

# 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.

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

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

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

YOUR NAME AND CONTACT DETAILS			
Full name	Swiss Belle Farm Ltd, Rene Burri		
Full address	177 McKinley Road RD1 Te Aroha 3391		
Email	familie.burri@web.de	Phone	027 2123 727
Fax			

ADDRESS FOR SERVICE OF SUBMITTER			
Full name	Swiss Belle Farm Ltd, Rene Burri		
Address for service of person making submission	177 McKinley Road RD1 Te Aroha 3391		
Email	familie.burri@web.de	Phone	027 2123 727
Fax			

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
Yes, 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
<i>(or person authorised to sign on behalf of submitter)</i>		
<i>Signature is not required if you make your submission by electronic means</i>		
Signature 	Date 7.3.2017	
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 own a 26 ha dairy goat farm, milking ca 650 goats, producing 70.000kgMS, located in Te Aroha. We are currently not within the area affected by the plan change, but we would like to express our opinion on the proposed plan anyway, because it will affect us in the future.

Our farm system is cut-and-carry, which means, all animals are housed in a barn and feed is taken to them. We decided to have an indoor farming operation, which came at additional cost of ca 600.000\$ for housing the animals, but it creates a lower leaching, because we can control nutrient application to our land. Multiple times in a year we clean out the composted manure out of the barn and spread it on our land area. We bought a manure spreader ourselves for ca 45.000\$, so we can spread out the manure more often and in smaller amounts at a time. We have an ongoing cost to maintain the cut-and-carry system, which includes more usage of machinery, more labour needed, more diesel used and animal bedding needed.

Our farm was part of the milking platform of a cow dairy farm and was converted to goat farming 1.6.2015.

We have the river boundaries fenced out fully, but our animals are housed permanently anyway.

We utilise pasture renewal to maximise pasture grown and harvested, for this we employ cultivation of the specific areas. Through this we also gain smoother land, which helps us for the cut-and-carry system.

We currently farm a 9ha lease block in addition to the main farm area, where we grow maize for silage and grass during the winter.

In the future, we are looking at expanding our farming operation and we want to keep our business efficient and profitable in an environmentally conscious way. In our ever changing world we need simple and flexible rules, that allow us to adapt to changes and keep our business at the top.

I am a Swiss farmer and did my agricultural education in Switzerland before I immigrated to New Zealand seven years ago. Switzerland is source of many rivers in Europe. It had water quality problems decades ago and faced the challenge to maintain the water in drinking quality as well as for recreational purposes. The Sempacher Lake eg was so polluted, that they had to pump oxygen into it to prevent the ecosystem from collapsing.

New rules were put in place to limit nutrient loss into waterways and now 20 years later the equivalent organisation to our Fish & Game here is complaining, that there are not enough fish in the water due to a lack of nutrients. This proves, that the Swiss system is very efficient if not too efficient.

I would like to explain the Swiss approach to the problem:

- the whole system is controlled through subsidies for complying farmers
- targets to achieve: reduction of nitrate contamination of surface and underground water, reduction of phosphate contamination of surface water, reduction of herbicides in surface water

- tools and methods: crop rotation is mandatory, incl crop growing breaks so that certain crops can't be grown for too many years on the same area; ground coverage is maintained; prevention of erosion; extensive buffer areas (with no cultivation, no fertiliser nor herbicide use) along surface water; nutrient budget (Suisse Bilanz) regulating the phosphorus and nitrogen amounts (no more than 10% deviation to calculated plant requirement; takes into account, if existing soil fertility is low, farmer is allowed to apply more fertiliser to correct it)

- "Swiss Nutrient Budget" (Suisse Bilanz): farmer has access to free nutrient budget program and enters farm data, a certified officer checks the input and results, the officer is paid by government

- "Swiss Nutrient Budget" (Suisse Bilanz): benefits: quick overview over nutrient budget of whole farm, calculates max permitted stock units, calculate if there's an excess of nutrients on farm and calculate necessary adjustments, calculate maximum permitted bought-in fertiliser

The Swiss government has spent a lot of money to finance research and to make data and resources available to the farmer.

The Swiss system has its disadvantages and can't be applied to the New Zealand system straight away, but in our opinion it is worth looking at other countries, their strategies and their specific outcomes. Incentive payments for compliant farms and/ or levies for non-compliant farms could be used to encourage farmers to do their best.

Please take into account the flexible and differentiated approach and reward the farmers who do their best to look after the environment right now rather than looking into the past and setting static non-environment-friendly high limits.

Further general concerns:

People create huge amounts of water pollutants as well and with New Zealand's population increasing and cities growing the government needs to make sure, that everybody is aware of the impact and doing their bit. Water quality testing of the Waikato river before Hamilton and after Hamilton can show the impact of civilisation and the need to look at this and put regulations in place there, too.

In our opinion the submission and hearing process limits the beneficial outcome of the discussion, because the topics heard are restricted to the topics raised in the submission. In our opinion people, who put a submission in, should be able to raise any concern they have, regardless of whether they were written in the submission or not. This way further discussion points can be added and the outcome can be more refined. People who haven't put in a submission should be excluded from this.

I wish to be heard at the Hearing.

I am concerned about the implications the Proposed Waikato Regional Plan Change 1 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
47	Schedule B Nitrogen Reference Point	oppose	<p>The OVERSEER program has to be tailored to goat farming as well as any other different farming type. We as farmers need to be able to access and utilise the program without the step in-between of consultants and agents, this will also reduce costs involved. The filled-in forms could be sent to an authority for a final inspection and result in advice and recommendations or mandatory actions required. The OVERSEER program needs to be government owned to guarantee independent and neutral modelling, not biased by any industry which might have an interest in a certain outcome of the models.</p>	<p>We are not happy with the use of the OVERSEER program for modelling and setting the limits, because:</p> <ul style="list-style-type: none"> <li>- the OVERSEER program isn't designed yet to model the goat dairy situation properly,</li> <li>- the OVERSEER program isn't available to the public but just through agents and consultants at a high cost,</li> <li>- the OVERSEER program, which is not solely government owned and therefore can't model neutrally and independently</li> <li>- the Nitrogen Reference Point determined in the years 2014-2015 and 2015-2016: We support limitations, but they need to make sense and be fair and allow the business to change and adapt. The Nitrogen Reference Point rewards farms which had a high leaching at the time and it disadvantages farms, which had a low nitrogen leaching and were proactive at that time already. These farms will be limited in their future land uses and will be valued and sold at a lower price than high-leaching-limit farms, which allow the buyer more farming options through a higher leaching allowance.</li> <li>- In our opinion it is crucial, that businesses can change and evolve, like our goat dairy farm for example. It was created out of part of the milking platform of a dairy cow farm, which employed ca 0.5 labour units for this block. Now we farm the 35ha and employ 3 permanent staff. We are proud suppliers to the Dairy Goat Coop and create value and income for our local community as well as New Zealand as whole. We don't know, what the future will bring and we don't want to limit our and New Zealand's opportunities by putting a plan in place, that doesn't allow for change and adaptation in an easy and flexible manner.</li> </ul>

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 3.11.5.2.4 Permitted Activity Rule – Other Farming activities	oppose	specify details about fencing in clause	fencing out waterways: for our indoor- animals- permanently-housed situation, does this mean the fence around the barn? In our cut-and-carry situation, where no animal ever comes close to the water, the 3m and 5m distance of the fence to the waterway makes no sense. When all animals are housed permanently there should be no requirement for fencing out in addition to that.
40	Rule 3.11.5.2.4 C Permitted Activity Rule – Other Farming activities	oppose	Grazing should be permitted, cultivation should be permitted, but restricted in winter months	<p>The banning of cultivation leads to more use of herbicide sprays, which have an impact on the environment and can potentially leach into waterways, too. Organic farming depends on cultivation of land for weed control. Our own cut-and-carry system gets optimised through cultivation, which makes the land smoother and more efficient to work with.</p> <p>15 degree slope is not too steep to justify banning of grazing and cultivation.</p> 