

**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 -
WAIKATO AND WAIPA RIVER CATCHMENTS**

Submission Form

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

On: The Waikato Regional Councils proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments

To: Waikato Regional Council
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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

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Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

We are Reon and Wendy Verry and we along with our three children, Mathew, James and Charolotte are sheep and beef farmers in the Waipa/Waikato and West Coast catchments. We are part of the Mangaokewa sub catchment in the Waipa/Waikato catchment and have the Mangaokewa River as a boundary. In the West Coast catchment we farm on the banks of the Mokau River. Both these rivers provide our family with recreational and food gathering opportunities already and we would like to see this continue in the future. We count ourselves privileged to have this access to such waterways and feel a level of responsibility to maintain them and enhance them where possible.

We farm a total of 1300ha with 1200ha being effective. This area is presently farmed with 50/50 sheep and cattle with the ability to run up to 60% cattle depending on the economic and market signals.

Part of the farm has been owned by the family for 30 years with the most recent purchase 14 years ago. We have been farming a portion for over 10 years and have owned the farms in our own right for four years.

The current soil nutrient levels are below optimum, so we run cropping and fertiliser programmes to regrass and optimise soil nutrients to enable increased pasture production allowing an increase in stocking rate and stock performance.

To date we have fenced 14kms of rivers we bound to exclude stock, some of which is riparian planted, created three wetland habitats, we have 45ha of plantation forestry and fenced off 25ha of native bush to allow regeneration some which is under application for a QEII Open Spaces Covenant. The Te Araroa trail passes through our property which we help maintain, currently about 500 people per year use this track. We have always planned to continue these sorts of environmental activities as income and time allow. The farms also have extensive reticulated water schemes. Environmental impacts and outcomes are already part of our business philosophy and day to day management.

Like all farmers we will require some current, understandable scientific data which shows the extent of our farms contribution to each contaminant before making any large investments in the sort of mitigations envisaged. When such evidence is provided and accepted, we will within our resources, fix it.

Our goal is to farm sustainably, environmentally and economically to ensure that the next generation is able to continue farming. If our children were to farm they would be 6th generation farmers within the King Country district.

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King Country River Care

We have been involved with the King Country River Care (KCRC) group, a group of mainly Sheep, Beef and Deer farmers who have concerns about the long term implications for our area. In December 2016 we ran a meeting in Te Kuiti attended by 500 concerned farmers to hear about PC1. It was the first public meeting held in Te Kuiti about PC1 to be attended by WRC. Given the likely implications on our community I think this lack of effort to engage and inform in our area by WRC has been appalling. We think the Social and Economic implications of this plan have been under estimated.

The removal of the Hauraki area has created additional confusion; Alan Livingstone stated at the meeting in Te Kuiti in December 2016 that PC1 was a whole catchment plan. Hence the confusion as to why things are forging ahead with no public comment about when the withdrawn area might be re-incorporated.

KCRC have run eight submission workshops in our area attended by over 300 people. WRC were always going to have an uphill battle trying to get sheep and beef farmers on-board but my feedback from those meetings would be that the task is going to be considerably harder now due to;

- WRC not providing clear data about the current state of sub-catchments
- An overly confusing, self-contradicting PC1
- Impractical blanket rules around stock exclusion with little perceived environmental benefit from some of this fencing
- The grand parenting of nitrogen, rewarding high polluters
- Loss of flexibility in farming systems

WRC has missed an opportunity to create a partnership with landowners to improve water quality. PC1 is the most regulation that sheep and beef farmers have ever faced, with this in mind it was important for WRC to get it right. The outcome of this rushed effort has led to much more confusion, anger, fear and anxiety amongst farmers than there needed to be. It is hard to comprehend that \$14 million spent so far has resulted in such a messy document as PC1. I think there should be an external review into the whole process that was followed.

We believe that a sub-catchment focus with more emphasis on Farm Environment Plans is the best way to progress. This would allow farmers to focus their efforts on addressing the contaminants that are causing a problem on their farm and the ability to focus on the mitigations which will provide the best results. A longer timeframe of 30 years would provide more certainty to communities and the mitigation investments required.

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Implementation

The implementation team have done a good job of identifying the problems they are going to face. Regardless of the outcome of the submissions any goodwill towards WRC has been eroded by the process so far. There are also large numbers of sheep and beef farmers out there who have not engaged yet.

I lament the fact that WRC aren't planning to put any resources into more people at the coalface, which will not enhance the outcome or their own reputation. If this Plan Change is truly what the public demand then I some public investment into securing the outcome would be appropriate. Some serious involvement from WRC financially and labour-wise in the Registration, NRP and FEP process would be a good start.

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The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
<p><i>The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.</i></p>			
Objective 1	We support this objective with amendments	The reasons for this are: We want better water quality throughout the region but Objective 1 does not acknowledge that some sub catchments are already at the 80 year targets for some contaminants We agree with the sub catchment approach E.Coli and clarity targets in Table 3.11-1 are unachievable during flood events	I seek that the provision is: amended as set out below As an alternative I propose replacing and with and/or Objective 1: Long-term restoration and/or protection of water quality for each sub-catchment and Freshwater Management Unit
Objective 2	We support this objective	The wellbeing of the area is dependent on these factors being in balance. We are very concerned that not enough modelling was done about maintaining social, economic and cultural wellbeing. Our area relies very heavily upon the agricultural sector and our main town of Te Kuiti will be very badly affected if any of the jobs in town are lost as a result of less production from surrounding areas. The government is wishing to promote regional growth but PC1 seems intent on pushing more people into larger urban situations.	I seek that the provision is: Retained as proposed

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
<i>Objective 3</i>	We support this objective		
<i>Objective 4</i>	We support objective 4a. but oppose objective 4b.	<p>Objective 4a and 4b oppose each other. Table 3.11-1 creates uncertainty for our farm. What we are required to do in the short term may be a very different mitigation than is required for the 80 year targets. Investment in one mitigation may be obsolete in a subsequent plan leading to investment risk.</p> <p>If in the future there is a rule that certain classes of land are to be planted this will decimate small communities and towns in our region. There is no consideration taken to how important agriculture is to communities and small towns. Large scale planting of pine trees does not equate to small towns and communities thriving, eg Waimiha in the 1990s.</p>	Delete 4b. in its entirety
<i>Objective 5</i>	Oppose in part	The purpose of PC1 is to reduce contaminants from the land to improve the state of the waterways, regardless of ownership. Many of the current impediments identified could be applied to any piece of land including; issues of governance, compliance with central and local government regulations and the emissions trading scheme.	Retain 5a and c. Delete b in its entirety.

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
<i>Policy 1</i>	Support with amendments	<p>Supportive of a sub-catchment approach with each sub-catchment addressing the contaminants that are a concern within that sub-catchment. Would like some flexibility for low loss systems e.g. sheep and beef farming.</p> <p>Need more definition to what is a moderate to high level of contaminant discharge, too subjective.</p>	<p>Remove: "Manage and require reductions in sub-catchment wide discharges of N, P, sediment and pathogens by" and replace with:</p> <p>Monitor discharges on a sub-catchment basis. In sub-catchments where contaminants are above the 80 year level, manage and reduce as required.</p> <p>Use specific and measurable language in 1.a. and 1. b.</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
<p>Policy 2</p>	<p>Support in part</p>	<p>Support a. but think for the life of PC1 all current farming activities should be permitted with a FEP plan, the FEP being the blueprint for the actions each farm business is required to undertake starting with critical source areas, prioritising them and giving a realistic timeframe which allows for the variability in income.</p> <p>Don't see the need for nitrogen reference points in the sub- catchments where nitrogen is at the 80 year target. Let each sub-catchment deal with their own problems. Allow time to gather data and establish sources of contamination. Would like to understand how the targets have been set as there are different targets, is my sub-catchment being penalised to dilute a higher polluting one?</p> <p>Blanket fencing required in clause e. could be defined in the FEP at the property level to provide a more constructive approach. Given that farms are in different stages of development let the FEP determine what level of stock exclusion is appropriate in the PC1 timeframe.</p>	<p>Anyone with a Farm Environment Plan should be a permitted activity.</p> <p>c. Establish NRP's only in sub- catchments with N levels above the 80 year targets.</p> <p>d. Higher emitters need to reduce their contaminant output before low emitters are required to for any of the 4 contaminants.</p> <p>Replace clause e. with: Stock exclusion to be completed as per FEP recommendations.</p>

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Policy 4	Oppose	Policy 4 is a confusing policy that creates uncertainty and risk around investment in land uses.	Have a policy with a clearer outlook as to what may be required in the future so investments can have certainty.
Policy 5	Oppose	While a staged approach is understandable, subsequent plan changes must take into account requirements and investments made to satisfy previous Plans so as not to lead to redundant investments in mitigations. For example if PC1 requires fencing off a waterway, then the next 10 year plan can't require the reforestation of the same area making the fencing unnecessary. Another example would be if I plant pine trees, there is an expectation I can cut them down in 30 years' time.	Require this policy to acknowledge investments made on the farm must not be made redundant before the end of their useful life.
Policy 6	Oppose	Moving to a sub-catchment approach would better allow for deciding whether or not land use change can occur. Decisions should be based on land use suitability and sub-catchment contaminant levels. Ownership of land shouldn't be relevant.	Put something in there to that effect and remove reference to Policy 16.
Policy 7	Support with amendments	This plan should be about contaminant discharge not ownership.	Delete b. in entirety
Policy 9	Support	It will be crucial that WRC provide the sub-catchment information about reasons for current water quality and sources of contaminants before they can expect the co-operation of land owners in funding mitigations. There will need to be a lot of education before this occurs. Blanket policies will not gain buy in from landowners	

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
Policy 10	Support with amendments	<p>Change the Policy to reflect diffuse discharge as well.</p> <p>Agriculture is a regionally significant industry not allowed for under this policy.</p> <p>Point source should be treated no differently to diffuse discharges.</p>	<p>Change to Policy 10 heading;</p> <p>Policy 10: Provide for diffuse and point source discharges of regional significance.</p> <p>When deciding resource consent applications for <u>diffuse</u> and point source...</p>
Policy 11	Oppose	<p>No offsets without it being in the same sub-catchment. All other avenues must be exhausted. Not good enough to move out of sub-catchment unless table 3.11-1 is altered to allow for the pollution occurring.</p>	<p>Amend c. Offset measures must occur within the same sub-catchment. If not possible then alter sub-catchment targets.</p>
Policy 12	Support with amendments	<p>These considerations could equally be applied to diffuse discharges from farmland. Why are all point source discharges given more consideration than my farming enterprise in this respect. We should take into account the relative proportion my diffuse discharge contributes to the catchment load. Our dairy farm has made technology upgrades at great cost to the effluent system to reduce contaminants. We may need more time to allow investment costs to be spread out and there is no doubt diminishing returns are going to apply to some of the blanket fencing rules on my property.</p>	<p>Diffuse discharge to be allowed the same considerations as point source in this policy.</p>
Policy 13	Support with amendments	<p>Once again I don't see why my farming business is proposed to be limited to a controlled consent that will only last the remaining life of a plan with the magnitude and significance of the investment required as for point source. C.' recognises the need to provide appropriate certainty of investment where contaminant reduction measures are proposed'. Any business situation also needs appropriate certainty of investment. i.e.</p>	<p>I would like policy 13 to include all those situations which require consent 3.11.5.4 through 3.11.5.7</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		investment in fencing for stock exclusion.	
Policy 16	Oppose	<p>This policy is divisive for the community and will not foster the sort of co-operation and support needed to achieve the vision and strategy.</p> <p>We don't believe the ownership of the land should have any bearing on the level of contaminant discharge allowed. These rules should be the same for all.</p> <p>Even at the CSG level there has been some confusion about what this policy actually meant. Two people I spoke to on the CSG believed this policy applied to 5000 – 9000ha of land in the central North Island when this is clearly not the case. I also believe that this policy could be used to allow Maori land to continue development within land use. An existing sheep and beef farm could intensify operations with a non-complying consent using this flexibility.</p> <p>This policy also means that landowners in the rest of the Sub-catchment may be asked to do more to meet the short term targets.</p> <p>I do think some flexibility may be appropriate for land returned under a treaty settlement if a proposed change in land use was foreseen and planned at the time of settlement or before PC1 was planned.</p> <p>The River Treaty Settlements that gave background to PC1 came about because of Maori concern around water quality and river health. With that known it is hard to reconcile how Maori would want to remove themselves from being part of the solution with this</p>	<p>Either: Delete policy in its entirety</p> <p>Or Reword to: Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements only.</p>

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>policy.</p> <p>My understanding is that the purpose of Treaty settlements with tribes is to compensate for Historic impediments and actions by the Crown.</p>	
<p><i>Implementation Methods</i></p> <p>3.11.4.1</p>	<p>Support with amendments</p>	<p>This is good but I think landowners should be specifically named in here as in the case of the sheep and beef industry the sector bodies don't have sufficient significance to engage farmers.</p>	<p>Include landowners in the named list of stakeholders</p>
<p>3.11.4.5</p>	<p>Support with amendments</p>	<p>Sub-catchment planning is crucial to success. We would like to see the sub-catchment profiles and plans produced and circulated long before the plan is finalised. Education about the problems being faced will be needed before farmers will be motivated to address issues. No one will be willing to spend to the extent required without understanding the source of contaminants and the effectiveness of mitigations. I would have thought that WRC should have been onto this long ago. I am concerned WRC may not be arranging to put enough resources into property and enterprise scale planning. Clause a. needs some dates for these actions to be completed. I suggest this information will be crucial to inform the actions required in the FEP about appropriate, cost effective mitigations at the property level.</p>	<p>Put a date in a. which is at least 6 months earlier than when an FEP is required for a property.</p>
<p>3.11.4.6</p>	<p>Support with amendments</p>	<p>I think the WRC will need to do more than seek to secure funding, they should be making this a high priority</p>	<p>b. Allocate sufficient funding for...</p>
<p>3.11.4.7</p>	<p>Support</p>	<p>If individual properties and enterprises are to be</p>	<p>Keep as is</p>

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		allocated then there should be methods to measure the discharges at that level. This would require a major expansion of measuring sites.	
3.11.4.8	Support with amendments	There needs to be an undertaking from WRC to measure and collate property specific data now rather than just relying on 'best available data' when the time comes for allocation. Best available data is too broad a term when currently our sub-catchment best available data is flawed as far as contaminant source is concerned.	Change a. to read: Develop discharge allocation frameworks for individual properties and enterprises based on information collected under method 3.11.4.7, taking into account the property specific data and best knowledge and technology at the time
3.11.4.9	Support with amendments	Urban area growth needs to take account the freshwater targets to be met in the sub-catchments. Table 3.11-1	Change clause to reflect the sub-catchment targets
3.11.4.10	Support with amendments	Monitoring needs to be done at the property and enterprise level to establish sources and solutions	Add a.iv. Where sub-catchments are measured in an urban setting, sites should be added upstream from urban and industrial activities. Add a.v. Add new monitoring sites in each sub-catchment to collect property and enterprise specific data
Rules 3.11.5.1 to 3.11.5.7		At the start of these rules a bit of explanation about how to navigate through 3.11.5.1 to 3.11.5.7 would have been a good idea as it has been hard for people to decide which rule will apply to them and therefore the actions that will need to be undertaken.	Insert an explanatory note at the start of this section to help people understand how to find their rule.
Rule 3.11.5.1	Support with amendments	Clause 5 needs clarification as to what constitutes grazed land. Some farms have large areas of native bush, some grazed some ungrazed.	Alter 5. Use total land area instead of grazed area

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3.11.5.2		<p>This long convoluted rule has caused the most angst amongst farmers who suddenly think they can't graze or cultivate land above 15° without realising the rule will not even apply to them.</p> <p>This rule weeds out every hill country farm so maybe it should be called rule 3.11.5.2 Permitted activity Rule – Hill Country need not apply. This would clear up confusion.</p> <p>The rules about the fencing requirements are very confusing as they require compliance with Schedule C (1m setback) and either clause 3e or 4e(3m setback).</p>	<p>Put an explanation in front of these rules to explain to people how to find which one applies to them</p> <p>Clarify the rules so Schedule C is in agreement with 3.11.5.2 Fences require a 1 metre setback.</p>
3.11.5.3	Support with amendments	<p>People with an NRP of less than 30 kg N/ha/yr. should automatically fall within this rule as a permitted activity whether or not operating under an industry scheme. These are lower emitters and should not have to get a resource consent to farm.</p> <p>The timelines for action, Schedule A, B, C and FEP need to start when the Plan is finalised, not the dates given as these dates may occur before the final rules are known.</p>	<p>Add clause to allow lower emitters without and industry scheme to be permitted activities. Could be; 3.11.5.3 Permitted Activity Rule – Farming activities with an FEP</p> <p>Make the dates for registration, NRP 12 months after the plan is finalised. Stock exclusion and FEP to be pushed out accordingly</p>
3.11.5.4	Support with amendments	<p>It is unfair on farmers to have to gain consent just because their industry doesn't run a certified industry scheme. The requirements on these farms seem harsher than those participating in an industry scheme. Neither the auditing or management of 3.11.5.3 and 3.11.5.4 is planning on being done by the WRC. It seems it will all be third party so they are the same rule.</p>	<p>Make the requirements the same as the permitted activity requirements or make this a permitted activity</p>

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		<p>If there is to be a consent then let it be for at least 25 years so there is certainty of investment for consent holders. Not worth applying for if PC1 is in its last few months and a waste of everyone's money and resources.</p> <p>Realign dates as in rule 3.11.5.3 so dates start after plan finalisation. I don't see why people would bother to comply with rules in a state of uncertainty.</p>	<p>As these consents are probably not going to be granted beyond the life of PC1 why bother to have them. Make 3.11.5.4 a permitted activity.</p> <p>Fix dates for actions</p>
3.11.5.7	Oppose in part	<p>With a sub-catchment approach there may be room for development in some sub-catchments. This rule does not allow for this.</p> <p>Within our enterprise we have woodlots, winter cropping and maize. We're not sure whether this rule will apply when we rotate the location of these activities. I don't think this rule should apply because it seems very restrictive and the contaminants are already covered in the FEP.</p>	<p>Amend rule to for sub-catchment differences.</p> <p>Make sure this rule doesn't apply to the normal day to day activities within an enterprise.</p>
Schedule A	Oppose in part	<p>Clause 2 has no relevance.</p> <p>Clause 3 is ridiculous. The WRC holds registration details so their own database is the proof.</p> <p>Clause 5e. and 6ai. WRC will already have this information once they have the legal description from 5b.</p> <p>Clause 5f. is unclear what is required. What measure of stocking rate, which date? This clause doesn't relate to</p>	<p>Delete clause 2</p> <p>Delete clause 3</p> <p>Delete clause 5e and 6ai.</p> <p>Delete 5f.</p>

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		<p>the NRP and could be covered in the FEP.</p> <p>6a. ii, iii These should be covered in the FEP</p>	Delete 6.a. ii. lii.
Schedule B	Oppose	<p>Do away with grand parenting N and focus on the in stream indicators as the N measurement that counts.</p> <p>Overseer was not designed as a regulatory tool. It doesn't give credit to all mitigation tools available on farm. Attenuation is not taken into account by Overseer, as proven by recent trials</p> <p>a. NRP should only be required in those sub-catchments that have an identified nitrogen problem in the waterways. It is a waste of resources to gather all that information when there is not an issue.</p> <p>c. When overseer version changes happen there must be a re-calculation of baseline data and the opportunity to change the reference period if that is the wish of the enterprise. If the NRP is 30 and the next version calculates the same data as 33 then the new NRP is 33.</p> <p>f. Businesses will have different balance dates and this could lead to some anomalies. Would prefer to have more years available to choose from as limiting a farm with 100 years of farming down to 2 will not give a fair indication of the productive capability of the farm in all cases.</p> <p>g. There is no time limit on how long records must be kept, it should be no longer than other legal requirements.</p>	<p>NRP is only used in those catchments with an identified issue based on sub- catchment water measures. When nitrogen levels affect swimming and food gathering (an ecological limit).</p> <p>Change clause to non-penalise a version change.</p> <p>Define what is meant by 'financial year' The reference point should have 7 years to choose from at least, given that financial records are required to be kept for 7 years.</p> <p>Amend clause g. The following records() must be retained for 7 years and provided to the WRC at its request.</p>

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		<p>If adjacent land is bought we would like the opportunity to amalgamate the NRPs rather than having to farm the same farm differently.</p> <p>WRC will have to use some common sense when trying to apply an NRP to situations where farms are spread across Catchments. We farm in the Waikato-Waipā and the West Coast Catchments. We do not differentiate our management nor record which catchment stock are in. Requiring evidence of records will be impossible and shouldn't be expected. We will undertake to provide a realistic picture for the portion of farmland within Waikato-Waipā and expect the WRC to be pragmatic in their approach to this. It is an overlooked problem within PC1, we believe there will be a lot of farms in this situation, some may wish to include their whole farm in the FEP and NRP but this couldn't be compulsory for areas outside the Waikato-Waipā catchment. It is another point which has provided confusion at many of our meetings.</p>	<p>Allow amalgamation of NRPs on purchases of adjacent land.</p> <p>PC1 needs to allow for no NRP being required in these situations if it would be too hard to calculate. The FEP should be able to adequately cover the actions required to maintain or reduce contaminants</p>
Schedule C	Support with amendments	<p>1. Total exclusion is impractical in many situations. In situations where fencing is just possible, it has the potential to cause more contaminate loss (sediment and P) through tracking for fencing and subsequent stock tracking around such fences. In many areas the cost/benefit of fencing steeper (>15°), more extensively farmed land does not equate. A better approach would be to follow the new Stock Exclusion Regulations. If critical source areas >15° are identified in the FEP then stock exclusion or mitigations should be addressed within the FEP</p> <p>3. Some creeks or streams are unsuitable to be bridged</p>	Amend Schedule C to incorporate the MFE Stock Exclusion Regulations

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:	The decision I would like the Waikato Regional Council to make is:
	<p>or install a culvert in or would require great cost to install a livestock crossing structure. If stock are directly controlled when crossing a stream as in a mustering or droving situation then the risk may be acceptable. The FEP can be used to determine the risk. This rule also needs to clarify whether it is all livestock or just those required to be excluded.</p> <p>4. and 5. Stock exclusion must be based on the FEP accepting the fact that farming businesses are in different stages of development and arbitrary timeframes will cause many farmers hardship and cost some their livelihoods. Our area has an abundance of natural water which has in the past negated the need for water reticulation. Installing water reticulation is a major cost that will need to be faced by many farmers before stock can be excluded from waterways. The recently released MPI and Beef and Lamb report: Economic Evaluation of Stock Water on Hill Country provides some insight into this. While there is good payback on installing water systems, this was accompanied on average with increased stocking rate +0.5 su/ha and increased cattle ratio and increased production. These may all lead to an increase in N output, which PC1 does not allow for. Other contaminants may be reduced as a result of reticulation. PC1 may need to allow a slight increase in N if the decrease in other contaminants is more important in the FEP.</p> <p>The definition of a water body is too broad to be achieved everywhere within the timeframe proposed.</p>	<p>Amend to say: Livestock must not be permitted to enter onto or pass across the bed of the water body, except when using a livestock crossing structure or as determined by the FEP. There needs to be some frequency measure in here. Eg. OK to cross creek once a week. Also name cattle ,deer , pigs and horses instead of livestock.</p> <p>Let a realistic timeframe be determined as per the FEP following MfE proposed regulations and dates for stock exclusion which we include in the appendix. PC1 and stock exclusion should be based on these guidelines</p> <p>Water bodies requiring fencing should be specified and prioritised in the FEP</p>

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Schedule 1	Support with Amendments	<p>We support having a farm environment plan. There should be some joint funding of the FEP if WRC want to hold all the information it contains. There also some issues around privacy because the FEP will contain information that is sensitive to your business. There needs to be some clear guidance around who will have access to this information. If a farmer is expected to pay for the information they should have control over who has access to it. Could the FEP also include an assessment of the ability of the business to pay for requirements to comply? Would this inform any timeline requirements? At present the timelines are not going to be able to be met by some businesses due to cost.</p> <p>Each farm is unique in many ways. An FEP enables actions, mitigations and timeframes to be set that are land and business specific. The FEP should be used to prioritise the areas where most environmental benefit will be achieved taking into account the cost/benefit.</p> <p>The setbacks will take out a lot of land which will create an area for weed infestations requiring excessive maintenance. This takes out productive land, will there be any rates relief of compensation.</p> <p>5 metre setbacks are not always appropriate in a no tillage or peat, very flat situation.</p> <p>The five year rolling average sounds a bit hard to manage. With no requirement for providing a yearly Overseer number it would all be in hindsight. The FEP already manages and identifies Nitrogen critical source areas and mitigations.</p>	<p>2.a.i We would like Schedule C and Schedule 1 to be in agreement about what the rules are.</p> <p>2.a.ii Replace with; For areas with a slope exceeding 15° alternative mitigation measures may be used.</p> <p>Water reticulation should be specified as a mitigation.</p> <p>2.b.iii. Let the FEP provide property specific guidelines based on Best Practicable Option for cultivation setback.</p> <p>4. Forget about mandatory timeframes and use timeframes identified within FEP</p> <p>5. a. Delete 5.a. This can be managed within the FEP.</p> <p>Allow for the FEP to increase loss of some contaminants if the net gain for the environment is enhanced.</p>

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		<p>The recently released MPI and Beef and Lamb report: Economic Evaluation of Stock Water on Hill Country provides some insight into this. While there is good payback on installing water systems, this was accompanied on average with increased stocking rate +0.5 su/ha and increased cattle ratio and increased production. These may all lead to an increase in N output, which PC1 does not allow for. Other contaminants may be reduced as a result of reticulation. PC1 may need to allow for a slight increase in N from low emitters if the decrease in other contaminants is more important in the FEP.</p> <p>If the FEP is completed by a certified Farm Planner who will be audited, what is the point of the industry scheme, is this not repetition. If the Certified Farm Planner was used by all farms requiring an FEP. Then rules 3.11.5.3 and 3.11.5.4 would then merge into one with the overall result being much fairer for all with less work for WRC approving consents.</p> <p>The overreliance on the private sector to run this plan may be a weakness of PC1</p>	
Schedule C	Amend	Allow exceptions when animal welfare is at stake. If reticulated water breaks down, stock must have natural water access	Allow for exceptional circumstances for stock welfare reasons.

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	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
Table 3.11-1	Support with amendments	<p>This table is very confusing with different limits being applied to different locations. I'd like to think limits are based on some sound scientific principles but it seems to be a case of 'that's what is it now so we'll keep it at that' half the time. This doesn't help to identify sub-catchments with issues.</p> <p>Measurements need to be taken from meaningful locations. The Mangaokewa Stream is measured in the middle of Te Kuiti downstream from several industries including the district livestock saleyards and a free camping campground amongst others. It needs to be established how much contaminant is due to farming activities as opposed to other land uses if farmers are to bear the brunt of mitigation costs. There is no point in wasting money on mitigations if the contaminant source is elsewhere. Our E. Coli levels are high but the LAWA data shows this is due to two massive spikes which may not be farming related. We need more transparency and background to the data in the table. E.Coli targets need to allow for flood events. All contaminants need to allow for a cost/benefit analysis at the sub-catchment level rather than application of blanket N and stock exclusion rules.</p> <p>Why are there so many blanks on this table, why is there no explanation on swimming and fishing targets. Why are 80 year targets for different sites different</p>	<p>Provide data that measures contaminants at meaningful locations to narrow down sources, thus allowing better farmer engagement and involvement for a better outcome.</p> <p>Amend E. coli targets throughout the table to allow for flood events.</p> <p>Have consistency with targets and/or better explanations around the targets</p> <p>Provide complete data table, with relevant explanations</p>
Part C	Oppose	The definition of a stock unit do not equate with any other definition of a stock unit, where do these	Use some more standard measurement

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		definitions come from and are they appropriate? Cattle are over estimated and sheep seem to be under estimated.	

Yours sincerely,

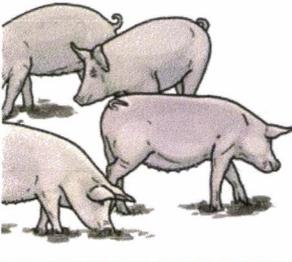
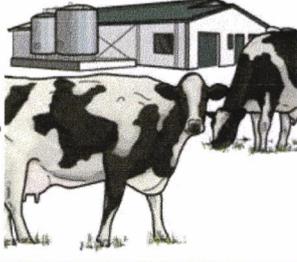
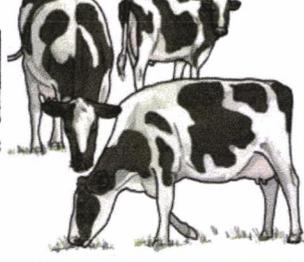
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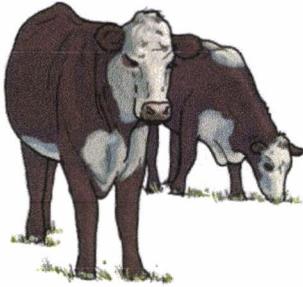
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Date

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*Farmers
Members of King Country River Care*

Pigs	Dairy cows [on milking platform]	Dairy support	Deer
			
<p>1 July 2017</p> <p>On steeper land, pigs must be excluded from waterways over 1 metre wide, lakes and wetlands.</p>	<p>1 July 2017</p> <p>On steeper land, dairy cattle on milking platforms must be excluded from waterways over 1 metre wide, lakes and wetlands.</p>	<p>1 July 2022</p> <p>On steeper land, dairy support cattle that are break feeding must be excluded from waterways over 1 metre wide, lakes and wetlands.</p>	<p>1 July 2022</p> <p>On steeper land, deer that are break feeding must be excluded from waterways over 1 metre wide, lakes and wetlands.</p>
<p>1 July 2017</p> <p>On rolling land, pigs must be excluded from waterways over 1 metre wide, lakes and wetlands.</p>	<p>1 July 2017</p> <p>On rolling land, dairy cattle on milking platforms must be excluded from waterways over 1 metre wide, lakes and wetlands.</p>	<p>1 July 2022</p> <p>On rolling land, dairy support cattle must be excluded from waterways over 1 metre wide, lakes and wetlands.</p>	<p>1 July 2022</p> <p>On rolling land, deer that are break feeding must be excluded from waterways over 1 metre wide, lakes and wetlands.</p> <p>1 July 2030</p> <p>On rolling land, deer must be excluded from waterways over 1 metre wide, lakes and wetlands.</p>
<p>1 July 2017</p> <p>On the plains, pigs must be excluded from waterways over 1 metre wide, lakes and wetlands.</p> <p>1 July 2020</p> <p>On the plains, pigs must be excluded from all waterways, lakes and wetlands.</p>	<p>1 July 2017</p> <p>On the plains, dairy cattle on milking platforms must be excluded from waterways over 1 metre wide, lakes and wetlands.</p> <p>1 July 2020</p> <p>On the plains, dairy cattle on milking platforms must be excluded from all waterways, lakes and wetlands.</p>	<p>1 July 2022</p> <p>On the plains, dairy support cattle must be excluded from all waterways, lakes and wetlands.</p>	<p>1 July 2022</p> <p>On the plains, deer that are break feeding must be excluded from all waterways, lakes and wetlands.</p> <p>1 July 2025</p> <p>On the plains, deer must be excluded from all waterways, lakes and wetlands.</p>

Beef cattle



1 July 2022

On steeper land, beef cattle that are break feeding must be excluded from waterways over 1 metre wide, lakes and wetlands.

1 July 2022

On rolling land, beef cattle that are break feeding must be excluded from waterways over 1 metre wide, lakes and wetlands.

1 July 2030

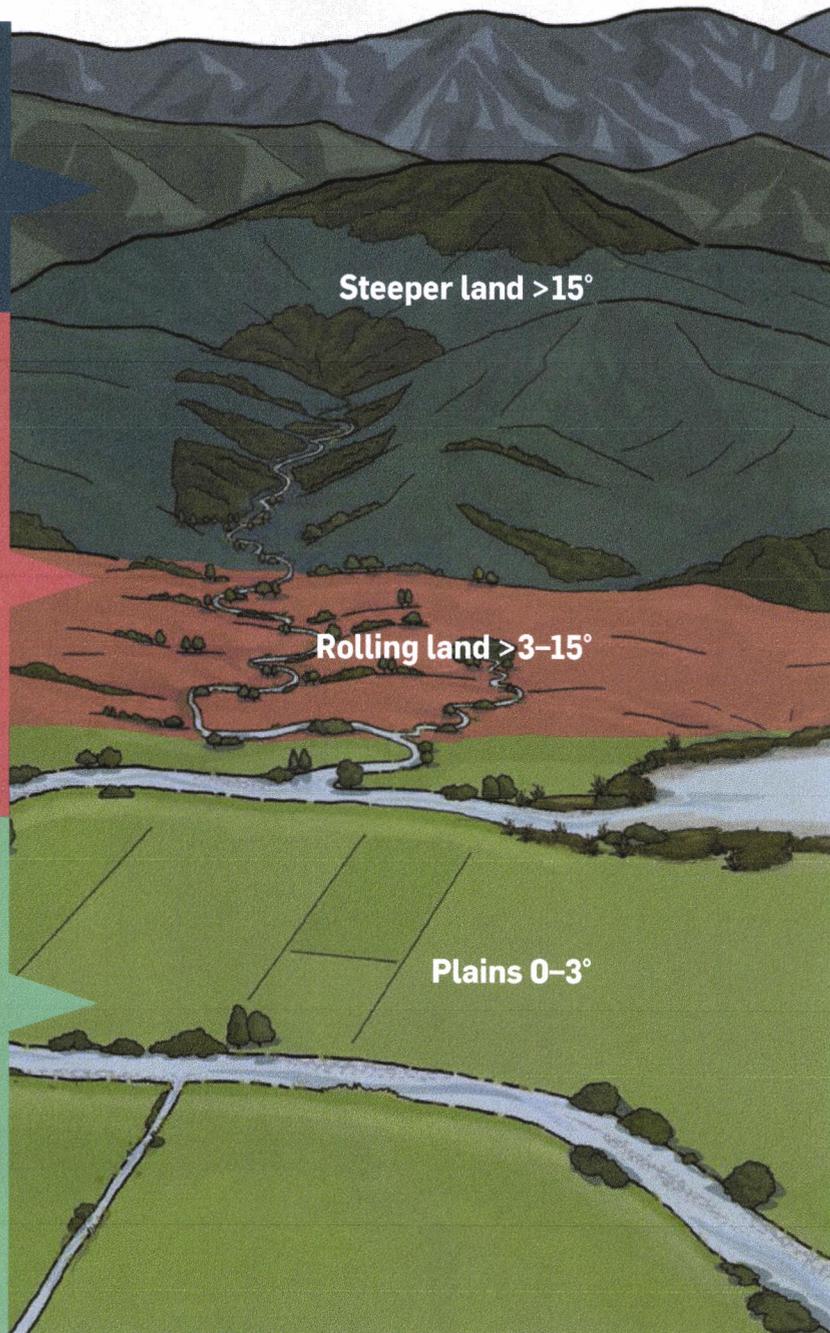
On rolling land, beef cattle must be excluded from waterways over 1 metre wide, lakes and wetlands.

1 July 2022

On the plains, beef cattle that are break feeding must be excluded from all waterways, lakes and wetlands.

1 July 2025

On the plains, beef cattle must be excluded from all waterways, lakes and wetlands.



Steeper land >15°

Rolling land >3-15°

Plains 0-3°