

Hearing submission to Canterbury Land and Water Regional Plan:

Plan Change 5

From: David Ashby
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- 1 My full name is David Leslie Ashby, and I have been a farm consultant since 1985. I am the principal consultant at Dave Ashby Rural Consultants Limited.
- 2 I obtained a B.Ag.Sc.(Econ) from Lincoln University in 1984. I am a registered member of the New Zealand Institute of Primary Industry Management.
- 3 My previous work experience includes a position of Farm Advisory Officer with the Ministry of Agriculture and Fisheries (1984/85), farm consultant with DR MacMillan & Associates (1985/90), Lincoln University Farm Advisory Service (1990/92), and in a private capacity operating as a registered farm management consultant since 1992 (MNZSFM).
- 4 Recently I have upskilled, obtaining the Massey University Intermediate Certificate in Sustainable Nutrient Management (2014) and the Certificate in Advanced Nutrient Management (2015).
- 5 Overall, I have more than 30 years of farm consulting experience with most of this in the Canterbury Area. I have prepared numerous land-use feasibility studies, and have given evidence at local district council and Environment Court hearings.
- 6 In total, I have 25 years of practical dairy farming experience, and I have owned a 350 cow dairy farm on the outskirts of Rangiora since 1993. Initially I was involved with town supply dairy farming for eight years, and more recently seasonal supply for 17 years.

Policy 4.40 (p4-5)

- 7 I wish to reiterate the points that I made in my original submission regarding Policy 4.40. I believe that Policy 4.40 should be amended to state that Farm Environment Plans (FEPs) are the primary means of identifying good

environmental practices across the range of farming activities, and to provide for “Overseer” to be used as a tool for providing trend information about the loss of nutrients from the root zone, and thus encouraging overall efficiency in the use of resources.

- 8 The problem with the requirement to establish nitrogen baselines calculated using the “Overseer” programme is that they are changing as the programme is updated. Farmers are finding it hard to understand that what is “true” today is not necessarily the case the next time “Overseer” is updated, when as far as they are concerned nothing has changed. Other problems with the calculation of nitrogen baselines being encountered are that some farmers have no fertiliser use information from 2009, and others are under the impression that they can make up numbers which will give them an advantage.
- 9 From a practical perspective there are other issues with “Overseer”. It does not realistically model nutrient losses in an arable cropping programme, and in other instances needs to be manipulated to produce a “reasonable reading”. For example, when dealing with an oats crop for winter grazing under planted with short-rotation ryegrass sown at the same time which will take-up the nitrogen produced when grazing the green-feed crop “Overseer” cannot cope. It is necessary to enter the ryegrass as being sown in the late winter when the green-feed crop has been eaten off to get the programme to register the reduction in nutrient loss because of the presence of the short-rotation ryegrass.
- 10 A further problem with “overseer” is its widely acknowledged margin of error which is at best +/- 15%. This means that there is not widespread confidence in the farming sector in it as a basis for regulation, which in turn undermines confidence in the Land and Water Regional Plan as a whole.
- 11 My second major concern is that the present process is extremely costly, and as far as I can see of limited value from an environmental perspective. For example, I have worked with the farmers in a Sensitive Lake Zone, among the first to be

required to file applications for “consents to farm”. Even with assistance in preparing the documentation from Environment Canterbury and Beef and Lamb New Zealand the costs for each farm were up to \$10,000.

- 12 More recently I have been providing nitrogen baselines for other farmers and have found cases where there is no information available. In another case the particular property had a variety of soil types which made the exercise very time consuming and costly for the farmer, and I found it difficult to see that there was going to be any real benefit from this work, either for the farm enterprise or the environment.
- 13 I would like to have seen as an alternative approach involving making all farming activities permitted activities, with the condition that all rural properties over a certain size had to have a farm environment plan. Also, that each farm would be audited within two years of the Land and Water Regional Plan becoming operative against its FEP, and would have to get a B grade or better to be allowed to continue as a permitted activity. Farms not gaining at least B grade would “default” into a conditional or discretionary use category depending on the circumstances, where regulatory controls would imposed and enforced.
- 14 This would not only have allowed the “bedding in” of the Matrix of Good Management (MGM), but would also have provided practical opportunities to begin to find out the extent to which bringing all farms up to MGM will be resulting in improvements in water management, both quality and quantity.
- 15 As it stands, we can only estimate the standard of farm management across Canterbury, and the time that it will take to bring those whose practices are below standard up to the required level. There is a limit to the level of reliance that should be placed on modelling, and it would be better if we had created the opportunity to be able to actually monitor the introduction of FEPs as a first step.
- 16 It is not too late to do this, and that is why I have requested changes including the dropping of references to Baseline GMP Loss Rate and other related changes.

Policy 4.38AA

- 17 I also wish to speak to is Submission 6 of my principal submission regarding Policy 4.38AA. As a farmer on the lower Waimakariri/Ashley Plain and an area zoned “Red”, I am very well aware of the increasing concentrations of nitrates in ground water as it moves down the plain. At the same time, there are areas of the upper Waimakariri/Ashley plain zoned “Green” and this Policy provides opportunities for these farmers under specified conditions to increase their loss rate beyond their nitrogen base line. The Policy also infers that it is possible to demonstrate that if the base line is exceeded on these properties will be no adverse effect. The problem is that whatever leaching takes place on the upper plain will help to contribute to the nitrate levels down gradient.
- 18 From this perspective it would seem that the only way to create a “level playing field” is to have all farmers in a catchment where nitrate levels are such that “Red” zoning is applied are subject to the same regime. My concern with Policy 4.38AA is that it is not treating farmers equitably. It is creating more opportunities for farmers at the back of a catchment or on the upper from a regulatory perspective than those down gradient or downstream.