

**BEFORE THE**

**Waikato Regional Council**

**IN THE MATTER OF**

**Healthy Rivers Wai Ora Plan Change 1**

**STATEMENT OF**

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# Proposed Waikato Regional Plan Change 1

## General Submission

### Background

We have been farming for 49 years in a variety of farm systems, 38 of which were on the same property. In that time my wife and I originally farmed sheep and beef but rising costs and low prices for lamb at the time forced a gradual change over several years to maize growing and dairy heifer grazing.

Since selling our original farm we have been maize growing for both silage and grain with a small number of beef cattle on 47 Ha at Ohaupo surrounded by dairy farms. We also winter graze dairy cows on annual rye grass planted after the maize silage has been harvested. We have fenced all drains on the property even though most are dry for 8 to 9 months of the year. Two sediment traps have been constructed to trap any runoff. We soil test every year and get fertiliser recommendations done based on nutrient requirements for the seasons crop.

We have serious concerns about the direction PC1 is taking and the potential to cause economic and social harm in our rural areas, these are as follows;

- 1 The effect of deintensification on farms and the flow on to rural communities.
- 2 The predicted cost to the economy in the Waikato, Waipa area.
- 3 The huge cost of consents and compliance.
- 4 The plan was passed on a casting vote by the previous council suggesting even they had reservations about the plan.
- 5 The lack of sound science and agreement as to the actual state of the rivers and the source of the contaminants.
- 6 PC1 aims for higher standards than NPS FW

While we support taking practical steps to improve our impact on the environment this plan is laying an unfair burden on agriculture. Farming will be like owning a building with a Heritage order placed on it, we will be unable to increase production to compensate for rising costs, or adapt to market trends or consumer demand. Plan Change 1 asks farmers to stand still at best and in some cases go backwards for the next 10 years while more information and science is gathered to sort out what to do next. In nearly five decades of farming one constant has always been that you have to have an ability to adjust your farming system to adapt to changing market forces to stay financially viable.

We see PC1 as the biggest threat to farming we have faced as it takes away farmers ability to adapt to markets and consumer demand. According to the Ministry for the Environment report 2018, Our Land -Land use statistics from 1996 to 2012 12000 Ha of farmland was lost to urbanisation in Auckland, Waikato and Christchurch alone, and you would have to assume that has increased rapidly in the years since. Take out all the land regional and central governments want planted in trees and then restrict land use and stocking rates on what is left, plus add an increasing world population and you have to start asking where is the worlds food going to come from.

We are told what we do now will still be affecting our waterways in 20 or 30 years time but no credit has been given to the huge improvements that have taken place in farming practices over the last 5 or 10 years which because of the lag effect will not fully show up for some years yet.

The public perception of the state of our waterways has been created by the extreme views of the environmental lobbyists who have an agenda to remove pastoral farming from New Zealand. If Cox's Creek ran through farmland instead of suburban Auckland it would have been on the news every night for a week, not a 30 second sound bite and then ignored by everyone including Greenpeace. We need to inject some balance into the debate, what people perceive as pristine, and the natural state of the rivers are along way apart. Lowland rivers will always contain a certain amount of sediment, there is also thousands of hectares of peat in the Waikato which naturally leach tannins and minerals that oxidise and discolour the water. Also, what is a safe e-coli level, is it 120cfu/100ml or 1000cfu/100ml as in the EU. OECD figures show that the Waikato has the fourth lowest levels of nitrates of 98 rivers reported on in developed countries, trout can be caught in central Hamilton and whitebait at Tuakau so is the river as bad as some want us to believe.

We should be asking what is an acceptable status for our rivers, what were they like historically. Early missionary journals written before land was developed or farmed report the Waipa as being muddy so what is the natural state of the river, how much sediment is historical and a natural part of the river system that we can't control, eg early deforestation, the Tunawaea slip, carp stirring up sediment in the river beds, high rainfall in the Rangitoto Ranges. How much does the urban environment contribute to our waterways through sewerage plant discharges and overflows, fuel and rubber deposits washed off roads, storm water flows and industrial discharges.

We believe a targeted catchment approach will achieve better results than trying to regulate the whole area as one. If council took on a more educational and mentoring role much more will get done. Money spent on consents is money that can't be spent on making improvements. The more bureaucracy gets involved in anything the more it costs, the longer it takes and the less gets done. Sure some guidelines will be needed but let's get a system in place where farmers can get on with their business in a sustainable and responsible manner providing a prosperous future not only for themselves and their families but also contribute to the financial and social wellbeing of the communities they live in.

Your vision and strategy for the Waikato river states: " Our vision is for a future where a healthy Waikato River sustains abundant life and prosperous communities who in turn are all responsible for restoring and protecting the health and wellbeing of the Waikato River and all it embraces, for generations to come".

Plan Change 1 will run down rural areas that are already under pressure to maintain schools, medical services, sporting facilities and all the things that make a community function. It will fail to "sustain prosperous communities" We need a system that lets farmers get on with remedial action where it is needed without the added burden and costs associated with resource consents and red tape, where rural and urban communities are working together all doing their bit in a practical way that maintains the financial viability of the farms and businesses thereby maintaining employment and supporting our communities. Farmers must be able to maintain control of their industry if they are to survive. We need some honesty and factual science in the debate, less agenda driven claims from lobby groups and some credit for the progress that has already been made by the dairy industry, and advances in technology such as GPS controlled aerial and ground

fertiliser spreading. Let education and awareness drive changes not laws and resource consents which will only result in added costs, delays and most likely legal action from one side or the other with council in the middle. The world needs food, we can produce it and we need to produce it for the prosperity of New Zealand. There are improvements that can be made with fencing, wetlands, sediment traps and strategic planting of problem areas. Current and future science and technology will also play a part, getting bogged down in bureaucracy and resource consents will add cost, delay progress and be counterproductive. We can only spend our dollar once it is better to spend it on environmental improvements.

We need to be very careful about where and how many wetlands are created due to the increase in bird populations these create and therefore increased nutrient loading which negates the purpose they were created for. As an example a wetland has been built to filter runoff from farmland around Lake Ruatuna at Ohaupo with the result there has been a large increase in pukako, duck and Canada geese on farms surrounding the lake causing increased nutrient loading, and pasture and crop damage with the result that we now have to use maize seed treated with bird repellent (at a considerable extra cost) in order to establish our crop. Wild fowl numbers will have to be controlled and who will take responsibility for that, my guess is like everything else it will fall on the landowner to fix a problem someone else has created.

## **DIRECT EFFECTS ON OUR PROPERTY**

### **Rule 3.11.5.7 Land Use Change**

In our case we have 47 Ha surrounded by dairy farms that we are growing maize on for both silage and grain. Until we bought it, it was leased by a neighbouring dairy farmer as part of his milking platform. As we are getting closer to retirement one option has always been to sell to a neighbour to expand his dairy operation. This is now no longer possible under this proposal. Farm succession is more difficult as future generations often have to make changes to make carrying on the family farm viable.

We feel that due to the low risk of runoff (as the land is flat) the sediment traps already in place and with suitable mitigation systems in place to control nitrogen land change should be permitted.

### **Rule 3.11.5.2**

**Cultivation of slopes >15 degrees.**

A 15 degree slope is not very steep and this rule will effect a huge amount of land currently used for maize growing or any other cut and carry operation including horticulture. It does not take into account the percentage of an area that may exceed the threshold, the distance from a waterway or if there is any flat land between the slope and any waterway or any other mitigation that might be in place.

A better alternative would be to assess areas on merit rather than a blanket ban.

**Cultivation within 5m of a waterway.**

Again, this rule is too general and doesn't take into account land contour, soil types or cultivation practices. Land use and profitability are reduced and no compensation is being offered. On some properties a 5m margin could amount to a considerable amount of land.

Alternative.

Reduce the margin and work on solutions for specific problem areas. If no solution can be found buy the affected area the same as would happen for a road reserve.

Schedule B

Nitrogen Reference Point.

The 2 years suggested for creating the NRP were both drought years which will have resulted in lower nitrogen use and possibly lower stocking rates. It gives an advantage to high NRP farms and leaves no room for those on a low NRP level to change current farm systems. This places huge restraints on farm saleability and makes succession planning so the next generation can carry on a farm more difficult.

Alternative.

A longer time span to give a more accurate picture of average stocking rates, fertiliser use and general farm practices. Build more flexibility into the plan and set limits that are achievable and sustain financial viability.

## **Summary**

We feel that a more targeted approach be followed that involves identifying areas where there is a specific problem and working to establish methods for remedial action. Much of this could be done through local discussion groups or committees with input from regional council staff to find a practical solution that everyone in the affected area could buy into instead of having decisions handed down from an office somewhere by people with no direct knowledge of the locality they are dealing with. This would be much more cost effective, result in quicker time frames for remedies to be applied and a greater buy in by those most directly affected as they would have direct input into any action that was needed instead of being told this is what you are going to do. Remember they are the people who have to find the money to pay for any work required. All actions have to be practical and affordable and be based on sound science and knowledge of all aspects of the area concerned, farmers know their land better than anyone, they work on it everyday in all weathers and so are better equipped to know what will work and what won't.

All changes must be made in a practical and affordable way and a program that is based on ideology and misleading information promoted by some is doomed to failure, not only for the aims of the plan, but also for many of those farmers directly involved.