Submission on proposed Southland Water and Land Plan – 31 July 2016

Southland Water and Land Plan
Environment Southland
Private Bag 90116
Invercargill 9840

Submitted by:

Winy and Maarten van Rossum; Local dairy farmers based in the Waituna/Waihopai catchment areas since 1994. Originally from the Netherlands. Land owners of 878ha, employing 14 staff.

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Trade competition:

We would not gain an advantage in trade competition through this submission.

Hearings:

We wish to be heard in support of this submission and its contents. We would be prepared to consider presenting our submission in a joint case with others making a similar submission at any hearing.

Submission:

Rule 20 – Farming:

We oppose this rule.

Farm Management Plans are required by all farmers. These can be produced by the farmers themselves. However, we feel we do not have the time commitment required to produce a farm management plan, therefore we would hire a contractor to do this work for us. This would come at a high cost to our business as we would require 6 plans for our 6 properties all together. From the Environment Southland estimate; these plans would cost around $5000 each. This is a significant cost to the business.

We would like to recommend that field days and/or workshops are held as an alternative to educate farmers on good management practices. This would allow buy in from farmers and would provide a positive approach to allow farmers to upskill. The cash that would have been used for the Farm management plans could then go towards making improvements on the existing land.

Physiographic zones are used in this rule to categorize land areas. We oppose the use of the physiographic science as a tool as there has been no scientific evidence on how accurate the physiographic zoning science is to date. Once the science has been proven to be accurate we would accept the use of the physiographic science.
Or recommendation would be to provide a detailed report on the accuracy of the physiographic zone science to the public.

**Rule 23 – Intensive Winter Grazing**

We oppose this rule, and we would like this rule amended.

The current rule states that a maximum of 50ha can be winter grazed across all physiographic zones, and that a maximum of 20ha can be winter grazed for both old Mataura and Peat physiographic zones.

This rule does not fairly account for farm size. We would recommend to use a percentage of total winter grazed area. We propose that a maximum of 30% of an “individual farms” – as classified by the legal description of the land would be used for all physiographic zones. This does not discriminate between farm sizes.

**Rule 25 – Cultivation on Sloping ground**

We would like this rule amended.

Where the rule states “cultivation does not take place more than once in any five year period”, we would like this rule amended to state, “cultivation does not take place more than once in a 3 year period”. Please refer to the above submission point on rule 23 for more detailed information regarding this amendment where 3 years relates to 30% winter grazing, as this area would need to be regrassed to keep that area economically viable to our business.

This 30% would allow farmers to have a less intensive winter grazing system. For example a high yielding Fodder beet crop has a much higher stocking rate over winter and therefore would have a much greater adverse environmental impact than a crop of oats which has a much lower yield and therefore lower stocking rate than Fodder beet.

**Rule 35b iii - any pond, tank or structure used to store agricultural effluent prior to discharge is certified by a Chartered Professional Engineer.**

We oppose this rule.

Using a chartered professional engineer would be a great additional cost to our business because we know for a fact that there are currently only 2 chartered professional engineers in Southland. This means (due to the high demand for these professionals) outsourcing would occur. The charges for getting a chartered professional engineer from outside the Southland region could significantly reduce the economic viability of our farming business, and would also send money out of the Southland economy.

Our recommendation is to use a suitably qualified civil engineering consultant as specified by the current Environment Southland list of suitably qualified people (This list contains 8 people, all from the Southland region).

In addition to this, a drop test is now required for all effluent storage facilities (effluent ponds).

We oppose this test.

We recommend as an alternative to check the existing inspection “holes” of the effluent ponds that have these in place, and only to do the drop test on effluent ponds that do not have these inspection holes.
Rule 38 - Animal and Vegetable waste

We would like this rule amended

Where the Rule states, “from 1 May to 30 September in any year”

We would like to amend this by adding, “unless there has been no rainfall <10mm over a 5 day period before and after application, as predicted by the local weather forecast”. We would prefer this value (<10mm over 5 days) to be based upon proven scientific evidence, where no drainage event and therefore loss of N and P occurs under this given value over the range of days stated.

Thank you for you time to consider this submission. If you have any queries, please don’t hesitate to contact us.

Yours sincerely,

Winy van Rossum  
Maarten van Rossum