

BEFORE THE

Waikato Regional Council

IN THE MATTER OF

Healthy Rivers Wai Ora Plan
Change 1 and Variation 1A

STATEMENT OF

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STATEMENT OF Jo and Andrew Gaston

This statement:

Introduces our sheep and beef farming business and the way in which we manage our land to make the best of it and also preserve its natural attributes.

Outlines the parts of PC1 that we support and those parts that will challenge the future viability of our farming business and compromise our plans continue to implement and maintain farm environmental gains; Specifically our focus in on:

- i. The foundations of the Vision and Strategy and the need for certainty going forward
- ii. Nitrogen reference point
- lii Stock exclusion rules
- iii. Land use change restriction
- Iv. Farm management plans
- V. Sub catchment approach

Outlines an alternative approach focussing on a WRC fully supported sub catchment approach and other suggestions as alternatives to the rules in this proposal and

How we want to progress in developing our business for the future.

1. My name is Jo Gaston. My husband Andrew and I are owner operators of a 625ha effective dry stock farming business located at Mahoenui in the West Coast catchment. We felt strongly that it was important to be involved now in this process because these changes will potentially affect all farmers in the Waikato regions four catchment areas.

The Gaston family have been farming in Mahoenui for the last 55 years and our partnership of 27 years is the second generation on this property which we have expanded over time.

Our family have a well established commitment to caring for the land with Andrew's father creating many dams and ponds on the farm 30 years ago (as he cleared the land of gorse) which have developed into natural wetlands and sediment filters. These now flourish as a natural habitat for flora and fauna alike creating an environment rich in

biodiversity. The stock generally leave these areas alone due to the preferred provision of clean reticulated trough water.

We run a breeding and fattening operation with perendales and angus cows in a 68/32 ratio at an approx. 9.4 stocking rate per ha. We sell fat and store lambs, try to fatten most of the male cattle as R2 progeny, with heifer replacements selected at 15 mths to calve as two year olds. The cows are split into 2's, 3's, 4's and calved out on the hills with the ewes to reduce soil damage over the winter spring seasons.

We have a large area of retired native bush 268ha as well as numerous small areas of bush with future plans to fence these off. We would like to see our native bush retirement block recognised as contributing to environmental mitigation.

Our soils are predominantly Mairoa Ash over banded mudstones and sandstones which are light and prone to drying out but also some areas are prone to erosion from slumping from a high rainfall which is on average 1650mm per annum.

We have low Nitrogen inputs and outputs, the potential for some E. coli contamination and recognise that sediment and phosphorus losses are our main water quality issues.

We have 8% flat to undulating land, 12% rolling to strongly rolling down lands and 60% moderately steep hill with remaining steep hill country. As part of our environmental management plans we have a detailed farm plan created by a Land management consultant which gives clear guidance for land use and specific environmental mitigations we can undertake such as waterway fencing, pole planting and land retirement for erosion control, track management and encouraging biodiversity etc.

Our hill country needs careful management in the winter and low stocking rates. The wet winters and the heavy soils are prone to pugging from cattle and we have to manage our stocking rates by selling heavy cattle in the summer and autumn.

In many of our gullies we have naturally occurring wetland sediment traps of raupo and flax which the stock stay out of due to the provision of water troughs in each paddock. (Photo) Which make the mandatory fencing off of such water bodies unjustified and a poor use of resources.

Over the years we have fenced off sections of stream banks to prevent stock (either sheep and cattle or cattle only) from entering the waterways as finances would allow. (photo) We have also planted small sections of river bank and allowed growth of self seeded trees to create shady water environments to improve water quality.

We value the ability to make decisions regarding our unique farm and farming operation for the different stock types and classes we manage and need to retain independence and flexibility to allow us to look after our business and the environment at the same time. We favour a well supported educative approach to bring about the necessary changes in farm management practices in order to achieve improved water quality in our local catchments. We accept that there will be a need for some regulation to bring those reluctant to change into line.

With support from Andrew I have been actively engaged with WRC PC1 from the CSG and B+LNZ farmer consultative workshop stage and encouraged my local community and rural women's farming group to participate. Later as member of the KCRC group we collectively worked hard to engage our fellow farming colleagues in both the PC1 catchments and the West Coast catchment. I personally felt it was critical to be involved with this process as I could see the far reaching effects this plan will have on our industry and dependent communities. It was not a time to say 'someone else will sort it "as often heard in farming circles and in their defence - 'Farmers love to farm' and they would rather be working hard on their farm as off it'.

After encouraging engagement with this consultative process it was with shock and disappointment that we discovered the CSG's last minute abrupt 'u turn' on the major policies; NRP - grand parenting which was till that time a LUC approach (having all agreed at the start of grand parenting as a non starter) and the stricter than normal stock exclusion

rules affecting slope that water ways were to be fenced off to i.e. from 15 to 25 degrees? We believe that the CSG process while well intentioned did not produce a balanced plan owing to the tight timeframes imposed upon it. Nor did the hasty 50/50 call by the WRC to pass this plan inspire any confidence in its integrity.

The specific parts of the plan that we are commenting on

Vision and strategy:

We support the vision and strategy “where a healthy Waikato River sustains abundant life and prosperous communities who in turn are all responsible for restoring and protecting the health and well being of the Waikato River and all it embraces for generations to come” in principle but consider that this will only be achieved by setting realistic targets based on scientific data. Trying to achieve a water quality from 60 years ago does not make sense. We need to be able to balance good environmental stewardship with financial viability which will ensure that the investment into improving the water quality continues.

We highly value our land and support actions taken to improve our water quality. We have spent the last 27 years working hard to make our farm productive and financially and environmentally sustainable. We want to continue to farm and carry on this process but are very concerned at the potentially restrictive nature of PC1 and how it will cause economic hardship due to the crippling costs of fencing and the devaluation of our land.

We take pride in our business by; managing our stock to a high standard by ensuring they are healthy and well fed, that our pastures are noxious weed free (- gorse is a high nitrogen producer), subdivided paddocks, repaired fences, pasture renovated some paddocks, established a reticulated water system for the whole farm (all paddocks have clean fresh drinking water), established shade and shelter belts.

We have also worked hard to look after the land which in turn looks after the water quality - we have fenced off major streams to prevent erosion and planted the edges for shade. We have retired gullies and planted hundreds of poplar poles to stabilise the ground.

We try to follow good farming practices with regards to cultivation of crops, application of fertiliser and any earthworks carried out to reduce the risk of contaminants such as sediment and phosphorus entering the water ways.

We are very proud of what we have achieved so far and get great satisfaction from seeing our healthy stock, the natural regeneration of native vegetation in the gullies and creeks, the trees we have planted and the wildlife enjoying them.

We want to continue farming our land to realise its productive potential as well as continue to fence, retire and plant all those areas we have been planning for so we can leave the land one day for another farming family to take over and enjoy.

We believe that sheep and beef farming have a place in these hills with careful management and this should be encouraged as environmentally sustainable with our products reflecting our good stewardship. These changes are essential for our lands longevity and quality of life for all. The survival of the sheep and beef industry is vital to all the communities it supports and the people employed by related services such as stock agents, trucking firms, fertiliser reps, shearers, fuel outlets, timber merchants, stock and station outlets, tyre services etc.... Our closest town of Piopio - 20 mins away with stock and station agents, cafe, dairies, gift shops, motel. Te Kuiti is our closest main centre and is 40 mins away with supermarket, retail shops, doctor, police station, small hospital, freezing works etc

We need to have more certainty for our future in farming which gives us confidence to continue to invest in our businesses.

Stock exclusion:

This has pushed out the fencing This rule has been designed to reduce the direct contamination of water way by pathogens such as E.coli found in animal (and human) waste which is more likely to happen where high stocking rates of cattle are allowed direct access to the water way. We acknowledge that it makes sense to do this and have fenced off approx

8 kms of our water ways on mainly flat land where we intensively graze cattle.

However, it does not address the issues of overland pathways of contaminants which are the more likely scenario in an extensive farming system like ours. So it would be more effective to manage this through our LEP/FEP where these areas are identified and mitigations used accordingly such as buffer plantings of trees and grass below sheep yards to filter contaminants before they enter the water way.

We note from reading the WRC Section 42 A that the rule to “exclude domestic cattle horses deer.... from permanently flowing water bodies including drains, lakes and wetlands” has now been recommended to include ‘intermittently’ flowing water bodies. We consider that this to be unachievable within our farming context in view of the topography of our hill country. The requirement to fence off to a 25 degree slope is a very strict rule which is not consistent with the NPS on FW. We do not understand why it has been included? How are we are expected to be able to assess this slope in an environment that is so inconsistent for slope? (Photo)

If we were to comply it would necessitate our entire farms water sources being fenced off i.e. Approx (depending on the definition we have only measured what we could see on the aerial photo) over 100kms of fencing at a cost of up to \$18 per m of conventional fence... An amount unachievable under any timeframe on our income and a very poor use of resources as the low stocking rate and provision of reticulated water negates the need for the majority of this fencing.

We are quite different from the dairy industry in that we run many different classes of stock and types which require different management. As we predominantly run sheep we have 4500 including lambs compared to 250 cattle beasts (low cattle fencing off every water way does not make either scientific sense or financial sense on a cost/benefit analysis. Each industry is unique and agriculture should not be treated in a broad sweep approach.

In comparison with the dairy industry sheep and beef farmers generally have lower incomes which fluctuate annually necessitating a more conservative approach to spending (- just ask any accountant to tell you the difference between our spending habits). We therefore invest in fencing off streams and critical source areas over time as finances allow. There is an issue of limited available labour too to fence off these areas. We have only had permanent staff for the past 8 years which has enabled us to have the time from away from day to day stock management to implement our fencing plans. It is very expensive to employ a fencing contractor if you can get one! So we have tried to do it ourselves.

There has been a lot of emphasis placed on fencing off the waterways by the dairy industry with the comments of our dry stock industry dragging its feet to comply but let us remember that fences only stop the nitrates going directly into the water (by stopping the cattle from entering the water) they do not stop the intense nitrate loading of ground water (and ultimately river water) through the intensive stocking rates of dairy cows urinating on the pasture within those fences!

What we want is a clearer definition of waterways based on the scientific need to include the type (size) of water way and the fencing of waterways where it is warranted and in accordance with our LEP/FEP which clearly has critical source areas and overland flow pathways identified.

By using a tailored approach and good farming practice we are more likely to achieve better economic and environmental outcomes to restrict pathogens entering the waterways and allow for sheep only areas, the retirement of gullies and planting shade and shelter well away from waterways.

By making good use of our financial investment in this type of infrastructure there will be much more industry acceptance than a rule which is harsh and unjustifiable.

Evidence shown in photos of fenced flat land and natural filtering systems in gullies with raupo and flax on moderate slopes which are ungrazed. Also fencing of mainstream with stage fencing approach, one

side one year then the both sides the next year with Poplar poles planted for stream and stock shade on both sides.

Photo of our staff who have worked hard to plant the poles.

Nitrogen reference point

Our farming system operates on a relatively low nitrogen input basis with limited nitrogen fertilisers usage and a low cattle ratio (68 sheep/32 cattle) at a stocking rate of around 10 su per ha.

We consider that as low nitrogen polluters we should not be penalised by a NRP which will effectively cap any future production gains we might wish to make by changing around our stock class ratios.

This unfairly penalises us for our low and responsible nitrogen inputs and enables higher nitrogen input systems- the main polluters to continue to do so. This is because it will be much easier for high producers to reduce their outputs with less effect on their bottom line than those who are low outputs based already - who will struggle to make the necessary reductions.

We do not wish to see one industry offsetting the contaminants of another industry as implied by this rule that dairying will continue and sheep and beef hill country will be sacrificed and planted in trees to offset this. Sheep are lighter animals which do not damage the soil to the same extent as cattle thus reducing the effect of sediment loss, phosphorus and E.coli reaching the water ways.

This cap will effectively devalue our land so that it will be hard to sell when there is neither clear scope for flexibility nor certainty for our industry's future.

This rule will detrimentally affect other catchments water quality too as some dairy farmers from PC1 will seek to graze out their cows from their own catchment areas into other catchments to reduce their NRP. We have examples of regulatory flight in our own community with the recent sale of farms to dairy farmers from PC1 areas wintering their cows right next to our local river!

We consider that there needs to be application of these changes in a fair manner taking into consideration the unique characteristics of each type of agricultural/horticultural business and the identification of sub catchments with high nitrogen contamination rather than a blanket approach.

There needs to be greater research into Land Use Capability as a realistic option for dealing with water quality issues and not NRP /grand parenting as proposed at present. Overseer maybe the only touted suitable tool but it was not designed for this regulatory role.

It is vital to consider the effects it will have on the whole community as it will have severe economic ramifications. These problems have occurred over many years and it is unfair to penalise one farming generation for all the previous farming activity that has occurred. To make the necessary change in mindset will take time to re-educate all those who use the land to change the practices they believed to be acceptable to use for all the preceding years.

Land use change restriction

This rule to stop change of land use has been implemented to stop the mass intensification of the dairy industry within the Waikato region. We consider it to be inequitable because it penalises those farming in a low intensity system from improving their ability to raise their productivity. It is vital in a dry stock farming system to have flexibility from year to year to manage differences in market changes or climatic events which we are seeing more regularly. We may wish to take on more dairy grazers and reduce our sheep numbers because of the threat of facial eczema (a disease prevalent in humid warm conditions). This lack of flexibility removes our ability to farm to our lands potential and reduces our land values to those who may wish to diversify at some later stage. If we are farming in accordance to best farming practice under a LEP/FEP why can we not retain this flexibility?

We see this rule as enabling the high polluters to continue to contaminate the water bodies because there is no change being made to their businesses which we consider to be grossly negligent.

We do not favour the current government's plan to plant a billion trees at the expense of our farmland in a broad sweeping plan which does not appear to take into account the different land topography, water catchment systems, soil types and rainfall and access of areas to be planted in - then what happens at harvesting time?. These changes to land use potentially mean more damage to our soils and waterways as we have seen in the East Cape area after high rainfall events. The King Country is also a high rainfall region with our property experiencing rainfalls of on average 1650mm+ (about 65 inches) per annum. We would like to see the specific provision of rules to address the issue of intensification of the dairy industry (and some dry stock farming operations) so that the stocking rate is reduced to at least >18 su/ha. Other farming operations should be assessed on a case by case basis on their merits while adhering to environmental best practise.

Sub catchment approach

The sub catchment approach brings the problem right to your door and is a chance for everyone involved to become accountable and to actively work towards a better result together. It is empowering those who know their land and its capability to find the best solutions for it. It has been well observed that belonging to a group of people you know and you feel comfortable with is essential to the uptake and adoption of new information. It increases the level on interaction in the group and questioning is vital to learning rather than just sitting back and listening which may not be enough to support good understanding. Hands on participation are essential as by and large farmers are practical people who need to see or do rather than a visual presentation for example. With some guidance and funding we can achieve more for our individual farms and take ownership of these issues which will be far more effective in the long run than sledgehammer regulations which disempower us as business owners. There need to be incentives to improving our water quality and rewards going to those who are on track already. This approach should be holistic encompassing all aspects of environmental good practice and good farming practice to ensure good animal health and animal welfare practice.

We are members of two local sub catchment groups; - 'the Awakino River' - and 'the Lower Mokau River'. The first because of our strong community ties to the Mahoenui community which is actively interactive in supporting each other through the local community hall and a stock scheme. The second is where our catchment drainage system discharges into and we consider it is important to be part of both moving forward. Our participation may also encourage other farmers reticent to join such initiatives.

FEPs

We have been working on our LEP for the last 8 years and we are concerned that the new rules will require further compliance in association with a certified farm environment planner. My husband and I have combined university educations in agriculture and horticulture and we have continued our learning with extramural study, membership of farm discussion groups and regular attendance at locally run industry workshops. We consider that as intelligent hardworking people we do not need to be micromanaged to farm in a sustainable manner. We need guidance, encouragement and the confidence that we are farming in the best possible manner to implement and maintain environmental gains and that there is sound reason to continue to invest in our farming business.

There are many ways in which to mitigate the loss of contaminants from farmland and a LEP is only one part of the equation from which to work through these issues. An LEP/FEP is a living document which is constantly under and review and being implemented and adjusted as we work through issues and changing conditions. It is important to retain our flexibility to adapt to new situations and to embrace new technologies.

Land use change capability mapping of our farming system has given us much more detailed information on which to manage its opportunities and vulnerabilities and Identify critical source areas and pathways. This approach combined with matching farming systems to the capability of the land provides the most efficient and effective approach to managing the contaminants of concern to our industry; phosphorus, sediment and pathogens.

We have been fortunate to take advantage of a recent Hill country erosion fund initiative with WRC and central govt which has helped us achieve various fencing of water way projects, riparian plantings, farm LUC mapping and hill stabilisation with poplar pole planting. The funding equated to 70% which was an enormous boost to these plans. Importantly while managing these environmental mitigations there are other considerations to take into account. Pole planting is used to stabilise the soil and to reduce erosion and thus reduce sediment and phosphorus losses and in the first few years these areas need to be carefully managed to enable poplars to establish before re introducing cattle to the paddocks. This can be done by fencing - costly and in steep terrain a difficult option and with retirement of these areas comes the reduction of pastoral area available for grazing requiring reduction in stock numbers or bought in feed to compensate which ultimately affects our income something we must manage.

In conclusion

We sincerely hope that you as commissioners will take every opportunity to learn more about our industry and what these rule changes mean in a practical sense to the farmers applying them and the effects on their livelihoods and communities. Please come and visit our farms and see what we are doing for yourselves.