Before The Waikato Regional Council

In the matter of Healthy Rivers Wai Ora Plan Chane 1 and Variation 1A

Statement of Donald William Francis and Robyn Wendy Williamson

Date: 21st May 2019

Contact for service:

Name: Robyn Williamson

Phone: 078710809

Email: Williamson.robynw@gmail.com

Robyn Wendy Williamson

Scope of Statement

1. This statement:

    a. Introduces our farming business, and the ways that my husband and I farm to the natural capability of our property
    b. Outlines which parts of the proposed Plan will make it difficult to continue delivering these on-farm environmental gains;
    c. Specifically, I will focus on:

        - Farming within Environmental Limits
        - Nitrogen Reference Point – Provisions
        - Stock Exclusion – Provisions
        - Farm Environment Plan – Provisions
        - Subcatchment approach – provisions

    d. Outlines alternative ways to better meet the Plans objectives; and
    e. Outlines our future vision for our farm and sheep and beef in general

Introduction

We are Don and Robyn Williamson farming sheep and beef in the Owhiro Valley south of the Kawhia Harbour. This district is in the Western Catchment Zone neighbouring the Waikato/Waipa catchment.

Our Farming career spans 27 years; local community activities are an integral part of our lives. We have brought up 2 children, now adults, who frequently come home to the coast.

Farm Specifications:

265 ha of medium hill-country – two separate blocks 80 h and 185 h

Altogether broken into 20% hay-country; 50% medium hill (15-25 degrees); 30% steeper (25+ degrees) and includes 20 hectares of native bush. There is an additional 32- hectare QE11 Block which is fenced off from stock. Our farm is 50:50 sheep & beef.

We have always been mindful of soil health, having learnt earlier in our career the risks of pugging with cattle. To reduce this risk, we divide our 60-cow herd into 4 smaller mobs during the winter months and farm them in pockets, only restricting them behind a hot wire when they are close to calving. Maintaining a beef cow herd is a very important part of our mixed system as they have a vital role in grooming the pasture under the ewes and lambs during springtime – lambs requiring fresh clover to achieve optimum weights.

Fertiliser is prioritised to be applied to the good contoured land, where there is more opportunity to intensify, but not to the point of damaging the soil through over-stocking. Soil tests are carried out 3 yearly, we use low soluble phosphate within the mix of nutrients required.

Our goal is to keep good grass covers during the winter months, especially on the more vulnerable steeper contours, to minimise sediment/phosphorous loss through excess moisture run-off.

We farm dairy heifers on our 80h block and aim to ensure a good wedge of grass prior to winter, which reduces the need for feeding silage on the wet days, when the cattle are fed two breaks of grass instead. Large machinery can lead to soil degradation and compaction.

Our first project was completed in 2012, stock restriction of a key stream with electric wires and some matsudana willows were planted on a bend to mitigate bank erosion. We did not riparian plant, rather relying on long grass as a filter of the contaminants. What has evolved is that the native species, in time, are naturally being established.

We attended a B+LNZ LEP (Land & Environment Plan) workshop in 2014 and have steadily worked through the mitigations in recent years. The work has included poplar planting on identified erosion prone slopes; additional water reticulation and stock restriction of another water course. Alongside environmental management, we see strategic pole planting as being our key mitigation for the control of sediment and Phosphorous and also for shade.

Our annual budget includes the environmental work we can afford each year including an annual amount for the maintenance of the work completed – such as weed control; washouts and or dry summers requiring replacement of trees and fences. Our aim is to have reticulated water in all paddocks, having just three to complete.

I have been involved in the sheep and beef industry for nearly eight years as a farming leader. I am a member of the Mid Northern North Island Farmer Council (MNNIFC), past Vice Chair and immediate

past Chair. I am also a founding member of Farmers For Positive Change (F4PC), working alongside B+LNZ to assist farmers through the PC1 Submission process and more recently to host a number of Farmer Hearings workshops.

Don and I fully support the F4PC alternative Plan to PC1.

During the last eighteen months, through my work as a Farmer Council member, I have been involved in the Lake Whangape Catchment at a high level, to support the setting up of satellite subcatchment groups. The MNNIFC identified the need to employ a Subcatchment Coordinator to support both the Whangape and the Puniu catchment groups: the role being to liaise with the group leaders, assist with funding requirements etc. The outcome was that we employed ecologist, Merrin Whatley, to fulfil this role. I have also been involved in assisting the setting up of three subcatchment Groups in the West coast/Kawhia Harbour, where we farm.

Don and I have family members and colleagues who farm in the Waikato region, we are very concerned for them because of the unfairness of the PC1 Rules. Farming in the Western Catchment Zone, we understand that environmental rules will be introduced within 5 years.

The two key areas of PC1 that we will be challenging are Grandparenting of Nitrogen and stock restriction up to 25 degrees, rules that will have a serious negative impact on sheep and beef farming businesses and the health and sustainability of our rural communities. This is an industry that has had very profitable consistent returns in recent years and one which has been committed to the value add of its products. An industry, through leadership from B+LNZ, developed an origin brand that embraces good farm practices, which includes attributes of environmental sustainability, animal welfare and biodiversity. This brand “Taste Pure nature” is targeted towards the lucrative grass fed, “conscious foodies” market around the world.

We believe there are exciting times ahead for our sector when you consider the business opportunities now available through growing a mosaic of crops and animals, producing a range of high end, good quality food. There is also the opportunity to create more biodiversity and the potential to sequester carbon.

Specific parts of the plan I am commenting on

3.11.5.2 Nitrogen leaching grand-parented to the highest annual loss rate calculated for 2014/15 or 2015/16 and must be not greater than 15kgs/N/ha/yr.

Rule 3.11.4.4, Schedule B, Schedule 1 Application of Nitrogen Reference Point (NPR) – Nitrogen leaching grand-parented to the highest annual loss rate calculated for 2014/15 or 2015/16

We oppose a cap on Nitrogen based on grand-parented figures and the reasons are:

This will hinder the extensive farmer from reaching his land use capability potential and that of his children and grandchildren. There is considerable sheep and beef land that can be developed further with moderate fertilisation. When we consider what is productive land, contour is only one part of the picture; soil health and type are also significant in conjunction with sound management. Some of the best contoured lands around the Waikato river are degraded due to over use! I’ve heard the saying capping Nitrogen will “hold the line” however, this thinking “holds up” our sheep and beef development! This is unfair and may reduce land values.

At home we farm to the grass growth curve, this means we need flexibility within stock classes; the ability to adjust sheep to cattle ratios as market forces and or climate extremes dictate.IE: at times

there maybe a need to purchase more cattle to clean up excess pasture, or other times sell cattle when a feed deficit is looming. Some farmers prefer to farm without any supplements which make it essential to be able to adjust cattle numbers.

The plan does not recognise, investment in biodiversity and environmental work already completed.

Land that is likely to be afforested due to these rules, is the breeding ground of our store lambs and beef calves. These animals are routinely taken on to finish on lower flats however, without these cattle processing plants will not survive in the region, leading to job losses.

We would like to see the grand-parented N cap removed and a "sub-catchment planned approach" be introduced using the LEP (Land and Environment Plan) as a monitoring tool.

Land and Environment planning (LEP) endorses good management practices. Workshops assist farmers to use a farm map to identify **land use risks** ie: (critical water source areas), nutrient budgeting, mitigation options and a timeline to work to. To make this practical, the farm map can be divided into Land Management Units – a grouping of similar land types. Consideration for LMU design includes erosion prone areas, wetlands, fragile soils, accessibility, areas of flood prone, etc. The farmer can tailor this to his farm business. LMU allow the farmer to assess his **strengths and weaknesses,** and follow up with any required changes to his land management. Assessment of the Risks will reveal the contaminants that need targeting.

Importantly identification of land use risks will reveal the main contaminants on farm, not some one size fits all blanket ruling!

A subcatchment planned approach evolves when the landowners of a catchment come together to prioritise and target collective actions at catchment scale.

How does this work?

Catchment Group leaders are required to facilitate the group, this person needs to have the right skill-set ie: facilitation, administration, some local catchment and environmental knowledge and motivation to keep the group on track. The Group may decide to pay an annual subscription to fund the coordinator and this is working well in several catchments – locally - King Country River Care Inc (KCRC), whaingaroa Harbourcare.

Each farm has an individual farm base Nitrogen discharge allowance set. Like land should be treated the same and the flexibility of land use maintained. Farmers seek expertise which will provide them with nutrient limits for individual farms through use of the overseer model. Primary consideration should be given to the natural capital of the soil allowing for optimal land use. Base discharge allowance data is important as it provides a good starting point for future monitoring of the contaminants.

Excessive discharge must be reduced in line with soils capability: For those that have very high discharge levels, a staggered reduction over time will be necessary.

Setting catchment goals and individual farm goals to enhance aquatic ecosystems ie: once the catchment Risks are identified, ie: sediment, the individual farm plan will be the mechanism for determining mitigations such as management adjustments and strategic poplar planting over a period of time. With expert guidance the goals can be set for the catchment.

There may be an opportunity for the group to apply for outside funding, this is already happening with groups in the Lake Whangape catchment.

Suitable Land Management Units (LMU) could be identified through the LEP for plantation forestry or retirement from grazing. Again, use of this planning tool to identify risks, will result in an informed decision made by the farmer. There may be, through the subcatchment group, an opportunity for neighbouring farms to create a large tree plantation or wetland depending upon their catchment scale profile and critical source areas and subsequent goals etc.

In all other areas in PC1 which refer to grandparenting of Nitrogen we oppose.

Rule: 3.11.5.2, 3.11.54, Schedule 1, Schedule C - Stock exclusion from all permanently flowing water-bodies, wetlands and lakes by date specified in Schedule C the FEP

We agree that cattle, deer, horses and pigs should be excluded from water bodies up to a 15-degree slope, where farming is intensive ie: 18 stock units/ha+.

We do not agree to physically fence stock from flowing water-bodies over 15 degrees and the reasons are as follows:

The cost is prohibitive for little or no benefit
Water reticulation and fencing materials would cost many thousands of dollars. The damage created through large machinery required to clear a line for mechanical post drivers, creates more erosion of sediment for little or no reduction of N. The on-going costs of maintenance ie: fencing repairs and weed control in difficult terrain is counterproductive.

Fencing in certain situations can create the tracking of animals along the fence leading to more sediment run-off.

There is, we believe a better way other than stock restriction to remove contaminants in hill country.

Using LEPs farmers can identify the contaminant risks leading to the mitigations required to limit sediment, phosphorus, e-coli and N. I will explore these as follows:

Farm heavy cattle extensively, or not at all, on steep slopes (25+ degrees). On our property we will farm cows and calves throughout late spring and summer at 6 stock units/ha, integrated with sheep and lambs. This being the highest grass growth-rate time of year.

Avoidance of farming older cattle on slopes (25+ degrees) in winter or when very wet.

Identify critical source areas on-farm: this can be achieved by the farmer going out in the rain and observing where the water is tracking off the hills. It may be that a wetland be created strategically to capture the run-off from these areas. Wetlands, fenced off from stock are a great way to filter the contaminants, store water in wet conditions and release in the dry times and also create biodiversity for our native birds. Farmers are good practical problem solvers and can find solutions in the field ie: placement of larger rocks on the bend of a stream to deflect water gauging.

The planting of shade trees away from the waterway will discourage stock camps and thus nutrient build-ups and the risk of e coli. Poplar poles are ideal, but care should be taken not to plant them too close as the build-up of animal faeces' (carrying e coli) can be carried down with the water in a flood.

Poplar poles are also a great way to mitigate sediment run-off, but do need to be planted strategically and once established their roots will help to hold the soil.

Use of temporary electric fencing at certain times of the year to fence off a waterway when the farmer wants to graze cattle in an area more intensively for a short time should be allowed, with conditions.IE: No more than 18 Stock units ha and troughed water available.

3.11.2.2. Objective 2: Social, economic and cultural well-being is maintained long-term

We support objective 2 in principal however enforcement of *Rule: 3.11.5.2 (stock exclusion up to 25 degrees) & 3.11.5.4 (N caps to 15 N/ha or less)* will result in large tracts of farm land lost to trees/bush, depopulation within our communities and a direct contradiction to rule 3.11.2.2.

We challenge this rule because:

Whilst we value plantation forestry, a farmer should be able to consider this as he does with any other business proposition, by carrying out due diligence. ie: the area targeted is the right contour, right place ie: within trucking distance from a port - and right species. If a farmer has decided to retire some steeper land, he should be able to off-set this with the intensification of his flat land, but only up to its land use capability. PC1 could prohibit even this from happening.

What we as farmers don't want is to be "ruled out" from making our own decisions about our income streams. Drystock farms, because of their varying contour and soil types, are fortunate to have a range of potential options: lamb, mutton, wool, sheep milking, goats, deer, beef, honey, crops, forestry and some we haven't explored yet! In other words, "Farming to fit the land". We don't believe it is fair for our generation to be forced into making these long-term decisions to lock up large amounts of land for 20 plus years – thus taking the power away from our children and grandchildren.

I would like PC1 amended so that it adopts a subcatchment approach to managing land use and water quality tailored to the specific issues faced by the sub-catchment and a 30-year timeframe for achievement of its objectives. The first period to a 30-year initial Plan, should provide communities and individuals with certainty relative to what will be required of them and to enable sound business, succession and investment decisions to be made, including environmental mitigation. This will also give flexibility to provide time to meet the targets of swimmability, Mahinga kai and ecosystem health. This approach needs to have targets and goals that are achievable with current technologies – we can't run our businesses on the "hope" that technologies will catch-up for us within 10, 20 years, so suggested by PC1! Science of course will continue to play a very important part as time evolves. The 30-year option would need a 10-15-year review to ensure the plan is on-track and assess the health of local communities.

3.11.2.4 Objective 4 – People and Community Resilience

We support objective 4 in relation to providing for people and community resilience, however as currently proposed the objective fails to provide for this outcome because it recognises that as currently proposed PC1 will not achieve its objectives and further plan changes, including increasing stringency of land use controls, will be required ***(Objective 4b).*** The outcome is a plan which fails to provide communities and individuals certainty about what will be required of them in the future, and which fails to ensure people and community resilience.

Enforcement of 3.11.5.4 and 3.11.5.2. will reduce farm profits, land values, and community viability; making objective 4 "people and community resilience" unachievable.

Drystock production will be frozen, but farm costs will increase with inflation as it has done for many years. With land values decreasing farmer ability to borrow will reduce and our communities will suffer through depopulation and reduced services.

To summarise I would like to outline further benefits of The Subcatchment Approach:

This is a "stepped approach": Identify issues; set objectives and goals; targeted actions on-farm; timelines; show and tell – share achievement's with local urban centres; review results – set new objectives and continue the process.

Intrinsically driven farmers feel empowered to act because they are in the driving seat. If the guidelines are reasonable, they will buy-in to it, indeed this is happening. The whole community including land owners, local industry, tourist operator working together. Farmer information is paramount, often they have intergenerational knowledge of the catchment.

Logically farmers want to know the status of their water and the subcatchment approach provides an opportunity to create water monitoring sites throughout the region. This isn't just about the four contaminants present in the water, it is also about what living organisms are cohabiting there. Ecologists tell us that good environmental practice can result in a quicker positive response for species diversity regardless of the water quality tests, where there can be a lag and which takes more time.

Catchment groups can bring in expertise as required: WRC, Farm consultants, Industry good etc.

Catchments support B+LNZ's goal that all sheep and beef farmers, will have and be implementing, an LEP by 2021. B+LNZ as a further backup will provide extension activities for farmers.

Further farmer education and support available as eventually catchment groups can come together to share ideas.

There are successful examples of subcatchemnt groups working throughout NZ ie: Pomahaka in southwest Otago; more locally whaingaroa Harbourcare in Raglan.

There is great support for subcatchment group participation locally - recent examples: KCRC operating in Aria Piopio and Healthy Rivers Westcoast – Oparau, Te Waitere, Marokopa Catchments. Both these groups are within the Western Catchment Zone and are very active.

LEP's and subcatchments – education leading to real change long term …real change does take time.

We want a plan that we can have faith in, that we can do the work and understand the "why". It shouldn't be viewed as a tick the box exercise.

We want to be responsible to clean up our own contaminant losses.

It is important that we are able to reach the Vision and Strategy, however we believe this can be achieved by inclusively taking everyone along for the ride.

Thankyou.