

ORC Omnibus Plan Change - Plan Change 8

Submission Reference no: 58

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Submitter Type: Not specified

Source: Web Form

Overall Notes:

Clause

Are you a trade competitor?

Position

I am a person who would not gain an advantage in trade competition through this submission

Notes

Clause

What are you submitting on? You can submit on specific parts of Plan Change 8 or the whole plan change.

Position

I am submitting on specific parts of the plan change (please detail below).

Notes

Clause

The specific parts of the plan change that my submission relates to are:

Notes

Part A - Nutrient Allocation policy 7.D.6 And Part C - policy 7.D.9 Part D - Insensitive Grazing Part E - Stock Exclusion

Clause

What is your view on the Plan Change 8 or the specific parts listed above? Please select one, if you have multiple views state clearly in the notes box below.

Position

Oppose

Notes

Clause

The reason(s) for my views are:

Notes

Nutrient Allocation (Nitrogen) Part A - Nutrient Allocation policy 7.D6 And Part C policy 7.D.9 I oppose this policy The Policy locks in Nitrogen for high leaches in resource consents for up to 10 yrs. This means there is automatically less Nitrogen available in the allocation for farmers who were farming within the environmental limits under when ORC reviews the regional plan, because a significant proportion of the nitrogen has already been locked up in resource consents that will expire well after the regional plan changes. The ORC has not done the scientific work and modelling to determine how much nutrients need to be reduced in Otago waterways and therefore how much nitrogen allocation is available to land users. ORC should not be allowing nitrogen to be locked into resource consents until it has done that work It also effectively sets up grandparenting nutrient allocation frame work. Restricting farmers to limits based on historical nutrient losses is Grandparenting. Grandparenting punishes farms such as ours with low nutrient losses by removing our ability to adapt and change, whilst allowing the high leaches to continue as they traditional have and continue to negatively impact water quality Our financial sustainability for our business is based on implementing the development plan for the farm. The proposed Grandparent provisions will severely impact the financial stability of our business, our ability to retain staff, the taxes we pay and the money we spend with agricultural related businesses. ORC have not done the scientific , economic or social analysis to determine what allocation frame work is the right one for Otago. Intensive Grazing Part D. I oppose the proposed Intensive Grazing rules in respect to the 100ha or 10% of the land holding rule. I oppose the proposed Intensive Grazing Rule in respect to the 10m vegetative strip between the area of grazing and a water body. We farm 1050ha . Our pastures have limited or no growth from May until September. We rely on spring/summer harvested silage, balage and hay and Brassica crops to feed our stock over the winter months. The rule states

100ha or 10% of the land holding – whatever is lesser, of brassica, beet and root crops. This rule is unfair and punishes larger landowners. Especially as it applies to both grazing summer and winter crops. Our low rainfall and use of sacrifice areas means we rarely experience plugging and run of from intensively grazed brassica crops. Putting this rule in place will make little or no difference on the sediment and nutrient losses from intensive grazing areas on properties like ours, but it will mean additional expense and time in respect for applying and paying for a resource consent. I support the exclusion of pastures and crops in this rule. I would ask the Environment Court to remove the 100ha maximum limit and apply the 10% rule only. Stock Exclusion Part E I support the desire to maintain or improve the quality of water in Otago, I understand that in some instances stock can have a negative effect on water quality. However, I oppose blanket rules that do not consider the variability of land type, stocking rate and farming practices in Otago. I oppose rule 13.5.1 8AB – definition of a dairy cow The exclusion is for pigs and dairy cattle at this stage. Dairy Cattle farmed for milk production and weaned and unweaned calves and dry stock. The exclusion of Dairy Cattle is the first step towards more comprehensive stock exclusion and by 2023 all cattle will be excluded. I oppose the blanket rule of all cattle exclusion from all 1m wide waterways. On extensive properties such as ours with large blocks, small creeks and low cattle stocking rates, the effect on water quality is non-existent. We know this, because to comply with ORC 6A based on permitted activity we have measured the quality of the water that passes through our farm as it leaves the property and know water quality has not been affected by cattle. The cost of fencing the waterways on these large rugged blocks and putting in a reticulated water system (if even possible) is eye watering, and could threaten the viability of our farming business, for no benefit. Fencing \$15 per metre. This is a direct cost with no increased production benefits to support it. I support ORC current permitted activity-based rules around water quality as it allows farmers the flexibility to manage the water quality on their farms without blanket restrictions. I would ask the Environment Court to remove the blanket restriction that exclude all cattle from waterways greater than 1m in 2023. And replace it with rules that give exception to extensive properties with low cattle stocking rates and slope and or give exceptions for those properties that can show the quality of water has not been degraded in any way by the cattle grazing polices of the farming business I support the exclusion of sheep from this rule. As excluding sheep will have minimal if any positive effect on water quality but will add significant fencing costs - \$20 per meter for sheep exclusion fencing vs \$15 per meter for cattle.

Clause

What decision would you like the Environment Court to make?

Notes

Nutrient Allocation(Nitrogen) Part A 7D6 - Delete this policy ORC needs to undertake the scientific economic and social analysis to make an informed policies and rules to address Nitrogen losses in Otago. This needs to be done in consultation with farmers. Intensive Grazing Part D - For the reasons stated above. I would ask the Environment Court to remove the 100ha maximum limit and apply the 10% rule only. Stock Exclusion Part E - I oppose the blanket rule of all cattle exclusion from all 1m wide waterways. On extensive properties such as ours with large blocks, small creeks and low cattle stocking rates, the effect on water quality is non-existent. I would ask the Environment Court to remove the blanket restriction that exclude all cattle from waterways greater than 1m in 2023. And replace it with rules that give exception to extensive properties with low cattle stocking rates and slope and or give exceptions for those properties that can show the quality of water has not been degraded in any way by the cattle grazing polices of the farming business.

Clause

Do you wish to be heard in support of your submission? All submissions will be considered by the Environment Court. Please indicate if you wish to be heard in support of your submission.

Position

I wish to be heard in support of my submission

Notes**Clause**

Please indicate your choice(s) below. If you do not indicate your intention to call experts, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Environment Court might make.

Position

If others make a similar submission I/we would consider presenting a joint case with them at a hearing

Notes**Clause**

Authority to act:

Position

I confirm I have the authority to sign this submission on behalf of the submitter

Notes

The submitter have elected to withhold their personal details from publication.