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**Subject:** PC7 EIC - As One Inc (submitter number 387) [DC-Documents.FID2837222]  
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**Attachments:** [image003.png](#)  
[15072020\\_20069\\_CLWRP\\_PC7\\_Waimak\\_evidence\\_Mike\\_Freeman\\_FINAL.pdf](#)  
[Evidence of Mark Nalder for As One Inc \( 11769417 1\).PDF](#)  
[Evidence of Julie Mehrtens for As One Inc \( 11769253 1\).PDF](#)  
[Evidence of Alan Hawkins for As One Inc \( 11769411 1\).PDF](#)  
[Gavin Reed PC7 evidence \( 11769244 1\).PDF](#)

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Good afternoon,

Please find **attached** the following evidence. This evidence is filed on behalf of As One Incorporated (submitter number 387), and also on behalf of individual submitters, where a second submission number is provided:

- Dr Michael Freeman (expert evidence);
- Mark Nalder (submitter number 272);
- Julie Mehrtens;
- Alan Hawkins (submitter number 413).; and
- Gavin Reed (submitter number 374).

I have copied Hans van der Wal into this email, who is also counsel for As One Inc.

We note that additional information was loaded onto the Plan Change 7 hearings website yesterday. Our witnesses have not had the opportunity to review that information, or comment on it in this evidence. We reserve the right to file further evidence in response to those matters, if required.

Kind regards,  
Jamie.

**Jamie Robinson**  
Associate

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## **BEFORE THE HEARING PANEL OF THE CANTERBURY REGIONAL COUNCIL**

**In the matter** of the Resource Management Act 1991

**And**

**In the matter** Plan Change 7 to the Canterbury Land and Water Regional Plan

Statement of evidence from Mark Nalder (submitter number 272), also on behalf of As One Inc (submitter number 387).

Dated: 17 July 2020

### **Experience, background and our farm.**

- 1) My full name is Mark James Nalder. I am a dairy farmer near the Cust township. My wife Pam and I operate as Four Hooves Limited, and we have owned and operated this farm for 6 years. We milk 360 cows.
- 2) I worked in the building sector for 8 years, before we started share milking 330 cows on my parent's property. We contract milked and share milked over the next 5 years building cow numbers to 920 in Waimate having moved several times. That gave us the equity to purchase our current farm in 2014. The wealth we built we achieved ourselves, through a huge amount of hard work. We are incredibly proud of the farm that we now own and operate ourselves, not for someone else. Although we employ some casual staff, my wife and I run the farm mostly by ourselves
- 3) The property has been a dairy farm for around 80 years. A local historian thinks it was the second farm in Canterbury to be irrigated. The Cust River runs through the property.
- 4) Our farm is irrigated with water from wells on site. We are slightly unusual in this area, as we are not supplied water by Waimakariri Irrigation Limited. We operate under resource consents that authorise our water take, with our irrigation consent needing to be renewed in 2024.
- 5) Our farm is located in "Zone E" of the Nutrient Priority Areas identified by ECan in PC7. Within that zone, there is a requirement that our farm reduce nitrogen loss by 90% beyond GMP.
- 6) To understand the impact of that, you need to understand our current situation:

- a. The Nitrogen Baseline for the property is 59kg N/ha. In the 2018/2019 season, our loss rate as estimated by Overseer was 54kg N/ha.
  - b. When we use the Farm Portal to assess our GMP Baseline number, we are advised it is 36kg N/ha. This is a significant shift from our current situation.
- 7) Since purchasing the property, we have had two poor payout years. Despite that, we have strived to improve the property, with the priority being to re-fence the property. All waterways are now fully fenced off, with stock excluded. We have also spent some capital on the dairy shed and an in shed feeding system.
  - 8) When we first purchased the property we wintered on, but this winter we have been able to winter off. Our decision to winter on or off depends on several things, however I consider we are lucky to have a farm that provides us that choice.
  - 9) We made a submission in our own name (Four Hooves Limited, submitter number 272), however we are also members of the As One Inc group, and fully support the submission and evidence that group has prepared.
  - 10) My wife and I fully support the goals of improving water quality, and we acknowledge the importance of farming well. However, the methods that this Plan Change propose will only result in sending those farmers within the Nutrient Priority Areas bankrupt. Any environmental improvements need to be introduced in a way that is financially viable.

**My key concerns with PC7 as proposed are:**

- 11) The 6 reduction steps as proposed in table 8-9 for our property will send me broke. The dairy milking platform will be non-viable. Immediately there is the effect on the value of my property. Secondly there is the impact on profitability. The effect on cash flow is not immediate but the effect on value of the property is. That could affect my bank security.
- 12) The reduction steps are stated as being needed to improve the water quality in the Cust main drain yet less than half of the Cust surface catchment has been included in Zone E. The remaining area of the Cust surface water catchment requires no reductions beyond GMP.
- 13) The reductions are primarily to be made by dairy milking platforms and other consented activities. There is approximately 1500 ha of dairy milking platform that is in both zone E and in the Cust surface catchment. That is 8.5% of the Cust Surface catchment of 17,856 ha. That small area is responsible for achieving a large proportion of the required water quality improvement.
- 14) I have read the evidence that Mike Freeman has prepared for As One Inc. Although I don't pretend to understand everything he says, it resonates with what I understand as a farmer in the area. There seems to be some massive flaws with what ECan is proposing, that Mike has identified. My biggest fear is that this process will send me, and others like me in the "NPA"

broke – all without improving water quality because so many sources remain unchecked.

- 15) Under PC5 we are required to be farming at GMP from 1 July 2020. That is now. That means we should be farming to the GMP number of 36 kg N/ha. The reduction steps from that would be to 30, 25, 19, 14, 9 and finally down to 3 over the 6 steps.
- 16) It is my understanding that the Portal which generates the GMP number does not work. Again, this isn't something I pretend to be an expert on, however I am someone whose livelihood is made or broken by that number. I understand around the farming community there are serious concerns with how the Portal works, and the number it generates. It doesn't seem fair to me that my business, and my livelihood, is dictated by something that is commonly accepted as flawed at best, and broken beyond repair at worst.
- 17) If the Portal is right, the 36 is correct then that is already a reduction of 39% from my baseline.
- 18) I am presenting this evidence because I am hugely concerned about my future, and the future for my family. There is no question that these changes will bankrupt us, the only question is how quickly we will get there. These changes will not only affect us. The rural businesses we support, local schools our children attend, and community events we assist with will all suffer as the farmers within the NPA struggle to continue farming.

Mark Nalder

17 July 2020