

**Executive Summary of Submitted Information**  
**BEFORE THE** Southland Regional Council – Environment Southland  
**IN THE MATTER OF** Southland Water and Land Plan

Stephanie and Kenneth Blakely  
Hamish and Hannah Blakely

*'Tomogalak Run'*

**DATE:** 27<sup>th</sup> June 2017

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**Statement of**

Kenneth Bruce Anthony Blakely (Barney)

Stephanie Mary Elizabeth Blakely

Hamish John Blakely

Hannah Grace Blakely

Good morning

Submitter No: 80, 81

Submitter Name:

BLAKELY, Barney, Hamish  
& Hannah

Date Received: 27 / 6 /17

My name is Hannah Blakely and I am speaking today on behalf of the Blakely family. I am going to briefly highlight the key points from our submitted evidence taken as read as well. We also have will talk to some of our original submission. We farm 1650 ha and 9,500 stock units collaboratively at Tomogalak Run. We have a separate 76 ha hogget block.

The acquirement of "Tomogalak Run" in 2002 meant taking on considerable debt levels and the pressure to ensure long term viability and sustainability is very volatile based on the market derivatives.

We farm to the environmental capability of the land and manage critical source areas. We reside outside of all water catchment zones.

We do not agree with some aspects in the original Proposed Water and Land Care Plan. We are not a one size fits all farm due to our size, scope and terrain.

The initial recommendations in the land and water care plan show a lack of understanding of hill country farm systems. The original plan unfairly penalises large scale extensive operations that already implement good environmental practises.

We wish to highlight the following rules from our submission and submitted evidence.

#### Rule 70

**The s42A report stock exclusion recommendations need to be ratified as they are more practical realistic and sustainable to our farming practice and inline with proposed government changes. but an addition made to rule 70 that excludes bedrock hillcountry from excluding stock from waterways.**

We have calculated that from the original recommendations we have to fence 45km of minor waterways(under.5m) and add a water scheme at a cost of \$2,730,000. We do not believe this will improve water quality. Fencing is our only exclusion option and therefore excludes sheep by default.

This is a significant capital outlay that is unobtainable. If the recommendations from the s42A report are not ratified, we will have no other alternative but to sell the farm.

#### Rule 23 Intensive Winter Grazing

**We strongly recommend the the 50ha ruling be changed to 10% of the total farm effective land.**

At Tomogalak Run we need 80 ha of crop every year. Setting the 50 ha have the opposite desired effect and hugely decrease water quality. We will not be applying for resource consent to winter capital stock. We have 76ha hogget block down the road on a separate title and will put in an additional 30ha of crop there. This is a hugely unsustainable and an unethical environmental land use practice.

It will also not stop a farmer with 100ha putting 50% of it into crop for intensive wintering. We see ourselves as caretakers of the land we will not be forced into becoming pillages of the land.

At Tomogalak Run, we will use our own judgment to guide what is an appropriate area to fence to restrict stock access to waterways on crop creating a buffer zone. The proposed setback distances in the s42A report are unrealistic when

incorporating the natural existing filtrating buffer-zones as outlined in our evidence. Farmers should be able to use their own judgments with monitoring.

## Rule 25 – Cultivation on sloping ground

We OPPOSE this.

**Only new development that has not been previously cultivated above a 20 degrees slope should be subject to resource consent.**

Traditional farming practices should not have to be modified because of the environmental impact of land that have been developed, intensified and diversified if they are not resulting in environmental degradation.

The Southland Economic report states Adapting and applying good management practices to suit the land, farming practices and business requirements has been shown to minimise these losses to a greater extent.

Rule 20 - Appendix N Farm Environment Plan – In the S42a report, the environment plan needs to exclude all sheep and beef farmers from completing a nutrient budget who have no more than 10% of intensive winter grazing. The recommendations in the s42a report currently penalise extensive and traditional large sheep and beef farms. There no proven reductions in water quality, or management of environmental mitigations and risks in a 400 hectare farm wintering their capital stock on 20 hectares with a intensive stocking rate and not completing a nutrient budget, than our property of 1650 ha wintering capital stock on 80ha. Deer wallowing and pacing create far more environmental impacts than extensive hill country farms like ours. But we are expected to pay over \$5,000 dollars for a nutrient budget using overseer. This was the cost of each farm unit involved in the Southland Economic Study.

The Southland Economic Survey validates this by stating states *Nitrogen losses from an extensive property with predominantly sheep and some beef cattle is generally low because of the lower concentrations of nitrogen in sheep urine and the large area of the farm.*

Emma Moran clarified a few aspects from the economic report for us. Three sheep and beef farms including Awatere Station a similar farm type to us were so complex they were unable to be modelled realistically in OVERSEER® As they were complex farm systems.

*When modelled in OVERSEER, all three farms produced the same error message – “excess feeding to a stock class in a month”. This ‘bug’ is well-known to OVERSEER users, It was accepted that these farms could not be modelled in OVERSEER Version 6.2.0, without significant manipulation of the base file.*

She felt that from her research findings that you cannot expect every farm to fit into overseer.

*This result indicates that the ability to accurately represent some drystock farms in OVERSEER is an important consideration for its use in policy.*

Therefore, we feel overseer must be removed as a tool for nutrient budget requirements. A purpose it was never designed for.

We propose that a collaborative approach to mitigating environmental effect on water quality on farms be developed. Environment Southland need to stop practises such as the fly overs on Sunday afternoons which I question the legality of. They need to take a note out of Work Safes book to develop environmental plans.

If we can handle health and safety, we farmers have the mental capacity to handle environmental management. Some farmers may refer to these practises as common sense. Environment Southland needs to engage farmers at a level that respects their knowledge and understanding of their land. Create a steering body with representatives from different farm types as well as environmental advisors. Develop a simple generic template certified by beef and lamb, Dairy NZ and other farming bodies to record a simple plan for each farm type. Develop field days fronted by a farming bodies such as Beef and Lamb and invite farmers with similar farming types to engage. Alternatively consult and visit farm discussion groups. Provide examples of best management practises and how to mitigate environmental challenges in non scientific language. Care about us as farmers. We do not want farmers burying their heads as we cannot obtain or meet the unrealistic resource management guidelines. We don't want farmer to stop developing environmental practises with fear of persecution. Coming onto our property is a privilege not a right and farmers need respected with time to adapt to change. We want to empower responsibility for environmental management not breed fear.

We want the evidence that we are not holding the line. We know Tomogalak Run is more than meeting the aims and objectives in the environmental aims of the water and land care plan. We test our water ways by drinking it and swimming in them. There is no scientific evidence that our 3 farm outlets have ever exceeded acceptable nitrate levels. They have never been tested. We don't exist on Beacon.

In concluding we request that the hearing panel takes into account all aspects of our farming operation and our summited evidence, as it is imperative that we are able to balance our strong environmental management practices with being able to farm in a sustainable manner. It is imperative for Tomogalak Run to become a generational farm unit that these four essential principles we have outlined are adopted and ratified in the Land and Water Care Plan.

We know our land. We use good management practices to guide us in our everyday lives and what is appropriate for the environment. We will continue to be dedicated to protecting and caring for our waterways as we have been doing for our future generations.

*I would like to finish with a few words from my husband Hamish*

*"If one environmental ruling of fencing waterways is going to undermine and end one farmers dream he has worked towards for 48 years we must conclude that this is not a viable or balanced approach and includes a clear disregard or respect for this farmer's investment into their family, their environment and their farming future. It portrays alack of understanding or sympathy for this farmer's approach. \$2.3 million dollars worth posts and good old number 8 wire is never going to create best practice for water quality on our farm. If there is no equality why are we bothering farming here?"* Hamish Blakely – second generation farmer Tomogalak Run

We will now answer any questions the panel may have.  
Thank you