

Enterprise.

We have four properties (1400ha) running as an integrated business within a seven kilometre radius. They are owned by two different land owners, WJ Trust and RP&WJ Verry Trust. Verry Farming Ltd owns all the stock and plant and is the operating company. Everything is 100% owned by my wife and I (and the bank). Two properties are all in Mangaokewa sub-catchment of PC1, one of which has a 20ha Maori Lease. One property is part in, part West Coast Zone. The fourth property is also in the West Coast Zone.

We understand that if an NRP is applied it needs to be attached to land. We wish to be able to farm in a way that does not increase the amount of Nitrogen we are leaching as an enterprise but being able to spread it between our blocks to allow us to retain the flexibility to farm blocks making the best use of our resources. E.g. Dry conditions, supplementary feed, cropping, altitude, right stock class for right situation.

The attached example shows 16 stock transfers between our properties over six months, and how problematic it will be to not have an enterprise level approach. WRC's Section 42a suggests enterprises are too complicated, the reality is farming systems and structures are complicated. One of the main factors is cropping. We have limited suitable land for cropping, part of cropping is pasture renewal and removing heavier stock from steeper country in the winter. Pasture isn't something you want to be doing every 3-4 years. We have a 10-12 year cropping rotation which involves 10-16 ha per year. If the ability to rotate the crop is lost it may lead to us cropping more often on a smaller area, due to where we were cropping in the reference year.

We wish for PC1 to have the ability to transfer Nitrogen within an Enterprise even if the blocks are non-contiguous. If the land is sold then PC1 should have a mechanism to be able to transfer Nitrogen allocation between properties as long as it is not seen to be overloading one property with Nitrogen. Alternatively it could just be sold with the NRP having to apply. Neither of these circumstances need stand in the way of an enterprise farming its allocated nitrogen over all blocks between sales without going through an expensive consenting process.

Sub-Catchments

Need to have the farming community on board

Sub-catchment groups are a good way to engage farmers

WRC needs to ensure that they have specific information available that is relevant to the sub catchment and its own unique issues

FEPs

Would like these to relate to sub-catchment situation more.

GFP if adopted needs to updateable

