

1. My name is David Gardner
2. I made a written submission on the plan.
3. I farm an 805Ha dryland Sheep & Beef property situated on the southern side of the Waihaorunga Valley. It is in the headwaters of the south branch of the Waihao River and has no permanently flowing waterways
4. My Grandfather first came to this property in 1911. I am the 3rd generation to farm this land and would now like to be in a situation where I can pass it on to the next generation to stamp their mark on it and further develop it their way. The production increases in 104 years have been huge. When I was growing up my father had 3000 su's on what was then a 1200 Ha property and now we have 5000 to 6000 su's depending on the season. The farm has gone from producing about 2000 lambs then compared with this year we will have about 4800 lambs. About 33% of the su's are now beef compared with 10% back then.
5. My father was one of the instigators of the Waihaorunga Water scheme which was a major achievement because that provided the platform for me to carry on with extensive subdivision. The combined result is a huge increase in production. This intensification has had a positive effect on the environment as a result of subdividing paddocks and being able to provide water to each of those paddocks mean that stock no longer spend time around wet areas, dams or streams. Shelter belts and some blocks of trees have also been planted which helps lower wind erosion.

I would say that the property has always been farmed with care for the environment. I use a more expensive form of phosphate than superphosphate because I believe it is better for the environment. Mostly I direct drill all our crops because there is less chance of wind and water erosion of the soils. If I thought we were sending excessive amounts of nitrates into the creek or river systems, I would be the first to do something about it.

In the plan our discharge limit would be a little below where I am now at 14kgN/ha. No Ecan staff have ever been here to talk to me about the implications of the plan on our property or ever given me any logical explanation why these limitations have been set.

6. There is a statement in the plan that I'd like to quote, "due to a lack of in-catchment water, the area is now dependent on irrigation water for further economic development to occur". In my view this is an absolutely ridiculous statement. How it could have got through to this point I can only guess. It reflects, in my view the whole approach to allocation of Nitrogen, favouring future development of irrigation at the expense of farmers like me.

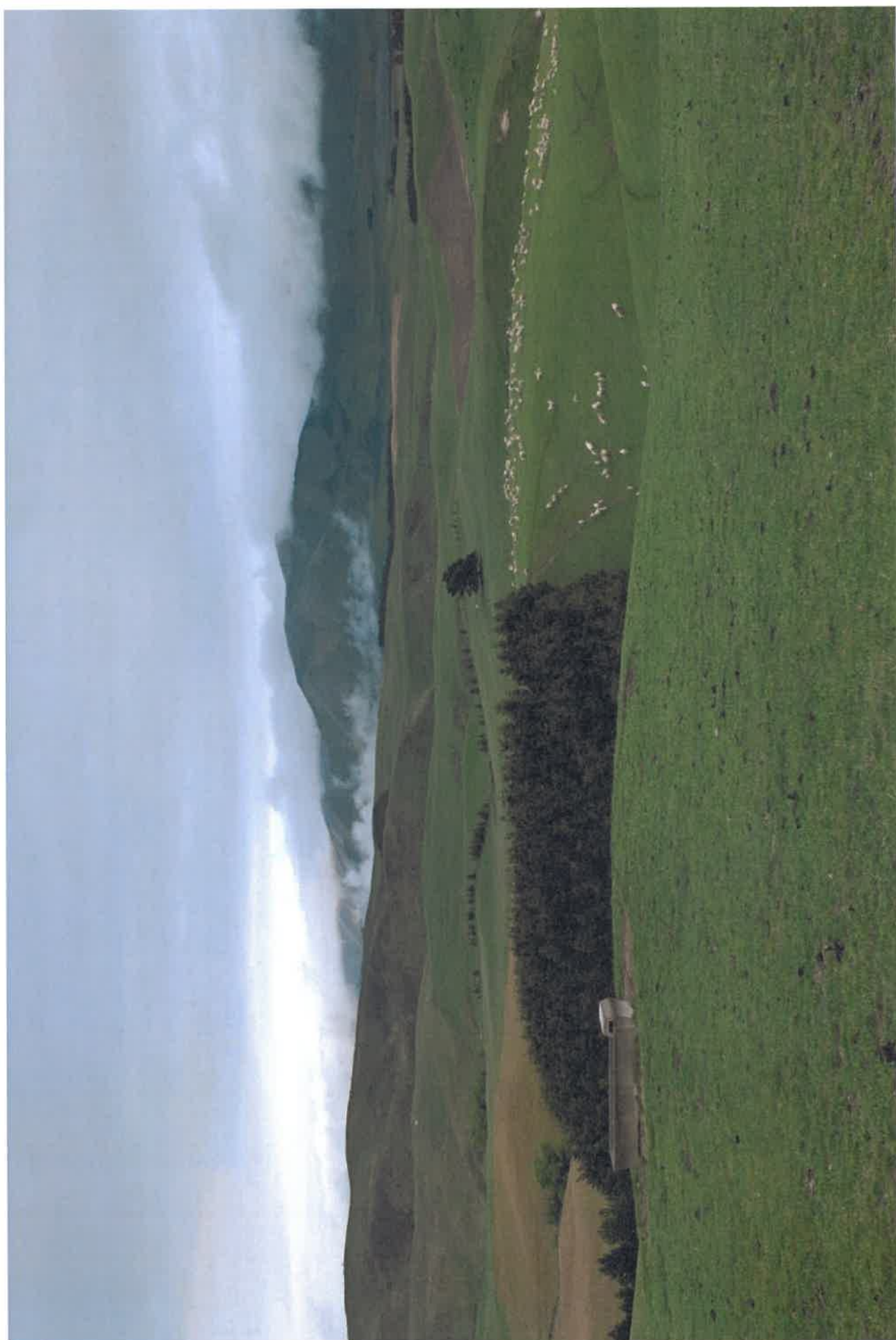
7. I have highlighted some of the production increases that have occurred up until now on our property but this is an ever evolving process. I have no doubt that in the next 50 years similar increases could occur or vastly more than that. Lucerne, Tall Fescue and specialist lamb finishing feeds are some of the innovations that we know about and are happening slowly here already. There will be many more other innovations that we haven't discovered yet. As we improve our knowledge and efficiency of production, there will be greater environmental gains. Keeping hold of nutrients and exporting as product is what all farmers want to do, as we do that better, there will be less nutrients lost, especially given the scrutiny the public put on our actions.
8. At a national level you will probably know that halving the number of sheep hasn't resulted in the half the kgs of lamb being produced. Almost the same amount of lamb is now produced, when we had double the amount of sheep. The inclusion of Lucerne in dryland systems especially in Marlborough and Central Otago has led to a huge increase in production.
9. The inability to be able to further develop the this farm because of what I view as a totally inaccurate Nitrogen allocation system based on an obsession with numbers, rather than actions that might improve the environment, would be absurd, and detrimental, not only to our family but to the wider economic health of the community I see the development potential here as huge with more widespread use of shelterbelts to slow the drying winds as an example The continuing improvement of genetics in livestock combined with ever improving and new plant varieties will continue to drive increased production.
10. As dryland sheep and beef farmers, we shouldn't be disadvantaged because we tend to develop slowly out of income, rather than borrow all the money up front and do it all at once, or because of the decisions we have made to reduce our potential environmental impact.
11. Earlier in this process, we were not deemed to be part of the Lake Wainono catchment and I think that is the way it should be. I suspect that when the creeks are running here, the box will be open so run off from here wouldn't go into Lake Wainono. If we weren't connected to the lake the effects that we were having on the environment would need to be measured in the Waihao river and in places further up than it is now. It would also mean that we would not be affected by the potential failure of augmentation or worse than expected water quality from the Hunter Downs catchment.
12. I went into the NARG process thinking that we would get a fair hearing but it became apparent early on that ECAN were favouring setting discharge limits that would impact on those with existing lower Nitrogen discharges. Neither the Waihao Downs Irrigation Scheme nor the Hunter Downs Irrigation Scheme had started at that stage so there were no prior investment to protect. Under the proposed allocation method, I am personally really concerned that if both of these irrigation schemes go ahead, and water quality deteriorates, what will happen to those farmers who are not part of those schemes. As a dryland farmer, my expectation would be that I can continue to develop my property but I

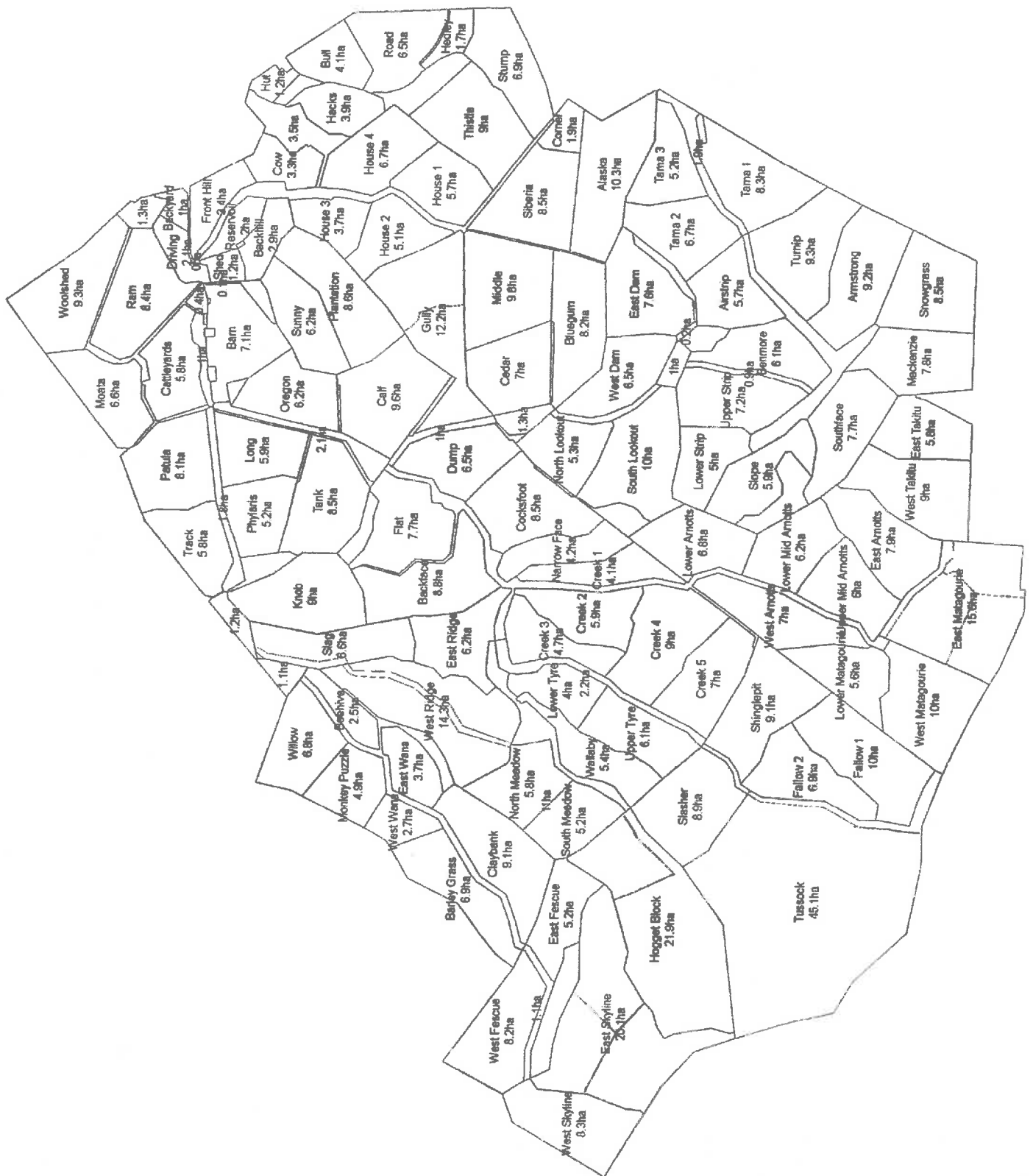
there is huge risk now to me that I will not be able to do that because the big investments in irrigation will need to be protected.

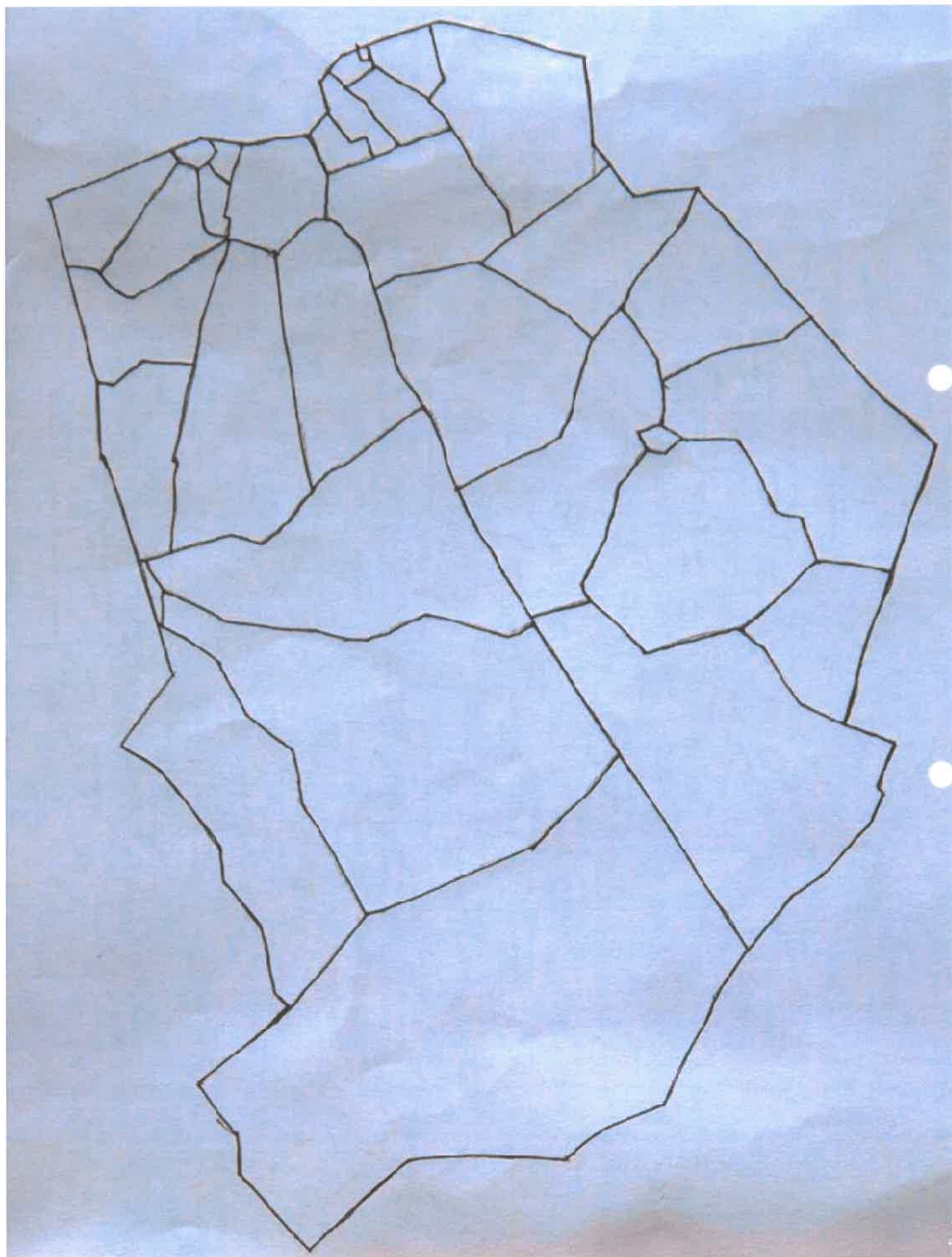
13. An Overseer nutrient budget has been developed for our property (statement of evidence of Dr Samuel Dennis on behalf of B+LNZ). My understanding is that it is very much determined on how the soils are classed and varies from 8 to 14KgsN/Ha on our property. We have a layer of heavy clay under much of our farm and in other places it is bedrock. In my view what Overseer determines about N loss on our property, and what in reality happens, will no doubt be apart. The hydrology work won't have been done to determine what really happens on our property and there are not nearly enough water quality metering sites in our catchment to find out what might be actually going on. It is, after all, what really happens that matters, not what Overseer says!! Overseer as a farm tool can help me understand the potential difference in nutrient loss, between different land management options, but to use it to help constrain what I can do in the future, without necessarily improving my actual nutrient loss, just makes me angry.
14. We have practises that we need to improve on and these are the things that will improve water quality, not some inaccurate paper based number system. The current proposal won't
15. t make me change my management, but doing things I know will make a real difference motivates me to change. Some examples are:
 - Making sure we don't lose leachates out of our silage pits or if it does happen, that we can catch them.
 - Don't cultivate small gullies that may erode if we get heavy rain.
 - We have improved awareness of water quality problems associated with pugging so we are implementing strategies to minimise this. These include planning to use areas that don't pug when we have heavy cattle and wet ground conditions. Reducing heavy cattle numbers in the winter.
16. In conclusion I think this plan that is being forced upon us is all based around a belief that there is no opportunity for production growth outside irrigated land. Growth is what Ecan and this Govt want as the greatest priority, but this focus is going to be at the expense of farmers like me.
17. Improving the environment that we all live in seems to be lost in all this. I want you to make decisions that will bring back the focus to improving the environment and provide me with the confidence that I can continue to farm with the same optimism that my father and grandfather have before me.

Melford Hills

- 805 Ha
- 400-600m Elevation
- 1500 su Beef Cattle
- 3700 su Sheep

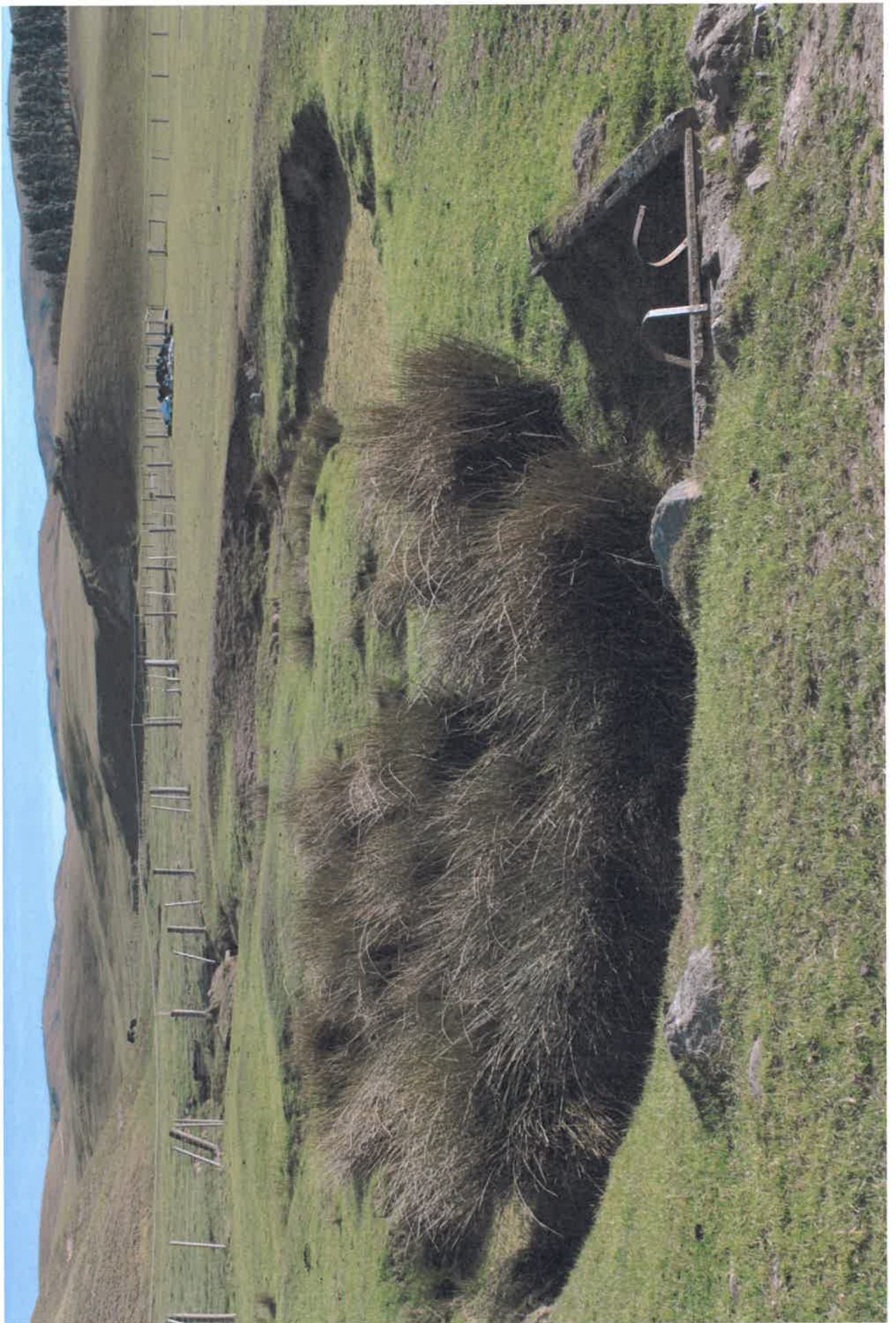


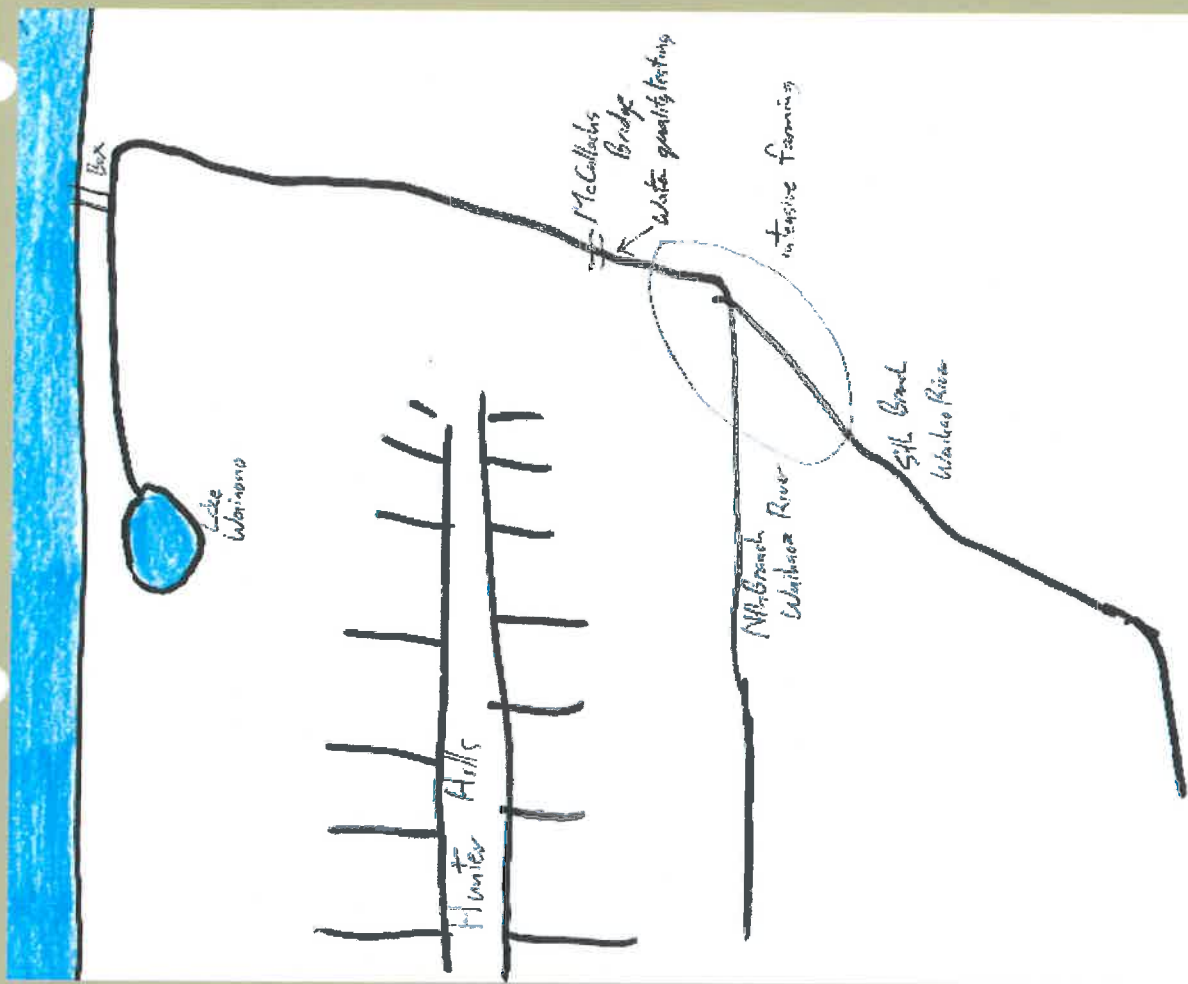




A photograph of a dry, cracked landscape under a clear blue sky. In the foreground, the ground is parched and cracked, with sparse, dry vegetation. A small, dark, rectangular object, possibly a building or a vehicle, is visible on the horizon line. The background shows a vast, flat expanse of land stretching towards the horizon.

**“Due to lack of in-catchment
water, the area is now dependent
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5/11/11
M. J. Hill

