

Kathleen Bentham
Bentham Farms Ltd
R D 1
Te Aroha

3 March 2017

Science and Strategy
Waikato Regional Council
Hamilton

Dear Council

SUBMISSION – Healthy Rivers

Running short of time I am choosing to make my submission more general, rather than specific to each planned rule change. If my submission won't be heard unless it is focused on each rule change please send it back and I will re arrange it.

We have 220 ha of flat sandy loam, some of it zero grazed for dairy goats and the rest organic dairy cows. Stocking rate conservative, both units don't have top production per hectare, but in the top 20% profitability when financials are benchmarked.. The farm has been one of the more studied farms, and I have gleaned interesting scientific knowledge along the way.

We also have a 400 ha hill country block – sheep, beef forestry and native, some covenanted. I was in the stakeholder group for sheep and beef farming. I was happy with the process at the time, there were very good discussions. Good ideas and resolutions came out of it and there was to be NO GRANDPARENTING !!

Comments cover 3 areas, the first being most important.

- Grandparenting (Nitrogen reference points) might achieve economic stability, don't achieve equity, and to truly achieve water quality must be brought to an appropriate minimum amount of leaching PER HECTARE . For everyone.

Science has proven N fertilizer to deplete soil carbon. Broadly, the level of carbon in the soil has an effect on efficiency of nutrient cycles, water holding capacity, nutrient 'storage' So why allow certain fertilizer regimes that have been proven to result in increasingly worsening 'leaky' soils to continue?

- Overseer or a similar tool should be continued to be used as a guideline and to monitor changes. It needs to have more measurements added to include other factors contributing to nitrogen leaching. I have enclosed a diagram used in a presentation of a Massey study on nitrogen leaching to illustrate. Such things as pasture composition, legume content, rotation length, cultivation, depth of humus and soil carbon measured. Dairy Goat doesn't currently have a useful, accurate overseer type model even though attempts have been made to adapt the one used for dairy farming. They would like more time, and as a small progressive co-op I am confident the Healthy Rivers requirements will be grasped and understood from within.
- Farm Plans. Within the region are 50 or more organic certified or certifying dairy farms. In addition there are certified sheep beef and grazing farms. We all have a farm and management plan, which is closely scrutinized by an auditor, followed by peer review, then various overseas regulators and markets audit NZ's auditing! To my observation they cover the criteria of WRC under the new proposed standards. Such things as stocking rates, fertilizer inputs, cultivation, soil testing, biodiversity, water testing come to mind. We would very much like to be exempt from extra expense and time involved in producing a farm plan, plus monitoring, whether we pay for it directly or indirectly.

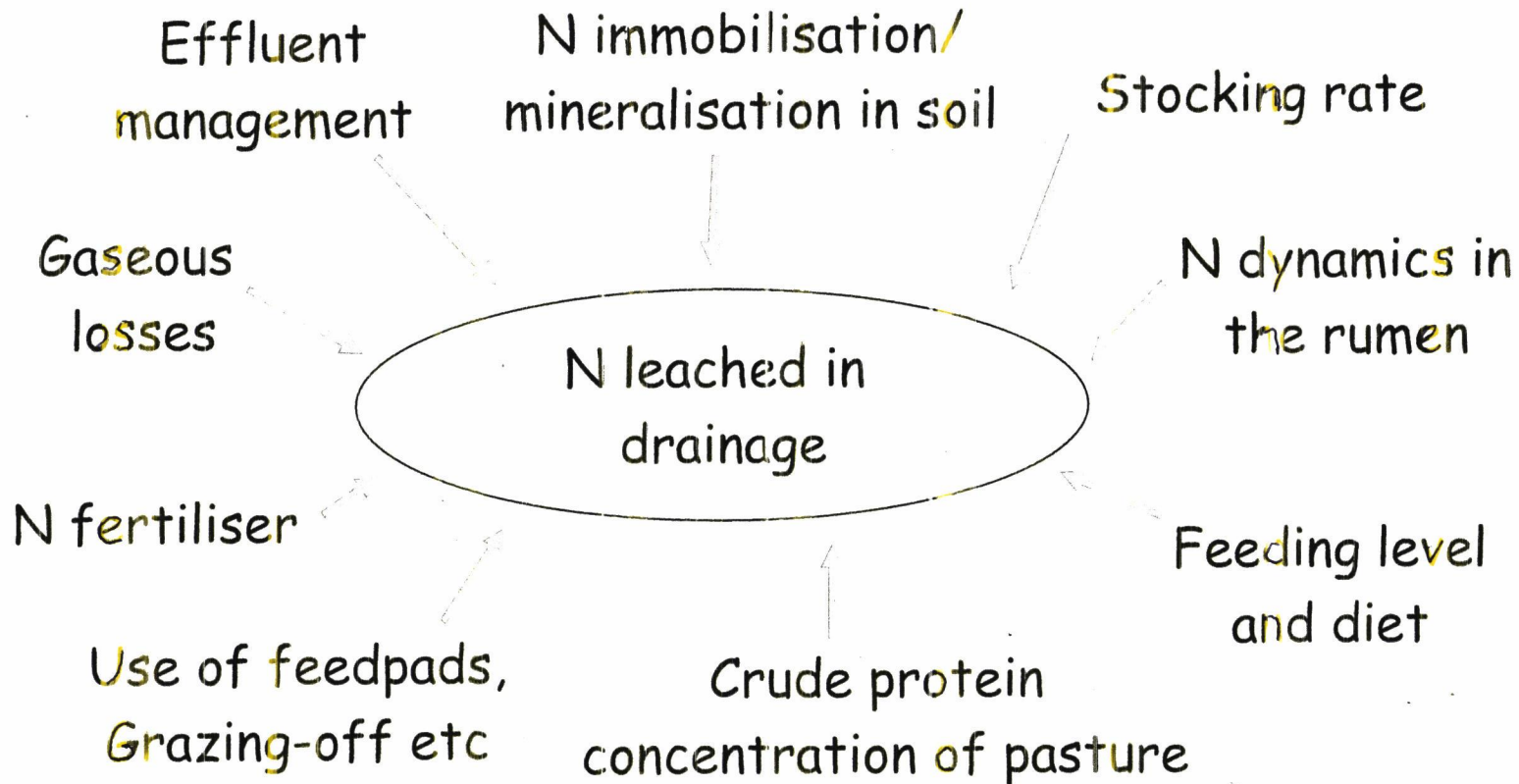
Thank you for the opportunity to make a submission.

Kathleen Bentham



Bentham Farms Ltd
benthamfarms@gmail.com

What factors effect nitrate-N leaching?



From: Bentham
To: [Healthy Rivers](#)
Subject: (MERGE with 10079254 do not need to print) RE: Healthy Rivers Plan Change 1 Submission 10079254
Date: Tuesday, 4 April 2017 7:22:23 a.m.

- We are not gaining advantage in trade competition
- Still considering speaking
- I would like to have the opportunity to make a joint case.

Thanks,

Kathleen Bentham

Bentham Farms Ltd
Te Aroha

From: Healthy Rivers [mailto:healthyrivers@waikatoregion.govt.nz]
Sent: 31 March 2017 3:41 PM
To: 'benthamfarms@gmail.com'
Subject: Healthy Rivers Plan Change 1 Submission 10079254

Hi there,

Thank you for your submission, it has been received. I just require answers to a few questions in order for your submission to be considered complete, this is a requirement under the Resource Management Act.

- Could you gain an advantage in trade competition through this submission?
- Do you wish to speak at the hearing in support of your submission?
- If others make a similar submission, would you consider presenting a joint case with them at the hearing?

Once this information has been received your submission will be processed.

After all submissions have been collated, you will then be sent a formal letter acknowledging receipt of your submissions. This letter will contain further information about the next steps in the submission process including information about hearings dates.

Kind regards,
Danica

Danica de Lisle | Submissions Co-ordinator | Science and Strategy
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