

Submitter No: 811

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# Submission

## 811

Thys H. & Staut T.

Opening statement.

Good afternoon

Thank you for giving us the opportunity to discuss our submission.

We appreciate the effort that E.S. and you as commissioners in particular are putting into this land and water plan, working together to create a sustainable future for Southland.

We are Herman and Tinneke, owner operators of a 400 cow self-contained dairy farm South of Invercargill.

After many years of intensive dairy farming in Europe we made Southland and its grass-based farming system our home 16 years ago.

We do believe in the future of this grass based system where the nutrient cycle\* is a lot better balanced and has a minimal environmental footprint\* compared to most dairy operations world-wide.

\*Nutrient cycle A grass based nutrient cycle is unique efficient as there is minimal intervention involved. The cows harvest the grass themselves and deposit the waste product themselves back onto the paddock. This waste product is reasonably balanced to the pastures requirement to grow again and close the cycle. The milk that gets produced and exported of the farm as well as the meat gets compensated by importing fertiliser into this cycle.

\*Environmental foot print Due to the effectiveness of the nutrient cycle an absolute minimal amount of extra carbon is required for the production of milk and meat. We do not bring in large amounts of foreign nutrients that then will be deposited on NZ soil, we do not need vehicles to get it here, we do not need fossil fuels to deposit its waste products back on the paddock and we do not need to import materials to house these animals.

Submission discussion

**\*1 PHYSIOGRAPHIC ZONES POLICIES.** Policy 4-12, P26-28

As said in our submission, E.S. has done well to use soil science and base rules, policies and management on these physiographic zones.

*Our issue with this is:*

- A.** The physiographic zoning is a young and debatable science. It therefor needs to be peer reviewed and proven to stand up to scientific scrutiny.
- B.** At farm level we need workable definitions of zones without the need of costly consultants at the farmer's expense, especially in a case where more than one zone is found on the same farm or paddock.

**C. Policy 11 – peat wetlands**

Peat and Wetlands are not necessary one and the same thing.

Not all peat is wetland and not all wetland is peat.

Peat soils across the whole of NZ have been farmed successfully for many years.

Refer to p 17 where “extensive peatlands” is mentioned

Therefor we *object* to the name “peat wetlands” and propose it to be called peat soils and it not being treated or thought of as wetlands.

**\*2 FARMING ACTIVITIES THAT EFFECT WATER QUALITY. Policy 16, P30**

**A.** The use of the wording “New dairy farming”.

It is highly inappropriate to single out one industry!

A poorly run farm can be harmful to the environment no matter which animals or crops are farmed.

Solely focussing on dairy farming is a big insult to a community that has already taken a lot of initiative and has invested hugely on their own account into improvements for the environment

*We therefor propose* the removal of the discriminating wording “new dairy farming” and change it to “intensive farming practise”.

**B.** We see potential benefit in the discouragement to establish new intensive farming activities in the close proximity of lakes as the run off may feed into the lakes.

However lagoons and estuaries receive pollutants over a long distance from the whole catchment, therefor restricting the establishment of new intensive farming activities in close proximity of

these water bodies is NOT fixing any of the problems. It is a typical example of carrying a bucket of water to the sea solutions.

*We therefor propose* the removal of the lagoons and estuaries from appendix Q.

#### C. Policy 16 appendix N

There is a trend that seems to have developed over the past ten years where farmers have been told that the consent application is too complicated for them to comprehend and a strong push by E.S. has been made for the farmers to use expensive consultants.

This is not only an insult to the farming community it also doesn't achieve much.

A farmer that writes his own application and management plan, understands and owns the plan. An application and management plan written by a consultant is far more likely to get filed rather than adhered to.

*We therefor propose* that E.S. simplifies the process by creating and providing templates and structured guidelines for its consent applications and management plans.

D. Policy 16 states **“farming” activity that effect water quality.**

Where in this plan is there any policy relating to:

- \*Urban activity that effect water quality

- \*Industrial activity that effect water quality

Along the New River Estuary are several industries and outlets from the Invercargill waste and storm water system.

All potentially affecting the water quality in this water body.

Again one industry and one very important economic part of the southland community got singled out in your policy 16.

*We strongly suggest that E.S. makes a bigger effort in addressing every single issue across the board and stops singling out one part of the community.*

If E.S. wants to be taken seriously that it is truly and honestly committed to improving water quality, as we are, than it should target all contributors equally!!!

**\*3 Effluent management** policy 17 p30-31

We are in support of policy 17 as long as design, construction and operation are NOT controlled by businesses that gain trading advantages from complicated rules and red tape bureaucracy.

**\*4 Stock Exclusion** policy 18, p31

**\*5 Management of the effects of groundwater and surface water use** policy 22, p33

**\*6 structures and bed disturbance activities of rivers and lakes** policy 28, p35

**\*7 provide for the extraction of gravel,** policy 29, p35

**\*8 Drainage maintenance** policy 30 p36

**\*9 Rule 13** p45

**\*10 Rule 22** p50-51

**\*11 Rule 23** p52-53

Intensive winter grazing,

As stated before, policy 16 appendix N; a management plan written by the farmer and not a consultant could improve environmental outcomes.

Visiting and advising farms regularly on winter grazing practices is more effective to the environment than the proposed consents. Field advisors will get a better buy in than consent/compliance staff in an office.

Keep it simple keep room for initiative and innovation.

Where is the scientific research quantifying the 20-50 ha rule?

Scientific it does not make any sense as many small wintering set ups will most likely have a bigger negative impact than a few big ones. If we want to improve the environment we should **all** be committed to best practise. Education is the key.

**\*12 Rule 24** p54

**\*13 Rule 32** p59

**\*14 Rule 38** p63

### **Animal and vegetative waste**

This rule is too restrictive and does not imply environmental benefit.

Where is the science to proof animal waste can only be applied every 2 months? It should be perfectly fine and it is common practise in many other countries to spread slurry from animal housing facilities after every grazing or cut of silage to replace nutrients taken away by the grazing or mowing. Using Organic fertiliser rather than applying imported chemical fertiliser.

We propose to base it on best farm practise.

Keep it simple keep room for initiative and innovation.

**\*15 Rule 54** p75



**\*16 appendix P p 204**

Pond drop test is too expensive too impractical and can be compensated with other alternatives.

## **CONCLUSION**

You probably have seen and heard everything now.

From,

The local government bodies with their own political and financial goals who will happily avoid responsibility and tell you they need their pollution to be exempt.

To,

The baffled and hurt old farmer, that reads this water and land plan as a condemnation of his lifetime of hard work on his land, working with nature to provide for his family his animals and his community alike. Not understanding why we need the change or how all of a sudden he has become responsible for all the dirty water in his province.

To the huge multi farm holdings with their own large economic interests and a personal financial agenda with access to some great intellectual resources to help them defend their personal interests.

To the aging sheep farmer who feels the rug has been pulled from under his feet, and all the dairy farmers in between.

Rest assured that the one thing we have in common as farmers is that we want the same sustainable future on the land for many generations to come

Personally we like to see this being accomplished by

- a water and land plan that involves the whole community in Southland .
- a water and land plan that is simple and straight forward , no bullshit approach.
- a water and land plan that is more outcome based than the current rule based one that has a far less communistic approach and leaves more room for entrepreneurship and will encourage innovation .
- a water and land plan that effectively does what it should have been set out to do

and that is improve the water quality... *fast, efficiently* and to great standards by getting “ALL” the industries and ALL the communities involved .

Closing thought;

The Lord's Prayer is 66 words long and has sustained its purpose for over 2000 years.

The declaration of independence has 1322 words and sustained the USA for nearly 250 years.

Our latest dairy consent application was 4352 words long and will only serve our business for maximum 10 years.