

## Submission

My name is Dan Studholme

I am speaking today in support the submissions from The Low Emitters Group and Beef and Lamb

Our family have been farming in Waimate since 1854. I am the fifth generation on the farm.

We are currently entering into a succession process. As a general rule, to be successful, farm succession requires an increase in farm income.

As you can see from our mission statement we are very focused on looking after the land and environment. I believe that economic growth and improving the environment can go hand in hand. However I have concerns that under the current proposal there will be winners and losers and little improvement to the environment.

My submission relates to four main points:

1. Allocation
2. Sustainable development
3. Practical solutions
4. Flexibility

## Allocation

I believe the allocation of nutrient discharge should be based on sound science. It has become quite apparent that the science relating to allocation in variation 3 is inaccurate.

I accept that regional plans require tools to assess and measure outcomes and set limits. However, those tools must be fit for purpose. I have heard many times that Overseer is the best tool we have, but if it does not do the job required then it is not much use. The saying 'to use a sledgehammer to crack a nut' comes to mind for this situation.

The allocation of nutrient discharge should be applied fairly. There should be no favour of one enterprise over another. All farmers have large investments in their land.

The allocation of nutrients should not be decided by taking a snap shot in time but should be based on what is sustainable for a particular piece of land. The baselines in many cases are simply not relevant as farming and environment systems can change dramatically to adapt to new situations.

I believe that all farmers have to pull their weight to mitigate their environmental footprint, but, to be truly effective higher emissions should equal higher mitigation.

I am a strong believer in incentivising. There is currently no incentives to mitigate beyond the set limits.

## Sustainable development

We have a long term development program on our property. This program requires significant investment due to the terrain and our desire to protect our waterways and biodiversity.

We need to continue this development to secure our future. The saying 'If you are not going forward you are going backwards' is all too true for a family farming enterprise.

I believe we are developing our land sustainably. However it requires a significant amount of extra investment. Whilst some of the environmental work is mutually beneficial it is not really essential to development. We have now got around 50ha out of a total 750ha our farm excluded from stock with

30ha protected in perpetuity with QEII covenants. The point being that we need to be able to afford to look after the environment.

To be able to afford it we need to increase production. Which requires higher stocking rate and more fertiliser. This may or may not be possible under the proposed plan. But it is essential for economic and environmental survival.

### Practical Solutions

The proposed plan is far too reliant on models and numbers which are wildly inaccurate. The focus should be on practical solutions:

What is causing pollution?

Where is it causing pollution?

How do we 'eliminate/isolate/minimise?' To use H&S lingo

When the science around the models and numbers become reliably accurate we can then start to apply them to the mix.

There seems to be a disconnect from reality in this process. The focus on models and numbers often does not reflect reality. An example would be in the use of overseer where changing the input of how a decision is made can alter the nutrient loss in overseer when in reality there is no change...

### Dryland Potential

There is little recognition of the potential for increased production on dryland properties. Farming systems are changing rapidly in this space, with the adoption of new technologies, particularly plant species and cultivars and management systems around them. Subdivision of good land and protecting poor or sensitive land generally happens during a development program. This should be seen as mutually beneficial but because production is increasing the models may not allow it.

### Flexibility to farm to the full sustainable potential of the land

Flexibility is of paramount importance. Farming systems have to constantly adapt and change. To be limited to a land use based on the past is a train wreck waiting to happen. Animal welfare issues are just one obvious problem if there is insufficient flexibility. E.g. Stock may not be able to be bought off someone with no feed because the buyer has not got the nutrient allocation to allow for those stock.

On our farm there are undeveloped areas with very low stocking rates which have the potential to double production sustainably. We have historically not used nitrogen fertiliser on over half our farm land but strategic use of nitrogen on this land will be an important tool going forward.

### Summary

In summary I fully support the need to look after the environment but it needs to be done fairly. I would ask you to look at following the actions put to you by the low emitters group.

## Submission

My name is Dan Studholme

I am speaking today in support the submissions from The Low Emitters Group and Beef and Lamb

Our family have been farming in Waimate since 1854. I am the fifth generation on the farm.

We are currently entering into a succession process. As a general rule, to be successful, farm succession requires an increase in farm income.

As you can see from our mission statement we are very focused on looking after the land and environment. I believe that economic growth and improving the environment can go hand in hand. However I have concerns that under the current proposal there will be winners and losers and little improvement to the environment.

My submission relates to four main points:

1. Allocation
2. Sustainable development
3. Practical solutions
4. Flexibility

## Allocation

I believe the allocation of nutrient discharge should be based on sound science. It has become quite apparent that the science relating to allocation in variation 3 is inaccurate.

I accept that regional plans require tools to assess and measure outcomes and set limits. However, those tools must be fit for purpose. I have heard many times that Overseer is the best tool we have, but if it does not do the job required then it is not much use. The saying 'to use a sledgehammer to crack a nut' comes to mind for this situation.

The allocation of nutrient discharge should be applied fairly. There should be no favour of one enterprise over another. All farmers have large investments in their land.

The allocation of nutrients should not be decided by taking a snap shot in time but should be based on what is sustainable for a particular piece of land. The baselines in many cases are simply not relevant as farming and environment systems can change dramatically to adapt to new situations.

I believe that all farmers have to pull their weight to mitigate their environmental footprint, but, to be truly effective higher emissions should equal higher mitigation.

I am a strong believer in incentivising. There is currently no incentives to mitigate beyond the set limits.

## Sustainable development

We have a long term development program on our property. This program requires significant investment due to the terrain and our desire to protect our waterways and biodiversity.

We need to continue this development to secure our future. The saying 'If you are not going forward you are going backwards' is all too true for a family farming enterprise.

I believe we are developing our land sustainably. However it requires a significant amount of extra investment. Whilst some of the environmental work is mutually beneficial it is not really essential to development. We have now got around 50ha out of a total 750ha our farm excluded from stock with

30ha protected in perpetuity with QEII covenants. The point being that we need to be able to afford to look after the environment.

To be able to afford it we need to increase production. Which requires higher stocking rate and more fertiliser. This may or may not be possible under the proposed plan. But it is essential for economic and environmental survival.

### Practical Solutions

The proposed plan is far too reliant on models and numbers which are wildly inaccurate. The focus should be on practical solutions:

What is causing pollution?

Where is it causing pollution?

How do we 'eliminate/isolate/minimise?' To use H&S lingo

When the science around the models and numbers become reliably accurate we can then start to apply them to the mix.

There seems to be a disconnect from reality in this process. The focus on models and numbers often does not reflect reality. An example would be in the use of overseer where changing the input of how a decision is made can alter the nutrient loss in overseer when in reality there is no change...

### Dryland Potential

There is little recognition of the potential for increased production on dryland properties. Farming systems are changing rapidly in this space, with the adoption of new technologies, particularly plant species and cultivars and management systems around them. Subdivision of good land and protecting poor or sensitive land generally happens during a development program. This should be seen as mutually beneficial but because production is increasing the models may not allow it.

### Flexibility to farm to the full sustainable potential of the land

Flexibility is of paramount importance. Farming systems have to constantly adapt and change. To be limited to a land use based on the past is a train wreck waiting to happen. Animal welfare issues are just one obvious problem if there is insufficient flexibility. E.g. Stock may not be able to be bought off someone with no feed because the buyer has not got the nutrient allocation to allow for those stock.

On our farm there are undeveloped areas with very low stocking rates which have the potential to double production sustainably. We have historically not used nitrogen fertiliser on over half our farm land but strategic use of nitrogen on this land will be an important tool going forward.

### Summary

In summary I fully support the need to look after the environment but it needs to be done fairly. I would ask you to look at following the actions put to you by the low emitters group.



# LWRP Variation 3

Submission: Dan Studholme



Tabled at Hearing on  
4th November 2015



# Background

- Family have farmed in Waimate since 1854
- Entering Succession process

## **Mission Statement**

We are a family owned and operated sheep, beef and dairy grazing farm. We strive to grow our business to ensure this opportunity to the next generation. We strive to make efficient use of inputs, maintain excellent land stewardship and environmental practices, and produce high-quality commodities for the end user. We value rural life and are committed to keeping our rural community vital.

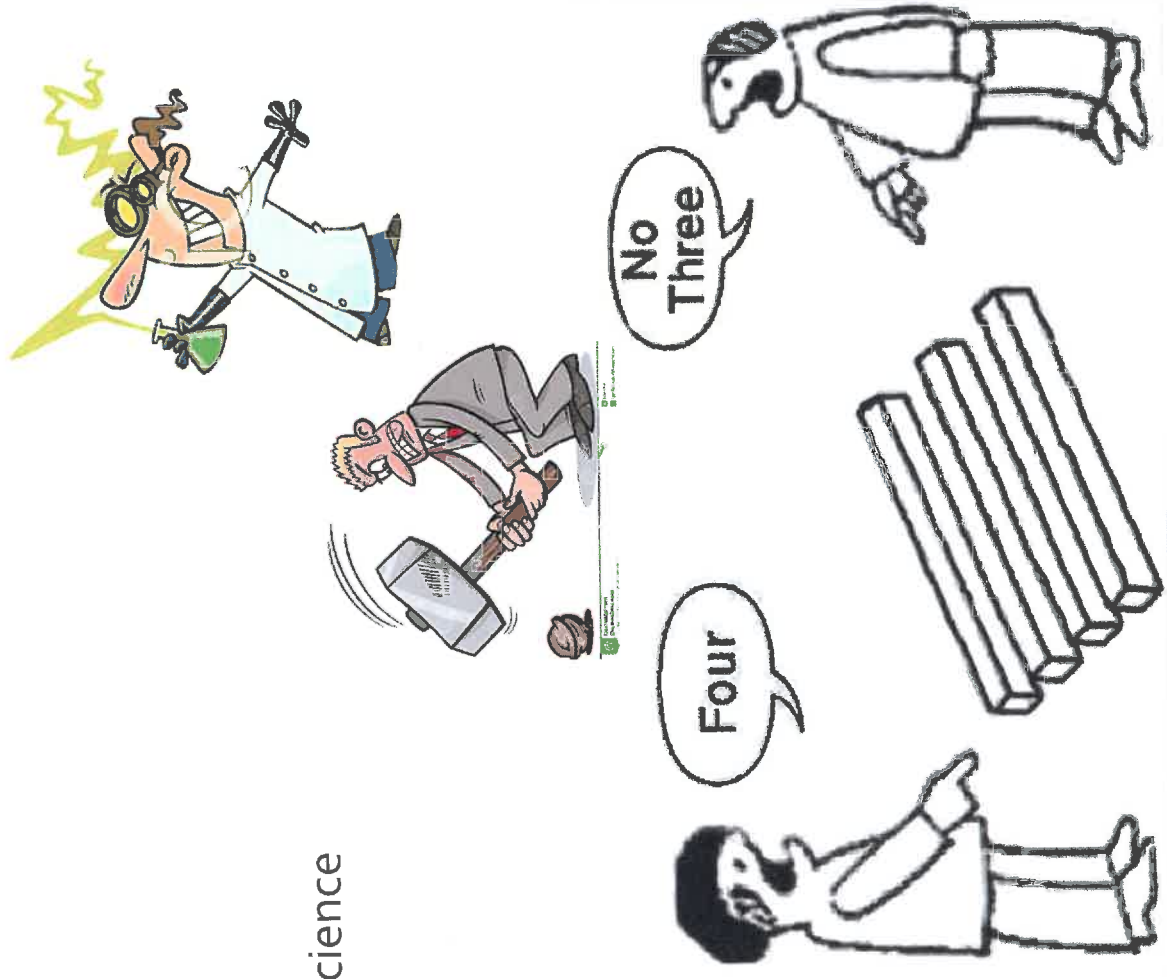


- Allocation
- Sustainable development
- Practical solutions
- Flexibility



# Allocation

- Allocation needs to be based on solid science
- Overseer
  - 'using a Sledgehammer to crack a nut'
- Equal treatment
- Baselines
- Higher emissions should equal higher mitigations
- Incentive





# Sustainable development.....?

**Ability to Develop to secure our future**



**We need to be able to afford to look after the environment**



Increased Production and stocking rate?  
Essential for survival!  
Will this plan allow it?







## Focus on Practical Solutions First



# Dryland Potential





## Subdivide and improve best land Fence and protect poor/sensitive land



# Flexibility to farm to the full sustainable potential of the land

