

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

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

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

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

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 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyrivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details. We also request you send us a signed original by post or courier.</i>
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS

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		Fax	

ADDRESS FOR SERVICE OF SUBMITTER

Full name	Mary-Ann Mathis		
Address for service of person making submission	as above		
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TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

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

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SUBMISSION POINTS: General comments

I own a 136 ha dairy farm in the Upper Waikato Catchment currently milking about 380 cows. It is in the Pokaiwhenua subcatchment. We have owned the farm since 1992. Two families reside on the farm and another lives off farm.

The farm is operated as a conventional spring calving farm. Much of the property is rolling and all above the 15 ° cut off for grazing and cultivation rule. Attached is a view of the property and the neighbouring one. [Rollett & Paraonui Road Dec 16.mp4](#) While much is developed pasture, there is an on-going issue with buttercup coming from a neighbouring property and weed control and regrassing subsequently

The Mangamingi Stream bordering our property has been fenced off for many years. There is one bridge stock crossing point. Fencing the stream has been done mainly for stock safety. The waterway had been overgrown with blackberry but this has been removed. Willows are creating a problem. They have been removed by the power company and local Council but have regrown. It is impossible to spray them from the streambanks. The Stream is also used by locals to collect watercress and eels despite being listed as unsuitable for swimming.

Water is sourced from two bores. However, during the past two years it has been necessary to drop the bore level by 6 meters. This can be attributed to the increased draw from the Lichfield manufacturing plant and three years drought.

Our Nitrogen leaching level dropped in the past two years from 47 kg/ha/year to 39 kg/ha/year largely as a response to having a more favourable weather situation. The Nitrogen conversion efficiency rose from 32% to 40% according to Fonterra's Overseer modelling- largely as we did not grow a forage crop. This reduced the nitrogen leaching risk. Soil tests are done biennially and fertiliser applied as recommended.

This is a well-established dairy farm which has always aimed to improve the environment. Initially, the main focus was weed control and the removal of rubbish. A number of years ago an in-ground effluent system was put in to enable farm effluent to the pump from a sump to a travelling irrigator. This covers 33% of the farm. As a further backup \$49,380 was spent in 2013 to build an effluent pond to hold 3-6 months effluent. This is mainly used to hold water which is pumped onto pasture during summer. \$12,685 was spent in 2011 extending the in-ground effluent system to a travelling irrigator.

We have an on-going tree planting programme growing many of our own trees and have planted areas subject to pugging in more robust pasture to minimise this. We have also worked with DairyNZ and AgFirst to develop a Sustainable Milk Plan.

Our stocking rate has been decreased as a result of several years of drought, a low milk payment response to reduce costs and due to the effect of a neospora outbreak which resulted in many cows aborting their calves. This is not sustainable financially and we will increase the stocking rate back to about 400 cows. The farm supports three staff and the owner. Decreasing the stocking rate will result in being unable to employ so many people.

In the future, I plan to continue to develop this farm using changes in technology and management practices to ensure the farm size remains viable. It is intended to retain the farm for the benefit of our extended family. Living so close to town, we need to ensure a good relationship with our urban neighbours. In order to continue to farm this land we need surety in consents and the rules imposed for a long period of time. We need to have flexibility in such things as stocking rates, growing crops for stock feed or sourcing outside feed when needed in order to cope with market demands and the vagaries of different seasons.

I am concerned about the following issues with PC1

- Grandparenting of stocking rates. If either 2014-15 or 2015-16 are used these dates are not a fair representation of the long-term stocking of this property due to weather, market return, stock health issues and mating performance over those times. I believe a fairer method to determine stocking rate would be a five year rolling average. There needs to be some flexibility to determine this level not to randomly pick two years. This farm would be particularly disadvantaged should the current proposal be accepted.
- Imposing extra costs on the property in terms of monitoring and reporting will affect our ability to be sustainable. For example, our current practice of soil tests biennially is effective as soil tests change very little over time. Being required to employ approved consultants will add another level of costly bureaucracy. We already gather much of the information required through Fonterra and this would be more realistic in practice.
- Setting N reference points and demanding a marked improvement over time is counterproductive when the property is already performing well in this area. A carrot and stick approach has always proven to be less successful in creating the changes desired than other methods.
- Setting a level for cultivation at 15° slope is impractical in rolling country. See attached video of the property.
- Demanding 5 wire fencing along waterways is expensive and impractical in terms of controlling weeds along the streambank. A better approach would be to follow the lead of the Dairy Accord with two wire fencing and its definition of what constitutes a waterway.
- Setting levels expected for improvement across the board is unrealistic. The property may already be performing well and so has less scope to show major change or it may be affected by other land users in the area such as the case with our proximity to the sewerage plant of the town.
- There needs to be a consistent policy platform across all contributors including the urban area.

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

- The significant negative effect on rural communities
- The cost and practicality of the rules.
- The effect that the Nitrogen Reference Point will have on my business and my economic wellbeing.
- 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

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
40	Rule 3.11.5.2 Permitted Activity Rule – Other farming activities			
41	Rule 3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	OPPOSE	<p>Amend 3.11.5.3 as requested by Federated Farmers in their submission.</p> <p>Combine FEP with current requirements of Fonterra to stop duplication of bureaucracy costs. FEP accepted on merit- may be drawn up by number of people including farmer</p> <p>Make dates for FEP acceptance longer to allow time to research and verify</p> <p>Give flexibility to N reduction- too restrictive</p>	<p>This proposal will impose significant costs on my farming activities including</p> <p>The tight timeframe to collect and verify data, especially if FEP needs to be modified</p> <p>Needs to be flexibility with Overseer- it is a model only. Needs to allow for adverse weather events, major market issues etc.</p> <p>Having only registered FEP experts creates a climate for price hiking.</p> <p>Time needs to be allowed to meet N leaching limits- better to create a process of improvement over time which most farmers try to do anyway than imposing arbitrary levels which may be impossible or uneconomic to meet especially in this area where many farms are still in an early development phase.</p> <p>The ability for Environment Waikato to make an ad hoc change to the model is also of concern.</p> <p>I am also concerned that this is not practical because we need certainty to be able to invest in the changes imposed on us and some flexibility to cope with weather events and other events such as stock health</p>

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				issues.
42	Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	OPPOSE	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including The tight timeframe to collect and verify data, especially if FEP needs to be modified</p> <p>Needs to be flexibility with Overseer- it is a model only. Needs to allow for adverse weather events, major market issues etc. Having only registered FEP experts creates a climate for price hiking.</p> <p>Time needs to be allowed to meet N leaching limits- better to create a process of improvement over time which most farmers try to do anyway than imposing arbitrary levels which may be impossible or uneconomic to meet especially in this area where many farms are still in an early development phase. The ability for Environment Waikato to make an ad hoc change to the model is also of concern.</p> <p>I am also concerned that this is not practical because we need certainty to be able to invest in the changes imposed on us and some flexibility to cope with weather events and other events such as stock health issues.</p>

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44	Rule 3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production			
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 my farming activities including the inability to adapt my farm for changes in either market-driven activities eg from dairy to dairy beef or for changes in my lifestyle. This is a family farm close to town and it may be a personal choice to change to grazing stock. The opportunity cost to intensify or change land use is important especially as this is an urban margin property.</p> <p>As parts of the land are being developed we need to go through a process of clearance, cropping for weed control and contouring and then into permanent pasture.</p>
46	Schedule A: Registration with Waikato Regional Council			
47	Schedule B: Nitrogen Reference point	OPPOSE	<p>Amend Schedule B as requested by Federated Farmers in their submission.</p> <p>There should be some flexibility to the determination of the base years.</p>	<p>This proposal will impose significant costs on my farming activities including</p> <p>As outlined above 2014-5 and 2015-16 have been years when this property has been destocked because of management issues, weather and market</p>

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			<p>Other influences need to be accounted for</p> <p>Other alternatives to Overseer need to be considered. It is a model and so provides a generalised understanding of systems but these are often found to be faulty in practice.</p>	<p>returns. Using these as a base for the NPR will have a significant financial impact. At a normal stocking rate of 40 more cows a \$6 payout for milk would make a difference of \$96,000 a year return.</p> <p>The potential inability to farm at the current level would make this land decline in value. This could result in several million dollars of investment being lost.</p> <p>Being required to limit N also limits the funds available to reduce other losses.</p> <p>The proximity of this property to the Tokoroa urban area makes the levels of N, P and E Coli high in our base groundwater.</p> <p>Farmers need to be able to illustrate their ability to improve environmentally using other science. As technologies improve so will the parameters used.</p>
50	Schedule C: Stock Exclusion	OPPOSE	<p>Amend Schedule C as requested by Federated Farmers in their submission.</p> <p>Fencing waterways has caused other environmental issues.</p>	<p>This proposal will impose significant costs on my farming activities including weed and pest control. The build up of willow in the Mangamingi Stream which has occurred since it has been fenced will cost several thousands of dollars to clear and then to prevent the willows from re-establishing.</p> <p>Requiring the fencing any intermittent waterways is not practical. It is also subject to the personal view of the agent concerned. It is also affected by urban</p>

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				stormwater channelling which artificially puts a lot of water through the farm at times.
51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission. Proposal requires a duplication of what is already being done	<p>This proposal will impose significant costs on my farming activities including the duplication of monitoring which is already required by Fonterra.</p> <p>The avoidance of cultivation on land over 15⁰ would make most of this land unfarmable. The value of the land would then plummet as would the productive return of the land.</p> <p>FEP requirements will add significant cost to my operation- estimated additional \$3000-\$10,000 based on advisors and farm management time. Nutrient budgets and nutrient management plans are things we have done for a number of years in conjunction with the fertiliser companies.</p>