We oppose mandatory fencing for permanent waterways as it stands- the contour and angles (twists and turns) of our creeks and streams make it completely impractical to fence some of them; again this should be worked out through an FEP.

Permanent flowing water needs to be defined – for example, 1 metre wide, and 30cm deep, as per the National standard. This would be our recommendation. Standards need to be set for how to measure averages because of the varying sizes of any particular water body.

We strongly suggest increasing the “mandatory” fencing threshold from 15 to 25 degrees, as is the National standard.

We do, however have major concerns even with this – in June of 2014 we had a major storm in the Waikato. On our flats we had a significant number of fences wiped out which required 2 full-time fencers working for 5 weeks to re-erect and repair damaged fences (a major cost in both time and money). If we had the hill country waterways fenced off we would have lost all of them from one tributary – and the fences themselves would have been completely destroyed, and lost in the lower waterways causing damage and blockages to the waterways themselves. Fencing in the upper-waterways is not practical!

We do not agree with “one rule for all”, as not all farmers are having a detrimental affect on the water quality in the region. The current section 32 analysis (of the Resource Management Act, 1991) states that estimated nitrogen losses from non-dairy pastoral farming from 1972 – 2012 has been 4% (as opposed to dairy farming which has increased from 43% to 63% over the same period). We believe this is too big to be overlooked!

Areas where the biggest gains can be got should be targeted first!

Even if WRC paid for fencing to be done, we believe the money would be better used to target high-polluting areas/problems – we all want value for money, and any money spent by WRC should have a return by way of water quality improvement.

A point to consider is even by fencing off all dairy farm stock from waterways the nitrogen problem remains – the evidence points to the application of huge amounts of artificial nitrogen on intensely farmed ground.

A sub-catchment approach is far more reasonable, and we strongly recommend this. Losing the viability of the hill-country community for very small gains in water quality does not make sense – whichever way you look at it!

An NRP will remove any further development potential and yet

we do not have a nitrogen problem in the hill country area we live in:

We have been using RPR, a non-soluble fertiliser for many years. There is little run-off or leaching because of our soil types.

We oppose the implementation of a Nitrogen Reference Point (through grand parenting) as it will only reward the biggest polluters and this is not fair to us – because we are paying off our farm it means development is a long-term goal, with small improvements made as time and money permit – to put a cap on our development, when we are low-polluters is grossly unfair, as the high-polluters are essentially allowed to carry on as is (our farm carries at most 12su/ha – we use no nitrogen and don’t have a feed pad) whereas common dairy farm stocking units are around 25-30su/ha. In order to grow grass to feed that amount of stock the biggest tool they have is artificial nitrogen.

A friend of ours (dairy manager) told us that he recently spread 750l of effluent along a 100m strip of paddock and by the time he got to the end of the strip it had all been absorbed – they may be allowed to do this but what affect does this have on the soil and then waterways?

It is a huge concern that Ballance (fertiliser company) is advertising artificial nitrogen as the cheapest form of feed to dairy farmers in newspapers at the moment. This thinking must change if we want to see improvements to the water! (scientific evidence-based data proves it!!)

Fencing off waterways on intensive dairy farms will not stop the leaching of nitrogen into soils, and then waterways, when effluent and nitrogen are being applied at the rates commonly done in the dairy industry.

Dairy farming as it is when highly intensified is unsustainable- hill country farming in the Waikato is more than sustainable as we are already farming in a very sustainable way!

Any plan changes need to have scientific, evidence-based data to back up decisions that have huge financial, social and emotional implications for people.

We have water of the highest quality running through our farm and as we've said our five children and ourselves have always swum in the creeks with never an adverse affect on our health! We have stony-bottom creeks that are self-filtering. Our water includes fresh water crayfish, and we have some local Huntly Maori who regularly come and fish for eel in the water up the farm.

At this point we must say that no consideration at all has been given in “the plan” to those farming organically... those already farming in the most sustainable way will be hugely disadvantaged by the NRP implementation. We ourselves would need to make few changes to our farm management practices to be certified organic.... Should this not be a consideration in the PPC1?

We support the long-term restoration and protection of water quality (objective 1) but strongly recommend alignment with the National Policy Statement for freshwater management – one reason is that the flooding and high-flow conditions are outliers so need to be removed and that there is no consideration for many variables, such as soil type – the contaminants the PC1 is concerned about should be addressed on a sub-catchment basis which could be done through a Farm Environment Plan (FEP). This would achieve more and be fair.

We must note that half way down our valley there is a natural waterfall of approximately 2 metres – Koi Carp cannot come up the valley past that point – there is some decrease in water quality from this point down the valley with the continual erosion and disturbance of the stream banks by the Koi Carp, but there is a **major** deterioration through 9km of dairy farming country before water testing is done down at the Waikare Road site.

Please note that “an analysis undertaken using ten yrs of data of macroinvertebrate count data provided by Waikato Regional Council on hill country farms (Land Use Capability 6 & 7 sites with ground truthing undertaken) within the Waikato and Waipa catchments clearly demonstrates that water is primarily of excellent quality, shows little or no degradation across this period not dissimilar to that of native bush streams.”

In other words it doesn't get much better than that.

Koi carp is another issue that needs to be included in the WRC's plan with specific strategies and measurable targets. Koi Carp are a major contributor to pollution of some waterways and should not continue to go unaddressed.

It is unreasonable for PC1 to mandate huge cost burdens on us as hill country farmers when the costs are out of proportion to the environmental footprint of those farms, and where the improvement gained would be minimal.

The land use change (rule 7) as it stands will mean we are not able to intermittently rotate the use of different paddocks for summer crops as the seasons require – this needs to be addressed, and could be addressed through an individual farm environment plan – it is an important factor in managing our land.

The PC1 plan aims to deliver a 10% improvement in 10 yrs to the water quality – From all available data there hasn't been a 10% deterioration in our water over 40 yrs or more so it is unreasonable to demand what you are, of us. Targeting the high-contaminant problem areas could gain more than 10% improvement in 10 yrs, without putting sectors of the community out of business.

An example of this relates to e.coli levels (one of the 4 contaminants the plan addresses) – two of the worst areas affected in NZ are the Avon and Heathcote in Canterbury, and the Oakley and Otara streams in Auckland. There are no stock remotely close.

Our own example in the Waikato is Lake Rotoroa, in Hamilton itself. E.coli levels are too high for the lake to be swimmable, but again there isn't a farm animal remotely close. The evidence shows the need to drastically reduce the numbers of ducks.

The upper reaches of the Waikato River carry mercury and arsenic pollution due to geothermal activity. This is serious but has nothing to do with farmers. Are these pollutants being addressed in the PPC1??

Like many hill-country farmers we employ staff- we have a full-time Fencer-General and employ contractors throughout the year – with huge costs put on us it would be unlikely that we could continue to employ someone full-time so that is one less family in the community – the affect on hill-country communities if similar to our position would be devastating! What would this mean for local unemployment rates, local schools, and local businesses???

We are concerned with the proposal of farming land being converted back to forestry, as forestry does not stimulate community or economic growth and development (as seen on the East Cape). Forestry kills communities! There is only intermittent full-time work for some – the numbers do not stack up financially, with only a return on investment at harvest (?20-25yrly) – and a huge amount of environmental damage at harvesting as well.

When someone buys a farm they always look to see how they can improve the value of it - those of us who use good management strategies, and are not intensively farming are being penalised – which will affect our land values going forward – we will have a capital devaluation in our property – which will in turn make us a greater risk to the banks – our ability to plan for the future through growth, innovation and succession planning will all be affected, detrimentally. (As seen in the Taupo region)

Objective 2 of the PPC1 is that social, economic and cultural well-being is maintained in the long-term – as proposed, it cannot be achieved for hill country farmers – the compliance costs, and costs of fencing alone will mean an extra \$300,000 minimum to our loan - with a decreased ability to pay this back! We haven't calculated the amount of grazeable land we would lose with the 3m buffer zone required for the steeper fences –(this would be sizeable given the contour of our farm), nor the land lost greater than 15 degrees that would not be grazed by sheep. If there is an objective for this it needs to be measurable, and yet the WRC have already stated they have no known means for measuring this.

We believe these compliance costs are unjustified in light of “water quality and it's improvement” being the main issue.

Contaminants should be addressed on a sub-catchment basis. Assess us individually. Require that we test our water and impose compliance measures accordingly.

Just an observation – 30 yrs ago the sheep and beef farmers would have had 2 seats in the CSG, and dairy probably one – common sense (and your own studies) suggest dairying has had a huge affect on the quality of water in the Waikato and Waipa districts.

We believe that a Farm Environmental Plan should be implemented, with individual farmers being involved in the development and assessment of these; people who know and work their land, (who understand the soils and effects of fertilisers) involved in all the decision making, enabling low-polluters to maintain their businesses, livelihoods and farming practises without unnecessary compliance costs, especially for negligible gains in water quality!

We have concerns over the stocking rates applicable to the permitted activity rules within the plan, and think it is not unreasonable to adjust to something similar to the Auckland and Gisborne regions (18su/ha as opposed to only 6su/ha). Let's be reasonable, especially as hill country farms are generally stocked at a much lower rate than on flat land. Although not stocking at the suggested rate, there should be room for us to increase our productivity over time if it doesn't affect the quality of our water.

We also have concerns over the reliance of OVERSEER as it solely relates to nitrogen discharge and for a lot of hill country farmers, nitrogen is not a major issue – all four contaminants should be considered on a sub-catchment basis. From our reading OVERSEER developers acknowledge there could be up to 50% margin of error (or more) in the data for dry stock farms – this is unacceptable to us as hill country farmers when our futures are uncertain. OVERSEER was never designed as a regulatory tool and we don't think it should be used as one.

In summary-

Please consider this as a personal issue.
Please consider the implications of proposed changes in light of what you are wanting to achieve.

We want to work with the council to achieve improved water quality where it is achievable, but we object to having costly and impractical measures imposed that will not achieve it, especially at the expense of our business and rural community's viability, where the science does not necessitate many of the proposed requirements for us as hill country farmers.

We leave you with a thought-

Your local council make changes in YOUR residential area which require you to borrow a large amount of money, adding to your already existing mortgage, and at the same time decreasing the value of your home by 20-30% (possibly more) to achieve almost nothing.
This would be untenable... add to that taking away your ability to earn up to 20-25% of what you have previously earned.

Would this maintain social, economic and cultural wellbeing in your residential area??

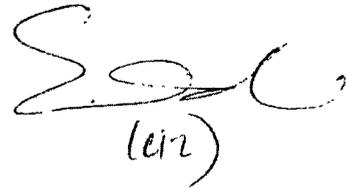
Would this achieve community resilience in your residential area??
(objective 2 and 4 of the PPC1)

Thank you for your time!

Faithfully,
Fraser and Liz Crawford



(FRASER)



(LIZ)

1. www.enz.org/nz-cities-compared.html (2014)