

**IN THE MATTER** of the Resource Management Act 1991  
**AND**  
**IN THE MATTER** of the hearing of submissions on Proposed  
Plan Change 5 (Nutrient Management and  
Waitaki Sub-region) to the Canterbury Land  
and Water Regional Plan

**BY** **THE WAIKAKAHI FARMERS GROUP**  
Submitters

**TO** **CANTERBURY REGIONAL COUNCIL**  
Local authority

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**STATEMENT OF EVIDENCE OF MAURICE HELLEWELL AND MARK HURST ON  
BEHALF OF THE WAIKAKAHI FARMERS GROUP**

Dated: 22 July 2016

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## **INTRODUCTION**

### **Qualifications and experience**

1. Our names are Mark Hurst and Maurice Hellewell. We are both living and actively farming in the Greater Waikakahi Zone. We are both third generation farmers and our families have been farming in the area for nearly 75 years. Both of us have been actively involved in Environment Canterbury's collaborative process from day one.
2. We are the nominated spokespersons for the Waikakahi Farmers Group. The Group represents the vast majority of farmers directly affected by the rules in Proposed Plan Change 5 relating to the Greater Waikakahi Zone of the Northern Fan area of the Lower Waitaki River. Under the original provisions of the Land and Water Regional Plan, our farms were located within the 'red' Waikakahi Nutrient Allocation Zone.

### **SCOPE OF EVIDENCE**

3. Our evidence will provide information on our farming operations, the implications of Proposed Plan Change 5, and the community collaborative processes which occurred prior to the release of the Proposed Plan changes.
4. The Waikakahi Farmers Group represents a diverse range of soil types and farming activities - cropping, sheep and beef (including semi-high country), certified organic mixed farming, deer farming and dairy farming.
5. The Greater Waikakahi Zone is irrigated on the flats by border-dykes and spray systems. Large areas of the hill country are irrigated by way of K-Line. Within the Zone there are also significant areas of dry land.
6. Currently, the majority of farms have over 50 hectares of irrigation (only eight do not). Four of these farms are semi-high country and not irrigable. For the remaining four, irrigation would be reliant on water from the new Waihao Downs irrigation scheme. There are approximately 13 dairy support farms - six of these are in the hills of the lower reaches of the Zone and the remaining seven are in the Elephant Hill and Waihuna area of the Zone. These farms are a mix of irrigated and dryland, with areas of kale and fodder beet grown for winter feed along with all grass systems.
7. There are two arable farms on the flat and five sheep and beef farms on the hills. The remaining farms (approximately 23) are dairying. A current trend is for more

wintering of stock on-farm with some kale and fodder beet being grown on the dairy platforms.

8. In the early 1990s, a farmer group was formed in our area - Waikakahi Resource Care. The group was set up to provide practical guidance and support to those farmers along the Waikakahi Stream to improve environmental outcomes of the stream. It later became known as the Waikakahi Stream Group.
9. Over time, the Waikakahi Stream has been fully fenced and many farmers have undertaken riparian plantings. Culverts and bridges for stock and vehicle crossings have been installed. More recently this work has extended to the wider Waikakahi catchment. All irrigators in the wider catchment have a working Farm Environment Plan (FEP). Major improvements have been made to health of the stream and it is once again becoming a thriving trout habitat.
10. We have encouraged Environment Canterbury ("**ECan**") to undertake further water sampling at the top end of the Waikakahi Stream so that we can gain a better understanding of it and this has now extended into the Waihuna and Elephant Hill areas.

#### **IMPLICATIONS OF PROPOSED PLAN CHANGE 5**

11. Our understanding of Proposed Plan Change 5 ("**PC5**") is that the majority of farmers in the greater Waikakahi area will need a consent to farm in order to continue their current operations. **We oppose this.**
12. As a community, we discussed the need for the minority "high emitters" to reduce their environmental impact. However, we cannot see how PC5 deals with high emitters and so they will continue to have a higher Nutrient Discharge Allowance ("**NDA**") at the expense of everyone else – i.e. GMP figures for stocking rates of 5 cows/ha.
13. Instead, all farmers will be required to farm at GMP, with the majority (that is, farmers with irrigation and those with winter crops - all but four) required to reduce their modelled leaching rate to 90% of GMP. ECan have assessed the area at being 250t of nitrogen - at a 10% reduction that is 25t on top of the reduction to GMP. We are assuming ECan believe all farmers to already be at GMP.
14. We understood the point of the reduction for high emitters was so that it would create 'headroom' that could be used by the farmers who are not (fully) intensified. However, as there is now no scope for them to intensify (because of natural constraints (for those in semi-high country) or because of 10% reduction rule), this actually means that the 25t reduction/headroom will not get used by anyone.

15. **We oppose the 90% of GMP requirement for the majority of farmers.**
16. Farm Environment plans are required for all farms, including those that do not have them through MGI. **We support this.**

#### **COLLABORATIVE PROCESS UNDERTAKEN**

17. At the meetings during the consultation process with ECan the Waikakahi, Elephant Hill and Waihuna districts (now known as the Greater Waikakahi Zone, being 15,710 ha) had around 90% turnout from the farmers in the community. We were told that a large amount of the area (7,117 ha) had been “red-zoned” and that water quality standards are not being met.
18. One of the main mitigation concepts that came from the community group was that there would a cap and 10% reduction in nitrogen leaching from the high emitters. The “head-room” gained from this reduction was to be held in trust for further development of unimproved land on the same land use. The intention was that high emitters would be defined as those above the median. This approach would be closer to an equal allocation model, yet still give confidence to those who have developed so they could remain economic. We continually asked for a clear definition of a high emitter from ECan but we were not given one.
19. During the meetings, it was discussed that farms may need to be operating at GMP and that in the near future a portal would be available for farms to enter their Overseer data. The implementation dates for the limits are 2020 for GMP and 2026 for the 10% reduction - for high emitters.

#### **THE CREATION OF 'HEADROOM'**

20. During the community collaborative process, ECan staff used the phrase 'headroom' to describe the additional nitrogen allocation which would be made available if high emitters reduced their rate of leaching. Headroom has already been created in the catchment with conversions from border-dyke to spray irrigation that have been completed over the course of the consultation and plan-drafting process.
21. No investigation has been made into how much headroom has been created through this conversion process, and then using GMP and environment flows to offset any increase in in-stream nutrient concentration.
22. Through their investigations, ECan suggested that up to 50% of the Waikakahi nutrient discharge was coming from the Elephant Hill and the Waihuna areas. This was questioned and ECan are now investigating with water sampling of stream and bores. A report is due to the community in October of 2016, which may mean the restrictive provisions of PC5 are unnecessary.

23. In contradiction to the message around the need to create headroom. we were also told that ECan didn't want to see more conversions of border-dykes to spray due to the risk of increasing concentrations of nutrients in groundwater. However, PC5 makes using border dykes for irrigation virtually impossible with restrictive conditions such as 85mm of water use per 14 days. Under PC5, it is going to be very difficult to meet irrigation and nutrient reduction limits with border-dyke irrigation.

#### **WHAT WE WOULD LIKE CHANGED**

24. We will create further headroom by all farmers moving to GMP. Additional **unnecessary** headroom would be created if all farmers who now require a consent reduce their leaching to 90% of GMP. The community's intention was that only the high emitters (defined as those above the mean) are to be reduced by 10% - not every farmer who has irrigation or winter grazing as defined by ECan. **The 90% GMP needs to be removed.**
25. ECan should quantify the headroom that has been created from existing conversions of border-dyke to spray needs and consider the use of environmental flows considered to manage potential increase in-stream nutrient concentrations due to reduced runoff from border dyke irrigation.
26. All irrigators in the wider Waikakahi catchment have a working FEP. We should build on this current framework as a practical plan and a compliance tool to ensure irrigators are making the nutrient savings required to enhance water quality. Using OVERSEER as a guide during this process is helpful with ensuring more detailed management changes are made.

#### **CONCLUSION**

27. The 90% of GMP reduction required under the current rules is contrary to the community's intent and should be removed. All farms should have a working FEP. The Greater Waikakahi Stream group will continue to work with farmers, MGI, and ECan to support better environmental decision-making, and this should be recognised.

**Maurice Hellewell**

**Mark Hurst**

22 July 2016