

M and P Harding submitter no. 73451

Healthy Rivers Plan Change One

Mr Chairman, fellow Commissioners,

Thank you for the opportunity to speak to the submission my wife and I made to the Waikato Regional Council's Healthy River's Plan Change 1.

I farm in partnership with my wife Pam on 426 ha of land that is in catchment No 19 and designated as Priority 2 in Plan Change 1.

The land is rolling to steep limestone country made up of 365ha in grass, 35ha of native bush and 26 ha of plantation forestry.

We farm sheep and beef at a ratio of 50% cattle to 50% sheep, with a stocking rate of just over 9 su/ha. The mix of cattle to sheep has been the same over many years and we believe it is tailored to environmental sustainability. We have resisted the urge to run more cattle at the expense of sheep, even though economically we would have made more money from the cattle. Significant areas of steeper land have been designated "sheep only" to avoid the excessive erosion that cattle would cause. Also consideration has been made as to the class of cattle we winter on our predominantly clay soils. To this end our main cattle policy involves carrying rising yearlings through their first winter and selling them before their second winter.

On our land the rising yearling cattle cause far less erosion than older heavier cattle.

Future development of the farm will concentrate on improving production from our better land, while less productive land will be farmed at environmentally sustainable stocking rates. 65ha has been identified for retirement in the future. This land consists of steeper, erosion prone cliff faces, steep gullies and potential wetlands.

Much of our land is prone to both creep erosion and in major rain events, large scale slipping. 30 years ago we began planting poplar and willow poles to hold these (vulnerable) slopes. This has largely been successful although many more years of planting is needed.

In our submission we opposed a Nitrogen Reference Point. We strongly oppose this provision on the following grounds:

1. The nitrogen leaching on our sheep and beef farm is estimated at much less than half of the average Waikato dairy farm and has been that way for years. Why should we be constrained from increasing our production when we are not the problem? The reality is we would have to more than double our nitrogen leaching to come close to the nitrogen leached from the average Waikato dairy farm.
2. A nitrogen reference point is a draconian measure that stops us from increasing farm production but lets the real nitrogen polluters continue to pollute our waterways.
3. Sheep and Beef farming in the Waikato is an all grass system. To farm profitably into the future through good and bad climatic seasons we require a flexibility in the Nitrogen Reference Point of 20%. Typically, in a good season, farmers will carry stock longer and to heavier weights, even

carry a few more stock. Both of these measures would increase the Nitrogen Ref Point significantly. Conversely, in poor seasons, the opposite is the case in an all grass system. Stock will be sold earlier and at lighter weights and less stock may be purchased as replacements. These measures significantly depress the Nitrogen Ref Point. For these reasons, to farm profitably, sheep and beef farmers need a 20% flexibility in the Nitrogen Ref Point. I am sure you would agree that profitable farmers are more likely to spend money on enhancing the environment than unprofitable farmers. Sheep and beef farming in the Waikato needs to be profitable for the sector to do good environmental work.

I would now like to focus our attention on a statement from the Healthy Rivers Plan Change 1 document which reads;

"Full achievement of the Vision and Strategy will be Intergenerational". We have no problem with this - a factual and plausible statement.

However there is a sentence in support of this statement which I will comment on:

" In addition , the current understanding is that achieving water quality restoration requires a considerable amount of land to be changed from land uses with moderate and high intensity of discharge to land use with lower discharges: (e.g. through re forestation)"

Commissioners, the specific areas of land that may be retired through regulation in the future need to be identified and signaled to farmers now. Farmers need and deserve this information so that they can make sound economic decisions in their business going forward. Some farmers face considerable expense constructing fencing to protect waterways on steep land and clearly this money could be largely wasted if the land is required to be retired in the next Plan Change. If they have the information now farmers may decide to retire the land now rather than incur those fencing costs.

The 65 ha we have identified for future retirement is shown in the power point. It has a Land Use Classification of 6e and 7e. The soil is shallow - often only 1 to 2 feet of soil above the mud and silt stone rock. However it is still productive land, carrying sheep at a stocking rate of around 7 ewes per hectare

My concern commissioners is that this land has limited economic value if it is retired. Clearly the shallow depth of soil and steep topography would not support large heavy trees. Planting Manuka may be a viable option. However, bee-keepers require blocks of greater than 80ha for Manuka honey collection.

My thoughts at present are that natural regeneration might be the best option. If this happens a financial return from carbon credits will be a long time coming and at the present price of carbon would not come close to equating to the sheep farming return from this land.

Therefore, taking 65 ha of land out of our present farming system will cost us money. We believe provision needs to be made to compensate farmers who retire farmland that has limited potential for forestry, carbon farming or other economic enterprises.

We believe that a fundamental basis to the Healthy Rivers vision needs to be that:

"The community shares the cost of future changes in land use".

To simply state that farming has caused the pollution in our rivers and farmers need to clean up the mess will not achieve the results we all desire. We need to work together and the cost must be fair and equitable.

Finally, our plea to you as commissioners is to draft this Plan in such a way as to encourage farmers to follow best environmental practice voluntarily. Encouraging farmers to work together in sub - catchment groups will achieve far greater progress, far sooner than regulations will ever achieve. In our view regulations only have a place as a means to bring slow adopters into line with the majority.