

Tabled at Hearing 08/05/2013

ECAN LAND AND WATER PLAN

EVIDENCE OF DAVID LESLIE ASHBY

- 1 My full name is DAVID LESLIE ASHBY. I am a dairy farmer running a 350 cow seasonal supply dairy farm on Plaskett Road, Rangiora.

I have been dairy farming my present property since 1993. Prior to this I was a farm consultant.

- 2 I am concerned on how the ECan Land and Water plan will affect the viability of my business. Generally I am supportive of the plan. Changes needed to happen to recognise the effects of intensive dairying on shallow soils previously utilised for dryland farming. The plan has a greater effect on farms on light soils than on heavy soils.

However, there may be some serious consequences including a loss of viability of some farms, a redistribution of wealth, widespread rural unemployment and social disruption.

- 3 The role of the Zone Committee is to set nutrient limits and levels for their zone. I believe this is about balancing jobs, economic growth and the environment. Nutrient zones (4.34-4.36). [Section 5 of the RMA.]

- 4 Each farm will be required to implement a Farm Environment Plan, the regular audit of that plan and to record on a per enterprise basis nitrogen discharges. Farmers will need to have extensive record keeping to comply with the audit.

My concern is who will prepare these plans, at what cost and who will audit them?

I am aware that Massey University is running intermediate and advanced courses to gain accreditation to complete nutrient budgets. In the interim there will simply not be enough people on the ground to complete these budgets and plans. At the moment fertiliser company representatives complete nutrient budgets for their clients but they have a clear conflict of interest. This, in my opinion, will create jobs for a number of people and another layer of compliance cost for my business. This has the potential to become another part of the RMA industry and may not ultimately prove to be a cost effective way to manage the use of land for water quality purposes.

5 I am concerned at the use of **OVERSEER TM** as a regulatory tool. **OVERSEER TM** is an animal nutrient model designed to calculate nutrient losses from the root zone, not to ground water. Like all other models **OVERSEER** is dependent upon the information put into it. Lincoln University has done considerable work on this and I am sure that **DAIRY NZ** will comment on this in their submission. My concern here is *rubbish in, rubbish out*, particularly when a person's livelihood depends on the outcome.

6 In terms of giving farmers certainty about what they can and cannot do and to achieve the levels of nitrogen leaching considered acceptable, it would be simpler to set totals for fertiliser applications and stocking rates for different soil types. All farmers should be carrying out Best Farming Practice.

If the Regional Council is determined to use **OVERSEER TM** as the main regulatory tool for achieving acceptable rates of leaching and nutrients, it would be advisable for Environment Canterbury to develop a set of threshold guidelines. These could be used to assist farmers who are uncertain about the results that they are generating on their farms.

If this alternative approach was included as part of the suite of regulations it would provide farmers with an alternative yardstick, if for some reason the **OVERSEER TM** calculations do not appear to do justice to their situation.

7 It is a waste of time and effort completing an annual nutrient budget. A nutrient budget every three years is more than adequate and reflects the time-frames nutrients move through the soil. It will also provide for seasonal variation, eg drought.

8 I believe considerable care must be taken in setting nutrient limits and allowances for catchments.

From a Dairy NZ study of the Selwyn Waihora Catchment 25% of dairy farms have negative cashflows at a \$6/kg MS payout.

It was calculated that nutrient restrictions would have an impact of up to 30c/kg MS which could result in 40% of dairy farms having negative cashflows. This could result in widespread unemployment and a redistribution of wealth. I am sure that Dairy NZ will develop this further in their submission.

9 I believe a lot more work needs to be completed before restrictions are put in place.

- I believe a cap on stocking rates to control discharges may be the simplest and easiest way to implement the plan. Most of the nutrient discharge is coming from animal urine. Over time this, in my opinion, will force cows indoors and consequently increase the cost of production and the cost of food.

- Limit nitrogen use with a cap of 200 kg N/ha/yr administered by an audit of fertiliser records.
- A nutrient budget using **OVERSEER TM** every three years will be a guide to nutrient discharges. **OVERSEER TM** is only primarily an animal nutrition tool, not a regulatory tool.
- Compulsory effluent storage (30–40 days) required on all dairy farms.
- Planned Riparian plantings that don't inhibit drainage flows and is assessable for weed control/growth.
- Monitoring catchments to ascertain actual nutrient loadings (2013-2017) and a cap applied and managed accordingly by the community.
- All land uses and farm types should come under these controls, not just dairy farmers.

Thank you.

D L Ashby