

Ivan

From: Deane Carson <deane@agribusiness.co.nz>
Sent: Monday, 11 September, 2017 3:41 p.m.
To: 'Ivan'; jolene@agribusiness.co.nz
Subject: Submission - notes.

Submitter No: 11

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Main Talking points for submission
They need narrowed.

Date Received: 14/9 /17

Before reading them it would be worthwhile reading the B+LNZ song sheet which summarises the rules will and the section 42A report.

<http://www.beeflambnz.com/sites/default/files/consultations/sub-pages/the-song-sheet-southland.pdf>

Thanks for time to consider our submission. We appreciate the immense effort required to weigh and balance everyone's views.

Farm Management Plans

- I am one of 2 independent approved trainers for B+LNZ LEPS *+ Jolene is accredited Nutrient Management + Sustainable milk plans*
- We view environmental plans favourably as they are a good education tool
- Experience suggests farmers farmers regulated to do EPs treat the process with some contempt limiting value.
- Adding extra regulation pressure and auditing will likely undermine the value of the plans. People are less likely to commit ideas and resources if they think they will be held accountable.
- We prefer the council to support FEPs. An example might be reducing rate costs of those that can complex an approved FEP. To reduce audit risks a third party could log completion records.
- We reject the section 42A report findings. *Empowering farmers to make change*

Physiographics

- We think this could be a useful education tool to help farmers make decisions
- However has still not been proven to be accurate at farm scale.
- As such there is a risk farmers will be untreated unfairly if it is used as a regulation tool
- With farm values at risk, we think this is very serious and should not be undertaken until the following occurs:
 - It has a known accuracy at farm scale
 - The public have had a chance to consider the application of the model and agree it is suitable
- We reject the section 42A recommendation that the tool is retained as a regulatory tool.

Intensive Winter Grazing

- Restricting wintering area is likely to have the following unintended consequences:
 - Drive intensification and nutrient use on crop areas around the 50ha/20ha mark
 - Push livestock onto land less suitable for wintering
- Restricting land that wintering based on size is unfair on those farmers with scale. The council is targeting farmers with scale rather than those that have impact. We consider this to be unfair.

We would pose that the council seeks to encourage farmers to do the following
Winter graze toward waterways

Graze the 3-20m area as the last bite
or controlled activity
(better definition of water is needed)

- If it is a must do rule - we suggest a percentage basis better targets the problem.
- We reject the section 42A report finding on this matter.

Cultivation on sloping Ground

- Waterways on sloping land have lower Sed, Ecoli, N and Phos - targeting some of our lowest impact farming
- Land over 20 degrees is in our experience some of the lowest intensity farmers with small returns
- Restricting the ability to use this land will drive it to Gorse/broom which has a much higher N output.
- Alternatively farmers may intensify with fertiliser to justify grazing pressure to keep gorse out.
- Regional data shows highest sediment losses occur in Winter. This does not coincide with P losses, therefore biggest sediment contributors are likely to be other sources - eg bank erosion as evidence would support.
- Slope measurement is complex and as slope can vary from cm to cm.
- The unintended consequences and costs are too high.
- We reject the section 42A report finding. It is still too limiting for steep slopes and complex to apply.

Stock exclusion

- Farmers report increased erosion when sheep are fenced from waterways. This will be an unintended consequence of fencing cattle from waterways.
- Bank erosions is considered the largest sediment contributor to estuaries as evidenced by research.
- We would encourage research into the stock exclusions sediment interaction before more is done.
- In the matter of ecoli a significant body of research shows wildfowl are a significant contributor to waterways. We would support further evidence into this matter.
- We reject the section 42A recommendation. This rule should be left to central Government.

General

- B+LNZ reports cash losses on Sheep and Beef Farms for the last couple of years. The affordability for major costs are not there.
- Releasing multiple contentious rules simultaneously can create trust challenges. We would encourage the Council to do a better job of utilising stakeholder groups in the future and to pace itself. Recent reporting has indicated 5yr improvements in Nitrate. LAWA NZ reports all contaminants are stable. Regionally the line is being held. Council reactions need to keep this perspective to sustain the economy and farmer trust.
- Complex rules to tackle complex issues often contain multiple unintended consequences or multiple loop holes. Often education is far more sensible to tackle complex issues.
- Issues like Stream bank erosion and wildfowl have been recorded as major pollution issues of waterways. If we keep spending money on minor contributions we will run out of money to deal with major contributions.

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Why rather than what
Empowering farmers, eg environment plans up but ...
Support catchment groups
farmers embrace technology as it becomes available
eg 4th effluent system
We have issues ~~about~~ with the section 32 report.
↳ not debated enough
↳ Arguably not done by truly independent qualified people.

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* I have had 30 years experience in farm management which is essentially change management

* What I have learnt is that to get real long term change requires empowerment - transformational management rather than transactional management
- why rather than what

* Ideas for improvement have to come from farmers themselves rather than being forced upon them - that is why we are advocates for catchment groups where farmers can have effective input & control

* Although we are in favour of L.P.s these need to be ~~done~~ initiated by farmers themselves - We have heard of examples ---

* Farmers have always embraced technology when it comes along so we need to encourage good science based technology

* We have had issues with the section 32 report. We do not believe it is anywhere near detailed enough to show true impacts of proposed changes nor has been carried out by what we would call independent parties.

Yours sincerely,



Deane Carson
Director



Ivan Lines
Director

Bibliography

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