

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	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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

SUBMISSIONS CAN BE	
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 Tracey Burgess		
Full address 83 Jack Russell Drive, P O Box 12, Te Awamutu 3840		
Email randd@terracare.co.nz	Phone 0212474446	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name TerraCare Fertilisers Limited		
Address for service of person making submission 83 Jack Russell Drive, P O Box 12, Te Awamutu 3840		
Email randd@terracare.co.nz	Phone 07 871 8211	Fax

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<input checked="" type="checkbox"/> We could gain an advantage in trade competition through this submission.
I am not directly affected by an effect of the subject matter of the submission that:
(a) adversely affects 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.

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

*Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1
(continue on separate sheet(s) if necessary.)*

Chapter 3.11

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(select as appropriate and continue on separate sheet(s) if necessary.)

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

MY SUBMISSION IS THAT

*Tell us the reasons why you support or oppose or wish to have the specific provisions amended.
(Please continue on separate sheet(s) if necessary.)*

TerraCare are a company that sells proprietary dicalcic based phosphates. We deal largely with the Dairy and Sheep and Beef sector, but also with horticultural enterprises. We are based in Te Awamutu, with our main office and manufacturing plant in Jack Russell Drive. We have consultants active in the Hawkes Bay, Manawatu, BOP, King Country and Waikato Regions.

Our goals are to supply good nutrient advice based on what our clients need, along with a product list which gives high flexibility and productivity, while being environmentally responsible.

TerraCare agrees with the general direction of the Plan change regarding the effort to reduce contaminants in water bodies. In particular, and relating to this company directly, in mitigating the impact of phosphorus on waterbodies.

However we see considerable shortfalls in the methods proposed to meet these objectives that we submit should be amended.

In general these relate to the shortfalls in using OVERSEER as a method of regulation, the focus on a nitrogen reference point as a regulatory tool, the lack of other goals in particular soil phosphate levels, the lack of support and science to educate on alternative phosphate forms to superphosphate, and the short time frame given the current scarcity of qualified persons capable of constructing environment plans.

I SEEK THE FOLLOWING DECISION BY COUNCIL

(select as appropriate and continue on separate sheet(s) if necessary.)

- Accept the above provision
- Accept the above provision with amendments as outlined below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

Amend as follows:

Use OVERSEER as a direction rather than an absolute

Support field research and information dissemination into alternative forms of phosphate other than superphosphate

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

I wish to speak at the hearing in support of my submissions.

I do not wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

Yes, I have attached extra sheets.

No, I have not attached extra sheets.

SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature



Date 2.3.17

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.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

Additional sheet to assist in making a submission

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	State in summary the nature of your submission and the reasons for it.	State clearly the decision and/or suggested changes you want Council to make on the provision.
Schedule B (c) and (d)	Oppose	<p>Best management practises (such as the fertiliser code of practise) highlight that in the case of phosphorus, solubility is a major factor to consider for runoff. The science literature behind this is clearly outlined for RPR (which is factored into OVERSEER), however there is bias in both the literature and the uptake of existing literature towards mono calcium phosphates. Due to this OVERSEER does not satisfactorily account for alternatives in its nutrient budget outputs.</p> <ul style="list-style-type: none"> • I.e OVERSEER sees no difference between a highly soluble product and a very low water soluble product in its estimation of phosphate runoff (I.e DAP/DCP coupling). • While the properties of DAP and DCP are vastly different the only other options are to “tick” superphosphate or RPR in the fertiliser section. Neither of which are a correct description of our products impact on soils. <p>This model does not assess attenuation factors, in other words what happens beyond the root zone is dependant on factors beyond the modelling capacity of OVERSEER. This leads to misunderstanding of what the OVERSEER phosphate outputs mean in relation to freshwater contamination.</p> <p>OVERSEER was never intended as a tool for regulation setting and as such it is not accurate enough to be used for setting limits when such high impacts on industry are facilitated. We are also not aware that it has been peer reviewed by independent mathematicians and soil scientists.</p> <p>The reliance on this also inhibits innovation and focus on discovering other methods of attaining the objectives of this plan.</p>	<p>Support science which provides viable alternatives to superphosphate</p> <p>Collate all data regarding solubility and factor into OVERSEER or any other tool used to more accurately assess the nutrient output of an enterprise.</p> <p>Clarify the meaning of the outputs in relation to risk of freshwater contamination.</p> <p>Use OVERSEER as a guide to best management practises not a regulatory tool</p> <p>Publish the model so it can be peer reviewed by other modellers/make the peer review commentary publicly available if this has been conducted.</p> <p>Notify what the inherent errors are within the model</p> <p>NZ phosphate research is largely based on mono calcium phosphate thus bias to hear this story only exists.</p>

3.11.3 Policy 7 (d)	Oppose	<p>Not having set goals for the reduction of phosphates when there is significant research supporting a phosphate range in soil which highly reduces the potential for runoff contamination.</p> <p>Bias towards research support: Focus on nitrates fails to consider the full impact of phosphate in waterways. This then reduces the emphasis on research and support for innovative phosphate options.</p> <p>In addition, and compounding this bias an existing duopoly in the New Zealand fertiliser industry directs research to be beneficial to the corporations rather than the end user and the recipient waterways.</p>	<p>A phosphate range in the soil is readily measurable and a more certain indication of potential for contamination than nitrate leaching in OVERSEER. This could be a trigger to assess a farm at a closer level.</p> <p>An independent body should be created to assess research on a value based basis and funding and information dissemination be assigned on that basis.</p>
3.11.3 Policy 2 (c)	Oppose	<p>Target fixation; If you are below then you aim for above, if you are above you seek to go just below rather than further.</p> <p>Engenders the propensity for “gaming” to provide the flexibility that is needed in an everchanging industry. The industry is always changing due to climate and economic factors (e.g export prices) that are well beyond the control of individual farmers.</p> <p>Regulatory measures are a negative tool and as such uptake is resisted.</p>	<p>Best management practises and objectives are set rather than a definitive point.</p> <p>Incentives are set for nutrient loss mitigation rather than punitive measures.</p> <p>Systems that incentivise have shown that continual improvements are resultant, particularly as competition ensues to gain incentives and innovation and applied effort therefore occurs. The benefits of this direction therefore multiply.</p>
3.11.5 Schedule 1	Support and oppose	<p>We are in general support for the concept of Farm Environment Plans. However we are concerned that the identification of mitigating measures are not inclusive of all mitigation potentials for phosphate contamination. It appears that mitigation emphasis is unbalanced in the direction of the after effects of phosphate contamination. This does not allow for discussion on the suitability of various phosphate forms for the particular land use enterprise.</p>	<p>More emphasis placed on importance of potential mitigating factors around phosphorus contamination.</p> <p>Factors that are put forward as discussion points include the form of phosphate fertiliser suitable for the farming enterprise, with that suitability being based on factors such as the farm system and production goals.</p> <p>Those giving advice on this should be fully cognisant of the properties of different phosphate forms.</p>