Janel Hau

From: John Grigg <j.grigg@haldonpastures.com>
Sent: Monday, 9 June 2014 8:36 a.m.
Subject: Submission to Selwyn/Te Waihora Variation
Attachments: Ecansub1210_A4.doc; LWRP1303.doc; SelwynLWRP1303.doc; Further Submission Form.doc

Categories: Purple Category

Dear sir/Madam,
I am currently in the UK and struggling to find a way to sign my Submission. My signature is on the original submission which I have attached and I will forward signed copies when I return on the 11th June. The attached email is also part of my submission.

Sorry for the inconvenience

Yours sincerely

John Grigg

-------- Original Message --------
Subject: Fwd: RE: Hello Keith,
Date: Mon, 26 May 2014 20:28:51 +1200
From: John Grigg <j.grigg@haldonpastures.com>
To:lakecoleridge@amuri.net

regards

John Grigg

-------- Original Message --------
Subject:RE: Hello Keith,
Date: Sat, 16 Mar 2013 00:53:35 +1300
From: Betteridge, Keith <keith.betteridge@agresearch.co.nz>
To: John Grigg <j.grigg@haldonpastures.com>

Hi John,
I am writing this from Japan where I am on a 2 week visit. I would very much like to be able to help you in a professional way, but I have only my impressions to pass on, in relation to sheep and waterways, as I only have reasonable data on cattle.

Sheep can get by on fewer drinks/day than cattle, and indeed if they are managed without water they can get by in most situations without water trough water, so I guess they would not go out of the way to go into streams for drinking.

I have never seen nor heard of sheep wallowing in water: deer yes and cattle rarely if ever, though they will stand in water
In my experience sheep do NOT stand in water
I am unaware of sheep eroding stream banks. In truly sheep-managed pastures, the turf is more dense than in cattle pasture, and thus resists treading damage to a greater degree than would a more open cattle pasture. Further, sheep have about half the loading (kg/m^2) than cattle so individually cattle would be much more damaging than sheep around stream banks.

I don't believe that sheep damage stream banks or stream beds, but I have no data to support this proposition.

The fact that there are no useful data available is in itself indicative that sheep cause little damage around unfenced streams.

Not particularly useful I'm afraid and I can understand why the question has been shuffled along to me. I don't know who to pass it to now!

Good luck and I hope this is of some use

Regards
Keith

From: John Grigg [mailto:j.grigg@haldonpastures.com]
Sent: Thursday, March 14, 2013 10:31 AM
To: Betteridge, Keith
Subject: Hello Keith,

Karin referred me to you with regard to some queries I have.

I am trying to find out if there has been any research on the behaviour of sheep around waterways. I am a Sheep and cropping farmer on the Canterbury Plains. I have the Hororata River through the Farm, the Selwyn River on one side and numerous Spring feed streams on the farm. I have personal knowledge of our own sheep's behaviour but I need some scientific knowledge or at least an experts opinion on the drinking and general behaviour around water.
I understand that there has been work on Cattle and deer as they are more destructive.

The main issues I am trying to answer are:

1/ Do Sheep wallow in water
2/ Do sheep avoid water except when drinking
3/ Do Sheep erode the banks of rivers
4/ Except when pushed such as intensive break feeding of feed crops do sheep cause significant damage to river and stream banks.

I am putting forward a submission to Environment Canterbury at the end of the Month.

I would appreciate you ideas on this matter

Regards

John Grigg
Sent from Windows Mail

FOR OFFICE USE ONLY

Submitter ID:

File No: PLAN/LWRP/DRFT/6SU/2

Environment Canterbury Regional Council
Kaunihera Taiao ki Waitaha

Submission on Proposed Canterbury Land and Water Regional Plan

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 5 October 2012 to:

Freepost 1201 Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

Full Name: JOHN MAURICE GRIGG **Phone (Hm):** 03 3180731

Organisation*: _____ **Phone (Wk):** "

* the organisation that this submission is made on behalf of

Postal Address: HALDON PASTURES, HORORATA **Phone (Cell):** 0274 577 642

R.D.2 DARFIELD **Postcode:** 7572

Email: j.grigg@haldonpastures.com **Fax:** 03 3180781

Contact name and postal address for service of person making submission (if different from above):

_____

_____

Trade Competition

Pursuant to Clause 6 of Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

a) adversely affects the environment; and
b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

☑ I could not gain an advantage in trade competition through this submission; or

☐ I could gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

☐ I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

☐ I am not directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Signature: J.R Grigg **Date:** 5 October 2012

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:
(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

☐ I do not wish to be heard in support of my submission; or

☑ I do wish to be heard in support of my submission; and if so,

☐ If others make a similar submission, I will consider presenting a joint case with them at the hearing.

This submission supports the submissions from Federated Farmers, Dunsandel Water Users Group and Irrigation NZ. In addition, I have a number of concerns regarding the proposed LWRP.
5.133. The inclusion of sheep in this rule will have serious effects to both my farming operation, and the river and wetlands. The Hororata River flows through the middle of the farm on the upper plains, and floods on a regular basis. High bank areas are fenced but there are numerous areas where the river would destroy fences when flooding. We have approximately 7 km of river, which would require 14km of fence. Being flat, flood gates are not practical. From experience temporary electric fencing does not work in a dry Canterbury summer with woolly sheep. I enclose pictures of our river managed by us with weed control and grazed by sheep.

Photo 1: Hororata River

Photo 2: Hororata river

Photo 3: Water race weir at Hororata River

Photo 4: Hororata River

Photo 5: Selwyn River

Photo 6: Selwyn River

Photo 7: Children playing in Hororata River

Photo 8: Children standing beside Selwyn River

The second picture is of the Selwyn River not managed by us and not grazed. Is this what these rules are promoting?! Sheep inherently avoid going into water, and thus cause minimal damage to the river banks unlike cattle, deer or pigs. If I have to fence off the river, the willingness and financial ability to control the weeds will be diminished. Also my ability to maintain the erosion, and flood protection will be more time consuming and expensive due to all the fences.

The other issue is the fire risk. This rule will leave long vegetation along the river, so I will be left with no choice but to exclude fishermen from the river (there is no Queens Chain on my section of the river) and inform my insurers that Environment Canterbury is liable for any fire that gets out of the river due to this stock exclusion policy.

I have no issue with keeping sheep out of waterways when on a break fed crop. We have irrigation near the river and that is all fenced off from the river.

Photo 9: Haldon Pastures Spring fed stream

We also have about the same area of spring fed streams (another 14km) we have been working with DOC to help retain the Canterbury mudfish in this area (Photos 9 & 10). DOC has been poisoning the willows. Photos 11 & 12 show poisoned willows that have collapsed. Again a permanent fence would have been damaged. We have some areas fenced but not all. We have preserved this area since my Grandfather bought it in 1925. No cattle have been in there since then. It has a 4/5 on the ecological survey with the current management. We manage this area to allow the streams to flow and fully permanent fences would make it very difficult and expensive. Swampy plants have evolved to choke up waterways and to be able to farm along side these streams a level of practicality has to be incorporated. Sheep have also been part of this management tool, for similar reasons to the River management.

Photo 10:
Haldon Pastures Spring fed stream

Photo 11 Poisoned willow

Photo 12 Poisoned willow

Contrast photos 9 & 10 to an area we bought in the 1990s (Photos 13 & 14).
Our goals are to enhance these streams as well, but without some practicality, our willingness and financial ability to achieve these goals will be severely compromised.

Photo 13 Un-restored stream

Photo 14 Un-restored stream with willow invasion

I seek the following decision:

Delete Livestock and replace with Cattle, Deer and Pigs

Nutrient Budgeting

I support best practise with regard to application of fertilisers.

I do have concerns that some of the proposals are ahead of the science.

Being in the Selwyn/Waihora catchment we are part of a natural nutrient catchment zone. The good swampy soils around Christchurch were built up in this way over thousands of years. The fertile soil around Longbeach was such a zone until my great great Grandfather drained it to produce highly fertile and productive land.

Has the research been done to see where the major sources of these nutrients come from? Lysimeter work looks at vertical movement of nutrients, whereas horizontal movement is something that needs to be understood. I have had a PhD student doing such work on my farm, but to my knowledge those results are not yet published. Having lived by the Hororata and Selwyn Rivers all my life I have seen a lot of sediment flowing past me during floods. Has the nutrient content of these floods been analysed? As both rivers dry up in sections this has a significant influence on nutrient transfer. If the natural volume of nutrient transfer to Lake Ellesmere was e.g. 90% of the nutrient flow to the lake, then the problem would take a different form – rather than targeting the leeching from plains land, the focus may need to be on erosion control in the hills.

Through out the world there are examples of nutrient catchment zones which subsequently feed plants and animals thousands of years later, sometimes thousands of kilometres away. The Persian Gulf is fed by dust from the deserts and according to David Attenborough the sea has a higher concentration of phosphorus and nitrogen than intensive agriculture. Another example is that the Sahara desert is the main mineral source that fertilizes the Amazon rainforest, and about half of the annual dust supply to the Amazon basin comes from the Bodele depression – a region approximately 0.5% of the size of the Amazon, or 0.2% of the Sahara. Nutrient catchment zones are a part of this planet and a natural phenomenon; we need to be realistic as to what we can achieve in the face of Mother nature.

I seek the following decision:

That the commissioners put in clauses that allow the alteration of nutrient rules as science progresses and the understanding improves.

John Grigg (BAgSc)

LWRP Submission from John Grigg No.190

Commissioners,

On reviewing my submission there are a number of points I wish to add.

Firstly an apology for my mistake in thinking that The Dunsandel Ground water users group had submitted. The driving force behind that group has moved on to Irrigation New Zealand and that is where my support should have gone.

Feeling that my inherent knowledge around how sheep behave around water wasn't scientific enough, I went looking.

I Googled "sheep behavior around water" and "sheep in water"

I learnt a number of interesting facts

Sheep use smell to locate water

Sheep and cattle tend to graze into the wind

Sheep move more quickly toward water than away

I even found a YouTube video of "angry sheep pushes man into water"

In other words there were no articles I could find pertaining to this issue.

So I tried another tack and headed for some New Zealand knowledge as we are one of the premier countries with regard to sheep research.

I was pointed in the direction of AgResearch. The attached email from Keith Betteridge gives his impressions on the issue.
[Refer to attached email]
This confirms my own observations over the last 25 years on our property.

I would be interested to know where the Council obtained its expert and scientific opinion on the behavior of sheep around waterways. If this opinion was not substantiated by scientific back up then it is fundamentally flawed.

Sheep are also a useful tool to manage weeds and grass near waterways. They reduce the need for chemical control of weeds near waterways. With control by sheep and follow up spraying by farmers we can reduce the effect of nitrogen form Gorse and broom leeching into the river. As shown in the Photos in my submission.

I also submitted on the risk of fire. The recent Fire in the Southland Waituna Swamp illustrates the issue, and shows that even swamps are susceptible in a dry period. Long rank growth and a hot Canterbury Nor'wester are a recipe for a disaster. We are instructed by councils to mow our road sides and keep rank growth to a minimum. Sheep contribute in this respect and manage a lot of the risk by keeping the growth under control along waterways and beside swamps. I do not wish to lose the nationally significant area on our farm to a fire that could have been avoided by sensible management.

Again I will reinforce my view that I agree cattle, deer and pigs should be excluded from waterways, however I strongly feel that this should not apply to sheep. I trust that you as commissioners will take a serious look at this issue so we can move forward and continue to look after an area that I am passionate to keep and enhance for future generations.

The other area I submitted on was Nutrient budgeting.

I read a recent article on the proposal to have a permanent outlet from Lake Ellesmere to the sea. I was intrigued to see the reasons why the weed beds – aquatic macrophytes – had not established after the Wahine Storm. Opening the Lake sucked the water from the bottom of the Lake. That should be great for reducing the nutrient load of the Lake. But no! Aquatic macrophytes want a still and nutrient full environment in which to grow. Sounds very much like a good cropping farm to me! It also appears to be a Nutrient catchment zone that the weed beds need to survive.

Without human intervention the Lake would quietly fill up and flood the surrounding area until it spilt over the bar, taking the top of the lake out to sea while leaving the nutrients behind. So, because we as humans don't want the flooding of the lake we modify the environment by controlling the lake level artificially.

It is a manmade artificial environment.

I applaud the new proposal as it is a sensible option to take the lake as close as possible to its natural state without the flooding – namely a nutrient catchment zone. This will allow the weed beds to re-establish in a rich and fertile environment.

This is why I submitted that we need sensible regulations that adapt to scientific knowledge and understanding as they develop. In a previous submission to Ecan I commented that Farmers generally use best practice principals. This meant using DDT in the middle of last century to control grass grub. As the knowledge of DDT improved that practice ceased. This is why it is extremely important that you as commissioners put in rules and regulations that are sensible and adaptable to advancements in science and the overall understanding of the environment we live in.

Thank you for considering my submission. As you can see I am a passionate family farmer. Family farmers realize that we are custodians of the land and we endeavour to pass on the land in a better state to the next generation. To do this we need sensible regulation that balances the ability for farmers to achieve their goals, with the perceptions of non-farmers who come from a different understanding of the environment.

Commissioners,

Firstly I appreciated the Commissioners' change to the original stock exclusion policies. I have re submitting my submission to the LWRP so that the zone committee can see why I oppose policy 11.4.12 (d). I am concerned that the Committee has not followed the lead with regard to the drains. I also oppose 11.5.19 and11.5.20 on the same grounds that they have no scientific basis and are fundamentally flawed. I am sad and frustrated that I have to do this again. I support the NCFF submission as I can see the impracticality of the rules in the hill and high country.

I seek the decision

11.4.12 (d) "drains" be included in5.68 1 and that 11.5.19 and 11.5.20 be deleted

I also have concerns re the "Phosphorus Sediment Risk Areas" in the mid plains. On what scientific basis are these areas allocated? In looking at the source material I have seen lots of technical reports but very few peer reviewed and published scientific papers. I am still waiting for the paper from the Phd student that did research on our farm. I suspect that far more phosphorus is deposited from the flood flows that cover our farm than is leeched from the designated areas.

Again I would ask "Has there been research into the nutrient inflows to Ellesmere from floods and normal flows down the Selwyn River?"

I seek the following decision

That the Phosphorus sediment risk areas on the plains be withdrawn until further scientific evidence is presented.

My third area of concern stems from the meetings I have attended when Ecan officers have said that there needs to be a 76% reduction in water take to

achieve the objectives for Selwyn/ Te Waihora Zone. In 2003 Ecan had water catchment maps on their walls showing the belief that 50% rainfall recharge was acceptable for the aquifers. Then in 2004, when the report came out, it was suddenly set at 25% rainfall recharge (and was now a Red Zone). Now we are being told that we need to reduce by 76% of that 25%. My calculations make that 6% of rainfall recharge as the acceptable level for aquifer use. I think that that is getting very close to one standard deviation of the average rainfall in a catchment. What I am trying to say is that either the calculations have a very shaky scientific basis or that the figures have been manipulated to suit the purpose at the time. With the recent large change in catchment nitrogen allocation the confidence in how these major calculations are being done has been severely dented.

This is why I oppose 11.4.28. To put surface minimum flow restrictions on deep wells after 2025 without any evidence that the effects are more than minor goes completely against the Resource Management Act. The process of reapplying should take precedence and will assess the effects during that process. For example, the Haldon Water race intake is on my property and the figures quoted in the table have no historical data as it has just been put in and is not in the river. The river also often goes underground at that point and comes up further down the farm. The other monitor point on Mitchells road has only been there since 2007 and only monitors the channel which gives distorted flows as even in a moderate flood a large proportion is outside the channel. Sometimes my well levels are rising whilst the river is dropping. The CPW water may have also change the well levels. All these issues need to be reviewed through the RMA not a generic decision based on shaky assumptions.

I seek the following decision

That 11.4.28 be deleted

My fourth area of concern is the additional regulation around river and stream management. As can be seen in my photos we have been managing the river since 1925. We have never received any financial support for this process. The added cost of all these management plans is unfair to those of us who have to effectively pay for this river management. There was, I think, a Section 51 of an

old Local government act that allowed this maintenance. Is Ecan going to financially support those of us that have to carry out this work for the betterment of the whole river and stream network? If not then I think some practicality needs to be included in these rules. Regulation is a great thing when done from behind a desk and on a computer and is paid for by other people. It reminds me of a quote from one of my lecturers from Lincoln, “If the people who designed and built tractors spent the time operating and fixing tractors they would design them for ease of operation and service”. This was said in 1922 but is also relevant to those who create rules that have to be applied. I have a degree in Agricultural Science and I have struggled through the myriad of policies and rules, trying to interpret the meanings and consequences for me as a farmer. It worries me that many farmers don’t understand how these regulations will affect them.

I seek the decision

That the costs of River and stream management plans be paid for by Ecan.

Resource Management (Forms, Fees and Procedure) Regulations 2003

Form 6

Further submission in support of or in opposition to submission on publicly notified proposed policy statement or plan

To: Canterbury Regional Council (Environment Canterbury)

Name of person making submission:__ __John Maurice Grigg
_____

(print full name)

This is a further submission in support of a submission on the following variation to a proposed plan:

Variation No 1 to the proposed Land and Water Regional Plan (Selwyn –Waihora).

I am a person who has an interest in the proposal that is greater than the interest the general public has. I am a farmer/landholder in the catchment area covered by the plan and my farming activities/farm will be directly affected by the provisions for managing water quality and/or water quantity in the variation.

I support the submission of the North Canterbury Province of Federated Farmers of New Zealand.

The particular parts of the submission I support are:

The entire submission; The entire submission plus my own submission
_____

(*Identify the points in the submission you support).*

The reason for my support is:

_____
_____
_____

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

I seek that the whole of the submission be allowed.

I do wish to be heard in support of my further submission *(delete one)*

I others make a similar submission I will consider presenting a joint case with them at a hearing (*delete if you do not wish to be part of a joint case)*

_____

(Signature of person making the further submission or the person authorised to sign on behalf of person making the further submission)

Date: __8/062014_____

Address for service of person making further submission:

__157 Haldon Road_____
__Hororata_____
__R.D.2 Darfield 7572_____
_____

Ph:03 3180 731 / 0274577642

Fax/email: j.grigg@haldonpastures.com