

Submission on Waikato Regional Council's 'Plan Change One' (PC 1)

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Signed:



Shane Croft

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Submission

1. I have reviewed Waikato Regional Council's Proposed Healthy Rivers/Wai Ora Plan Change 1 (PPC1) and **oppose** the Plan Change in its current form.
2. I wish to be heard in support of this submission
3. I could not gain an advantage in trade competition through this submission.
4. I am not directly affected by an effect of the subject matter of the submission.
5. Thank you for the opportunity to submit on the Waikato Regional Council's Proposed Plan Change 1 (PPC1).

I am a Dairy Farm Consultant and have lived many years in the Waikato region. I currently live in the Auckland region. Original from the South Island I grew up in Southland and Otago and spent a lot of time in Wanaka where I enjoyed the lake. I completely agree with the focus on water quality and the sustainability of this resource. But we all need to be accountable in managing this resource and the effect of management has on communities. We all want clean water but at what price. If no farming is allowed or it is so restrictive then this will have a significant effect on ALL communities within a region and nation. Will this mean food will be required to be imported into New Zealand to meet the growing demand due to population increases? Will the people be prepared to pay more for food if imported and surely the food imported should be grown in such a manner as if it was grown in New Zealand under PC1. Otherwise, this is hypocritical. I care for the land, the people who farm the land and all of the New Zealand people. One culture is not greater or better than another we are all New Zealanders who want clean healthy water for generations to come. As a consultant I advise my clients to farm environmentally, using natural fertiliser products that don't leach, for example Guano as a source of Phosphate and the use of slow release nitrogen fertilisers and Sulphate of Ammonia. This is with the aim to use little to no nitrogen fertiliser but to develop the soil as a living organism that supplies its own nitrogen through clovers and soil biology. I am seeing this on farm with my clients. I use the Albrecht Approach to soil and fertiliser management and we truly see this working on farm and clients use less phosphate and nitrogen fertilisers because of my approach and advice.

6. Partial Removal of Catchment

The withdrawn area is generally described as the area in the north-eastern portion of the Waikato River Catchment.

The reason for the withdrawal of the area is to enable Waikato Regional Council (WRC) to undertake consultation with Hauraki iwi authorities in this area.

Due to this catchment being withdrawn it does not make sense to continue with the implementation of PC1 while this catchment is not included.

Therefore the whole of PC1 should also be withdrawn until such time that the WRC has had time to consult with Hauraki Iwi Authorities and all issues are resolved.

Remedy: Withdraw all of PC1 until full consultation with Hauraki Iwi Authorities is completed.

7. Vision and Strategy

WRC does not clarify within PC1 the definition of “swimmable”. We all agree that swimmable and being able to take food from the entire length of the river is excellent. But the term swimmable needs to be clearly defined.

As a keen water skier, water quality is very important to me. But I would not go swimming or water ski if the river is in flood or unsafe. The river must be safe to swim in.

By not having a clear understanding and definition of “swimmable” in PC 1 it requires all days of the year to comply with swimmable. Therefore in flood events all water quality standards can not be met and therefore the goals of PC1 can not be achieved. In flood events, is when sediment, phosphate and E Coli levels will be greatest and this is not due to any on farm activity.

Remedy: Clear definition of “swimmable and safe” regarding water quality over the entire Waikato Region as it relates to PC1

8. The use of Overseer

The Overseer Model was developed as a research model to help guide and lead research in nutrient loss, to test ideas and assumptions. It was developed as a support tool not a regulatory tool.

Overseer does have limitations;

1. Assumes all data to be true and accurate.
2. The System is in a quasi – equilibrium (inputs commensurate with production levels on farm)
3. Long term annual averages – assumes a steady state.
4. Not Predictive
5. Assessing Model Performance – Accuracy, Error, Precision, and Uncertainty. (Sustainable Nutrient Management in New Zealand Course book. Section 7.51

Due to the above limitations, intentional or not, within the Overseer Model this will create variations in the output from Overseer around nitrogen leaching and phosphate losses. These variations that cannot be proved in absolute accuracy, as whole farm assessment / measurements are impossible. Therefore it is not possible to accurately determine the true and actual nutrient loss. This will result in the goals of PC1 not being achieved.

Overseer is owned 50% by Ballance and Ravensdown Fertiliser Companies. Is this good, as these companies have a vested interest in the computer model and will this model truly and correctly model nutrient loss?

If Overseer is to be used as a regulatory tool, has the model been International Peer Review based on its research and science in the development of the model and its use? If the model has not been Peer reviewed or has been, but the review only commented on the models ability as a

“research / theory based model” then how can it be used as a regulatory tool? Is the tool fit for purpose?

Remedies:

That Overseer not be used as a regulatory tool but used as a qualitative tool as a “what – if analysis” on a sub-catchment basis. If used in this way and on a sub catchment basis then sub catchments that are not meeting water targets relating to nitrogen and phosphate can explore solutions that may reduce nitrogen and phosphate.

Explore other methods to establish Nitrogen Reference Points if required to meet water quality targets. As focused farm management practices in “sub catchments that don’t currently meet PC1 Targets” may achieve targeted PC1 water quality targets without the need for Overseer and a blanket rule to reduce nitrogen usage.

9. Nitrogen and Phosphate

The over emphasis on Nitrogen relating to a Nitrogen Reference Point, NFP almost at the exclusion of the other 3 contaminants, Phosphate, sediment and E Coli, is wrong. I do not support the use of a NFP on farm.

The key reason is that research, a 37 year, whole ecosystem experiment, clearly showed that reducing Nitrogen could not control Eutrophication of Lakes. The key issue is phosphate not nitrogen. This key point has been lost in PC1. There is other research that clearly shows that phosphate is a key contributor in water quality or the increase in phosphate in water is a key contaminant in water quality decline. Research has shown that controlling phosphate use and reducing soil phosphate levels that are adequate to grow and produce crops etc are critical in water quality. See research articles.

Currently the NFP is grandparenting and this is at the exclusion of farmers who have reduced their nitrogen usage, it does not promote or encourage farmers who have reduced their nitrogen usage. It treats all forms of nitrogen as the same, so it does not allow for the use of “Smart Fertilisers”

In Overseer Phosphate is modeled but it is limited. Whereas every year farmers measure there soil phosphate levels through soil testing which is as accurate as the model within Overseer. Yet this was omitted in PC1.

As highlighted in the above point, the ownership of Overseer, the inclusion of a Phosphate Fertiliser reduction within agriculture would have a significant impact on Ballance and Ravensdown Fertiliser Companies. But would also have a significant impact on improving water quality.

Remedy:

Removal of a Nitrogen Reference Point as a blanket rule. Focus on a sub catchment basis where water quality does not meet the targets within PC1 and focus on the issues / contaminants within the sub catchment. This would then mitigate the requirement for a blanket NFP. This approach may also mean that some sub catchments may not need to mitigate nitrogen.

10. E Coli

E Coli is a blanket term within PC1. I do not support this.

Within PC1, E Coli needs to be clearly defined in regards to water quality targets. E Coli can be tested to clearly state the source of the E Coli, eg Cattle, Sheep, Bird, Human.

If the E Coli in water is not cattle or sheep, but it is bird or human then how does the farming community reduce this? If they can not, then how can they be held accountable? Bird E Coli needs to be consider in Lakes also.

If the levels of E Coli are above the target levels of PC1 but are not farmed animals, primarily Cattle and Sheep, but in fact Bird or Human, then this needs to be stated within PC1 and the offending source of E Coli needs to be cleaned up and removed. If this is from a point source discharge of materials / wastes into a water body / water way are causing E Coli levels to increase,

then this offender needs to clean up the discharge regardless if they have a consent. Also the offending body should not be allowed to dilute their discharge to meet their resource consent. That is, take water to dilute the waste, then discharge the now diluted waste. This is not allowed in regards to dairy effluent so should not be allowed in regards to city waste water or sewage being discharged into any waterway within the Waikato Region. All towns and cities need to treat their waste / storm water and sewage to the target levels of water quality of PC1 without dilution.

Remedy: E Coli needs to be clearly defined as to the species that the E Coli originates from. Levels of E Coli need to be defined relative to Cattle, Sheep, normally farmed animals. If the E Coli is from a animal that the farmer has no influence over then this should be excluded from PC1

11. Land Use Change

I do not support this under PC1.

There are Land Use maps in New Zealand based on their soil types, slope and suitability to farming. The land should be farmed / managed in a manor that is appropriate to land use and class. This is where Farm Environment Plans can help determine farming enterprises on land.

Remedy: The use of Land Use / Class Soil maps and Farm Environment Plans to help determine farming enterprises.

12. Exclusion of Pests, both animal and plant

PC1 does not include pests as a source of contamination. Koi Karp should be included as a major contributor of sediment and there should be an eradication plan. This also applies to bird species on lakes, Canadian Geese for example on Lake Waikare.

Remedy:

Inclusion and development of eradication of pests that cause and contribute to the decline of water quality. This should not just be paid for by the farming community but by all.

13. Grazing of steep land, fencing off waterways and water reticulation

I support and do not support this within PC1.

This should be on a case by case situation. Soil erosion, sediment, phosphate, E Coli and nitrogen enter waterways through many factors but where a Sub Catchment is meeting all of the targets under PC1 then the current farming practices are working. The cost to the farming business on a blanket rules in areas where water quality is not an issue is not correct. The length of time within PC1 also gives no assurance to farmers that the rules will not change in 10 years time.

This is where a Farm Environment Plan, on a case by case approach in a sub catchment would then focus the communities that contribute to the waterway would be the ones that are required to clean it up.

Remedy:

A Sub Catchment approach with the use of Farm Environment Plans in only the catchments that have contaminate issues and only including E Coli that is from a farmed animal. PC1 needs to give assurance that rules wont change and gives farmers that the investment into fencing and water reticulation is worthwhile.

14. Loss of Value

PC1 does not allow of the loss of value in land due to the introduction of PC1. This will have significant impact on the land owner. This loss of value will result to Land Use restrictions and NFP of the land in question.

Due to the reduction in land use capabilities caused by PC1 land values will decline. This will cause interest rates to increase due to the reduction in Equity. This will have a flow through on the whole New Zealand Economy. Banks will see farming as high risk and this will affect credit rates and interest rates.

Remedy:

PC1 in its current state is unsustainable and needs to be re-written and where land owners values decline due to the new PC1 document, then the affect land owner should have financial compensation. This should be funded by all people in the region. As everyone wants the water clean so everyone should pay.

15. The Cost of PC1

Based on the costs of PC1 in the draft, I don't believe these are sustainable based on the Federated Farmers and Baker and Associates Case Studies. The cost to the wider community huge and not meet the goals of Objective 2 of PC1.

Remedy:

Complete review of the financial costs to the communities. Use of Frank Scrimgeour to do a complete analysis of the implementation of PC1. This must also align with National Policy Statement and Vision and Strategy.

16. Sub Catchment Approach

A sub catchment approach is mentioned in PC1. PC 1 proposes (3.11.3 Policy 9) that "... a prioritized and integrated approach to sub-catchment water quality management..." will be adopted. Then at "Implementation 3.11.4.5" it states that the "Waikato Regional Council will work with others to develop sub-catchment scale plans..."

If this is stated in PC1 that sub catchment plans will be adopted then why is PC1 being implement in a broad, 1 set of rules for the whole region? This is a contradiction.

Remedy:

PC1 be re-written with the focus of a sub catchment approach in dealing with soil contaminates.

17. Next Generation

Innovation comes from pressure and new ideas. These new ideas come from new thinking mainly from younger people. PC1 in its current form does not allow for the younger person to purchase the farm. This is because the NFP will restrict productivity. Often when farms sell the new owner lifts the productivity of the property but this will no long happen due to the NFP. So why then would anyone want to buy a farm if you cant increase the profitability of this farm. Profitability is linked with productivity and efficiency. What PC1 is saying, there is no or very limited opportunity in farming and don't buy land.

WRC say that the communities were all consulted through the CSG, but if the plan is wrong or needs adjustment then this is what needs to happen.

Lets not be so filled with pride and say that its good and correct when its not. The same applies to Overseer. If the model is not good enough then don't use it or make a new one.

Remedy:

Re-write PC1 that allows all goals of the NPS, WRA, Vision and Strategy and communities to be achieved.

18. Farm Environmental Plans

I support the idea of a Farm Environmental Plan but there is no detail in what is fully required. More detail is required in PC1. Also the skill level of the person(s) writing the plan needs to be high and they need to have a farm systems understanding.

19. Set back in regards to cultivation

I do not fully support the idea of Set Back within PC1 in regards to paddock cultivation.

Where there is a waterway as described by PC1 adjacent to a paddock then a set back that is appropriate should be in place to mitigate contamination of the waterway. But I do not agree with set back where there is no waterway adjacent to the paddock that is to be cultivated. The Farm Environment Plan needs to identify which paddocks that would require a set back and this would be on a farm by farm basis not a blanket rule. It also does not allow for drain cleaning. A set back will also encourage weeds.

Remedy:

That PC1 be re-written the set back is on a farm by farm basis and addressed within the Farm Environment Plan, not a blanket rule and also based on a sub catchment approach.