

Proposed Waikato Regional Plan Change 1 – and Waipa River Catchments.

Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE	
Mailed to	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
Faxed to	(07) 859 0998 Please Note: if you fax your submission, please post or deliver a copy also
Emailed to	healthyrivers@waikatoregion.govt.nz Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS		
Full name John Lawson Robinson and Gwen Williams as trustees for the Robinson Williams Farm Trust		
Full address 64 Koroko Road, RD1, Te Awamutu 3879		
Email robinsonwilliams@farmside.co.nz	Phone 021 904 852	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Robinson Williams Farm Trust		
Address for service of person making submission 64 Koroko Road, Rd1, Te Awamutu		
Email robinsonwilliams@farmside.co.nz	Phone 021904852	Fax

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
<input checked="" type="checkbox"/> I wish to speak at the hearing in support of my submissions.
<input type="checkbox"/> I do not wish to speak at the hearing in support of my submissions.

I could not gain an advantage in trade competition through this submission.

SIGNATURE

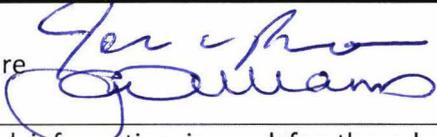
OF

SUBMITTER

(or person authorised to sign on behalf of submitter)

Signature is not required if you make your submission by electronic means.

Signature



Date

7th March 2017

Personal information is used for the administration of the submission process and will be made public. All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

SUBMISSION POINTS: General comments

We farm on a 130 hectare drystock farm in the Mangapiko sub-catchment which is in the Priority 2 area. We are running 500 ewes, dairy grazers and trading cattle. Our family came to this property in 1946 when our grandparents won a ballot for returned servicemen. We are now the third generation on the farm, lease the farm from our family, and intend to stay here indefinitely. Farming a small family drystock unit used to be very viable but it is increasingly hard to make a regular annual profit, and can (and has) been effected by droughts and other climatic events plus cyclical markets for produce. With further restrictions on how we can run our farming business we have serious concerns on how we can continue to productively manage the land and may have to consider off farm income as our principal way of supporting our family.

We believe the proposed Waikato Regional River Plan Change 1 for the Waikato and Waipa River Catchments to be of great detriment to our farm business and economic wellbeing and is contrary to the spirit in which the land was offered to our grandparents.

Our family has always farmed the property responsibly. For the last 9 years we have managed our beautiful Mairoa Ash soils biologically. We have minimised our sprays, controlled thistles manually and fertilised with natural products. We believe our approach to managing the land is not only responsible but is growing top quality grass, sequestering carbon and producing healthy animals. The Plan Change 1 does not reward those who have looked after the land and water, it penalises and limits them, yet those who have not looked after the land can continue to add to the water problems. We strongly believe that dairy farmers on flatter land, applying urea, with high stocking rates and irrigating effluent onto their pasture are contributing significantly more than us to the degradation of our streams and rivers, so why hit the hill country drystock farmers with uneconomic and scientifically unsound measures that will ultimately effect little change to water quality?

We have major concerns regarding the lack of scientific data relating to water quality in each sub – catchment. We are also concerned by the significant lack of detail within the plan. Reading the plan it appears that we will be forced to make substantial capital investment fencing property that in the future we may be forced to plant in forestry. We also have concerns as to how we will financially afford to build fences and plant forests with a significantly reduced income with enforced reduction of our stocking rates.

We don't understand why the urban community is not contributing to the clean-up of our streams and our rivers. The impacts of urban centres on the environment are significant however despite being well represented on the CSG there is no provision to reduce or cap impacts.

We are disappointed at the lack of transparency of the selection of those appointed to the Collaborative Stakeholder Group (CSG). We are also concerned with the amount of drystock farmers on the CSG - this was not a fair proportion of our industry given drystock farmers make up around half of the farmers affected. The drystock representative on the CSG did not sign off on the proposal. This plan is dictating to farmers how to run their farms but the farmers most affected weren't fairly represented on the 'community' in the formulation of the plan. Ultimately the plan wasn't voted on unanimously and the casting vote was made by an outgoing Chairperson putting the 'process' seriously under question.

In comparison to the consultation process adopted to decide the fate of the NZ flag, the consultation process adopted by the CSG has been significantly lacking. With the withdrawal of the Hauraki Iwi and that section of the catchment and the reasons outlined above we believe the Plan Change 1 should be withdrawn by the Waikato Regional Council and a better one developed with more targeted sub-catchment policies.

We support the vision of having clean and swimmable rivers but believe there are better ways of achieving this vision.



I am concerned about the following issues with PC1

We support the submission that has been lodged by Federated Farmers. We are particularly concerned about the following aspects of Plan Change 1:

- **The effect that the Nitrogen Reference Point will have on our business and our economic wellbeing.**
- The significant negative effect on rural communities
- The cost and practicality of the rules.
- The Farm Environment plan requirements leading to unnecessary and costly regulation of inputs, outputs, normal farming activity and business information
- The costs and practicality of the rules and requirements for stock exclusion, the Nitrogen Reference Point and the Farm Environment Plan.
- The timeframes for complying with the Nitrogen Reference Point rules which are too short and unachievable
- The plan significantly exceeding the 10 year targets in many attributes and areas
- The lack of science and monitoring at the sub catchments level
- The lack of clarity as to what actually constitutes a clean river. Why do the plans standards differ from the national standards?

I wish to be heard at the Hearing.

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 am concerned about the implications all of this will have for my property and for my current activity as described above. I set out my concerns more specifically in the table below.



SUBMISSION POINTS: Specific comments

Page No	Reference (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Say what changes to Plan Change 1 you would like	Give Reasons
41	<p>Rule 3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme</p>	<p>OPPOSE</p>	<p>Amend 3.11.5.3 as requested by Federated Farmers in their submission.</p>	<p>This proposal will impose significant costs on my farming activities including in getting a plan together and complying with all the steps. In Priority 2 area we believe the time limit of 1 July 2023 is too early.</p> <p>We are also concerned that this is not practical because we are likely to need more time to firstly consider our options when or if Plan Change 1 is approved, and also more time after that to establish our Farm Environment Plan.</p>



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45	Rule 3.11.5.7 Non-Complying Activity Rule – Land Use Change	OPPOSE	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on our farming future. If we acquire our neighbour's property for example it has always been the plan to convert their land back to organic dairying. This block has been a support grazing property for a decade in line with our neighbours circumstances (retirement). Including some of our flatter land to create a viable unit was always a possibility. This rule will curtail this happening and reduce the value of the land.</p> <p>We are also concerned that this is not practical because this reduces our flexibility in our business. Flexibility is a key component in running a business and lack of it may eventually drive us and/or others out of the business of farming.</p>



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47	Schedule B: Nitrogen Reference point	OPPOSE (STRONGLY)	<p>Any one or more of the following:</p> <ul style="list-style-type: none"> -Scrap the NRP Rule altogether - A ban on urea to reduce Nitrogen leaching -Instead of the NRP. A maximum stocking rate, say no more than 18 stock units per hectare (rolling average) managed through individual farm approved plans. -If previous periods of activity are to be taken into account we would like to see a longer period, 2005 to 2015. -Instead of the top 25% of nitrogen emitters being required to come back to the 75th percentile. We would like to see the top 50% come back to the 50th percentile. -Do more research and testing and conclusions around discharges from sub-catchments and manage losses tailored to those areas. -Consider the effects on sequestering carbon in soils. This requires farmers to build carbon in their soils which in turn holds onto nutrients and water better. Urea destroys carbon! - Amend Schedule B as requested by Federated Farmers in their submission. 	<p>We strongly oppose the Nitrogen Reference Point or any other 'grandparenting' policies.</p> <p>The timeframes that the Nitrogen Reference point is referenced to:</p> <p>2014/15. We experienced very dry conditions in the summer and autumn of 2014 (worse than the declared drought of 2013) and subsequently reduced our stocking rate further which flowed through into winter of that year. On a dry stock farm destocking is the only really cost effective way of dealing with severe weather events as supplementary feeding of stock of more than about 20% of their daily feed requirements for a reasonable time becomes more expensive than their return, and only magnifies losses.</p> <p>In the 2015/16 period we were 'warned' by NIWA and the Met Service of an El Nino event which was likely to cause another dry period. We therefore maintained a relatively low stocking rate and inputs to deal with the risk.</p> <p>Overall we ran low stocking rates over this period and see this period and Nitrogen Reference Point being applied to this period as a great detriment to our business. We suggest if the Plan goes ahead a 10 year period should be considered with an annual 'inflation factor' added for necessary growth to allow our business to remain viable.</p> <p>OVERSEER: It is our understanding that OVERSEER doesn't measure the real contaminant losses of an individual farm. There are too many errors involved in OVERSEER when used to predict nitrogen leaching.</p>

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				<p>We think this is an unfair system to decide the future of our farming business. We would also question why only Nitrogen is the sole criteria for deciding where a farm sits on the discharge of nitrogen, phosphorus, sediment and microbial pathogens scale.</p> <p>Schedule B and definition of stock unit : Use of defaults, not weights, and use the 'age at start settings' (National averages) in OVERSEER for estimating NRP rather than more scientific live-weight will create very misleading results on sheep and beef properties, properties with significant trading approaches, and properties running dairy grazers.</p> <p>The nitrogen reference point takes away flexibility to change or adjust our farming systems that may be required to remain economical. What worked on our land 50 years ago does not necessary work today to be viable. Many things have changed and prices have steadily declined over this period (taking inflation into account). To 'peg' our stocking rate and possible production to these periods through OVERSEER would severely handicap our business through lack of flexibility and ultimately lead the costs of farming overtaking our "pegged" production/profit.</p> <p>A reduction in viability will also lead to other effects within our community:</p> <p>-Inequalities between neighbour's production capabilities and resentment as a result. Higher dischargers will have no incentive to reduce discharges. We have biologically farmed our farm for the last 9 years, looked after our soil, sequestered carbon, and minimised all sprays and chemicals. Our</p>



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				<p>farm has never had urea applied. We genuinely believe that we have looked after the land and the water yet due to our conservative methods we are to be penalised with the lack of flexibility (needed in drystock farming) and the farmers down the road who have for years contributed more than their share to the pollutants are able to continue to contribute more than their fair share. We would like to see the banning of Urea as this would significantly reduce nitrogen leaching in our catchment and more than likely exceed the 10% improvement in water quality in the first 10 years.</p> <p>We believe that the introduction of the NRP will reduce land values (for some more than others). We estimate that our land may halve in value from 2014 to 2024. Taking inflation into account and working on the assumption that at the end of the period we will have a non viable farming business and have costs related to holding and caring for the land, we will only have the value of the accommodation/lifestyle value left.</p> <ul style="list-style-type: none"> -More people seeking and relying on off-farm income -Less employment and opportunities for families to enable succession -Less income into the community -Ultimately people walking away from farming -A breakdown in our local farming community -Breakdown of goodwill between the drystock farming community and the Waikato Regional Council. We believe greater gains will be made towards water purity when those impacted are consulted, worked with constructively and have the financial capability to implement agreed improvements.



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50	Schedule C: Stock Exclusion	OPPOSE	<p>Amend Schedule C as requested by Federated Farmers in their submission.</p> <p>Scrap swamps from being needed to be fenced.</p>	<p>This proposal will impose significant costs on our farming activities including the costs to fence and the costs of ongoing maintenance.</p> <p>We estimate that it would cost over \$100,000 to exclude the stock required from our waterways. This only using one or two wire fences to exclude cattle. This level of cost is not viable for our business in the timeframe required. It cannot be paid for out of income of the business particularly if we are farming under proposed Nitrogen Reference Point.</p> <p>Our farm has a reticulated water system to all paddocks bar one. We have a narrow stream running down the south side of our property. These paddocks are rarely used by cattie anyway (and we could make them sheep only paddocks under the Plan) but in our experience the cattle don't stand on the stream or even camp near the stream when they are in there. The biggest cost for us (if we used the paddocks with stream as sheep paddocks) would be fencing the network of swamps we have in other paddocks. In our experience the stock hardly go in these. Even if the do defecate in these swamps this is likely to breakdown locally and then be filtered by the swamp anyway.</p> <p>We don't set stock cattle on our paddocks choosing instead to move our stock on regularly therefore they tend to lightly graze paddocks and not 'push' into the swamp and marginal areas as much.</p>



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				<p>If the Plan was concentrated in a sub-catchment by sub-catchment basis and testing revealed that fencing would make a difference we would be happy to contribute. Just to spend \$100,000 to fence swamps if we don't know whether it is necessary is a great waste of our money that could be used on a targeted problem.</p> <p>We also have grave concerns with the fencing off of waterways will create other problems:</p> <ul style="list-style-type: none"> -Weeds (particularly blackberry) will proliferate. The (attempted) control of weeds with herbicides and glysohate will result in the chemicals multiplying in our water and causing health problems. Ultimately the rivers will become 'unswimmable' for different reasons. We believe that in time glysohate will be banned and labelled a carcinogenic product it is important that we watch the developments in this area currently unfolding in Europe. -Sediment: We believe sediment will just build up in the waterways and then arrive into the rivers in extreme weather events. The amount of sediment to the rivers in our opinion won't decrease in total, just the distribution of its arrival. We have seen this with a Reserve above our stream that runs through our property. At times the sediment is considerably worse than it used to be when it was a running stream. <p>Fencing some of the swamps on our farm is impractical as it is often steep and a straight fence is a total impossibility without losing a lot of good grazing land. Losing more productive land reduces further our ability to have an economically viable business.</p>



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				<p>We are concerned that investment made fencing our slopes over 15 degrees will be wasted when at some undisclosed point in the future we will be forced to plant these slopes in forestry. Forests cannot be paid for out of income of the business particularly if we are farming under proposed Nitrogen Reference Point. We are also unlikely to be able to borrow money from a bank to plant forestry.</p> <p>We would like to see testing of waterways at entry and exit points of sub-catchments and at points along the way and plans set around where the money is spent to improve water quality. Also by identifying which farms are contributing to the problems (if any) and working on those first.</p>
51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on our farming activities including the development of the FEP by an approved person. The proposed cost is just too much. The Plans unlikely to meet our business needs by taking away our flexibility/adaptability to react to the climate or the market conditions in a timely manner.</p> <p>I am also concerned that this is not practical because we believe the Council does not have the Resources to develop individual plans and the costs of implementation would be prohibitive to the rate payers.</p>

