

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.

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| SubForm | PC12016 | COVER SHEET | |
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| | | Submission Number | |
| Entered | | Initials | |
| File Ref | | Sheet 1 of | |

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

| SUBMISSIONS CAN BE | |
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| 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 | | |
|-------------------------------|--|-----|
| Full name | Shirley and Steve Trumper | |
| Full address | 449 Waikite Valley Road, R D 3, Rotorua 3073 | |
| Email | Phone | Fax |
| jadaz@xtra.co.nz | 073331543 | |

| ADDRESS FOR SERVICE OF SUBMITTER | | |
|---|--------------------------|-----|
| Full name | Win Dee Farms (2007) Ltd | |
| Address for service of person making submission | - as above | |
| Email | Phone | Fax |
| jadaz@xtra.co.nz | 0212771040 | |

| TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i> |
|---|
| <input type="checkbox"/> I could not gain an advantage in trade competition through this submission. |
| <input type="checkbox"/> I am not directly affected by an effect of the subject matter of the submission that: (a) adversely effects the environment, and (b) does not relate to the trade competition or the effects of trade competition. Delete entire paragraph if you could not gain an advantage in trade competition through this submission. |

SUBMISSION POINTS: General comments

We own a 450ha operation made up of 3 blocks. 350ha was purchased July 2015.

The main block is divided into 2 operations. A dairy block consisting of approx 180ha, contour ranging from flat to 15+ degrees.

Approx 100ha beef operation, rolling to steep, with the balance being Native and regenerative scrub and pines over the steeper part of property.

Our farming operation sits in 2 catchment areas, dairy predominantly sub catchment 2 with 1 support block of 55ha and the beef operation and another support block of 42ha in sub catchment 3.

Using Regional Waikato stock unit calculations we farm up to 20 stock units per ha.

The 350ha farm had been grossly mismanaged by the previous owners' son to a point where the farm was run down quite significantly. In fact on auction day steps were taken to provide extra security at the facility to ensure no adverse actions were taken by the son. As new owners we also had to take the extra precaution of securing Insurance to the full extent before settlement date in the event of intentional damage.

We are aware there are legal actions pending between the previous owner and manager.

The stock, which were purchased with the farm had significant health issues resulting in lower than optimum numbers for our first year of operation. Unfortunately at the same time our situation was made worse by a catastrophic event on our existing dairy enterprise. Through both these events and the dairy pay-out meant we were required to micro manage our expenses to income. This prevented our new operation to be run at optimal levels.

We have also had to invest in significant infrastructure on the farm - being water, troughs, fences and races. We have installed 5km of new water lines to mitigate existing water loss and to improve flow to troughs for animal welfare. We expect to complete another 10km of new water line, over time and finances permitting.

Culverts are semi blocked and have suffered damage through neglect and weather related issues. Races were poorly maintained and we were unable to start the upgrade until this current season.

We are also required to upgrade existing fence lines to meet the stock exclusion compliance approx 2km and significant parts of the boundary fences are in poor repair.

Our property borders Lake Ngapouri and we are currently working with Fish and Game and Te Arawa Lakes Trust on the environmental impact in and around this sensitive wetland and also improving the standard of our riparian area due to significant weed control required. This will require ongoing works and maintenance. Confirmed costs are approx \$5,500 at this time and we expect this to increase as further improvements are made.

We expect to upgrade the major crossings. We have 3 main tracks leaving the cowshed and each will require upgrade to mitigate nutrient run off. This is dependent on best practice advice to meet industry standards.

The waterways have an overgrowth of weeds and will require substantial investment to be brought to standard. We are budgeting approx \$50,000 for these works. The works will be done in accordance with environmental best practice guidelines and the support of an adviser.

To meet compliance for Fonterra, we have also had to invest in new milk chilling equipment which was \$60,000. This has been a significant outlay.

We need to plan for new measures on possible environmental impacts to our farming operation. We believe we need to secure consent for a minimum of 20 years to be able to carry out the required works and continue operating in a sustainable manner.

We are concerned about the following issues with PC1, with these being the additional costs to meet environmental strategies being considered for Plan Change 1 in the time frame currently being considered.

The main concern we have is the benchmarking dates chosen and believe these are grandparenting in another form. We are asking for an extension to the "benchmark" dates to be able to set a realistic benchmark for this farm under our management. This is an unknown and we cannot provide any accurate information from the previous owner to be able to "grandparent" from their data.

We do know the previous owner applied for a water consent to take water for approx 640 animals although he did not allow for his beef stock on the adjoining block of land. The run-off's, which have been in our ownership for many years, did not have a water take consent applied for as we were under the 200 stock numbers allowed for in Variation 6 grandparenting at that time.

A Benchmark of 3 - 5 years of new ownership would give us the opportunity to accurately reflect the nutrient level to be able to set a benchmark within Industry guidelines. We are happy to work with a registered practitioner through this period of nutrient setting.

The reason for this purchase was family succession and the ability to fully utilise the run-offs near-by.

The introduction of an Environmental Plan to be formulated by 2023 for our operation is probably not feasible. We would prefer to be given to sub-catchment 3 phase which is 2026.

The reason we are unable to use benchmark dates set by Regional Council is because we purchased late in the season and were not in a position to be able to optimise our purchase through extreme mitigating circumstances. We will also be unable to use the benchmarking dates for our Nitrogen Referencing as we do not have continuous data this being only our second year on the farm.

We support the strategy behind healthy clean water ways and believe it is in our Grandchildren's interests to ensure we pass on sustainable methods to not only provide a living for the families this farm supports but also meet our responsibilities as responsible land owners.

The costs are an unknown factor to consider because the economic impact has not been established. There are currently no registered qualified practitioners and this Plan Change 1 is being introduced before there is even a full and economical understanding of the financial implication this change will bring.

We support the submission that has been lodged by Federated Farmers. We are 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 our 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

We are concerned about the implications all of this will have for our property and for our current activity as described above. We set out our 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 | Amend 3.11.5.3 as requested by Federated Farmers in their submission. | <p>This proposal will impose significant costs on my farming activities including the probable impact of not having a full set of records and significantly lower-than-average production and stocking rate for the benchmark years.</p> <p>The farm was purchased late in July 2015 which is not a full year. The severity of our circumstances were such we had a non-movement order therefore negating the ability to fully stock the farm to its full potential.</p> <p>The existing stock on farm, purchased with the farm, were also hit with severe health issues requiring vet management of sick and dying stock.</p> <p>These factors combined with late purchase have prevented us from being able to fully reach farm potential.</p> <p>We have farmed to Industry best practice guidelines with Fonterra prior and do not see this changing.</p> <p>The 75th percentile Nitrogen reduction may have a significant impact if we are unable to measure our own farm practice accurately and need to rely on Overseer which is a program not designed for numerous soil types within the same sub-catchment area.</p> |

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| 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. | |
| 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. | |
| 46 | Schedule A: Registration with Waikato Regional Council | Support in part | There is property information provided to industry related businesses (Fonterra) now and these should be sufficient. | Regional Council rates currently should be sufficient to ensure there are no additional charges. |

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| 47 | Schedule B: Nitrogen Reference point | OPPOSE | Amend Schedule B as requested by Federated Farmers in their submission. | <p>This proposal will impose significant costs on our farming activities including the ability to sustain and support up to 4 families. The costs first to go will be staff reductions. This would place an unfair burden on the tax payer if those staff are unable to find employment in another industry.</p> <p>Environmental costs are unknown. Until Plan Change 1 has been implemented for some time only then will the true cost be known. Best case scenarios are not indicative of true financial impacts. (Building a house you plan for up to 20% additional expenditure) What would we be asked to have as a contingency?</p> <p>Overseer is being used as Best Industry Guide. That is all it is, a guide. It does not know individual circumstances or allow for any factors unique to the farming operation, nor does it provide accuracy around individual farms.</p> <p>This farm was purchased in July 2015 and therefore any further restriction in our ability to farm with the proposed plan will severely impact on our financial viability.</p> <p>While we see merit in some of the changes there needs to be a measured approach. The 10 year time frame is too fast and needs to be out to 15 years to allow time for changes to be made over time.</p> <p>Mitigating sediment in the stream is a priority. Funding industry compliance as well as environmental compliance will add significantly to farming operations. Our farm has also had to mitigate Health and Safety</p> |

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| | | | | <p>issues with the erection of new yards. This was at a cost of \$60,000.</p> <p>Nitrogen referencing will be unable to be supplied to any degree of certainty and we do not believe Overseer should be setting a standard based on best guide scenarios. The program itself does not take into consideration any variation of soil type with the same sub catchments.</p> |
| 50 | Schedule C: Stock Exclusion | OPPOSE | Amend Schedule C as requested by Federated Farmers in their submission. | <p>This proposal will impose significant costs on our farming activities including new fencing of the waterways.</p> <p>We have Lake Ngapouri on our boundary and although Te Arawa and Fish and Game have provided industry guides on the standard of fence expected we are required to contribute to this cost.</p> <p>Stock are currently excluded from the water ways by way of one wire electric fencing but we understand the standard is 7 wire batten fence around the Lake. We have agreed to fund our share when required.</p> <p>All other water ways have stock exclusion by way of one wire electric fences but in places this is not reliable therefore we are also replacing fences when finances permit.</p> <p>We would not have severe impact on our ability to fence the water ways with more permanent materials once we have the funds to complete this task.</p> |

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| | | | | <p>The waterways and Lake environment is protected by Riparian barriers but these are significantly affected with blackberry, broom and gorse. The removal of these is costly and an ongoing cost. The spray program we have instigated over the farm is approx \$3500 per annum. We hope to reduce this cost with the success of the spraying program implemented.</p> |
| 51 | <p>Schedule 1: Requirements for Farm Environment Plans</p> | <p>OPPOSE</p> | <p>Amend Schedule 1 as requested by Federated Farmers in their submission.</p> | <p>This proposal will impose significant costs on our farming activities, including the ability to replace grass species when required.</p> <p>While we avoid cultivation near the lake it is unavoidable on the slopes which are greater than 15 degrees as the entire back of our farm is that gradient slope or more. We do not carry out unnecessary works but the pasture species on this farm is not sustainable and requires replacement. We undersow by direct drill where appropriate but the soil type we have means in extreme weather events the soil is prone to pugging. We have attempted to mitigate this by using an area away from the lake to stand cows off during bad weather.</p> <p>We will take guidance on further mitigation where we can but at this stage we have no funds to be able to reduce our imprint further by building a standoff pad due to budget constraints.</p> <p>Nutrient budgets have not been factored into our situation due the extenuating circumstances we found ourselves in. The nutrient budget completed for Fonterra in our first year does not reflect an accurate account of our farming practice. Again we ask for an</p> |

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| | | | | <p>extended period to gauge a true reflection of our capabilities and ask for up to 3 to 5 years of ownership records to find our true position.</p> <p>Costings for Plans are based on best industry knowledge. Plans from \$2000 to \$5000 are being mooted as possible.</p> <p>That is only the plan cost. The implementation of any plan would need considerable investigation to ensure costs were as accurate as possible. The requirements of Farm Environment Plans are unknown and could be cost prohibitive.</p> <p>While forecast costs are a guide they do not factor any contingency for unexpected scenarios or individual situations.</p> <p>No one can accurately forecast it will cost X to complete a compliant plan but the costs we have factored in to meet the proposed plan could be 20 to 30,000kg of Milk solids.</p> <p>If we are also to reduce stock numbers to mitigate our Nitrogen footprint the impact has an even greater bearing as the effect would lower production, lower income and therefore the ability to stay on the land becomes more tenuous or unsustainable.</p> <p>Meeting stock exclusion can be completed simply and we do this to the best of our ability with one wire electric fences.</p> |

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| | | | | <p>Everyone likes to believe they farm sustainably and follow good Industry standards.</p> <p>Plan Change 1 needs definitive answers not best guess scenarios. The economic impact on the geographical area and the economy of the Country could be catastrophic if this plan is implemented with a wholesale change with scant regard to people's livelihoods.</p> <p>Farmers would not only lose their farms, lose their income they will also lose their homes.</p> <p>We absolutely support better management of our water ways but it must be a Region wide effort and not a land based target only.</p> |