

**From:** [Ben Hudson](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 7 to the LWRP Submission  
**Date:** Friday, 13 September 2019 12:14:49 AM  
**Attachments:** [ECan Submission.docx](#)

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To whom it may concern,

I have attached a LWRP submission in regard to Plan Change 7.

To Whom it may concern,

We STRONGLY oppose PC7s consent process and auditing.

I Ben Hudson, would like to speak at the hearing in the second quarter of 2020 please.

The reasons are, in the last 15 years we have spent as an industry, a large sum of money releasing two manuals and a third to be released soon on good farming practises. This has been funded by levies on velvet and venison. These manuals which have been sent to deer farmers right across New Zealand explain the best farming practises to improve our environment. There has been a huge input from all sectors of the industry. Since the release of the first manual deer farmers have been proactive in using this information to improve our environmental footprint. The first manual talks about fence pacing and how it causes sedimentary run off. Since the issue of that manual we have improved fence pacing by over 75% through deer becoming more domesticated and better farming techniques, like feeding the deer better and keeping stock out of wet paddocks. This has been discovered by our industry and implemented by our industry. More recent best practise manuals as well as viewing working deer farms is proof that we are improving and will continue to improve without extra costs that will not fix problems that we as an industry are working hard and getting on top of.

We also believe that the 20ha of strip grazed winter feed trigger is unjust, unnecessary and ill thought. We have over 800 hectares of land and grow less than 10% of our farm in winter feed, yet we will be asked to have a consent and audit. Whereas a farm of 100 hectares growing 20ha of winter feed is at 20% but do not need a consent or audit. This is not about fairness; it is plainly about thinking things through and talking to the experts (farmers) about how to achieve better practise. For example, strip grazing from the top of the hill down or leaving a grass berm of the steeper country that leads to waterways. It does not need to be forced upon us to do this. We are doing it now. We also have run off paddocks for the deer running on winter feed that is strip grazed. This achieves better su/ha figures and spreads out the pressure. We also pick a lot of fodder beet and feed it to the stags on grass. Therefor relieving pressure on bare dirt and allowing us to grass down faster. Please keep in mind all of this is happening now without consent or audits. If a level was to be bought in then I would recommend that 15-20% of total farm area or 20ha per land title.

I would also like to note that total stock exclusion from water ways is not acceptable. My reason for this is, there are different stocking rates for different areas of land. For example; we have a hill country block run extensively as a hind calving block. Total stock exclusion would render this area, no longer functionable with all of the springs fenced off. My recommendation to fix this would be to have a SU/ha ratio, if stock are to be in hill country amongst springs. I would suggest that 10SU/ha would be an appropriate level to have. I have reached this level from previous experience with a calving block we use. There is a sediment trap at the bottom of this area. Bearing in mind this good practise has been happening for more than 20 years, at cost and willingness from us as the tenants of the land.

As an industry we do not need to be forced to write up a farm environmental plans. This can be achieved from within our industry. The compliance for this will have a lot less expense, leaving more funds available to be spent where it will make the most difference to the environment. I.e P2P parties actively talk amongst each other, NZ Land Care Trust and also ECan about riparian planting to

protect our waterways and hill sides. This is all currently happening with out paying consents or auditors. If you would like more information on this then it is widely circulated with the above groups. In April 2018, Helen Risk from ECan attended our monthly meeting with a large group of deer farmers from all around the region. The meeting was held on our property to assist each other on how to improve, to achieve the best farming practises. In our view this will be successful at a lower cost for all involved including ECan. I believe it is fair to say Helen was impressed and was helpful in creating our FEP. It also allowed us to further ourselves in learning more about critical zones on our farm and to see how well we are doing. This also gave other farmers, NZ Land Care Trust and ECan the chance to see how we are doing and a chance to speak up and lets us know where to improve.

The perceived risk is exactly that, PERCEIVED. It has not been proven with recent or even local studies. We strongly believe that this process is being rushed without facts and data to back up what has been PERCEIVED. This is not enough evidence. Once we all understand the real situation then a plan can be put in place to mitigate any issues.

Further more I believe that there is too much onus being put onto the farmer for the E-coli levels in the local lagoon. ECan clearly states that there is not enough known about the risks associated with storm water drains that feed the local lagoons. I can tell you from first-hand experience that a very large percentage of the E-coli level, in particular Temuka, would be severely decreased to a much more respectable g/m<sup>3</sup> if they did not directly flow into rivers and lagoons. Exert from PC7 [Orari, Temuka, Opihi and Pareora Zone: state and trends in water quality and aquatic ecology. Draft Environment Canterbury Report No. R16/63](#) "Waitarakao/Washdyke Lagoon has high mahinga kai values and is recognised as a regionally important wildlife refuge. Little is known about the risks associated with stormwater inputs, drainage issues, and the challenges for future management of the catchment with regards to coastal erosion and expanded industrial development. Additionally, concentrations of nutrients (TP, TN) and *E. coli* in the lagoon exceed their respective NPS national bottom lines.

On the LAWA website it is quoted in saying that testing at the Manse Bridge north of Temuka as being in the top 25% for its 5 year median average of 0.01g/m<sup>3</sup>. This tells me that phosphorus run off from farmland above that bridge and rivers feeding into are not an issue that needs to be addressed by consent and audit process. Where I believe the issue is coming from, is the Taumatakahu Stream. The test site on Murray St clearly shows that the massively elevated levels of E-coli (which is "very likely downgrading"), this is very alarming when a huge push on the farmers is towards E-coli levels, phosphorus levels and nitrate levels to be fixed by PC7. To further my point the dissolved reactive Phosphorus level in the Taumatakahu Stream are more than twice the levels coming through from the Manse Bridge site and also twice the total Phosphorus level as well.

The Temuka river that feeds into the Opihi Lagoon is feed from a large amount of "high risk" Phosphorus run off land. I am very confident in saying that the problem is coming from Temuka township. The evidence that is provided on the LAWA website for its testing is testament to this. Before farmers can be further accused of decreasing water quality, Temuka township must be held accountable for its major part in E-coli levels, Phosphorus levels and Nitrate levels. The farmers have evidence to support that we are improving in our part in water quality over the previous trying seasons. Taumatakahu Stream has evidence of decreasing water quality and feeding into major issues in the local lagoons. Therefor more information needs to be learnt about storm water run off

and the effect it has on our countries lagoons before we as a farming community get punished for something that is clearly not in our control.

I firmly believe that these points I have raised clearly show that there is much to learn about Phosphorus runoff and where it comes from, which leads me to my final point. The “high risk” Phosphorus runoff zones are built on perception, which is not enough to bring in consents and audits. Particularly since current testing in our local area at high concentrate areas like the Manse Bridge test site, are proving that we are improving now on our own backs and industry funded best practise.

If we are forced to pay compulsory costs to ECan and contract auditors etc, then it will be our recommendation that our voluntary contributions from our levies will cease. This would be a shame as at present the money is spent efficiently with very little wasted by bureaucracy.

In 2007 we won the Balance Farm Environmental Awards for Innovation of which we are very proud of. This goes to show that we are serious about doing our best for the environment but there is only so much money that can be spent on this cause so it has to be spent actually doing the work. We consider our industry to be doing a very good job of the work being achieved to date.

Digital Signature. I have been given authority by each individual to include their digital signature in support of this submission.

George Rooney

Donald Hudson

Kathleen Hudson

Robert Hudson

Karen Hudson

James Hudson

Michael Hudson

Anna Hudson

Edwin Swain

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Kind Regards,  
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