

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 **ARNSTEAD ORGANIC FARM**

AND **WAITAKI IRRIGATORS COLLECTIVE
LIMITED**

AND **MORVEN, GLENAVY, IKAWAI IRRIGATION
COMPANY LIMITED**

Submitters

TO **CANTERBURY REGIONAL COUNCIL**

Local authority

**STATEMENT OF EVIDENCE OF MAURICE HELLEWELL ON BEHALF OF ARNSTEAD
ORGANIC FARM**

Dated: 22 July 2016

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INTRODUCTION

Qualifications and experience

1. My name is Maurice Hellewell. My wife Neroli and I own Arnstead Organic Farm, a certified organic, mixed livestock trading and crop farm of 65 hectares on the north side of the Waitaki River. We specialise in producing high-value produce for overseas and local markets.
2. Our family has farmed here for nearly 75 years. My parents were amongst five families who have milked cows here for over thirty years. I have lived here most of my life, so I know the catchment and the changes that have occurred in farming practices here very well.
3. I have been an active participant in the community processes aimed at promoting water quality in our catchment for many years. For example, I was a member of the Waikakahi Resource Care Group which was established in the early 1990s.

SCOPE OF EVIDENCE

4. My evidence will provide information on our farming operations, the implications of Proposed Plan Change 5, the community collaborative processes which occurred prior to the release of the Proposed Plan Changes, and what we would like changed.

OUR FARMING OPERATIONS

5. Under the original provisions of the Land Water Regional Plan, our farm was located within the 'red' Waikakahi Nutrient Allocation Zone. Under Proposed Plan Change 5, we are located within the Greater Waikakahi Zone.
6. Our farm is irrigated using water from the Morven, Glenavy, Ikawai Irrigation Company (MGI). According to MGI's consent conditions, we are required to operate under a Farm Environment Plan (FEP), including an OVERSEER nutrient budget, which is audited annually.
7. We have an annual organic audit undertaken by BioGro, an independent certifier with Ministry for Primary Industries (MPI) accreditation that audits to international standards for the organic production of beef, lamb, crops, and poultry.
8. Our farm also runs a food safety plan that is audited by MPI annually.

9. Under our audited organic standards there is a strong requirement to be environmentally proactive. If we did not meet the strict standards, we would lose our accreditation and not be able to supply to our markets. The following are some of these requirements:
- We are not allowed to use harmful inputs such as urea and superphosphate.
 - We have restrictions on how much natural Nitrogen can be applied (e.g. composts and manures).
 - We have restrictions on stocking rates. It is prohibited to intensively farm animals where they do not have access to adequate pasture.
 - It is a restricted activity to have feed pads. We have a feed pad which is used if soil conditions prevent us from using pasture or grown feed.
 - Irrigated paddocks must not exhibit signs of excessive watering, leaching, or waterlogging. On our farm, we apply water according to soil type. For instance, we only water the Temuka soils (high water-holding capacity) once and the Lismore soils (lower water-holding capacity) up to four times in a season.
 - We must prove that irrigation water is not contaminated with any prohibited or restricted materials.
 - There is an emphasis on building up the organic matter in the soils. Compost from our feed pad is put on the lighter soils to build soil matter.
10. We have been audited to these standards for the past 15 years. Our livelihood depends on having access to the high-value markets which this accreditation provides.
11. We have also been active in the Waikakahi Stream Group's catchment enhancement project. Two streams and two drains which flow through the farm have been fenced off and we have undertaken riparian planting. A catchment area has been established to capture by-wash water.

IMPLICATIONS OF PROPOSED PLAN CHANGE 5

12. Rule 5.44a: Our farming operation would not be a permitted activity under the proposed rules, as we have more than 50 hectares of irrigation. We have under 20 hectares of winter grazing (brassica and fodder beet). However, we will not be able

to increase this to being up to 20 hectares of winter feed because we are over our "Baseline GMP" number.

13. Rule 15B.5.39: Our farm would be controlled activity until 2020.
14. Policy 15B.4.26 and Rule 15B.5.43: Our concerns are that because of OVERSEER modelling and the GMP numbers in the Farm Portal, our farm may not meet the requirements of these Rules and therefore become a prohibited activity.
15. The OVERSEER model has limitations and does not reflect or model many of our organic practices. For instance, there is no provision for free-range poultry farming, and we run approximately 1,000 free-range hens. It will not allow for under-sowing¹ of arable crops. It does not allow for multi-species cover-cropping for soil protection and to promote nitrogen storage across crops. Yet, we must use this as the regulatory tool.
16. We have undertaken OVERSEER modelling to determine our baseline loss rate and our baseline GMP loss rate. We will have to make significant changes to our farming practices to meet the baseline GMP rate. A *further* 10% reduction (as required for the Greater Waiakahi Zone) would become even more prohibitive - if not economically impossible - under our current (environmentally-conscious) farming practices.
17. As an organic farm, we already have restrictions in place to ensure we have a low impact on the environment.
18. The grandfathering parts of Plan Change 5 means we are "locked in" to our baseline of 2009-2013 which is low because of our farming practices at the time.
19. When we enter our OVERSEER numbers into the Farm Portal, our baseline lowers again - I assume this is because the baseline figures for border-dyke irrigation is the restricting factor (it only allows for a maximum of 85mm every 14 days).

COLLABORATIVE PROCESS UNDERTAKEN

20. I have been involved with the collaborative process facilitated by Environment Canterbury from day one, contributing to the development of the community outcomes and values for inclusion in the Zone Implementation Programme Addendum. I have also attended most Zone Committee meetings and this has given me an understanding of the process and the role of the Zone Committee.

¹ Under-sowing is the sowing of a secondary crop underneath the primary cash crop.

21. During the community meetings with Environment Canterbury, I continually asked for a Plan that was closer to a modified equal-allocation model or a land-use capability model, and I feel this was totally ignored.
22. The closest we have to this in Plan Change 5 is "GMP" and the 90% of GMP requirement. This will affect all farms in the greater Waikakahi, which was not the community's intention and *certainly* not my intention.
23. During the community meetings we were told by Environment Canterbury staff not to focus on the (modelled) numbers, but rather ways we could improve water quality in the district more generally. The whole Plan, however, is about numbers. We should have had the opportunity to see how these numbers would affect our farm so that our input into the process was well-informed.
24. The Farm Portal was released after the draft provisions for Plan Change 5 were developed, and it is only now that we are fully understanding the implications on the Plan. This is very much putting the cart before the horse.

WHAT I WOULD LIKE CHANGED

25. From Arnstead Organic Farm's perspective, we would like the whole Plan replaced with our organic management plan, however we are aware that we need a plan that involves the Greater Waikakahi.
26. At the very least, we would like Policy 15.4.26 (and the Rules which implement it) removed.
27. We would like the opportunity in the future to be able to use some of our "banked" environmental capital.

CONCLUSION

28. I believe this Plan is unworkable and very hard to understand. My expectation as a farmer is that I should be able to pick up the Plan and, on my own, determine where I fit in - without having to pay **consultants** to do this work (which I cannot afford to do).
29. I believe the Plan is unenforceable. There is an emphasis on numbers generated by an averaging model that has an accuracy of plus or minus 30%. I am spending a lot of time and money getting OVERSEER modelling done to try and model my farm to meet the requirements of Plan Change 5. Really, I am just manipulating the numbers as my system does not fit with the model's assumptions and parameters.

This time and money could be put to better use through the implementation of practical changes that would **directly improve** environmental outcomes.

30. I believe the Plan is inequitable as it does not allow my low-emitting farm to have a similar nitrogen load as my neighbour's farm which has the same land-use capability. This is very much a grandfathering Plan. Our farm has been low-emitting on purpose so that we had environmental capital available for future use. This environmental capital could have been available for future farm succession. Plan Change 5 has taken this away from us.

Maurice Hellewell

22 July 2016