

The Chief Executive WRC

c/o healthyrivers@waikatoregion.govt.nz

Submission to proposed Plan Change 1 from:

Sieling Farms

PP Pieter Dirk Sieling

81 Ohuka Farm Drive

PO Box 336 Whitianga

Email address for service: dirk@sieling.nz

Phone 0211540123

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

General

Plan Change 1 should be withdrawn. Although there is some useful stuff in there it attempts to implement policies that discriminate against drystock farms and hill country farmers via the Nitrogen reference point and allocation and the requirements which are easy to implement on flat land but hard and expensive on hill country. The removal of the Hauraki section of the plan has also given the landowners in that area extra time and scope for submissions and is likely to lead to different policies and rules for that part of the Waikato catchment. PC1 should be used as a basis but fine tuned via a collaborative process with landowners and then put out for public submission. Moreover the NPS does not indicate regulation as a tool and non regulatory methods are generally more effective, this Plan Change is however rules based.

Relief sought: *Withdraw the entire plan change until the Hauraki lwi issues are resolved and further consultation with landowners has been undertaken.*

Objective 1, there needs to be a limit on what the proposed rules are meant to achieve. Relief sought, add: *The targets to be met shall not exceed the minimum standards or targets set by any current or subsequent National Policy Statement.*

Policy 2

a. A FEP should only be required for livestock farms running more than 20 SU/Ha or greater than 50ha. Relief sought: *amend policy*

D An exemption is required for low intensity land use, the ones using less N already get punished and some will not be in a position to reduce N inputs as they don't use much. How is a gorse covered farm going to reduce its N leaching? Relief sought: *add exemption*

Policy 3 add an exemption for low intensity and small scale enterprises. Relief sought: *add exemption*.

Policy 6 for clarity add a like for like clause, where a landowner can replace for instance an existing forestry lot with a similar sized one somewhere else and return the original forestry area to pasture. Relief sought: *add clause as described*

Policy 7 This policy is beyond the scope of PC1 and should be deleted. Relief sought: *Delete policy 7*

Policy 12 Add new sub e: *The relative cost of upgrading or replacing existing effluent storage systems versus the benefits achieved for systems that already show a reasonable degree of compliance.* (or words to that effect) Relief sought: *add new clause e*

Implementation methods:

3.11.4.1 Include landowners as stake holders. The group most affected is not mentioned other than through their industry bodies, that is simply not good enough and an affront to landowners. Relief sought: *include landowners as stakeholders*

3.11.4.3

Farm Environment Plans will be a costly burden on landowners and should not be required. These should only be considered when WRC can demonstrate that a property has a considerable contaminant discharge. Otherwise these will be an unnecessary cost. Relief sought: *Amend as described*

3.11.4.5 Relief sought: amend to say: WRC will work with *land owners*

RULES

3.11.5.1 2. Add Domestic as it is unreasonable to ask a landowner to control wild animals. Relief sought: Add *domestic* prior to cattle, horses, deer and pigs.

3. Remove, the hectareage of a property is irrelevant to potential discharge and furthermore it could be substantially covered in bush. Relief sought: *Remove clause 3 and the sentence prior to 5, also remove "Either" above 3, remove 4.*

5. 6 SU/ha is ridiculously low. It would be insufficient to control the grass. A normal stocking rate is 15 SU/ha (the traditional 1 cow per acre) Relief sought: *amend to 15.*

6. Relief sought: Amend as follows: No arable cropping occurs *other than regassing*

7. Remove, some farms run across several titles and also may have a run off nearby. Relief sought: *remove*

3.11.5.2 Relief sought: Remove *where the property is greater than 4.1 ha*. Alter 6 to 15.

2 Relief sought: Add *Domestic*

3. This entire part needs to be re written, the hectarage equations don't make sense for different landuses. Relief sought: rewrite entire section or at a minimum: Amend leading sentence to *50 ha*, delete a, amend e to say *domestic* cattle etc and replace 'cannot be within 3 meters' with "*can on average not be within 3m*"

4. Relief sought: *greater than 50 ha*. b ii: *20 kg N*. c: Delete as it is impractical. Land of mixed contour may contain many small areas of steep contour, they can't all be expected to be fenced off. E ii: add "*domestic*" and "*average*" as under 3.

5. Relief sought: Delete and replace with a contaminant output based criterium

3.11.5.3

3 Relief sought: Add *domestic*

5 If the property falls under a certified industry scheme, an additional FEP should not be required if the property adheres to the requirements of the scheme. The scheme provider (usually the company the property supplies) This is the creation of yet another set of expensive consultants to tick the boxes. FEP's should only be required where a property's activity falls outside industry schemes. Relief sought: *delete 5, 6, 7 and 8*

3.11.5.4 Oppose in its entirety. The one shoe fits all approach is over reaching and unnecessarily intrusive. Relief sought: *delete and reconsider criteria*

3.11.5.7. Allow for like for like swapping of activities on different areas as long as the increase in contaminant output is no more than minor. Relief sought; *amend rule as requested or address elsewhere in the plan*.

Schedule A. This is ridiculous, if WRC wants to persist with this they should up the area to at least 10 ha or more and select the at risk properties to be contacted from their database as their aerial photography will show most of the land-uses. Relief sought: *amend as suggested*

Schedule B g iii and i.v: Access to invoices is too intrusive and it will not achieve much. Relief sought: *delete*

Table 1 Inclusion of all landuses in the model. This begs the question, if part of a farm gets sold which has forestry on it will it then push the balance over the N ref point? Relief sought: *reconsider the model*

Schedule C 1. Relief sought: add *domestic*

2. Fences on river crossings are closer to the stream, the proposed requirement would necessitate unnecessarily wide crossings. Relief sought: add: excluding constructed wetlands *'and livestock crossing structures'*

5. i and ii. This is impractical, on hill country such minor trickles are often to close together and the end result apart from being very costly would be paddocks too small to be useful. Relief sought: *amend to a minimum stream width after consultation with landowners.*

Schedule 1 FEPs

The entire section is draconian and will lead to huge expenditure, in some instances without environmental gain, for livestock farms and should only apply to non livestock farms. A new section needs to be written for livestock farms following consultation with land owners. Relief sought: *write a separate section for livestock farming following consultation with landowners*

5.1.5 There are new harvesting standards agreed by the forestry industry and the government. The regional requirements should align with those. Relief sought: *Suspend 5.1.5 for reconsideration when the agreed standards are released*

Signed 7/3/2017

A handwritten signature in black ink, consisting of a stylized initial 'H' followed by a series of wavy lines.