

**Before The** Waikato Regional Council

**In the matter of** Healthy Rivers Wai Ora Plan Change 1 and Variation 1A

**Statement of** Dorothy (Dot) Parrott, John Parrott, Katherine Parrott and  
Conor Reeves Parrott

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Contact for service:

Name: Katherine Parrott

Phone: 027 6225565

Email: [katherine@redfeather.co.nz](mailto:katherine@redfeather.co.nz)

## Scope of Statement

1. This statement:
  - a. Introduces our farming business, and the ways that my parents and brothers farm to the natural capability of their property. It also introduces my perspective as an agri-business strategist, leader and futurist who sees both sides of the farm gate.
  - b. Outlines which parts of the proposed Plan will make it difficult to deliver on-farm environmental gains;
  - c. Specifically, I will focus on:
    - Long term land use
    - Nitrogen Reference Point – Provisions
    - Stock Exclusion – Provisions
    - Farming within Environmental Limits
    - Restricting Land Use
    - Contaminant Loss from Farm
    - Subcatchment Approach – provisions
    - Stocking Rates
    - Grazing Slopes and Grazing Winter Forage Crops
    - Social, Economic and Cultural Wellbeing, People and Community Resilience
  - d. Outlines alternative ways to better meet the Plans objectives;

## Introduction

Our names are Dorothy (Dot) and John Parrott, Katherine Parrott and Conor Reeves Parrott. We are three generations of a family that have been farming at Te Uku for 5 generations.

A love for the land has always been central to our family's thinking. We have worked extremely hard, through many generations to hold onto our land, carefully develop it and to support our families. Our love for our farms and the drystock farming way of life is evident through the current three generations of our family. We currently have 4 separate families involved in our Te Uku farm.

Throughout our lives, we have always been members of close knit and vibrant communities of people, who care about their land and consistently do their best for it. Farming practice has changed significantly in the 70+ years of my mother and father's farming careers, but we've always done our best to farm to current best practice, whilst looking after our land for future generations. Developing more sustainable and environmentally considered farming practices has been a natural progression and we are committed to looking after our land in the future as best we can.

## Farm Specifications

We farm a mixture of sheep, beef and dairy support on our approx. 370 acre farm at Te Uku. The farm is at Hauroto Bay at the top of the Raglan Harbour, and is approximately three quarters bounded by sea.

This farm has been in our family since the early 1930s. In the last 10-15 years when it was bought from Dot's parents' estate by Dot and John, we began fencing off the foreshore and doing riparian planting. This has equated to approximately 4 kilometres of fencing and planting, with further plans to complete more over time. This planting has the effect of controlling erosion, preventing stock from entering the harbour and waterways and assisting the local ecosystem. Our farm has an abundance of birdlife all around it, which we take great pride and pleasure in seeing.

We are careful not to overstock this farm, undertake careful stock management to maintain land and soil conditions, and have a nutrient plan in place so as to minimize the effects of fertilizer on land, waterways and the harbour. My father is 81 years old and is still the day to day farmer on this 370 acre property, along with another 100 acres next door. An integral part of our farm management decisions are based around his abilities at his age. Let me reinforce to you that at 81 years of age, you don't haul yourself out of bed rain, hail or shine to go out into the weather when you're not doing what you know and love.

Our wider family gathers, recreates and spends time on this farm, and in the harbour. A small family bach at the water's edge is the site of many holidays and gatherings. Our family has photographs of this bach from the days when people wore hats, suits and long dresses to go to the beach.

In my professional career I have worked with Beef + Lamb New Zealand to help them create their first environmental blueprint. I have attended farm environment conferences and proactively encouraged my family and other farmers to engage in the environmental sustainability discussion. I helped organise a B+LNZ Level 1 Land Environment Plan workshop in the Te Uku area approximately 3 years ago.

Last year, my family entered our Hauroto Bay farm in the Ballance Farm Environment Awards for the first time and we note that one of the judges' comments to us in their report was a recommendation to increase the stocking rate on our farm so as to make more of the potential of the property. From this, we drew a conclusion that we are walking gently on the environment on this property. We also support the Farmers For Positive Change alternative plan to Plan Change 1.

We are here today to speak to our submission, because we believe Plan Change 1 has largely failed to consider the implications of the plan on an entire sector – the drystock farming sector. It does not take into account the impact on the drystock sector's productivity, profitability or sustainability – meaning the ability of the sector to survive in the future under this plan. Also deeply concerning is the lack of consideration of the effect of Plan Change 1 on rural communities, because many of the items in this plan will significantly disadvantage some groups, pitting neighbours and communities against each other because they have not been treated fairly.

Please be very clear that we are prepared to play our part in environmental sustainability. But we believe we need a fair system that gives a fair opportunity to good people who would like to continue with the way of lives and careers they have chosen. Our fear is that in some cases, Plan Change 1 will prevent that. In most cases, the remedy we seek is for the plan to be amended and re-notified when a fairer, more considered, and progressive plan has been created.

## Specific parts of the plan I am commenting on

[Long Term Land Use Objectives: 1,3 and 4 Policy 5 and 7 Rules 3.11.5.3 to 3.11.5.5 Schedule 1](#)

We oppose these for the following reasons: this creates too much uncertainty as there is no visibility of what will be required past the 10 year timeframe of this plan. These sections raise the possibility that land may be required to go into forestry/native bush – but it doesn't say how much land. This makes it impossible for farmers to effectively plan for the future and may mean significant investment made by farmers will be wasted once future plans are brought into effect.

This part of the plan may cause significant capital devaluation of many farms – some to the point where they are uneconomic. It also means people won't be willing to invest in the improvements required, or in farms going forward, which is so counterproductive to what we are trying to achieve environmentally.

[Nitrogen Reference Point Objectives: 1 and 4 Policy 2 and 7 Rules 3.11.5.2 to 3.11.5.7 Schedule 1](#)

We strongly oppose this and our reasons for this are that fundamentally the system being proposed is unfair.

There is no ability to increase production which impacts significantly on farmers' ability to grow their businesses. Drystock farmers have traditionally always relied on flexibility in their farming systems and responsiveness to market conditions to stay sustainable. At present, our farm is stocked lightly at a rate an 81 year old farmer can cope with managing on a day to day basis. In our feedback from the

judges of the Ballance Farm Environment Awards last year, their recommendation to us was to increase the intensity with which we're farming. If a younger person was managing the farm, or when the next generation takes over the running of the farm we could do this, but we're unable to at present because our dad can't cope with that level of work. It's totally paralyzing to the future of this property if we are unable to increase production at any time in the future. Our family has fought tooth and nail to keep this farm in our family – it still has debt on it, so there will come a time when being able to increase production will be important for its sustainability. At the moment, living and working this farm is the choice of my parents as their home and place of work. But eventually, to stay in the family, production on this property will need to be optimized within sustainable limits.

Using a Nitrogen Reference Point is a form of Grandparenting – and this is not the best method for managing nutrient allocation. There are much better systems that give a more fair outcome and which allow individuals farmers the ability to be flexible in their farming business. Flexibility in farming system has always been important for drystock farmers to allow them to change farming policy based on market prices. This has been integral to their survival and will continue to be in the future.

In the past 20 years our farm has been used for many different purposes – for example growing maize or other forage crops, calving cows, grazing dairy heifers, fattening wagyu beef cattle, or fattening lambs.

Using Nitrogen Reference Points as the method for governing future farming practices uses an arbitrary historical method to control the future. This seems a nonsensical, ill-considered and unintelligent approach, given the rate of change in the modern world, and the fact we have no idea what technological, genetic, farm management or other advancements will be developed in the future that enable us to farm more efficiently or sustainably. In the information age, where we have the ability to use data and information to innovate more than we ever have in the past, grandparenting is simply not the best approach and properties/individuals' futures should not be controlled by an arbitrary historical measure. Can you think of a single other business entity or sector that is determining their future by looking at an arbitrary historical measure?

On our farm, we (and most other drystock farmers) are already low emitters. This method of nutrient allocation does not support, encourage or reward those who have already put positive changes in place that improve environmental outcomes. This method allows already high-emitters to continue to be high-emitters and is grossly unfair. Why on earth would you consider implementing a system that discourages those who are doing the best work?

Using Nitrogen References Points (or grandparenting) for nutrient allocation is detrimental to communities. It would be much better to use a different, more community-led approach that allowed communities and catchments to achieve the outcomes required. Nitrogen Reference Points as an approach pits neighbor against neighbor and is greatly concerning for the health and wellbeing of our communities. We recommend that a natural capital approach, in combination with a sub-catchment approach would achieve much better outcomes for the Region as a whole.

#### [Stock Exclusion Rules 3.11.5.3 to 3.11.5.4](#)

We oppose this part of Plan Change 1 as it currently stands as the National Water Accord provides a fairer, more equitable and achievable proposal. It recommends a different definition of a water body,

which we are more comfortable with. It also recommends that slopes up to 15 degrees should be fenced and we think this is a better solution for Plan Change 1, as a 25 degree slope is so impractical in many cases. As demonstrated by the Federated Farmers study, the cost of fencing hill country farms is prohibitive.

It is not clear from the plan what would happen in the many instances where fencing a water body was impractical, extremely difficult or likely to be damaged by naturally occurring weather events such as flooding. Our Hauroto Bay Farm is mostly rolling country with an easy contour, so we raise this point largely for the sector as a whole. However, one of our biggest challenges lies in managing the effects of foreshore erosion, so we do have experience of fencing off waterways that are then damaged by weather events such as flooding.

Our farm is approximately three quarters bounded by the Raglan Harbour. When fencing the foreshore, we were careful to set the fences back by a generous amount, ensuring plenty of room between the foreshore and our fences. However, we have already experienced significant areas of erosion where king tides and extreme weather events have caused the land beneath our fences to erode and require repair. Flooding and damage can occur even on easy-contour land, and the ongoing costs of maintaining fencing and plantings combined with the uncertainty Plan Change 1 creates around land use leaves farmers with huge uncertainty about what types of fencing to do, and how much to invest. The lack of long-term future for the drystock sector in particular as a consequence of Plan Change 1 leaves a huge amount of uncertainty about whether fencing is worth investing in. This too is hugely counterproductive to what we are all trying to achieve environmentally. We need certainty of our future to invest in the remedies we need to make.

#### [Restricting Land Use Change Pages 15 – 16 Policy 6 Rule 3.11.5.7](#)

We oppose this section of the plan and recommend that it be deleted in its entirety. The reasons for this are many.

This devalues our land, and could impact significantly on the potential value of our land in the future. It could impact significantly on our ability to farm sustainably i.e. To generate enough income to survive, and/or to meet environmental outcomes. In essence, we feel that this outcome is covered by other rules contained in the proposed plan.

As it is now, this part of the Plan restricts the ability of current and future generations to develop a farming business. It will impact my 81 year old father, and it will impact my 11 year old son Conor. He is here today as he would also like to say something to you.

#### **Conor:**

I think this plan is not fair and needs to have some changes. I lived on my grandparent's farm at Hauroto Bay for more than 8 years. I have camped on the edge of the harbour, swum in the sea, fished, kayaked, rode my horses on the farm and played in the mud my whole life. I help my grandparents on the farm and see how hard they work to look after it. My grandad is 81 but still does 95% of the work on the farm and he looks after it everyday of the year non-stop.

Hauroto Bay is a very special place for our family. At school, we learn about how important it is to look after the environment and that we should aim for a sustainable future – people make so much rubbish and pollution and we know that we need to make a lot of changes to stop the earth dying. But I would also like my cousins and I to have a chance to be the farmers at Hauroto Bay in the future. One day we want to be the people who take care of this farm. We would like you to make a

fair plan so that we have a chance to take care of the fabulous farm at Hauroto bay.

We have no idea what technological, production, genetic, nutrient management or farming practice advancements may be developed in the future. This section of the plan prevents flexibility in the future, when technological advancements may help facilitate the changes that we need to implement. If we don't have the ability to change our land use, we lose freedom of choice on the land we own, and we lose the ability to implement new innovations that could help us do even better. We're committed to good environmental outcomes, but we should have choice about how they are achieved.

It also restricts our ability to react to changes in the wider environment and maintain a sustainable business. This includes changes in the market, climatic changes and the effects of adverse weather. Ultimately, it means our flexibility to farm in response to wider environmental conditions is reduced and the drystock sector relies heavily on this ability.

### [Contaminant Loss from Farm Objectives: 1 and 3 Policy 1,2,4 and 7 Rules 3.11.5.2 to 3.11.5.7 Schedule 1 Table 11-1](#)

At present, Plan Change 1 states that even with the measures it proposes, the Waikato Region will not meet Objective 1 – which means that the plan is fundamentally flawed and will not deliver on its objectives. Therefore, we think these provisions need to be deleted in their entirety, with the plan being amended and re-notified once clear indications of land usage and outcomes are available.

We also note that the plan offers no thinking beyond the 10 year timeframe to indicate how the 80 year water quality attribute targets will be met. This creates a state of great uncertainty, with no clarity beyond a 10 year timeframe, but also no firm foundation for people to act on in the 10 year period of this plan. This is untenable – how can farmers be expected to undertake hugely expensive programmes on their farms, if they have no certainty about the future of their farms beyond this 10 year timeframe?

We also note that the proposed method of measuring contaminant loss from farms is built on incomplete science. The Overseer model used to measure contaminant losses has significant margins of error and does not provide a sufficiently reliable solution. This creates further error, uncertainty and potential unfairness. We understand very well that Overseer is the only system currently available but choosing to pin the basis of the entire Regional Plan on incomplete science and a system with known errors seems a flawed strategy in itself.

### [Sub-catchment Management Policy: Implementation method: 3.11.4.1 and 3.11.4.5](#)

On to something more positive - we support these parts of the Plan in part, as we believe a community-driven sub-catchment approach is an excellent way to facilitate wide-spread environmental gains, but do ask that it be amended. A sub-catchment approach has the ability to allow communities (and the Regional Council) to work together collaboratively. We strongly encourage you to include a sub-catchment approach in the rules with any consequential amendments arising from the submission process.

There are so many examples of communities proactively banding together to form catchment or sub-catchment groups. This has the ability to build community rather than divide it and gives more flexibility as a community works together to solve the issues.

## Stocking Rates Objectives: 1 and 3 Policy 1,2,4, 6 and 7 Rules 3.11.5.2 to 3.11.5.7 Schedule 1 Table 11-1

We would like to see this provision deleted in its entirety as it gives no ability for farmers to change their stocking rates, thus having the potential to cripple them in their businesses. I have already spoken about the fact that our farm is currently stocked at a lower than optimal rate because of the age of my father, the main farmer. Under the current Plan, we would have no ability to change our stocking rate should we want or need to and this is not practical for the future. As I have already spoken about, this part of the Plan is too restrictive and inflexible for dry stock farmers and the consequences for this sector in particular need to be better understood.

## Grazing Slopes and Grazing Winter Forage Crops Objectives: 1 and 3 Policy 1,2,4, 6 and 7 Rules 3.11.5.2

We believe this provision should be deleted in its entirety because a blanket ban on grazing any part of a property with a slope greater than 15 degrees immediately renders huge parts of many farming properties unfarmable. This would clearly have a massive effect on the productivity and profitability of many farming businesses, creating an enormous amount of destabilization and uncertainty with a very negative impact on many farmers, families and communities.

The loss of farming area will of course have a very detrimental effect on farm values, meaning families lose their investment in their farms – an investment made in our case over the course of many generations.

Similarly, a blanket ban on grazing winter forage crops is untenable and unnecessary. This will adversely affect the farming practice of many farmers. Done sensitively, and within appropriate environmental limits, grazing winter forage crops can be environmentally sound.

For these policies and rules, we suggest that the plan is amended and re-notified once further thinking, research and consultation with affected parties has taken place and an effective, sustainable way forward is developed.

## Social, Economic and Cultural Wellbeing, People and Community Resilience Objectives: 1, 2, 3, 4

This plan has a massive effect on the productivity and profitability of many farming businesses – and may render many of them uneconomic in the long term. This will hugely destabilize many farming businesses, creating significant uncertainty, and will have a huge negative effect on many farmers, families and communities. The negative mental, financial, emotional and physical impacts of this plan will be significant.

As it stands, Plan Change 1 will devalue people's farms significantly, meaning families lose the investment in their farms – which has often been made over many generations. Many of the requirements are impractical and unaffordable. People may lose the value of their life's work – or the work of many generations.

In the case of my parents, the value of their farm is literally all they have. There is no retirement fund, no other investments. My mother contributes approximately 20 hours per week of voluntary

time to her community – as a trained nurse, she contributes to her local church, rest home and many of the elderly, ill or dying in our community. If my parents lose the value of their farm, who will look after them? And who will look after the people they care for? What will replace the contributions we all make in our communities?

This plan detrimentally affects the social, economic and cultural wellbeing of a large group of people in this Region. It will impact negatively on communities.

This plan takes a highly regulatory approach to achieving water quality. This is NOT environmental leadership. This plan not build resilient communities – it creates regulated, rule and compliance-based communities, that are divided, in conflict and disempowered. In this day and age, we should be working in a more modern, collaborative and community-oriented way – organisations from primary schools to businesses are adopting far more people-driven collaborative approaches. Communities working together can achieve the outcomes that are required, but this plan does not give them the opportunity to do so – instead, it creates a rigid, inflexible, compliance-based situation where neighbours will have totally different outcomes and a lot of ensuing conflict. We can do so much better as a Region than the current contents of this plan!

### In closing

**A lot of people speak unkindly about the drystock farming sector: we are the quietly-spoken poor cousins of the dairy industry – particularly in the Waikato Region. It's not in our nature to fight, make a fuss or sing our own praises. The drystock farming industry has been criticised for being slow to the environmental table, but the truth is, the drystock farming industry has quietly and consistently been making environmental gains – such as a 30 percent reduction in our total carbon emissions since 1990. This improvement was achieved via a combination of production efficiencies, improved breeding and better farm management practices. And we're making gains in water quality too.**

**You'll no doubt have noticed that there were a large number of dry stock farmers who have gone deeply outside of their comfort zone to comment on this plan. That's because if this plan went through unchanged, it has the ability to decimate a very valuable sector of the community in this Region (the drystock farming sector) resulting in a lot of good people's way of life being lost or radically changed.**

**There's a lot of discussion out there that by forcing the drystock sector to plant their farms in trees, is a convenient solution to a few large problems. We make some cursory gains towards water quality outcomes, we allow the big business engines of dairying and the market gardeners of Bombay to continue largely unchecked and we even tick off some carbon outcomes along the way. We think this is a narrow, short-term view that falls short of what this Region is capable of achieving. We can do so much better.**

**We believe that implementing Plan Change 1 as it currently stands would completely overlook the opportunity the drystock farming sector has to contribute to the environmental changes that are needed in this Region and New Zealand as a whole. We strongly encourage you to revise the contents of Plan Change 1 and put in place a plan that takes a fairer, more progressive and collaborative approach to leadership of water quality in this Region. Thank you.**