

BEFORE THE FRESHWATER COMMISSION

UNDER	the Resource Management Act 1991 (the Act or RMA)
IN THE MATTER	of an original submission on the Proposed Regional Policy Statement for Otago 2021 (PRPS)
BETWEEN	OTAGO WATER RESOURCE USER GROUP Submitter FPI043 FEDERATED FARMERS NZ INC Submitter FPI026 and FSFPI026 DAIRY NZ Submitter FPI024 and FSFPI024
AND	OTAGO REGIONAL COUNCIL Local Authority

**EVIDENCE IN CHIEF OF KELLY ANN HECKLER:
ADDITIONAL EVIDENCE FOR FRESHWATER PARTS**



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EVIDENCE IN CHIEF OF KELLY ANN HECKLER: ADDITIONAL EVIDENCE FOR FRESHWATER PARTS

1. This brief of evidence is the same as the brief filed in relation to the Otago Regional Policy Statement 2021 - non freshwater parts. New evidence not previously provided to the non-freshwater panel is added in text that is shaded grey for ease of identification.
2. My additions largely relate to the consultation regarding the Freshwater Visions in the Manuherekia rohe of the Clutha Mata-au FMU.

Introduction

3. My name is Kelly Ann Heckler.
4. I am a Certified Nutrient Management Adviser, Green House Gas Adviser, Integrated Farming Consultant, Sheep and Beef farmer of a family-owned business, wife, mother, and community contributor.
5. My evidence relates to our family sheep and beef farm located in the Manuherekia Valley in Central Otago.
6. In our farming business, in more recent times, we have adopted an integrated farming approach. This has changed how we consider everyday decisions. We are still working our way through the process as we have only started in the past year. We are using the Whāma - Integrated Farming Framework to help us achieve our goals and outcomes now and into the future.
7. We believe that for our farming businesses to remain viable long term we need to balance our obligations to social, environmental, and economic sustainability (the 3 sustainability pillars or posts) in our everyday decision making. There are many farmers that are currently doing this in some way, shape, or form.
8. Integrated Farming allows us an intricate understanding of our farm as a whole system. By use of data, knowledge and experience we can

align our understanding with our outcomes. Over time we monitor, assess, and reflect if we are achieving our outcomes.

Ensuring our animals have the resources they need

9. An example is that one of our goals, in brief terms, is to ensure our animals have the resources they need to thrive. This comes from our value of being proud of our livestock and the produce that comes off our farm to feed our communities and the world.
10. Our outcomes relate to a wintering strategy that ensures stock production, minimises cost and potential impacts on the environment.
11. From here we have recognised the need for some changes to our wintering strategy. We have previously relied on brassicas as part of our wintering system but wanted to move away as some of the management options didn't suit our farm. After investigating many options, we identified that we didn't need to sow brassicas and run an all-grass wintering system.
12. Our farming system considered the impacts of the options under the 3 sustainability posts, below, (based on data, knowledge, and experience). If we didn't take a balanced approach and considered the decision under the 3 posts, we wouldn't be ensuring the longer-term viability of our farming business. For example, there is no sense in running an all-grass wintering system if the impact on the welfare of our stock is so adverse that they no longer remain productive.

Questions we asked at our farm

13. We asked and answered some of the following example questions when we completed our investigations:
 - (a) Environmental
 - (i) What will the impact of an all-grass wintering system be on our farm and catchment environment in terms of contaminant and nutrient loss?

- (ii) What will the greenhouse gas profile look like under an all-grass wintering system?
 - (iii) What will be the impact on chemical use?
- (b) Economic
- (i) Is this a financially viable option?
 - (ii) What will happen to animal production? Immediately and indirectly.
 - (iii) What impact will there be on the rest of the farm system?
- (c) Social
- (i) How will this decision impact on us and our staff workload?
 - (ii) What training will be needed to implement this decision?
 - (iii) Understanding and applying the current and ever-changing rules and regulations.
14. In farming systems there are many options to consider in wintering strategies (and all farm management) such as crops, and systems which can work for any farm. We chose the best system for our farm which became clear through consideration and analysis and linking this to our values. As farm systems are so unique, what looks to be a good option for one farm may not be for another. Considering the options under the three posts and gathering the data will ensure each farm is able to make an informed decision.
15. The change in wintering strategy, away from sowing brassicas and replacing it with an all-grass wintering system, has not been an overnight decision. We have always sown a mixed pasture sward, which the previous generation began, though we didn't apply this to wintering. Developing a wintering strategy more suited to our farm business, started 2 years ago though we have only just consolidated our pasture mixes and finally feel we might be able to grow enough feed to get through winter without impacting on some other area of

the business. We still need to finalise the data from this process, which will not happen until Autumn 2024, but the interim data is suggesting we are on the right path.

16. We felt the brassica wintering system for our farm was quite input heavy. The brassicas were not overly successful in yield as they were often attacked by pests. To combat this, we were having to spray insecticide multiple times which was an additional financial cost as well as adding to our farm emissions. After analysing our wintering systems under all the sustainability posts we could see that long term brassicas and constant spraying wasn't going to work. We knew, from our research, that under a grass-based system it would be lower inputs. We know that every time a vehicle (e.g. a tractor to work ground, or a 'bulkie' to sow fertiliser, or a spray truck) is going around the paddock, our inputs are increased and we value growing the most amount of feed for the lowest inputs to remain sustainable long term.
17. Our wintering system is mainly for our sheep, more specifically hoggets throughout the winter months and ewes after shearing. Therefore, we find an all-grass system works better for us the following reasons: we are not changing the diets of the sheep too much, the paddock regrows once it is grazed unlike many brassicas systems and the all-grass system is more extensive than grazing brassicas. We are also lucky our climate lends itself better to all grass wintering as we don't seem to get as much mud. It's not all benefits though as there are some management considerations, for example a larger area needs to be out in Autumn for the saved-up grass over winter that we wouldn't have had under the brassica system.
18. We have undertaken research and investigation in the hope that the decisions we make on farm can align with our values. We are constantly reflecting and learning as everything changes which may change the decisions we make. As long as they are considered with our values and the three areas of sustainability, we feel we have confidence that the decisions will be right for us at the time.

Consultation regarding the Visions in the Manuherekia

19. Consultation with the rural community was somewhat tense in the period September 2019 to June 2021¹. This period has been defined as the period for community consultation for setting the values for the Manuherekia Rohe.
20. I attended the ORC staff presentation, regarding the Manuherekia, at the Omakau Hall on Friday 28th May 2021 at 4pm. There was a significant number of attendees to this meeting so much so that the Omakau Hall was overflowing, and people were standing all around the back and sides.
21. In attendance from memory were ORC Chair Andrew Noone, Councillor Michael Laws and Councillor Gary Kelliher. There were also other ORC staff present. Food and Fibre producers were present along with many other businesses and organisations in our rural community.
22. Prior to the meeting there was a pamphlet delivered to most in the Manuherekia, including Alexandra, I assume. I have attached the pamphlet as **Appendix 1**.
23. Information in the pamphlet was unclear. Data sets were not complete. Non-migratory galaxiids which many landowners have a strong desire to protect were not even mentioned. For flow it was not clearly articulated where the measurement was applied.
24. I emailed the ORC chair, at the time, Councillor Andrew Noone to explain that I felt the information in the pamphlet was not clear and could be taken out of context. His reply was clearly not of the same view as mine as he thought the information in the pamphlet was acceptable.
25. The meeting went very poorly. It was not at all facilitated well. The audience was upset and inflamed especially when clarification was given about the information contained in the pamphlet, which only applied to the bottom third of the Manuherekia river. There were still

¹<https://www.orc.govt.nz/plans-policies-reports/land-and-water-regional-plan/community-consultation/community-consultation-round-one>

more questions to be raised from the audience though these were not heard due to the meeting ending at 6pm. No provisions were made to allow for future discussions or for the ORC to answer the remaining questions. This was more inflaming to the audience.

26. The pamphlet was used as a basis for information for the majority who completed the Online survey.
27. The survey report has then gone on to form the basis of many reports such as *Manuherekia Management Scenarios – Summary of consultation* which are meant to articulate the community values of the Manuherekia.
28. There has been no opportunity to circle back and revisit the values of the Manuherekia by the community. In my opinion this circling back should occur regularly.
29. In February and March 2022 when the ORC undertook consultation, for Otago's FMU's and Rohe, Manuherekia wasn't included. I was informed the ORC believed the Manuherekia community consultation was completed. I can assure you this not the case and it is bewildering that there are values assigned which in my opinion are completely unaligned with the community I live and work in.
30. I appreciate that there have been perhaps some unattainable timelines placed on the ORC around this process and maybe that is responsible for the limited and rushed consultation.
31. As the values are extremely important there must be the framework to enable communities to observe these values and reflect if the implementation of them is appropriate or if they need revisited and adjusted as time goes on, depending on how the community values change over time.
32. I would suggest that the regulations imply that values are fluid, not static.

33. In my experience rural communities are suffering submission exhaustion due to the gruelling number of policies ideally requiring submissions as they have direct implications on land users.
34. Policies that were out for submission at or around that time of the Otago RPS included Freshwater Farm Planning, He Waka Eke Noa, Manuherekia River management survey, and Water Services reform.
35. After working 10 to 12 hour days on farm the average food and fibre producer is then expected to spend the remaining hours of the day reading thousands of pages of consultation documents required to accumulate the information to form a robust submission, only for it not to count for much.
36. The community input is now faltering as submission processes are large efforts for no real acknowledgement that these submissions have been considered. Its unsustainable to keep asking our rural communities to keep committing to these processes as they are negatively impacting on people's lives.
37. This negative impact can extend to the whole family.
38. In my experience community engagement has in the past being hampered:
 - (a) by incorrect information being used to form ongoing reports
 - (b) by no ability to have future input if unable to attend meetings
 - (c) by no ability to circle back and revisit the issues or values
 - (d) because communities are exhausted by expending all this effort for little to no acknowledgement.
 - (e) No appreciation that consultation takes people away from their day job i.e. leaving the running of the farm to attend this consultation.
 - (f) Limited ability to see food and fibre producers as a major part of the solutions to the challenges we face.
39. These challenges require us to all make changes but none more so than food and fibre producers. The impacts on these businesses alone could be catastrophic if it is not understood. For this

understanding to take place the rural community needs to be included in the relationship and their values and perspectives included and considered in a fair and transparent process.

Conclusion

40. Currently the proposed Regional Policy Statement does not give us any certainty about the long-term sustainability of our farming business. When we read through it and think about how this applies to our business and our communities, we are left feeling confused, unsure, and let down. We have started on a path down the integrated farming journey and feel that this document could actually hold us back from achieving long term sustainability in our farming business, due to the lack of certainty provided.
41. Our decision regarding winter grazing strategy took us a large amount of time to work through. The proposed RPS seems to have no appetite for time frames to implement changes with respect to long term sustainability. Our experience has taught us that if this is not considered then it could be the downfall of achieving the intended outcomes.

Date: 28 June 2023

K A Heckler

Lauder Creek Farming

Appendix 1

You've told us in previous consultations about the Manuherehia River catchment that you want a healthy river you can swim, kayak and fish in, collect mahika kai from and that provides a reliable water source for your crops or business.



Photo: Ronan Creane

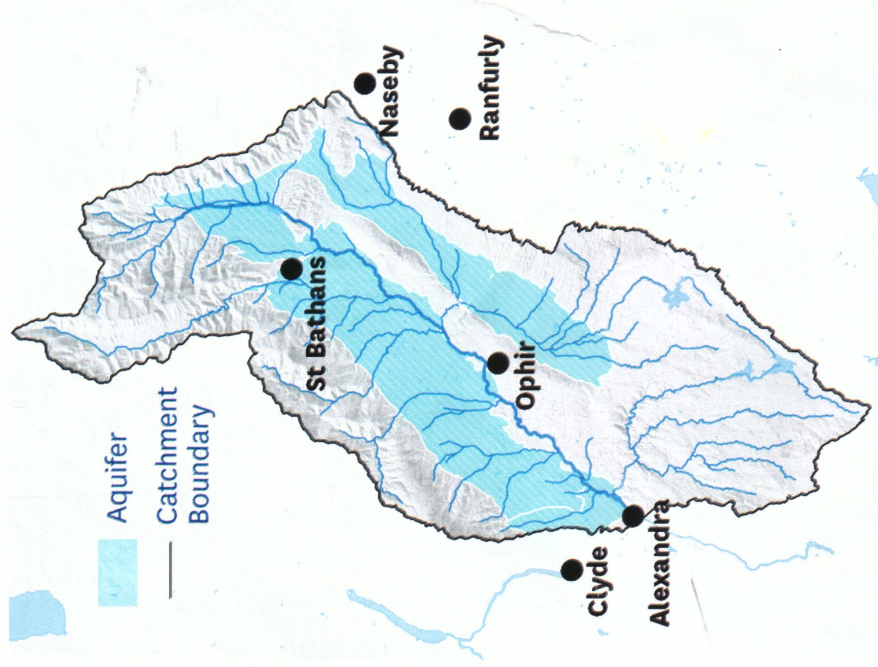
To achieve the things you value, we've developed five different Manuherehia River minimum flow scenarios (see overleaf). The scenarios each have different impacts on the values identified. The "minimum flow" is the level of river flow at which (if reached) all water being taken for uses such as irrigation must stop. A minimum flow helps to maintain environmental outcomes.

We'd like to hear what you think of the scenarios and which one you prefer, if any.

Community input on the range of water management scenarios will help inform the Manuherehia Rohe (area) section of ORC's new Land and Water Regional Plan, which will be notified and open to submissions from the public in 2023.



Manuherehia rohe



Tell us which scenario you prefer in person:

- **Alexandra Memorial Hall on Thursday, 27 May** anytime from **1pm to 8pm**. There will be staff presentations at 2pm and 7pm.
- **Omakau Hall on Friday, 28 May** anytime from **1pm to 6pm**. There will be a staff presentation at 4pm.

Or go online at:

yoursay.orc.govt.nz/ManuherehiaScenarios

to have your say and read more background information

Have your say

Do you love the Manuherehia River? Have your say on how it will be managed in the future.



Manuhereka River water management scenarios

Scenario 1

Minimum flow of 1,200 l/s

This flow slightly improves ecosystem health but is too low for mahika kai or sport fishing. Nuisance algae would affect swimming. Irrigation reliability is okay but may experience a modest reduction.

Scenario 2

Minimum flow of 1,500 l/s

At this flow, ecosystem health is improved, but would still be limited. Nuisance algae is a risk in low flows and Mahika kai and other mana whenua values are not fully supported at this level. Sport fishing might be OK for some anglers. Irrigation reliability is marginal and farm viability and land valuation may be affected.

Scenario 3

Minimum flow of 2,000 l/s

Ecosystem health is ok for most of the river at this flow, and mahika kai and mana whenua values are better but still not fully supported. Nuisance algae would be less of a risk, except in long periods of low flow, and swimming would likely be fair to good. Sport fishing would attract more anglers. Irrigation reliability would be poor and farm viability and land valuation would be affected.

Scenario 4

Minimum flow of 2,500 l/s

Ecosystem health and swimming would likely be good at this flow, as nuisance algae unlikely. Mahika kai and mana whenua values mostly supported at this flow, and sport fishing would be good throughout the river. Irrigation reliability would be very poor and farm viability will be stressed.

Scenario 5

Minimum flow of 3,000 l/s

Ecosystem health and swimming would be good at this flow, with very low risk of nuisance algae. Mahika kai and mana whenua values would be well supported, as would sport fishing, including tourist anglers. Irrigation reliability would be very poor (73-74%) and farm viability would be severely stressed.

