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**Proposed Canterbury Land and Water Regional Plan
Submission of
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Introduction

My name is Andrea Chalmers. I farm in partnership with my husband Neville, Parkfields, a 650 hectare farm at Flemington, south east of Ashburton. Parkfields is a combination of several blocks but is operated and managed as one farm. There is a distance of 8km separating the main two blocks. We are predominately arable farming (400 hectares) - growing cereals, peas, ryegrass and specialist crops as in vegetable seed reproduction but also farm sheep, jersey bulls, and graze dairy stock on contract.

Farmers all want to leave their land to the next generation in a good healthy state, and that we want our grandchildren to enjoy what we enjoyed as children. We understand the requirements to grow good produce whether it is arable or stock, you need a healthy environment of healthy soils and clean water. We don't dispute the need of policy or rules, but ask that these policies and rules are made on good science, practicality of implementation, economics and common sense .

Agriculture plays an important economic role in both Canterbury and New Zealand and New Zealand farmers are internationally known as "great innovated farmers" and the ability to remain innovated is essential. We need to have the ability to grow our business to meet market demands, in timely fashion and not be hindered by complex consent requirements that discourages new and exciting opportunities. Nor do we want to spend our days filling out forms.

We acknowledge that a lot of good work is being done by industry related groups in regards to the scientific and the technical side of the plan therefore I present this submission from the view of someone who is going to live and work with the Canterbury Land and Water Regional Plan 24/7, 52 weeks of the year.

Since the concept of the above plan, I have regularly attend public and industry related meetings on the above proposed plan including Ashburton Zone Committee meetings, Hinds Limit Setting workshops, and meetings organised by Federated Farmers, FAR, Ravensdown, Rabobank, and Ashburton District Council. I consider that I have a reasonable understanding of the proposed plan.

The following are comments on the Officer's Report

Definitions

Changed – I note that the definition of "changed" is now recommended to include:

4. *Greater than a 20% increase in the annual horticultural or arable yield, compared with the annual horticultural or arable yield averaged over the period 1 July 2011 to 30 June 2013.*

My question is what is "arable yield"? Is it a change of 20% in cereal yield, pulse yield, small seed yield or in total hectares? Therefore we would like to see "yield" replaced by "cropping hectares". A "change" should be a change in farm practice ie stock to arable to dairy to horticultural etc.

Site vs Property – On Page 76 it under "The difference between 'site' and 'property'", it states that the recommendation proposed in the Volume 1 Report for the definition of property is that land holdings to be adjacent. Our farm which we farm as one, would be considered two properties due to the blocks not being adjacent. This definition deeply concerns us due to the increase in additional work load in splitting one enterprise into two units, for compliance paper work, the financial costs of having two separate Farm plans for the one farm operation that operates over non adjacent blocks yet are farm as one and which stock and produce moving freely and regularly between. A property should include all land titles in an identity, whether adjacent or not as in Animal Health Farm identification, NAIT etc.

Section 42a

Volume 2 for Hearing Group 2 Officer's Report

Report Number R13/11 – Matthew McCallum- Clark

Offal Pits and On Site Refuse Disposal Pits (5.29 and 5.31)

While I did not submit on the Offal/On Site Refuse Disposal Pits I have noted the following recommended change in the rule "*The discharge does not occur: Within 50 metres of a surface*

water body, a bore used for water abstraction” etc. has been altered to read “within 100 metres of a surface water body”

We object to this change from 50m to 100m as this could mean that offal pits are sited into paddocks which would hinder farm business, be a safety hazard, and totally impractical. For Policy 5.33 and 5.34, *“the discharge of animal waste, or vegetative material containing animal excrement including from an intensive farming process”* and policy 5.35 and 5.6 Stock Holding Areas, has the distance is 20 mt of a surface water body etc unless areas defined in schedule 17 is 50 mt. For policy 5.37a the policy for silage pit or stockpiling of fermenting or decaying organic matter has been altered from 20 mt to 50mt. We would like to see the distance go back to 50 mts.

Fertilizers

5.52 (land based application) and 5.53 (aerial based application) states that *“there is no fertiliser discharged when there is water ponding on the surface of the land”*. We would like this to read *“there is no fertilizer discharged when there is water flowing on the surface of the land”*.

On land with heavy soils or uneven land, ponding does occur within our crop and pasture paddocks, Minor ponding can last for several days. Crops need nutrients at precise stages through their growth cycles and it is critical that they receive them at the correct times to ensure optimum take of applied nutrients along with getting optimum yields. It is only movement of water that may transfer nutrients to another site where they may not be needed. Aerial application is required when the land would be damaged through the use of surface vehicles in extreme seasons.

Overseer

The most recent meeting I attended regarding the proposed Plan was April 17 for Ravensdown’s shareholders in which the three main speakers were Mr Leo Fietje (Ecan), Dr Ants Roberts (Ravensdown) and Dr Roger Williams from FAR. This meeting was mainly on nutrient management and the use of Overseer. I admit that after attending this meeting and clarifying some points and then reading Environment Canterbury’s Officers Report, our (Parkfields) requirements regarding Overseer before and after 2017 is still confusing.

I have had a little experience with Overseer when we owned a dairy farm a few years ago and we used Overseer for our nutrient programming. Overseer works great in the dairy situation however with it still being developed for arable farms, there is understandably concern regarding the validation of the cropping model. There has been many mixed messages and conflicting advice

regarding Overseer to farmers. In the past two weeks we have been advised to use Overseer by Opus, our Ravensdown's Rep advised us that they have stopped doing them for arable clients as it was still being improved, and at the April 17th Ravensdown's meeting it was advised not to worry about beginning Overseer if we don't intend to "change" farming practices before 2017, but then reading the Officer's report, I feel as though we should be recording as we need to know our nutrient leaching (4.30 pg 92) *"Until 1 July 2017 the loss of nitrogen to water from existing farm activities will be minimized by raising awareness of the actions and activities that give rise to these discharges and the effects of these discharges on the environment and of a result of these nitrogen discharges being recorded by each farm enterprise."*

On Saturday, we downloaded Overseer and started loading information. Overseer requires you to allocate your farm into "blocks" crop, pasture, fodder and house. You then need to indicate what was grown on each block for the previous year or two as history. As our farm that has all three, mixed throughout the property depending on rotation etc, it appears that we will need to make each paddock a "block" as very few paddocks have the same history. When you have 40+ paddocks where all three farming types are intermixed, you can imagine what the stress level was like. Having to break down in monthly irrigation totals for some blocks and not others is going to be so time consuming and for what advantage? With many paddocks potentially having 5 crops over the base years for 2011/2013 and then accounting for stock movements etc the mind boggles with how much work is required to go back and locate all the information required. There are some questions that just seem totally irrelevant ie Sheep – how much greasy wool is produced, the house block – the % in garden and vegetables. Is this % required for urban sections?

Overseer needs to be user friendly for the farmer if it is to be used as a management tool in budgeting nutrient losses. I understand that it is not designed to be used on a regular basis, more as a yearly overview and not to be used on daily basis to make decisions. Also it must be remembered that a budget is a plan – and plans can and do change due to weather conditions, market conditions, financial reasons.

We are concerned that the base years quoted are 2011-2013 as originally at the first meetings I attended it was always quoted as 2009- 2013 and it was only after the plan was printed that it was realised that it had been reduced to two years. Many feel that for an arable situation, 4 – 5 years would give a more accurate picture.

My biggest concern is how Overseer is going to be regarded by Ecan. Dr Ants Roberts who has been involved in the designing of Overseer since it's conception in 1992 and Dr Roger Williams of FAR of which recently reviewed Overseer from the arable point of view both stated at the recent meeting that that Overseer should not be used by Regional Councils as a regulator measure but as a management tool to manage nutrients. I understand that Overseer is a model not intended for regular updating – more of once a year tool. So while an Overseer budget may be included in the Farm Management Plan, it is just a budget and this be recognized in the auditing process.

Hinds Limit Setting Workshops

I have attended all the workshops in the Hinds Valetta area. I appreciate the opportunity that we have been given to be involved in the limit setting process. I sincerely hope that the outcomes and suggestions from this group is taken into consideration when sub region limits are recommended to the regional council as many people have given many hours of their time to be involved. I believe processes like these workshops, where Council and public are working together benefits everyone.

In Summary

There are four pillars to the Plan as I understand – Environment, Economic, Social and Cultural. A lot of the plan has been written on the environment aspect, little on the social, economic or cultural aspects. It must be recognized that all four aspects are inter-rated. We must not forget about the economics, social or cultural viability for the people of Canterbury and New Zealand.

Farmers are price takers. We farm to what the market requires and when it requires it. We can-not increase the price of our produce to pay for improvements to our farming practice; the only way we can do this is by increasing production. In 1989 we received \$300 tonne for milling wheat which we harvested at 5.5 tonne/ha. 2012 harvest we are receiving \$400 tonne with yields averaging 11.5 tonne/ha. When you consider what power, fuel, wages costs were back then; there is no way we would still be farming at the yields we received back then. Yields have had to increase to pay for inflation and this has been done with science and management (weed/pest control, fertilizer and water).

We do not farm like we did in the 80's, 90's or 2000's or even 5 years ago. Our crops vary year to year, depending on price and market requirements. Stocking and the type of stock also varies. Back in the 1980's we farmed 2500 ewes, now we are down to 200. In the past beef cattle were brought to fatten, we have farmed deer and traded lambs but now we graze young dairy stock on contract.

The monthly grazing cheque is great for cash flow as some crop payments can now be paid 18 – 20 months after planting.

It is with this ability to grow what the market requires, when it requires it which has allowed us to continue to farm profitably. By farming profitably, it is allowing us to improve our farming techniques. Over the past three years, we have replaced some of our roto rainer irrigators with 3 laterals, providing more efficient use of water. These lateral machines are not cheap, each exercise costing approx. \$200,000 for plant and development. Soil management is also improving by using equipment that encourages less cultivation and working of the soils by incorporating straw and reducing stubble burning area. However this equipment is not cheap either and over the past few years would have invested over \$400,000 to enable minimal tillage. Yes, there is more technology we could be using and as equipment is upgraded and when finance allows, then these technologies will be incorporated into our farming programme. By limiting our yields and production through input control (using “models”) will have financial consequences thus slowing down the investment into latest technology. There needs to be sensible compromises.

Winter grazing of dairy cows during June, July and August has been a factor of why we have been able to introduce efficiency into our farming practice as grazing brings in a reliable source of income, especially if we experience several weather conditions ie hail, drought, wind, rain storms within our arable enterprise. How winter grazing is going to meet requirements is still an unknown to us. While feed pads with cut and carry may seem an answer in theory, in practical terms, there are the issues of where these are put, who carries the cost (quite substantial) and the cost (environmentally) of the harvest/transportation of the crop etc. Canterbury has a large dairy population and the wintering of these animals is no small exercise. It needs to be accepted that many of the desirable measures will need an acceptable lead –in time period by all parties.

There are many good farmers in Canterbury who run family operations. They farm by their knowledge that they have built up over a lifetime, from their peers, by reading papers, attending field days, from their farm consultant. They have an inner sense. You must be able to adapt to the conditions of the time – a manual or procedure policy should be used as a guideline only. It is no different than that of a passionate urban gardener who can tell when their garden needs a water, a boost of fertilizer or their lawn needs a top dress. Yet the sudden expectation for farmers in regards to Overseer, Farm Environment Plans and audits will cause stress, increased anxiety and depression.

Farmers are practical people and farming is practical work. The majority of farms are family owned and operated, employing extra labour to help with the manual work. That is NZ farming. Yes, there does need to be policies and rules, but not to the extent where the excess form filling, increase work/stress load and financial commitments in regulatory compliances (including NAIT, Health & Safety etc) leads to the demise of the family farm. The farm office may have moved from the kitchen table to the spare bedroom or the converted laundry, but the person running the office has stayed the same. Having seen a template of a Farm Environment Plan to meet requirements of the proposed plan has made us question “holy hell, why are we farming”. Much of what is required, only the farmer can do as it is they who do all the work and have the knowledge to be able to answer or record what is required yet you can’t farm from the office as stock need to be feed, crops planted. Looking at the template we are thinking a day a month just to meet these requirements yet the workload outside hasn’t decreased. Just because something can be measured and recorded doesn’t mean that it has to be. Common sense in essential information needs to prevail as time and finance is better of being put into practical use than satisfying the requirements on paper. Overburden by compliance will take the enjoyment out of farming and once you lose enthusiasm for what you love doing, you stop doing things right.

Rural suicide rate is 16/100,000 compared to urban suicide rate of 11/100,000. Long hours, isolation, fluctuating financial returns, debt, weather, regulations and the workload are all factors. Additional pressures lead to stress, increased anxiety and depression which, left untreated, can lead to suicide.

It is widely acknowledged that by 2050 the estimated world population will have increased by 2.5 billion people, requiring an extra 50 – 70% food. NZ and Canterbury is a strong position to be part of providing this, by producing seeds and agricultural products. We have good soils, favorable climate and accessible water. The key is water storage along with sensible management of resources that allows all four pillars (economic, environment, social and cultural) to be in proportional balance. Make the rules too tough, then Canterbury is in danger of be unable to take advantage of the opportunities that are out there.

Finally as a side note since 1999 we have been involved in an international rural work placement organisation and have employed young farmers from the UK, Denmark, Germany, Sweden and Canada along with travelling to these countries and talking with their peers. One of the reasons

they choose to come to New Zealand is to learn our farming systems, and learn how NZ farmers are able to farm profitably without the help of European/American subsidies or tariffs. They are envious of how we are able to farm in a way that allows innovation, the ability to trial the latest methods and to allow good farmers succeed after all, our land and farm is our major asset and livelihood so why would we want to degrade and devalue it.

Thank you.