

I am George Smith and farm the property 'Tamlet', of 705 acres, with my wife Kathryn, son Hamish and his wife Karen. My grandfather John Smith purchased 'Tamlet', situated on the Wyndham Ridges, in 1913 and was then succeeded by his son Walter who was my father. Hamish's son Caleb is the 5<sup>th</sup> generation. The property was a dairy farm from 1910-1944, supplying the Oware Dairy Factory. Since the war, sheep and a few beef cattle have been farmed and we now operate Coopworth, Romney and Texel Studs and a small number of beef cattle. We soil test regularly to apply what is needed to produce sustainably.

**This land has been in our family for over 100 years as have 10 other properties in our**

**Mimihau district.** Stability like this proves that no generation has been careless in their stewardship of their land but passed it on to the next generation as a productive asset.

A farm in our Wyndham area won the Balance Farm Environment National Award and a block they farm, neighbours us and is typical of our Mimihau area.

**We have extended the original farm** with a steeper 131 acres further up the Waiarikiki Road and Hamish purchased a further 126 acres at Doctor's Road Two duck ponds are fenced off on these. Native bush stands exist on the Waiarikiki Rd section. Small creeks intersect our 3 properties mostly less than a foot in width. All are clean running, have life in them and there is no flooding problem. Our land being on the ridges is quite steep in places, but is, or was without these rules, mostly able to be cultivated.

We all-grass wintered for about 30 years but since then we have used the spray and pray technique and prefer to leave grass on the paddock as this method shelters young seeds from sun, prevents soil run off in heavy rain and is a good way to preserve humates.

We know that water quality is paramount and that every effort should be made to preserve this precious commodity and pass on the land in good condition to the next generation.

**1. We are custodians for future generations and try to farm accordingly.** We appreciate the Three Rivers Catchment Group and meetings they organise locally to educate farmers. We would prefer as Nick Smith suggested to work "**catchment by catchment**" rather than rules for the whole region where there may be no need for them and they may not achieve the desired result. **We suggested testing water entering and leaving properties in our original submission and that work should be based on individual catchments. Please look at this option.** Water has been tested for over 10 years in the Mimihau River at the bridge and at Venlaw with very different results. An adjoining stream originates in Otago and is therefore outside this jurisdiction. If we could locate where problems are occurring then as a district we could work together to remedy the situation. River testing without accurate rainfall figures tell nothing, nor do farm rules prevent pollution that may originate in forestry blocks because of more free soil being washed downstream during heavy rainfall. We need to first locate the problem before we apply costly requirements which will affect the economy of our province, devalue farmland and in some cases, make farming properties uneconomic. With low incomes, we do not need our assets devalued by rules. Environment Southland should call a local meeting of those in the Mimihau catchment and there would be good support to find scientific causes and solutions. **Engage with, rather than dictate to ratepayers. Farmers are keen to help as William Rolleston stated recently.**

## 2. Stock exclusion - Rule 70

**We support that sheep are not included in the stock exclusion rule.** They hate wet feet and will not walk into water willingly. Eric will know it is very difficult to get sheep to walk through a gateway where there is a puddle as they all try and find a way around it. Sheep graze banks of streams and are an asset in weed control keeping creeks and rivers attractive to tourists and readily accessible for fishermen. They should never be excluded from grazing river banks except in intensive winter grazing.

**Riparian strips are not the answer.** We have heard of riparian strips planted as directed and banks have fallen in because of heavy grass verges, thus blocking the streams. This expensive exercise left this farmer worse off financially and damaged the waterway.

**Gorse and broom are both nitrogen fixing and will be unrestrained in riparian strips.**

There will be increased nitrogen in streams. (40 for gorse and broom 36 for dairy).

No one wants spray to be applied in waterways but this would be the only means of control. Environment Southland knows how costly this exercise is in the Oreti and Aparima Rivers. Sprayed gorse and broom is an eyesore and will not add to the beauty of the area when increased tourism is being encouraged.

Fenced off rivers will detract from the appeal of our natural landscape and many parts of rivers that are fenced are now inaccessible for fishing.

**In a sheep and beef operation perhaps a low stocking rate of cattle could be allowed and exempt from the no cattle rule.** This allows integrated grazing for pasture and parasite management and prevents drench resistance.

**20 metres is too wide a margin to take around an insignificant 1 foot waterway on our property.** Slope varies along the waterway and nothing appears like the diagrams. There may be a dip in the land prior to the waterway but the overall slope is 16 degrees.

**Assessment of slope is not easy nor defined.**

**No type of fence should be imposed in the plan** as with the advent of virtual fencing or fenceless farming, stock can be controlled by a GPS- enabled collar using wireless to guide animals to remain within boundaries. This could be used easily on sheep and beef farms. Please don't impose rules that would prevent modernisation and progress.

**Tell us what nutrient levels you require on farm.**

See what is being achieved by the "Pathway for the Pomahaka" where farmers volunteer and work together to understand why there are peaks and fluctuations in nutrient levels. Their project was joint winner in the NZ River Awards on Nov 26, 2016. Great publicity for a clean green NZ rather than negative attitudes caused by rules from the WALP imposition. It is not an exact science so we would be better to solve the problems together rather than set rules that may not achieve a desired result.

We suggest you set up a trial **Mimihau Catchment Water Care Group** to test results before applying this concept to the wider area. Use this small district stability and responsibility to achieve results and dispense with the rules until we can prove an improved environmental impact without them.

### **3. Intensive Winter Grazing – Policy 16 Rule 23**

**We appreciate that a definition of intensive winter grazing has been added in s42A to exclude pasture and cereal crops.**

The setback distances are too restrictive for a sheep operation. 455 submissions critical on this matter need to be taken seriously. They were not made for no reason.

The current RWP setback of 3 metres is consistent and fair to all farmers regardless whether they had a permanent fence prior to 3 June 2016. 10 metres is sufficient for greater than 9 degrees. If the suggested rules were implemented we would lose 70 acres of land on our home block to cultivation and winter grazing. This is theft without compensation. Who sprays and maintains this verge which is confiscated from the farming operation? Can we send the bill to Environment Southland?

**There needs to be a differentiation on the type of stock intensively winter grazed as there is a huge difference between 100 sheep and 100 cattle. Could you please alter the buffers to 3 and 10 metres for sheep intensively grazed?** There is some research information suggesting that it is not the buffer zone but the density and class of stock that causes problems. Apply research before rules.

In adverse wet weather, we can move stock to an area formerly used as a sheep wintering pad where stock have shelter, water and can be fed without overgrazing the winter break. Farmers are environmentalists and care deeply for the land they farm, keep our costs to a minimum and allow us to use the land we have purchased. There is no extra in farming incomes without product price rises.

### **4. Tile drains –Policy 30 Rule 13 Appendix N**

**We object to the requirement to map all tile drains.** While we are aware of some tile drains laid 100 years ago we cannot accurately find all drains despite wanting to. I know of a property where a farmer dug by hand 11 miles of drains and doubt that the present farmer is aware of them. Many people have gone onto new properties and will have no way of complying with this rule. How do you police an impossible rule?

**We support Beef & Lambs submission of mapping new and maintained drains. These are the drains farmers use and are aware of.**

**Discharge point contamination varies depending on the body of water it enters.**

Requiring no noticeable change in receiving waters 20 metres from discharge point is complicated. In a very small ditch it may show for a considerable distance, whereas if it entered a large river the effect would be negligible. Volume of discharge and the volume of the water body it joins are variables not allowed for in the plan.

Tile drains often show no colour as they are tapped into springs. Swales may have more colour but would often lie on the same line as the tile drain and distort the impression for the drain entering the waterway.

## 5. Cultivation on Slopes – Rule 25

All grass farming was the usual on our farm for about 30 years. This preserved the humates in the soil and caused no soil loss to waterways.

**Economically and environmentally we now need to renew pastures by planting sugar grasses that have been proven to reduce methane levels in sheep.**

We prefer to use a sequence of swedes, (pray and spray leaving a good thatch to protect young seeds emerging), and follow this with kale for perhaps 2 years before regrassing. It is more economic to have one paddock removed from the system than have two out of production.

This conflicts with the rule to renew pasture no more than once every 5 years. This paddock would not need renewal every 5 years.

We also submit that the land under cultivation would still be the same acreage to feed stock but not convenient, practical or economic if this sequence could not be followed.

**A proportion of our farm is over 20 degrees but poses no problem to waterways.**

We strongly believe the rule should not apply unless there is an adjacent waterway.

**The comment from the Soil Conservation Technical Handbook 2001 stating “59% of Southland soil is susceptible to surface erosion” needs to be understood in context.**

Our soil is deep, rich in organic matter and free draining unlike many parts of Eastern Southland which require intensive tile draining. It is not compacted by dairying or heavy machinery and has had very little cultivation. It is not flood prone nor on a fault line, nor is it volcanic soil. This farm was in grass when purchased over 100 years ago.

The criteria for the 59% susceptibility claim was;

soil that had been subject to tussock or crop burn off,

subject to overgrazing by rabbits or pests,

forestry dozing of steep slopes,

frequent cultivation,

a low infiltration rate of rainfall due to compacted soil,

or soil of sandy or volcanic origin.

Southland is a varied landscape and rules cannot be applied where they don't apply.

**The 20-degree rule makes no allowance for the remaining 41% of Southland.**

S42A should not have allowed this document to be accepted without clarification of its application to Southland. 509 submissions mostly opposing this rule are justified.

We need to be able to renew our pastures with low methane sugar grasses. Potentially 25% of our farm could be affected by these requirements and we would like the rule to include a percentage of pasture renewal over 20 degrees without consents.

## Farm Environment Plans – Rule 20

Sheep were farmed for many years without rivers being degraded and were swimmable.

We feel this is unnecessary bureaucracy and as ratepayers we are funding twice, first as a farm to produce the paperwork and then to cover costs of administration.