

Tabled @ Hearing  
24.11.15

**Hearing Statement of James Sim on behalf of the Combined Canterbury Provinces, Federated Farmers of New Zealand**

**Hearing of Submissions on the Proposed Canterbury Air Regional Plan**

**24 November 2015**

1. My full name is James Derek Sim.
2. I have been an arable farmer for 35 years on our property north east of Ashburton that is within the Crop Residue Burning Buffer Area. This property has been in our family for over 100 years.
3. I have held several farm leadership positions, including:
  - 1) Membership of the Canterbury West Coast Rural Fire Committee at the time when Mid Canterbury Federated Farmers and the Ashburton District Council developed the Crop Residue Burning Code of Practice that has been adopted as an industry standard.
  - 2) Chairmanship of United Wheat Growers NZ Ltd.
  - 3) Membership of the expert panel that prepared the Foundation for Arable Research (FAR) crop residue burning report for Environment Canterbury 2013.

**Use of crop residue burning**

4. I routinely use crop residue burning as an eco-friendly method of soil preparation. We don't burn every crop every year, but keep burning as a tool, for use in some circumstances. The removal of crop residue by fire has been accepted as good management practice for a very long time.
5. In the time our family has been farming the property we have never has a fire escape, been prosecuted, or even received a written warning for improper burning practice.
6. I own about \$1 million worth of new farm machinery, designed for a 2015 crop farm. My point is that I am not living in the past on our farm. My operation is profitable, and I enjoy growing crops. I have not been tempted to change my land use to dairying.
7. I grow wheat, barley, grass seed, clover, radish, Chinese cabbage, borage, peas and sweetcorn, and am sufficiently adaptable to try anything that is profitable, and legal.
8. Wheat residue is the most likely crop residue to be burned, as barley stubble can normally be sold. Some wheat straw can be sold from time to time. Wheat straw removal by burning has the advantage of wiping out pests and diseases that are not always controlled by mechanical or chemical methods. As a result, I have only used a molluscicide, a possible ground water contaminant, once in the last decade.

9. Grass seed, pea, vegetable, brassica and sweetcorn residue can be easily incorporated into the soil with modern machinery and would almost never be burnt.
10. The benefit of crop residue burning buffer areas is not supported by science or practical experience.
11. Townsfolk that are disturbed by smoke will likely be unable to distinguish between 3 or 4 kilometres or 10 to 15 kilometres because it is difficult to tell precisely where smoke is coming from. In the summer I occasionally ring a close neighbour when I see smoke to see if they are ok, only to be told the fire is many kilometres away from them.
12. My point is that the buffer zones will be a huge inconvenience to my operation and maybe effect profitability, but townsfolk may well believe there has been no reduction in smoke. They will still see and smell the effects of burning. Indeed, our skies have been affected by smoke from Australian bush fires from time to time.

### **Overseas experience**

13. I am eager to learn new and better management practices and belong to a leading farm discussion and consultancy cooperative. I also attend field days to upskill when possible. I have been to visit farms and exhibitions in Australia, USA, Canada, France and especially the UK which is possibly the most like NZ for wheat growing.
14. In England in 1988 the government announced that burning crop residue would be phased out in 3 years. Machinery was invented for straw incorporation and the chemical industry developed chemistry to control pests and diseases. Farmers and the general community believed they had eliminated a dangerous and messy business from their lives without any downside.
15. This year when I attended the 2015 Cereals event in Lincolnshire, I was amazed to discover that both scientists and farmers openly admitting they have an agricultural and environmental disaster that is out of control. Pesticides are no longer effective and in some cases are causing secondary issues like groundwater contamination.
16. Farmers that are industry leaders and that have achieved high yields with expert technology are having their crops destroyed by black grass, an invasive weed that has reinvented itself to become tolerant to selective herbicides. As a result, affected crops are cut for silage or destroyed by mulching.
17. Dr Jim Orson, a plant scientist from the UK, joined the FAR Crop Residue Burning Panel in 2013 by video conference at a time when he would have normally been asleep, because he felt it was so important that New Zealand didn't repeat the irreversible mistakes of the UK. He emphasised that the serious consequences of not burning crop residue has taken everybody by surprise in that country.

### **Local implications**

18. If Blackgrass invades our properties, growing certified seed for export will end. This is a multi million dollar industry, providing a lot of overseas earnings and a lot of off-farm employment. New Zealand is a world leader in small seed production.

19. If growing seed crops becomes unprofitable the land use in the buffer area would most likely change to dairying or land could be subdivided into lifestyle blocks that may then threaten crop growing further out.
20. When farmers burn crop residue they expose their operations to extreme litigation. Farmers are well aware that they will be held liable for any damage whether it is caused by their negligence or bad luck.
21. In my case, by removing crop residue near to town at my own personal risk, I am in fact making the neighbourhood safer by removing combustible material. Recently there have been serious fires on the outskirts of Christchurch, starting on small holdings where the owners work off-farm, have no equipment for firefighting, and little knowledge about the potential dangers of having long, dry grass on their properties.
22. The Crop Residue Burning Buffer Areas will not reduce smoke in Canterbury and will make an already stressful farm operation more complicated.

### **Conclusion**

23. My suggestion is for Environment Canterbury to educate Cantabrians that limited crop residue burning near populated areas is an existing, lawful practice that occurs for sound reasons, and that there are environmental benefits as well as dis-benefits, as stated in the FAR report.
24. Further, Environment Canterbury should support Federated Farmers in the education of growers about how to burn with minimum disruption to others, and impose severe penalties for deliberate anti-social behaviour.