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 ***Please Note:*** *if you fax your submission, please post or deliver a copy also*
Emailed to	healthyrivers@waikatoregion.govt.nz ***Please Note:*** *Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.*
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: Bruce Hathaway		
Full address 3344 State highway 5, Reporoa, 3083		
Email : hathawayfamily@xtra.co.nz	Phone 021 028 68983	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name		
Address for service of person making submission		
Email	Phone	Fax

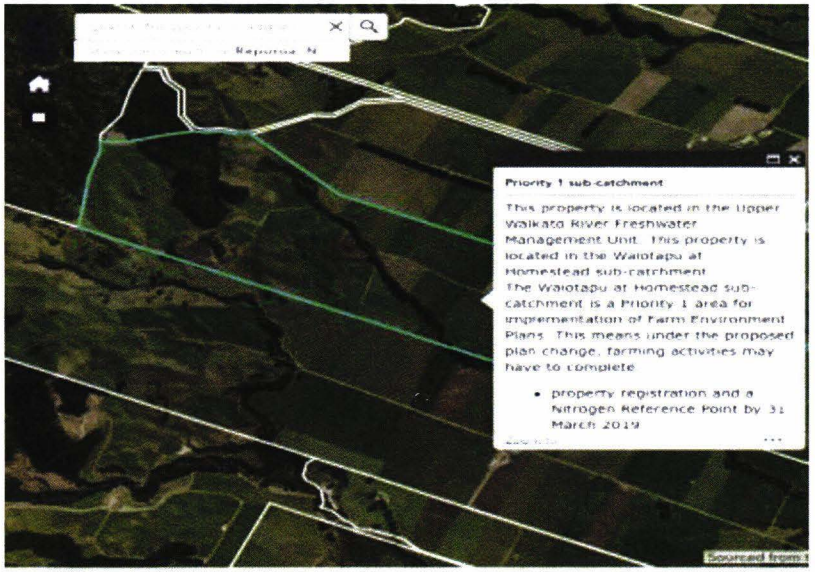
PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
(x) I wish to speak at the hearing in support of my submissions.
(√) I do not wish to speak at the hearing in support of my submissions.

I could not gain an advantage in trade competition through this submission.

SIGNATURE OF SUBMITTER *(or person authorised to sign on behalf of submitter)* *ignature is not required if you make your submission by electronic means.*	
Signature: Bruce Hathaway	Date 07/03/2017
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.	

SUBMISSION POINTS: General comments

I own a 230 hectare dairy farm milking 600 cows. The farm is priority one, in the Waiotapu homestead catchment. For one, the farm is actually not even identifiable on the map, as apparently State Highway 5, Reporoa does not exist.



There is an addition block in front of this but are not able to attach to this document.

The stocking rate on the farm is currently 2.6 per hectare, with 2014 Nitrogen reference points of 55 and 84 for 2015. The farms waterways are all fenced to exclude stock. We have a low input system, where we are classified as a 1-2 dairy based system. This means that the cows are fed majority grass. Due to this, I like to look after the farms soils and productivity. Therefore capital fertiliser is applied as well as maintenance fertilisers. The land is well maintained in winter to prevent pugging damages, and crops are fed in summer when feed deficits occur. Cultivation and fertiliser applications are key elements in the success of the farm.

I support the submission that has been lodged by Federated Farmers. I am particularly concerned about the following aspects of Plan Change 1:

- The significant negative effect on rural communities
- The cost and practicality of the rules.
- The effect that the Nitrogen Reference Point will have on my business and my economic wellbeing.
- The Farm Environment plan requirements leading to unnecessary and costly regulation of inputs, outputs, normal farming activity and business information
- The costs and practicality of the rules and requirements for stock exclusion, the Nitrogen Reference Point and the Farm Environment Plan.
- The timeframes for complying with the Nitrogen Reference Point rules which are too short and unachievable
- The plan significantly exceeding the 10 year targets in many attributes and areas.
- The lack of science and monitoring at the sub catchments level

I am concerned about the implications all of this 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
15	**Background and Explanation:** Full achievement of the vision and strategy will be intergenerational	**Support the vision subject to more achievable and realistic targets**	Paragraph 1: clear definition of the standards of the water quality that allows food to be taken from, and swimmable that is in relation to start point data. Paragraph 2: The 10-year period to achieve the 10% of the required change needs to be reduced	The 80-year period for water quality is identified as unachievable and uneconomic due to the lack of present day technology. Due to both technological, social, and economic constraints, the response cannot expect to be linear; therefore, the achievement of 10% in a ten-year period is overstated. This is due to the fact that not all of the contaminants going into the river are included in the ten-year period. So, you are trying to use a partial sector of the discharges to impact the change on the total reduction target. This being municipal and industrial levels not being assessed within this period. For example, if agriculture is responsible for 33% of pollutants into rivers, and an overall reduction of 10 % is expected in the first ten-year period, then this would require a 30% reduction in pollutants within the agriculture sector in order to result in a 10% reduction without reducing other pollutants inputs. (figures used as examples and are not factual)
16	Reviewing progress towards achieving the vision and strategy	Support subject to amendment	Paragraph 4: amend wording of NRP point; " a property scale nitrogen reference point to be established by modelling current nutrient losses from each property, (to delete) ~~with no property being allowed to exceed its reference point in the future~~ (and replace with) with future NRP to be recalculated as new scientific evidence and	Due to ongoing technological advances and more reliable science, the NRP cannot be assumed to always be at the point assessed under current modelling.

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			new technology becomes available. Paragraph 6: municipal and industrial point discharges, will be required to review their discharges...~~This will happen as the current consent terms expire~~ (replace with) this will happen alongside the plan change with all current consents being up for review Amend the first paragraph to delete "~~on farm actions~~" and replace with "land based and recreational actions" "and point sources discharges ~~reviewed as existing resource contents come up for renewal~~" replace with "existing resource consents to be reviewed.	All discharges inside the Waikato catchment should be a part of the change, with not just targets on farmers. These municipal and industrial consents need to be reviewed and changes to be made to comply with the proposed plan, without waiting for the term to expire. Farmers are having their consents revaluated well before the expiration date. Municipal and industrial discharge along the catchment area would have a substantial effect on the water quality. E.g. storm water discharge. (petrol, fuel, rubber, detergents) This allows for all contributors to the contaminant of water quality to be required to take action Municipal and industrial discharge should be reduced by the same percentage of contamination as agriculture. This puts the responsibility on all sectors to reduce contamination at the same rate.
27	**Section 3.11.2 objectives: Objective 3**	**Support subject to amendments**	"sufficient to achieve ten percent of the required ~~change~~" replace with "to achieve sufficient change "	The response is not linear, therefore the change at the start would be expected to be less due to historic actions, therefore the 10 % target is unrealistic. The 80-year target has already been stated as being

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			"~~Current water quality~~" changed to "water quality in 2010-2014" Add in after "water quality attribute targets" add in "<u>for each monitoring site listed</u> in table 3.11-1.	unrealistic The water quality needs to be defined The sites in table 3.11-1 are monitoring sites only, and are not indicative of sub catchment water quality due to the sites not being at the end of the sub catchments. The objective 3 states water quality for each sub catchment
56	**3.11.6** Explanatory note to 3.11-1	**Object**	The achievement of the attribute targets in table 3.11-1 will be determined through analysis of 5-yearly monitoring data The variability of water quality (such as due to seasonal and climatic events) and the variable response times....	These sites are monitoring sites only and not indicative of sub catchments, therefore data interpretation could be skewed. There are also other factors which could influence water quality, particularly sediment levels, which can occur due to natural disasters. There is no explanation how these natural disasters may affect the level of sediment increases, and how this would implicate targets not being achieved. For example, if an earthquake happens, and sediment from landslides enter waterways, does this mean that farmers then need to decrease their discharge further to reach the required targets set. As sub catchment water quality targets are not in the plan change, there is no assistance for land owners to show a correlation between land action and water

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				effect. This is particularly due to time lags in measured water quality.
57	Table 3.11-1	**Support with amendments**	Add in current water quality (2010-2014) values	To show comparison from current to future water quality levels to allow farmers to gain an understanding of the level of change needed.
29	**Reasons for adopting objective 3**	**Support with amendments**	Change ~~goals~~ to targets, Change ~~full achievement~~ to realistic achievement Add in after "vision and strategy", 1st paragraph, "as noted in the explanation to table 3.11-1 on page 56, water quality targets are not intended to be used directly as receiving water compliance limits/standards	Because it states targets in the explanatory notes in 3.11-6 on page 56. They have already stated that 80-year target in unachievable These monitoring sites are not sub catchments so cannot be used in a direct manner.
30	**3.11.3 Policies** Policy 1	**Support with amendments**	Change policy 1 to include diffuse and point of source discharges b) add in "through a managed approach" c) add in "sheep" add in point d): requiring point of source activities with moderate high levels of contaminant to reduce to their discharges to	All the policies are directed at farmers, where the whole sector needs to be included. The definition at the moment is to broad There is no clear reason why sheep are excluded Even playing field across all sectors.

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			water bodies through a manged approach	
	Policy 2	**Oppose**	requiring stock exclusion to be completed with three years following the dates by which a farm environment plan must be provided to the council, (add in) <u>and where water reticulation is already supplied over the whole farm, other farms (e.g. hill country sheep and beef) to be assessed on an economic and environmental basis.</u> Removed "or ~~in any case no later than 1st July 2026~~	Water consents are already over allocated throughout the Waikato/Waipa catchments, therefore the constraints of farms that do not have water reticulation are negatively impacted by this policy. Fencing all waterways in hill country is economically unfeasible within these time frames without subsidies. This will reduce the productive area of the farms and can decrease both the farm value and make it uneconomic to farm. This will have a chain effect across the communities.
	Policy 13	**Oppose a)**	Remove a completely	Consent terms exceeding 25 years could restrict potential advances in contamination reduction through improved technology and science. Policy needs to be even across all sectors, which means that point sources should not have different time frames for consents in regards to contamination.

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41	**Rule 3.11.5.3** Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	**OPPOSE**	Amend 3.11.5.3 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities. As we have a pumice soil, cultivation allows for the incorporation of fertilisers such as lime to decrease the acidity of the soil. This allows better rooting depths as soil compaction is corrected allowing for better plant root exploration. This allows better persistence of the plants. With the new regulations proposed on cultivation, this will decrease the productivity of our land. Soils that are too compacted cannot be corrected. Cultivation setbacks at 5 metres would result in margins that become unproductive and encourages an environment or pests and diseases, detrimental weed species and fire hazardous grasses in dry conditions. Cultivation setbacks will hinder the production on farm due to decreased area allowed to be cultivated close to waterways, which therefore will require more area to be cultivated to provide the same amount of feed
42	**Rule 3.11.5.4** Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	**OPPOSE**	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including, As we don't know what the 75 nitrogen percentile is, or where we sit in it, then we can only assume that reducing nitrogen inputs on the farm is going to result in less pasture This has a negative effect on the rural community. Pasture growth is dependent on the amount of N and

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				P in the soil, for pasture growth and therefore productivity, N needs to be applied. Restricting the amount of N that can be used will significantly decrease the rural communities. An alternative is restricting the N use as certain times of the year. For example, if 25 kg N/ha is applied in the spring the expected response is 12 kg DM/kg N compared to an expected response of only 7 kg DM/kg N at the same application rate in the winter. In winter, more N will be leached due to rainfall. Good milk production responses can be achieved from late winter/early spring applications of 30-50 kg N/ha to pastures with a cover of 1200-2200 kg DM/ha where there is a genuine feed deficit (applied 70-30 days before balance date i.e. when feed demand = feed supply). Good responses in late winter/early spring are due to plants being N deficient as: Nitrate has been leached from the soil over the late autumn/winter The rate of N fixation by the clover is low because of low soil temperatures (at 5-10°C nitrogen fixation is very slow) The rate of N mineralisation from soil organic matter is slow because of low soil temperatures
47	**Schedule B:** Nitrogen Reference point	**OPPOSE**	Amend Schedule B as requested by Federated Farmers in their submission.	As we don't know what the 75 nitrogen percentile is, or where we sit in it, then we can only assume that reducing nitrogen inputs on the farm is going to result in less pasture growth. A 20% decrease in nitrogen supplied, would result in a decrease of 75 tonne of dry matter of grass grown per hectare. This would result in a reduction of stocking rate which under present payout cause a $43,000 loss, as well as an asset loss value of $30,000. Less nitrogen applied on the farm will reduce not only

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				the plant quantity but the plant quality which would reduce the total amount of pasture grown per hectare. Plants require nitrogen to grow, therefore reducing the nitrogen applied on farm, will decrease the plant persistence particularly going forward into drier conditions. Reduced nitrogen loss restrictions will limit the amount of pasture grown on the farm, therefore reducing the amount of milk solids produced which will reduce income received and reduce the profitability. This has a more severe impact when the pay-out drops. The pasture grown can be offset by brought in feed but this would not only cost more, but will also influence the NRP. Nitrogen losses can be mitigated on farm by using products such as ProGibb which gives a lesser response than nitrogen products at a higher cost. Or by using low protein products such as maize silage which would cost considerably more in my district due to the distance from maize growing areas. These mitigation methods would considerably increase the on-farm costs and reduce the overall farm viability.
50	**Schedule C:** Stock Exclusion	**OPPOSE**	Amend Schedule C as requested by Federated Farmers in their submission.	
51	**Schedule 1:** Requirements for Farm Environment Plans	**OPPOSE**	Amend Schedule 1 as requested by Federated Farmers in their submission. Issues: cultivation setback (3 metres fencing	This proposal will impose significant costs on my farming activities including, fencing 3 metre waterways on land at 15 degrees would result in a loss of productive land. Cultivation setbacks at 5 metres would result in margins that become unproductive and encourages an environment or

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			with 15 degree slopes), cultivation setback of 5 metres from water ways	pests and diseases, detrimental weed species and fire hazardous grasses in dry conditions. Cultivation setbacks will hinder the production on farm due to decreased area allowed to be cultivated close to waterways, which therefore will require more area to be cultivated to provide the same amount of feed. The crop feed is an essential economic component of the system, providing both feed at times of deficit, nutritional value which maintains production and animal condition. This supports economic viability of the system.
			Stocking policy: identification of critical source areas	This will impose significant costs in mitigating surface water contaminant, particularly around cowshed races and feeding areas, which would require extensive drainage systems and feed pad constructions. There would be an extensive cost to put in effluent storage facilities which are all capital costs, which adds to debt servicing on the farm, but may not be reflected in improved farm valuation.
			Assessment of appropriate land use	Within paddocks, there is a variation of topography, which would be impractical to remove from grazing. For example, some paddocks have steeper sidling's or hills within the paddocks that may be classified as non-grazable areas. To remove these from the effective area, would incur a significant cost of fencing but also decrease not only the productivity of the land, but also the stock numbers due to decreased feed availability. This would result in reduced financial

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				returns, higher debt to asset ratios and decreased valuations of the property, resulting in less capability to implement other mitigating factors. Stocking policy to retain soil condition and pasture cover, would be impractical within a season, particularly in a dry year. This would result the selling of capital stock which would significantly reduce the profit margins and incur considerable capital costs between seasons.
			The use of overseer	Overseer is a model not based on measured losses, and within any modelling situation, the accuracy of the original data restricts the accuracy of the findings. This model was never developed for monitoring reasons. Therefore, more independent research is required before placing such heavy restrictions on farmers. There is evidence from accurate meter readings from the Taupo effluent farm that 500 units of N per hectare is resulting in 10 units of N leaching. Yet we are being restricted to the NRP. The limits within the plan saying of not being able to exceed the NRP going forward excludes the possibility of ongoing scientific and technological development that the NRP is inaccurate.
			Identification of slopes over 15 degrees	15 degrees is not accurately described in the plan, where topography changes within a paddock occur. How are the paddock contours measured? 15 degrees is a very small slope, and would be

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				questionable as to the sediment runoff. A 15 degree slope is equivalent to a wheelchair ramp, therefore 90% of our farm would be under this category.
n				