

Tabled at Hearing 09/05/2013.
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BEFORE THE

Canterbury Regional
Council

IN THE MATTER OF

the Resource Management
Act 1991 and the
Environment Canterbury
(Temporary Commissioners
and Improved Water
Management) Act 2010

AND

IN THE MATTER OF

the hearing of submissions
on the Proposed Canterbury
Land and Water Regional
Plan

STATEMENT OF EVIDENCE ON BEHALF OF CASTLERIDGE STATION LTD

Dated 6 May 2013

Introduction

My name is Kerry Harmer; I am a director of the Harmer family owned and operated property Castleridge Station Ltd

I hold a B Ag Sc 1st class honours in Farm Management from Lincoln University, and have been a farm consultant for the past 20 years, employed by Agriculture New Zealand, MAF Policy, Agriculture ITO and self-employed over that period.

I am currently a full time farmer, mother of three, secretary of Mt Somers Springburn School Board of Trustees, a Trustee for the Mid Canterbury Federated Farmers Charitable Trust, involved with the High Country Land Managers Group, and a member of the Mid Canterbury and High Country branches of Federated Farmers.

I have previously had extensive consultancy experience with all groups of farmers, in particular facilitation work and high country matters. I served as chair of the mid Canterbury high country branch of federated farmers and on the South Island High Country Committee.

I have significant experience in the district planning process having been involved in two Ashburton District plans and previous regional natural resource plan processes.

Castleridge station is just over 5800ha, a summer dry, non-irrigated high country property running approximately 25000 stock units made up of sheep, beef and deer breeding stock in the Ashburton Gorge. A large part of the property has been identified as being in a sensitive lakes zone. It is part of one of the older properties farmed in Mid Canterbury and was one of the first in Canterbury to have wire fences and experimented with irrigation in the 1800's, well before any irrigation on the plains.

We are a strong family oriented operation producing the best store stock possible and aiming to ensure that the environment we live in is able to support future generations of our family, with a focus on sustainability both environmentally and economically. We embrace new technology such as direct drilling for soil conservation and aim to minimise our impact on the environment in as many ways as possible.

Our strong sustainability ethic is borne out by the good working relationship we have with DOC Geraldine, our biggest neighbour, allowing significant access (often multiple groups on the same day) over our property and working together on weed and pest control as well as fencing projects such as riparian fencing of the Maori Lakes outlet stream.

We were one of three landowners who secured Clent Hills Station and brokered a deal to enable the Nature Heritage Fund to purchase a significant portion which began the Hakatere Conservation Area.

It would be impossible to live and farm in our environment and not look after it, our economic success is intertwined with careful management of the natural resources around us.

General Submission

The focus of the current proposed LWP took us by surprise as sensitive lakes zones had not been mentioned in earlier stages of the plans development and appeared at notification with no ability to comment other than through the submission process.

We had hoped that the new plan would be a collaborative approach to managing the regions resources, with individual solutions being brokered with partnerships on the ground for targeted areas, as we are becoming accustomed to with working with the likes of DOC.

What we got when we first saw the notified plan was a blunt regulatory instrument where by a resource consent would be required after 2017 in a sensitive lakes zone, regardless of environmental management or water quality measurements. This approach does nothing to encourage support within the community and it has taken over 12 months to try to forge some meaningful partnerships which might enable us to start making progress, after some pretty heated initial meetings. To be seen as guilty until proven innocent was probably not the best way forward!

This plan should have the ability for farmers to assess their own property and come up with workable solutions, something the regulatory consent process has never yet been able to achieve. This is the way forward for innovation in the high country, not properties being required to get a raft of resource consents for every small thing they need to do in normal day to day farm operations.

I have presented today on the proposed plan as it stands, with references to the s42 report where required, because we feel the regional council needs to understand not only how impossible it would be to farm under the proposed plan, but also that it will not achieve the objectives and outcomes for water and land that we all want.

Section Two Definitions:

Site and property.

The proposed plan definition of "site" as a legal title is very unworkable in a high country situation for a number of rules, such as 5.29- offal pits and 5.31 on site refuse. To only allow one pit per site means one offal pit on thousands of hectares in some cases, with a number of kilometres distance involved. The inability to move refuse from one site to another also causes issues where it is common to have a small freehold title around the homestead and one large leasehold title over the rest of the farm. The s42 report has addressed these issues in the main and Castleridge feels they will now accommodate the need to shift refuse and have multiple offal pits on one property, if accepted by the council.

The definition of property allowing for those adjacent which are run by the same entity, also suggested by the s42 report, enables operations such as ours where three parts of properties were combined and are run together to be addressed as they should be, which is as one.

Definition of stock holding area

The proposed plan definition captured activities which we do not believe were intended. On a property our size shearing can take 14-16 days, which would trigger the definition because there is no clarification as to how much of a day stock need to spend in the yards to be in the "day" period. The suggested changes to use 24 hour periods should go some way to helping this situation as stock simply moving through in and out within a working day we don't believe is what this definition was trying to capture. We therefore would like to see an amended definition used.

Section 4 Policies

Livestock exclusions from water bodies.

This will always be a very difficult situation for high country farming and the broad brush approach of absolute exclusion as in the proposed plan is never going to work on the ground.

Because of a number of factors, stock of all sorts cannot simply be removed from every natural water source in these areas. While it is possible to minimise stock access in some areas, others will always need either stock movement across water, or access to drinking water.

Our property is a classic example of this for a number of reasons. The first is simply topography, there are large numbers of small streams, seepages, and springs etc. running on the hill blocks that all three classes of stock (sheep, cattle and deer) are on. It would be physically impossible to totally fence these off and allow stock movement on and between blocks without moving through water at some point.

Alternative stock water options are only able to be used in some areas. We have some trough systems in place and for example last winter we had one -12 frost out of the blue. The troughs had 10-15cm of ice on them the next morning, impossible to break the ice to water all stock if all stock were relying on troughs.

We get frosts in any month of the year and at least 50-80 hard frosts a winter. It would be impossible from an animal welfare point to only provide water via troughs in winter as we could not physically keep water up to all stock. We must be able to provide clean drinking water to all stock at all times.

Damage to banks etc. is often greater when stock is only given one point of access in a confined area. With big paddocks/blocks the stock are able to spread along a waterway and damage is minimal as the intensity of crossing/drinking is very low, ensuring clarity of the water and minimal pugging. If only one watering point is provided a large number of animals will mill around in the same spot, causing more discoloration and sediment movement. Gentleman Smith stream runs through our property and Fish and Game have on a number of occasions commented on the high quality of water and riparian edge condition, yet we have allowed cattle extensive, non-pressured grazing for the past 20 years along that area.

It seems to us that individual solutions worked through a farm environment plan is a much better way to deal with these issues than the resource consent process which is expensive and report based which often does not see people actually using practical common sense solutions.

The s42 report (pg61) policy 4.26 has attempted to address these issues, and in most cases enables stock on hill country. It doesn't however address the occasional need to allow stock access for weed control or limited drinking water, and lacks a definition of what a "sensitive" area is. It also doesn't allow for careful, managed cattle or deer access without consent, despite it being part of the farm environment plan process. We would like to see this addressed by not requiring absolute exclusion or consents for sensible situations.

Nutrient Management

Rather than going through our submission in detail on this topic we felt it would be better to cover the main points of difficulty, the reasons why and show you some examples on the ground so to speak.

The following section refers therefore to the rules 5.39-5.51 and schedule 7: Farm Environment Plans.

We are all well aware that changes to water quality are going to take time and it seems an extreme view to require audits of farm plans and nutrient budgets every 12 months in an environment where inputs and outputs can take a number of years to move through the soil profile or down catchments etc. There appears to be support from within industry (e.g. Ravensdown) that some of this monitoring should only be every 3 years. Other industry quality assurance programmes that we are involved in, such as CMP certified farm assured, ZQue (Merino New Zealand), TB testing etc. use a three year audit programme and we feel the farm environment plans should be the same, especially as there will be a property borne cost to the audit process.

The Ashburton gorge sensitive lakes zone contains 4 main farm properties and DOC as landowners of the surrounding catchments. We have worked closely with DOC over the past 8 years and are now engaging in good dialogue with the Ashburton Zone Committee because we believe that the best way to get good water outcomes for the area is for the small number of affected parties to work together to gain useful enduring solutions.

This process will only continue to make progress if all parties are considered to be in a trusting setting. The proposed plan with its requirement to gain consent to farm is not in our opinion a trusting environment to make progress. The s42 report suggests loosening the consent requirement if a suitable farm environment plan has been prepared and we support this.

The s42 report has addressed a large number of our concerns but it doesn't acknowledge some of the overriding principles that are at stake.

As the proposed plan stands the economic sustainability of our property is at risk. The cost of compliance, to gain consents on a regular basis, prepare and get audited farm environment plans every year, not to mention obvious changes required such as fencing etc. on top of standard farm weed and pest budgets, other district and regional rates etc. mean a huge financial burden is being placed on a small number of individuals. We see little for our rates as it is, the lakes in question are not drinking or swimming sites, but water quality is important for recreational use and flora and fauna. This means it is for all people in Canterbury, yet the cost is falling squarely on

a small number of individuals, who are not the sole reason for the water being the way it is.

The Maori Lakes is a good example as it is a shallow sediment filled lake, easily stirred up in a normal nor westerly wind. There is a significant bird population, up to 400 Canada geese and 3-400 paradise ducks on top of a large population of swans and smaller ducks. Even without farming in the area this lake would have naturally higher levels of nitrate than a larger, deeper lake such as Lake Heron because of constant stirring of sediment off the bottom.

There are a number of research papers in Canada and the United States where small shallow lakes are contaminated by birds, predominantly geese and their effect has been effectively measured and is understood to be a contributor to the water quality of those lakes. We would like to see acknowledgement of the differences in lakes and their contributors.

Another issue we have is the plans disregard for any other sources of nutrient transfer other than from the surrounding farms. DOC is a significant landowner and not only is some of their land an extremely recent transfer from farming, but it also carries its own level of natural nutrient discharge.

Mineralisation and natural break down of vegetation, and other grazing animals such as rabbits, hares deer, birds etc. all contribute to the nutrient discharge into these sensitive lakes areas and throughout the catchments that feed them.

It is a fairly tough authority which chooses to make farming a non-complying activity in these areas if breaching a nutrient discharge level when nothing is monitored on the neighbouring land (proposed plan rule 5.49). We believe that this rule is too restrictive.

This type of consent approach has serious implications for farming in the high country, we cannot farm with certainty so our bankers are likely to place tougher constraints compared with farms elsewhere. There can be little development of a property, stifling innovation, efficiency and lifting performance as even in the s42 report a "change" is triggered by only a 10% increase in stock numbers, at which point a discretionary consent is required.

We believe this is far too stringent as it doesn't even restrict the grounds on which the consent is considered, making it very difficult and expensive to put a case forward that is likely to be accepted. This will impact on land value as properties are unable to reach their full potential.

The hard reality of living and farming in an extreme environment is that a few years we make a profit, most we break even and some we make a loss. If our budget starts filling up with consent applications, audit costs etc. then something has to give, it will be things like weed and pest control that start to drop, meaning a downward spiral and no genuine environmental improvement as is wanted.

A 10% shift in stock numbers is far too narrow in a practical situation. For every 1000 stock that is 100 more/less. A good farmer lifting lambing percent could trigger the threshold, as many merino farmers tend to keep all their merino lambs through the first year rather than selling as store lambs in the summer. Using our farm 25000su on 5800ha is 4.3su/ha, a lift of 10% equates to a shift of 0.4su/ha, hardly enough I would suggest to alter the environmental impact of the property, or to trigger a

discretionary consent process. We believe 10% is still too small as a threshold and 20% or a continued lift over a period of say 2 or 3 years is required rather than simply a shift of 10% from one year to the next. This narrow threshold will most definitely limit progress and productivity in the high country.

Conclusion

Overall we feel the s42 report has dealt with a number of the concerns outlined in our submission, but there remains a cloud over the level of rules associated with nutrient management, particularly in the area of consents, costs, auditing and acknowledging all sources of nutrient input.

The high country of Canterbury produces some of the highest quality merino wool in the world, is a significant source of prime beef for New Zealand and export use, has some of the larger deer breeding operations producing venison for local meat companies and produces an increasing proportion of Canterbury's lamb as more and more lowland properties shift to support the dairy industry.

Not only are we significant contributors to the primary production of the region but we support all the associated industry such as rural communities, towns, processors, schools etc.

We pay a significant proportion of rates based on land value compared with people closer to town who get domestic water, rubbish/recycling removal, road maintenance etc. We pay again to provide these services for ourselves on farm and may well now have to pay a third time through the resource consent process.

All This is done by a small group of people who get the mail once a week, have no cell phone coverage, organise, set up and pay fully their own internet services because we are the 0.2% that will never get funded access to these things.

We are feeling just a little bullied, contributing yet again to a lot of things that many will get the benefit from, paid for by a few.

All the while stifling the ingenuity, creativeness and flair that has enabled these farmers to farm in an extreme environment and continue to be innovative in their ways of dealing with whatever is thrown at them so that we can be proud to farm into the future in a way that works with and alongside our stunning natural resources and leaves the place as good if not better condition than when we arrived.

The regional council states its desire to progress development and economic wealth in our region, yet from where we sit we look like we are being made into a museum piece for the public to go for a Sunday drive and see in 100 years' time what it looks like now. Yet already it has changed in 100 years and will never be what it was, allow us to move forward into the future in a way that has all parties working together rather than by setting rules that stop activity in its tracks and keep the eye on the ball; " what is the environmental impact of this activity" rather than blanket rules that don't allow for innovation and sensible development.

References

The impact of Waterfowl on Water Quality; Fleming & Fraser; 2001, University of Guelph Ontario Canada