

# 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 to one of the above addresses</i>
<b>Emailed to</b>	<a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a> <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>
<b>Online at</b>	<a href="http://www.waikatoregion.govt.nz/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>
<b>We need to receive your submission by 5pm, 8 March 2017.</b>	

YOUR NAME AND CONTACT DETAILS			
Full name	Zach Mounsey		
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Email	zdmounsey@xtra.co.nz	Phone	027 464 9224
		Fax	

ADDRESS FOR SERVICE OF SUBMITTER			
Full name	Zach Mounsey		
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Email	zdmounsey@xtra.co.nz	Phone	027 464 9224
		Fax	

I could not gain an advantage in trade competition through this submission.
I could NOT gain an advantage in trade competition through this submission.
<input type="checkbox"/> I am / <input type="checkbox"/> am not directly affected by an effect of the subject matter of the submission that: <ul style="list-style-type: none"> <li>(a) adversely effects the environment, and</li> <li>(b) does not relate to the trade competition or the effects of trade competition.</li> </ul> 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.)*

Pg 47 Nitrogen Reference Point

General Comments

**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.)*

**SUBMISSION POINTS: General comments**

I am a 50/50 sharemilker milking 280 cows on 105 effective hectares in the Waitomo district, I also have an ownership interest in this property.

On our farm we have a comparatively low stocking rate (2.66 cows/ha) to the average (~3.0 in the Waikato) and run a low input system. In previous we have made significant on-farm investment in environmental projects such as a lined effluent pond, effluent area is ~30% of the farm with a travelling irrigator along with individual pods, all waterways fenced and some planted. All up this investment has been in excess of \$200,000 with further yet to go. In terms of farming best practice and potential farm environment planning we tick all have done very well. However, in terms of a nitrogen reference point through OVERSEER our results are not necessarily correlated with our high achieving on-farm plan and infrastructure in environmental projects at approximately 42kg of N for the 2015-16 season.

I am concerned about the following issues with PC1:

**Nitrogen Reference Point**

- Nitrogen reference point based on past two season's data. I think the idea of a farm plan works better to actually achieve best practice and environmental outcomes on farm as opposed to a contemporary model of what the farm is doing.
- Your nitrogen reference point and not being allowed to move from that (even if you are within the 75<sup>th</sup> percentile) I feel favours those who have not been proactive in investing in on-farm environmental projects over the last few years. i.e. someone who is doing well under the 75<sup>th</sup> percentile must remain at that point while someone just under the 75<sup>th</sup> percentile has more flexibility in their system going forward. Also, if they were to sell their farm the purchaser would be expected to do meet the historic nitrogen reference point, which if you were well under, could deter purchasers due to the lack of flexibility within the vendor's system. I feel this somewhat punishes good operators.

**Next generation in farming**

- With the nitrogen reference point forcing land holdings into historic outputs it can prevent the next generation making the most out of land opportunities in some cases. E.g. if an older owner-operator with very little or no debt is running their property very low input with very few livestock

numbers etc. and decides to sell it, younger farmers are unable to buy that property (most likely via debt funding) and increase the economic viability of that property to cover interest costs and service debt due to the productive output of the property is somewhat capped by the nitrogen reference point. There could be no such thing as a rundown farming business that can be made economically viable when purchased by young people progressing through the industry. I have heard that maybe corporates could offset this by allocating N to their other land holdings to make this work, but for individual farmers looking to be owner-operators this is not an option. I feel the use of a farm plan for best practice could be a better option here for the reasons noted above. Or, perhaps if there is to be a nitrogen reference point you should just have to operate within the 75<sup>th</sup> percentile so you have some flexibility within the farming system and you will be somewhat aware of whether you can meet that based on your management ability, soil type Etc.

### **We are all in this together**

- I support the overall intent of PC1 provided all those contributing to contaminant discharges or water degradation are required to take action.
- Farmers are only part of the equation here but I feel are getting lumped with more of the responsibility.
- Diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens by farmers in the Waikato are exacerbated by the lack of flow due to the eight hydro dams along. I can't remember the exact science here, however, I believe it use to take water approximately 7 or 8 odd days for water to flow through he Waikato river. However, it now takes somewhat 23 odd days for water to flow through the Waikato river due to the hydro dams.
- Any improvements by farmers will be forever be exacerbated unless this is acknowledged. If there is not going to be any change here farmers can only do so much (and should only be expected to do so much) to improve water quality unless all contributing parties are on board.
- The eight hydro dams along the Waikato, from Aratiatia to Karaapiro, have drowned important cultural and geothermal sites, altered fisheries, changed the river's ecology, hydrology, sedimentology, morphology, water clarity and quality, temperature regime, and recreational uses. Fair context around this towards farmers and their role in water quality is all I ask with this.
- This is the same for urban responsibility in their role in water quality as the PC1 doesn't necessarily address that.

I support the overall intent of the Plan Change as the first stage of achieving the Vision and Strategy for the Waikato and Waipa River Catchments. However, a primary concern for myself and other farmers is the uncertainty of future plan reviews.

Any attempt to accelerate that pace of change or to make further changes without the necessary level of scientific understanding will put at risk the environmental, social, cultural and economic objectives, as well as threaten the viability of the local communities. For these reasons, DairyNZ supports the overall intent, provided:

- a. The Plan Change retains the intent that full achievement of the Plan Change objectives for waterquality improvement, is targeted for 2096, with the Plan Change being the first stage, and
- b. All those contributing to contaminant discharges are required to take action, and
- c. It is the actions occurring on land that will be used by WRC to assess progress toward the Collaborative Stakeholder Group's aim of ten percent of the way towards the 2096 long term waterquality goals in the Plan Change, and
- d. WRC sets up a comprehensive programme of work that involves DairyNZ and other research organisations to identify and resolve information gaps in time for the next plan review, and
- e. Implementation of the Plan Change is made more effective by continuing to work with all keystakeholders, including DairyNZ to develop robust solutions andf. By amending the wording of the objectives, policies, methods and to provide greater clarity and clearer guidance to farmers about changes expected on farm.

I wish to be heard at the Hearing.

**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:*

**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**

- |   |   |
|---|---|
| <input type="checkbox"/> Yes, I have attached extra sheets. | <input checked="" type="checkbox"/> 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      Zach Mounsey

Date              8/03/2017

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.

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.