The specific provisions my submission relates to are:

**Water and Land Plan in its entirety**

My submission is to AMEND this plan.

Reasons: While much emphasis has been placed on a need to improve water quality through better land management etc, very little if any consideration has been made to the affects many of these rules will have on the farming community (directly) and the flow-on affects to the public of Southland (indirectly).

Where is the "Economic report" showing the affects, the costs and the benefits this plan will have on Southland?
And, where is the "Predicted Positive Outcomes" report which gives an indication of how these proposed rules will benefit water quality?
At this point it is clear that ES is expecting the farming community to pick up the tab and pay as they experiment at improving water quality.

The decision I would like Environment Southland to make is:

Delay this plan until such time as the report "Economic Affects on Southland, it's People and it's Farming Population" have been quantified. Also, a "Predicted Positive Outcomes" report must be completed and included with this proposed plan so that these can all be considered in conjunction by potential submitters.

**Physiographic zones**

My submission is to OPPOSE the use of physiographic zones.

Reasons: Most of this plan is based on Physiographic zones, I do not believe there is sufficient evidence to be grouping such large areas together. For example, in the Peat Wetland zone on our farm there are extreme differences within the area. Land Use Capability maps have also been called upon to help determine physiographic zones - these maps were created decades ago and are well out of date. At the time these maps were created we had 200 acres of grass (and 900 acres of raw peat), we have developed the farm much since then and now have 900 acres of grass (and 200 acres of rough grazing peat ground). Forty years ago you could hardly fatten a lamb on this farm, now lambs fatten fast on the fertile grass (we fattened over 4000 lambs to 19.5kg this season and the cows milked over 450kg/MS. It's not been raw peat for years!

The decision I would like Environment Southland to make is:

Use physiographic zone information as an additional guide for farmers - not for regulation. From what we have observed on our farm, the boundaries indicated on the physiographic zone are NOT accurate. We have found that soil maps used in conjunction with information about the length of time each area has been developed is a more accurate guide to leaky soils etc..

**Policy 18: Stock exclusion from waterways**

My submission is to AMEND this policy.

Reasons: I support this policy because livestock can do damage to stream banks at times and water quality will be better if animals are not wading and defecating in the water.

But I seek an amendment as I believe stock should not be excluded from the creek banks at appropriate times of the year. Sheep allowed to graze to the waters edge during the summer months do a good job of controlling weeds etc. Managed properly they can help prevent bank
erosion. If, on the other hand, the creek is fenced off permanently, long grass and noxious weeds grow, and when they get bigger (in the case of flax), or heavy in the case of dead grass they fall in and take significant amounts of soil with them.

The decision I would like Environment Southland to make is:
To require stock be excluded from waterways unless they are being used to control vegetation (during the summer and autumn months).

**Rule 13 (v): Discharge from installed sub-surface drains**

My submission is to OPPOSE this rule.

*Reason: It is too restrictive to demand farmers map the location of existing sub-surface drains. Many of these drains would have been put in prior to the present farm ownership and the present-day owners would have no idea where they are, let alone their depth. How are farmers to map these drains? And, to suggest they must supply this information “on request” is ridiculous. Does every farmer need to buy a gps unit with computer mapping program to enable them to record this data? And, where is the data recorded to? What program? Does the average city dweller know if there are any drains running under their quarter-acre section? Do they know where they are? At what depth? Where the outlet is? They can no more be expected to know this than a farmer know where previous farmers have put drains. Or for that matter does Environment Southland know where their drains are on the Titiroa flat?*

The decision I would like Environment Southland to make is:
Amend the rule to state that while it would be considered good farming practice to map any new sub-surface drains this is voluntary.

**Rule 20 (a) and (e): Farming**

My submission is to AMEND this rule.

*Reason: This rule excludes the need for smaller-landholders to complete a farm management plan etc. Ten 20ha blocks is the same as 200ha and the cumulative damage is often worse as a greater percentage of these 10-acre lifestyle blocks do not have their waterways fenced and they have little idea about plugging etc. I see no reason that they should be excluded from the same environmental rules as larger farmers.*

The decision I would like Environment Southland to make is:
Amend the rule 20(a) to:
"The use of land for a farming activity on a landholding that is less than 4 ha is a permitted activity."
Amend the rule 20 (e) to:
"Despite any other rule, from 30 May 2018 the use of land for the farming of sheep, deer or beef on a landholding that is between 4 hectares and 100 hectares in area is a permitted activity, provided the following condition is met:
(i) a Management Plan is prepared and implemented in accordance with Appendix N, but excluding part 4 (Nutrient Budget), which includes mitigations relevant to the farming type being undertaken and relevant physiographic zone, and provided to Environment Southland upon request, or the farming activity and the property on which the activity is undertaken is listed on the Environment Southland Register of Independently Audited Self-Management Participants."

**Rule 22: New or expanded dairy farming of cows**

My submission is to OPPOSE this rule.

*Reason: Firstly I notice this rule comes under the heading Region-wide Rules. Clearly this rule is not region-wide and stands to limit the income potential of farmers in these particular areas. This...*
Rule has been suggested on the back of limited scientific information and instead of a broad exclusion should be considered as restricted discretionary activity - not non-complying. A phosphate study of our farm (in the Peat Wetlands) showed that very little P was being lost from our peat soils and that P losses were associated with number of years of development etc. To make a blanket assumption about such a wide area is ludicrous and detrimental to the well-being of those farmers affected. This rule would also limit the value of non-dairy farms in the area, and in fact, de-value them substantially. Many farmers in the area cannot afford to have their equity diminished on the whim of some random scientific research.

Farmers in the Peat Wetlands area have already been adversely affected by the on-going negative publicity associated with Lake Waituna. Farms in this area are already unsaleable, what then happens if farmer equity is badly diminished? The environment and water quality in the catchment will be of little interest. Farmers here have made much effort to improve the state of Lake Waituna (at their own cost) and they have tried to work with ES etc for the betterment of the lagoon. This rule will undo all the goodwill and good work that has been achieved.

The decision I would like Environment Southland to make is:

- Change this to a restricted discretionary activity, rather than non-complying, across all physiographic zones.
- All farms are different, all farmers and their management practices are different and to all be tarred with the one brush, or in this case, physiographic zone, is unfair.
- Farmers must not be discriminated against based on the area they farm in.

**Rule 23 Intensive Winter Grazing**

My submission is to AMEND this rule.

Reason: Rather than a ruling based on 20ha or 50ha, this should be done on a percentage of the area of each farm holding. Anything else puts larger farmers at a severe disadvantage. This way if a farmer owns 1000 acres which comprises five 200 acre farms then each farm would be able to have, say 30%, forage crop.

The decision I would like Environment Southland to make is to amend this rule to be on a percentage of each farm property. I would suggest that 30% would be an adequate proportion for intensive winter grazing on forage crops.

**Rule 23, c (i) Intensive Winter Grazing**

My submission is to AMEND this rule.

Reason: That the area of land can not increase outside of a three-year average is overly restrictive. We farm beside Lake Waituna and are reliant on having the lagoon opened for drainage purposes. At times this opening can be delayed and this can limit our ability to make winter feed. Being able to put in more crop (than on a three-year average) can sometimes be essential and the decision to do so sometimes must be made quickly without having to go through a consent process.

The decision I would like Environment Southland to make is to amend this rule to a seven-year average.

**Rule 23 (b, vi) – Intensive winter grazing**

My submission is to OPPOSE this rule.

Reason: It is too restrictive to demand farmers map the location of sub-surface drains within the area of land used for intensive winter grazing. Many of these drains would have been put in prior to the present farm ownership and the present-day owners would have no idea where they are, let alone their depth. How are farmers to map these drains? And, to suggest they must supply this information "on request" is ridiculous.
Does the average city dweller know if there are any drains running under their quarter-acre section? Do they know where they are? At what depth? Where the outlet is? They can no more be expected to know this than a farmer know where previous farmers have put drains. Or for that matter does Environment Southland know where their drains are on the Titiroa flat?

The decision I would like Environment Southland to make is to delete this rule. If ES was to make this voluntary they might get uptake from within the farming community - the big stick approach will only yield a negative response.

**Rule 23 (b, viii) - Intensive winter grazing**

My submission is to OPPOSE this rule (in relation to Lake Waituna).

**Reason:**

Firstly, I notice that this rule comes under the section Intensive Winter Grazing which refers to forage crops, and yet (part b, viii) only refers to winter grazing. It states that "winter grazing does not occur within 100 m of the outer edge of the bed of any lake or the Coastal Marine Area;"

At times, if Lake Waituna is not opened to the sea it floods out on to surrounding farms. It could be argued where the bed of lake Waituna starts and ends (in farmers' paddocks). This rule could impact on us as water backs up (when the lake is full) along Moffat Creek about half way through our farm. If we are therefore unable to winter graze within 100m of this backed up water we would have very little farm left to winter on.

Also, we could be non-compliant by virtue of a rising lake level which we have no control over.

The decision I would like Environment Southland to make is to modify this rule in relation to Lake Waituna. A better option would be to stipulate that Intensive Winter Grazing does not occur within 20m of the wetland reserve.

**Appendix N Management Plan Requirements**

My submission is to AMEND this rule.

**Reason:** The requirements for this plan are over-zealous. I support the idea of all farmers having an environmental farm management plan but this must be a simple document farmers can do themselves, probably by way of a website template accessing all relevant data. If the requirements are too onerous (as they are in the present form) then farmers will employ consultants to complete this plan and not take ownership of it. The whole reason for having such a plan will be lost, along with the lives of more trees (off to the paper mill).

The decision I would like Environment Southland to make is to amend this rule to require a simple but farmer-focussed document, which only contains relevant information - a legal description is hardly necessary nor is another print out of the resource consent conditions (especially when this must already be displayed etc)

This plan should be reviewed 3-yearly, not yearly as stated.