

INTRODUCTION

1. My name is Nicole Irene Phillips. My husband and I operate an extensive hill country merino sheep and beef farm in the Hakataramea Valley.

SCOPE OF EVIDENCE

2. My evidence will provide information about our farming operation and how the proposed rules under Plan Change 5 will affect us.

OUR FARMING OPERATION

3. My husband and I lease a 4536-hectare hill country property in the Hakataramea Valley. We farm 3800 merino ewes and 1300 merino wethers and winter approximately 2500 merino hoggets. The hogget numbers are reduced in the spring and we retain only replacement numbers for the ewe (700) and wether (450) flock. This equates to a stocking rate of 1.4 Stock Units per hectare. Our farm is traditionally known as 'run' country, predominantly hill country with no cultivated land.
4. We grow no fodder crop and have no irrigation.
5. Under the original provisions of the Land and Water Regional Plan, the Hakataramea Nutrient Allocation Zone was classified as 'orange', as water quality outcomes were at risk of not being met.
6. Under the Proposed Plan Change 5 rules, our farm is within the Flat and Hill Zone(s), meaning that we would be a permitted activity under Rule 15B.5.24 and Rule 5.44A as we have no irrigation and do not grow fodder crops for wintering cattle within the Hill or Flat Zone.
7. We would need to register our property within the Farm Portal by 1 July 2017.
8. We would not have to prepare an OVERSEER nutrient budget under the present plan framework.
9. Our current modelled level of nitrogen leaching using OVERSEER is 7kg of nitrogen/hectare/year lost to water using OVERSEER v6.2.2. Under the previous version of OVERSEER v6.2.1 which was the current version when our submissions were provided the losses were 4kg Nitrogen/hectare/year. The increase in Nitrogen loss under the current version of OVERSEER does not change the activity status as we have no irrigation and grow no feed for winter grazing, we are still classified as a permitted activity.

10. However, if the water quality in the Hakataramea River was to decline in the future, there is no clear framework within Plan Change 5 that sets out how any reductions would be implemented.
11. Due to our farming system we have limited means to reduce our Nitrogen loss, other than destocking capital stock. As an example if we destock by selling our capital wether flock, a total of 1300 animals then this reduces our N loss to 6kg Nitrogen/hectare/year, a one off 15% reduction in Nitrogen loss which equates to an ongoing 16% reduction in total revenue on farm, which on a property like ours would certainly become uneconomic.
12. As OVERSEER only reports Nitrogen loss in whole numbers, a reduction from 7kg nitrogen/hectare/year to 6kg is the smallest measureable reduction that we can make. Whereas a property with a Nitrogen loss figure of 25kg Nitrogen/hectare/year can make a measureable 4% reduction by dropping from 25kg to 24kg nitrogen/hectare/year.
13. Those properties with irrigation or large developed areas will likely be able to make Nitrogen reductions without reducing capital flock stock numbers, which seems unequitable as they will generally, on a per hectare basis have higher Nitrogen losses than a farm like ours.

CONCLUSION

14. Plan Change 5 needs to provide a clear framework that shows how any Nitrogen reductions required in the Hakataramea Catchment will be implemented.
15. I don't believe that the reductions need to be required across all of the farms within the catchment, it is my opinion that those farms that are classified as a permitted activity be exempt from making any reductions. This is due to generally low Nitrogen losses on a per hectare basis, and no requirements to prepare an OVERSEER nutrient budget and the likely need to make capital stock reductions to meet any reduction target.
16. I believe that any reductions should be required from those properties that require resource consents under Plan Change 5. This could be further defined to those with the highest Nitrogen losses per hectare having to make the first reductions.

Nicole Phillips

6 July 2016