

Submission to the commissioners for Waikato Regional Council Plan Change One.

April 30th 2019

I am George Moss a farmer from the South Waikato District and are part owner with my wife Sharon of two small dairy farms and a dry-stock unit, which is attached to the dairy units. We also lease a section of land to a pine tree nursery.

We are impacted by this plan change primarily by the fact that we are restricted from increasing our dairy platform at the expense the dry-stock operation.

We may also fall close to 75th percentile for nitrogen loss per hectare despite being a low intensity operation because of soil type and climate factors.

We accept this imposition for the greater good of the environment.

I was member of the Collaborative Stakeholder Group representing a Dairy industry perspective and I am confident that plan we collective produced, while not perfect in fairness and equity is a plan that achieves significant initial improvement in water quality, while minimising the impacts on farmers and farming communities.

I attended every single meeting over the two plus years the CSG met, plus attended over 40 industry meetings.

I would like to take a moment to acknowledge the role of the five Waikato and Waipa river Iwi at both the co governance & CSG level. I believe them to be the unsung heros of this process.

It is my view, Iwi through their representatives brought the perspective that it is the long term "game" or vision that is most important and that the people and the environment are "one" entity and the health and wellbeing of one impacts the other. The alternate view is that the environment is a bunch of resources to used for monetary gain.

In fact, the only big losers in this plan change are Iwi interests who have not had the opportunity to develop Treaty Settlement Lands to desired

effect whereas most of, if not all other land owners are using their land as they wish.

My view is that the CSG operated off two base premises:

FIRST BASE PREMISE

CSG started from a base premise that the Waikato and Waipa river systems and the tributaries cannot be expected to accept any further increase in any of the four contaminants.

Intensification of agricultural and land use change leading to increased loads of contaminants is therefore an untenable proposition to the Vision & Strategy for the Waikato River.

Hence the rule making Land Use Change a non complying activity requiring a resource consent.

We the CSG did understand the restrictive nature of this rule, but equally we understood that activities and/or farming practices that farmers were undertaking prior to notification were the activities best suited to their aims and ambitions at that point in time.

The cost of this rule was not direct cost to a farming business but more a cost in the nature of potential reduced capital value and lost and forgone opportunities.

The CSG understood that if some were to increase their contaminant discharges then some else would need to reduce correspondingly or more.

SECOND BASE PREMISE

That contaminants entering the water both directly and diffusely need to be reduced over time.

The plan change in its simplest interpretation allows land users to do the day after the plan change what they were doing the day before providing that they move to good management practices on that land over time as directed by Farm Environmental Plans or FEPS.

Also those land users, who are in the top quartile for Nitrogen loss per hectare based on the dairy industry curve, will be required reduce to the 75 percentile point.

All land users are required to hold their nitrogen loss to at or below a nitrogen reference point (NRP) based on highest number either 2014-15 season or the 2015-16 season.

These actions modeled indicates a minimum of a 30% water quality improvement over the period of the plan change. The CSG target was 10% improvement over the first 10 years.

There are some practical challenges around the implementation of these rules, which I will address in the Block two submissions.

NEGATIVE IMPACTS or losers under the plan change in order are:

Iwi Treaty Settlement lands as their owners & beneficiaries have not had the opportunity to optimise the use of these lands for the benefit of their beneficiaries,

Due to historical constraints, this is by far the biggest injustice within the plan change and again I want acknowledge the self less sacrifice of Maori interests for the benefit of the Awa. It was my utmost regret that rules prevented the CSG from being able to address this beyond rule 16.

Small landholdings namely dairy, that while they may have a higher N loss/hectare than other land users, their small scale means that overtime their ability to adapt or mitigate will be severely constrained.

Larger land users with low N loss/ha that wished to intensify across their entire property are constrained, but many of these may still have options as their total pool of N could be quite significant providing options to retire some land and intensify other land with no net increase in contaminants to water and conceivable even a reduction in some other contaminants. Eg sediment.

I note that there have been submissions that water should be managed on a sub catchment basis and limits only applied where the contaminant is an issue. This was considered by the CSG and all science indicated that reductions are required everywhere for the interests of the managing the

levels in the mainstem of the rivers and lakes. **Again to allow an increase somewhere, will require a equal or greater reduction by others to achieve the same reduction in the main stem. Potentially increasing in equities between sectors and individuals within a sector.**

POSSIBLE WEAKNESS

While the plan change does not specifically exclude communities from coming together to address water quality issues through a collective approach, there are no specific mechanisms to facilitate this. Such a mechanism may reduce the overall costs of reducing contaminant discharges to water and therefore community costs.

POSITIVE IMPACTS

This plan change in my view will allow businesses to continue for the most part as they are, but with the requirement to make improvements in the management of the four contaminants.

This plan change significantly reduces the chances of stranded capital on and off farm and chance of significant social disruption.

That modelling indicates a very significant improvement in water quality over the period of the plan change (10yrs) this an opportunity that should not be lost.

Changes to the plan should not lead to lesser improvement in water quality.

In closing, I would like to acknowledge and thank the Co-Governors of Waikato Regional Council for the innovative and inclusive approach to address what is a complex and difficult problem of both protecting and improving the environment while maintaining viable and vibrant communities.