

Submission on WRC Plan Change 1 – Waikato and Waipa River Catchments

Submission Form

Subform	PC12016	Cover sheet	
For Office Use only			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

Submission on a publicly notified proposed Regional Plan prepared under the Resource Management Act 1991.

On: The Waikato Regional Councils proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments

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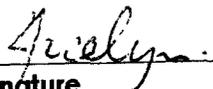
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We are not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on our ability to farm. If changes sought in the plan are adopted they may impact on others but we are not in direct trade competition with them.

We wish to be heard in support of this submission.

If others make similar submissions, we would consider presenting a joint case with them at the hearing.



Signature **8/3/17**
Taupō Lake Care Inc secretary. **date**

Introduction:

Taupō Lake Care Inc (TLC) is an Incorporated Society representing private farmers and Māori Āhuwhenua Trusts and Incorporations in the Lake Taupō catchment. TLC represents the majority of pastoral farmers in the catchment.

TLC is committed to achieving sustainable, viable farming - economically, socially and culturally as well as environmentally.

TLC was involved in the development and implementation Chapter 3.10 of the Regional Plan commonly referred to as Variation 5. The Lake Taupō catchment was the first catchment in the world to operate under a cap and trade regulatory regime involving diffuse discharges from land to a waterway.

Our membership is eminently experienced to contribute to the hearings.

Submission:

Matter:	Explanation:		Decision required:
<p>Definition – Enterprises Page 81.</p>	<p>Amend.</p>	<p>Many of our members operate enterprises that include land in the Waikato and/or Waipa catchments. Operating a business under two different management systems, including two versions of Overseer® and two management plans, will be complex. Note this is farms that drain into the Waikato catchment as well as those farms crossing the boundary into other catchments. Nationally this runs into hundreds of farms and in the catchment dozens and dozens.</p>	<ol style="list-style-type: none"> 1. WRC and TLC members to work together to develop an acceptable method catering for enterprises that cross catchment borders. 2. WRC to advocate for a national solution to this problem
<p>Acronyms</p>	<p>Include</p>	<ul style="list-style-type: none"> • For consistency, the regional plan should use the same terminology throughout. Introducing a new term for like terms is confusing for people new to a catchment (farmers or advisors/service providers) in chapter 3.10 the NRP is called the TAND and NDA; Total Annual Nitrogen Discharge or Nitrogen Discharge Allowance respectively. Likewise, the Farm Environment Plan (FEP) is the same as the Nutrient Management Plan (NMP) in chapter 3.10. • We need national terms for the same thing. WRC should take a leadership role by advocating regional councils adopt national terms/acronyms for similar 	<ol style="list-style-type: none"> 1. Change all references for Nitrogen Reference Point (NRP) to Total Annual Nitrogen Discharge (TAND) or Nitrogen Discharge Allowance (NDA) per hectare. 2. Change all references to the FEP to Nutrient Management Plan (NMP) 3. WRC to instigate a regional council initiative to have national terms/acronyms for similar regulatory concepts.

		regulatory concepts.	
Security/privacy. Implementation Method 10. Page 38	Include	<ul style="list-style-type: none"> We need to know what private Intellectual Property (IP) is available for public to access and what is reserved to certain WRC staff. A system or register is needed to inform prospective purchasers etc. a property's permitted nitrogen discharge, if the NRP is retained. 	<ol style="list-style-type: none"> WRC to protect IP. WRC to have publicly accessible register of property Nitrogen Discharge Allowance
The 5-year rolling average. Controlled Activity Rule 4. Matters of Control and Schedule 1 clause 5. Pages 43 and 53	Support if the NRP is retained	The 5-year average is recommended by Overseer Ltd, allowing some years to exceed the NRP if others are below the NRP. This gives the rules some flexibility. Continually changing versions of Overseer® means the concept has the potential to be impractical.	
Nitrogen Reference Point Objectives 1 and 4 Policies 2 and 7 Rules 3.11.5.2 to 3.11.5.7 Schedule B, and any other related provisions Pages 27, 30, 32, 40 – 45 and 47	Oppose	<p>Our experience of a regulatory cap is in a cap and trade regime where the version of Overseer® is static. This supports trading or off-setting, innovation and efficiencies giving flexibility and certainty for our businesses. On the other hand, the cap has reduced capital values, promoted farm amalgamation, depopulation, stress and reductions in low impact properties.</p> <p>We believe the NRP, as planned, will be ineffective as a reference point because the Overseer® output will be forever changing and, importantly, future Overseer® outputs are unknown, consequently disrupting management plans.</p>	Delete the Nitrogen Reference Point and the use of Overseer® for regulatory purposes.
Farm Environment Plans Policy 2, Rule 3.11.5.3, 3.11.5.4, Schedule 1 Pages 30, 41, 42 and 51.	Support with amendment	<p>The Taupō catchment is unique. The aim is to maintain current high water quality. Before the Taupō cap was introduced riparian areas were already fenced, planted and reserved in Land Improvement and Rāhui Whenua Agreements. The standard of environmental management is high in the catchment, as reflected in major awards received - 10 since 2000.</p> <p>The situation is different in the Waikato and Waipa catchments. The regulatory emphasis in the plan suggests stock exclusion from waterways and edge of field mitigations are the targeted activities. These activities are not effectively measured by Overseer®.</p>	WRC to develop a measurement system that targets e-coli and phosphorous as a precursor for the whole farm FEP.

		It would be better to develop a stock exclusion measure that takes into account of the length of waterway excluded, and/or the amount of fencing, and/or the area of planting, and/or the edge of field improvements and stock intensity. Once the stock exclusion and edge of field improvements are achieved an Overseer® based program could be considered. This would prioritise mitigation efforts on a property or enterprise level in a targeted manner.	
Certified Industry Scheme, Certified Farm Environment Planner and Certified Farm Nutrient Advisor 3.11.4.2, Schedule 2, and related matters.	Support in principle.	Our experience is that some farmers or farm managers prefer (and are able) to do their own NRP and FEP. The expertise and knowledge of the farm business manager for an enterprise or property is not being tapped. There should be a means to use this expertise. The advantage of this is timely management of the environmental effects.	Add a qualification to the Certified Farm Environment Planner and Certified Farm Nutrient Advisor requirements that allows the operator of an enterprise or property to take the role of the Certified Farm Environment Planner and Certified Farm Nutrient Advisor for that enterprise or property.