BEFORE THE Waikato Regional Council

IN THE MATTER OF Healthy Rivers Wai Ora Plan Change 1 and Variation 1A

STATEMENT OF ALAN AND SARAH DUDIN

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STATEMENT OF Alan and Sarah Dudin

Scope of the statement

1. This statement:
    a. Introduces who we are and our farming business.
    b. Outlines the parts of the Proposed Plan that will make it difficult for us to maintain our farm business at the sustainable level we aspire to. Specifically, I will focus on:
        i. Farm Environment Plans (FEP)
        ii. Nitrogen Reference Points (NRP)
        iii. Stock Exclusion

Introduction

2. Alan and myself, formed Sarala Land Company and brought an easy to steep hill country farm (335 ha) at Mapiu, in the Upper Mokau Catchment of the Waikato region seven years ago. Drystock farming has been a life-long ambition for both of us and have been working towards this since we met 24 years ago. Both of us attended Massey University and have completed Bachelors of Agriculture science degrees.
3. Alan went on to have a successful career in fertilizer sales and as a rural bank manager before becoming a full time farmer. Sarah has spent her career working for regional councils and other government agencies developing Land and Environment plans and promoting sustainable farming systems. With our complementary skill sets, we believe we can achieve a whole sustainable farm system that will provide both us and our children, and following generations the life that we desire.
4. We have been farming this property for seven years and have considerable long-term plans to maintain and enhance the property through soil, riparian, nutrient and biodiversity management. We utilize such tools as farm budgeting, nutrient budgeting, FEP and soil conservation options to achieve these plans.
5. There is 12 ha of plantation forestry, 46 ha of native bush and 6.7 km of permanent streams running through the farm, plus countless intermittent

waterways and Critical Source Areas (CSA). Water is a major feature of the farm. 70% of the Native Bush is fenced to exclude stock browsing and the 3.1 km of the main waterways are fenced to exclude cattle access, with a variety of options implemented to protect the other waterways. Environment Waikato funding for environmental works in the Upper Mokau has historically been lower than other areas in the regions, and this is reflected in the speed at which we can afford to implement our proposed works program.

6. The farm is presently carrying 1,170 mixed aged ewes, 130 drystock yearlings, 40 drystock two year olds, and 200 Friesen cross dairy replacement grazers.
7. We work hard to match the stock classes to the land classes to ensure that we maintain the integrity of the soils and slope stability on the farm. Our stock policy has; sheep grazing only LUC Class 6e and 7e slopes(21-30 degrees), sheep and cattle grazing areas on LUC classes 3w,4e and 6e slopes (0-25 degrees) and gullies retired from stock grazing. We have a flexible winter grazing system, where we to move mobs from the 6e slopes when significant amounts of rain is forecasted and prevent cattle treading damage on fully saturated soil as much as possible.
8. We provide reticulated water and shade for stock in all our paddocks. We will continue to manage our intermittent waterways and CSA's, to prevent cattle access when they are flowing through temporary fencing and working long-term permanent fencing. Utilisation of other good management practises such as; sediment traps, soil conservation trees and techniques to manage sediment loss is part of our farm philosophy.
9. We work hard to have an adaptable farm business that can cope the seasonal and environmental challenges.
10. Although we are not farming directly in the Waikato Waipa Catchment, Alan and I do hold concerns about the impact this plan will have on farming businesses and communities in the Catchment, and the influence this will have on further policy making in the future.

11. 

Gullies are left to re-vert to a variety of scrubby species to reduce stock access to critical source areas and provide soil conservation benefits

Tree type is matched to Land Class, providing shade on Classes 3 & 4, and forestry plantation for Class 7e slope with high erosion potential.

Sediment Trap, to slow waterflow and trap sediment in grasses and drop out in pond.

Discussing winter grazing in a RMPP group

i. **Farm Environment Plans (FEP)**

1. We support the use of FEP's and these should be integral part of farm management. The FEP should be tailored to each specific farm, based on the Land Use Capability System assessment at a scale of 1:8,000. The LUC system will provide accurate prediction and management of erosion and sedimentation. The use of the LUC system will reduce some of the variability between the assessment of risk from Certified FEP providers.
2. Each farm business is diverse and unique, the FEP required should reflect this through paddock scale mapping and implementation planning. It should include:
    i. LUC assessment to identify potential erosion risk
    ii. Development of Land management Units to support the formation of a nutrient budget in Overseer
    iii. Identify critical source areas and waterways
    iv. Outline a comprehensive works program addressing ways to protect and improve Soil Quality, Water Quality, Biodiversity and farm infrastructure.
    v. Timeframes and actions over an affordable period for the business
    vi. Reviewed and audited annually.
3. The FEP enables farm businesses to develop good management practises as well as implementing physical works. For us, we fenced to exclude cattle access to the main waterways, but also have a winter grazing policy on identified Class 6e slopes where mobs are a lower stocking rate and removed when soils are fully saturated. Utilise lower stocking rates in the slopes where gullies are vegetated, to prevent the loss on "natural barriers" preventing cattle access to intermittent water and Critical Source Areas.
4. The FEP template and auditing process should be flexible and have the ability to adjust the works program as the farm business adapts and changes with often external influences such as climate and markets.

ii. **Nitrogen Reference Points**

1. We oppose using a nitrogen reference point (NRP) that is based on historical figures, which enables the high nitrogen loss farmers to continue to 'pollute'

while the farmers who have been achieving lower levels of nitrogen leaching will be restricted on their ability to improve production. This creates an inequality across the region, as the dairy industry has historically been able to significantly increase their production capability and their nitrogen leaching, while typically the drystock farmers have made lesser production increases and as a consequence have lesser nitrogen leaching.

2. The NRP will provide a limited ability for farm systems to adapt to climatic and market conditions. The drystock system adjusts stock class, crop rotation and other variables to meet the market and climate challenges, all of which is influenced by the NRP limit. To continue on the same farming system from one identified year for the indefinite future, will reduce profitability and resilience of the farm business. Reducing the ability to adjust stock class in response to climatic events will negatively impact the farmers ability to protect soils and land classes, water quality and stock welfare, and business profitability.
3. The NRP will have a direct impact on the perceived value of farm properties, due to the purchasers being restricted to the previous owners farm system. The NRP limits the ability to realize the potential productivity of the natural land class. If there are no perceived financial gains to be achieved, the NRP will restrict the value of a property. This will significantly devalue some properties, and reducing the financial resilience of rural communities and towns.
4. We would support a policy setting Nitrogen leaching limits based on the natural capital on the land. The allocation of leaching limits allocated to Land Use Capability (LUC) units. The natural capital system (LUC allocation) allows farmers to develop a farm policy appropriate for the capability of their land resource. It will limit the high Nitrogen leachers (polluters) and allow the lower nitrogen leachers to reach the natural potential of the property. This would also better maintain the value of the land resource, as people can still purchase a farm without being limited by the previous owners farm system.
5. Overseer Model has limited appropriateness for setting an NRP. This is a modelling tool with a variability of roughly 30%, and we do not believe that it is a good fit for this purpose. (for example a NRP of 15kgN/ha/yr, could have a variable of 6 kg N/ha/yr.) Updated versions on Overseer have historically

made the model more sensitive to changes in the farm systems and typically increased the nitrogen leaching of the same farm system. So it is expected that it will become increasingly difficult to achieve the allocated NRP using the same farm policy and stocking rate, as the Overseer model is updated over time.

6. We propose that the Waikato Regional Council revisits the Nitrogen leaching limit allocations on the LUC system as Overseer modelling is improved and subsequent versions are released.

iii. **Stock Exclusion**

1. We do not support fencing to exclude stock from waterways for slopes greater than 15-25 degrees, many of these areas with slopes of this steepness is impractical to successfully fence to exclude cattle. There needs to be more flexibility in the options available to manage sediment loss from 16 degree + slopes. The FEP would be an effective tool to tailor the policy on each farm based on the potential risk level identified.
2. Possible examples of alternatives in the FEP would be: Have a clear definition of a “stock proof natural barrier”, so that gullies that grow blackberry, manuka or even gorse, these would all exclude stock access and not require a fence as often for these plants to establish the grazing pressure is not great. Provide greater flexibility to cattle grazing on slopes over 15 degrees, by acknowledging that best practices such as rotational grazing at times when runoff of sediment would be low (for example summer months, and low flows, or fast rotation such as 12 grazing days spread over a 12 month period) both would maintain pasture quality but would be as effective as fencing to exclude from waterways. Placement of troughs and shade trees will also influence cattle movement around the paddock.

Natural Barrier of Manuka and native vegetation, with Soil conservation trees adjacent a waterway

3. The permanent stock exclusion from intermittent waterbodies and CSA is impracticable in hill country areas over 20 degrees. This will reduce the ability for hill country farm systems to manage the pasture quality on these slopes. Implementing a series of best management practise through the FEP to manage these areas when the risk of contaminant loss is high would be a more affordable option.

Summary

1. The key points are:
    a. Farm businesses are diverse and unique systems, which require flexibility in all areas to adapt to situations that are often beyond our control
    b. We support the use of FEP's to tailor an environmental works program at farm scale (1:8,000) that identifies and manages the potential environmental risks. This needs to flexible and auditable.
    c. We do not support the use of the NRP, and have big concerns around the effectiveness of Overseer, rewarding the "high leachers" with continued allowance to operate with "low leachers" unable to reach the

lands natural capital potential. The devaluation of low NRP farms and the wider impact on communities.

d. Fencing for stock exclusion on slopes greater than 20 degrees is often impracticable and alternative solutions through the FEP process should be considered.
e. We have worked our lifetime to establish a successful and sustainable farm that we will take care of for the next generation. Our goal is to enhance the environment we work, play and raise our family in.