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	PC120 16	COVER SHEET	
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FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

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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.	

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

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

JACQUELINE MARIE HAHN

As [redacted]

Signature	Date 8-3-2017
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 with my husband 1190 ha we run a self- contained dairy unit of 1100 adult cows + their young stock, + sheep on 678 ha in the Waipa catchment + another 50 ha of lease land, (which is part of the oldest dairy farm in the area) and the remainder runs dairy beef some empty carryover cows from this farm and dairy graziers, and beef graziers from a drought stricken area this financial year from other properties on a farm in the Mokau catchment.

I have a bachelor degree in Environmental Science (2012), and completed the intermediate course on the Overseer modelling tool. We have 50.6 ha of bush and wetland in QEII covenant and intend to put another 150 odd ha on the Mokau catchment that up to our ownership had stock access.. 9 ha of the covenanted area was not fenced off previously and 22ha of native bush on a property we purchased 5 year ago has now been fenced. Most of this bush mentioned generally has waterways contained within or starting from. Further area was taken out of pasture production into covenant for better protection of waterway and karst systems, as well to prevent erosion and allow easier fencing . The work was undertaken in lower payout years but this occurred from retained funds and contributions from QEII and Regional Council. On top of this the properties have several small blocks of pines and planted another 4.5ha just previous to the QEII covenant. We have other small areas we intend to retire from grazing for erosion control, inability to improve(cannot drive tractor on) or because of shallow soils.

We just got funds for traps to reduce stoat, rat and opossum numbers around our QEII blocks, we have falcon pairs in one of the larger blocks.

On the block we graze own heifers and sheep we back on to treaty settlement land (LUC 7) held, and cared for by DOC a large chunk of what we want to fence off borders this, but DOC has no money to help with boundaries and the added complexity with that land been held for settlement has slowed protection efforts down. Additionally this land provides never ending supply of goats and pigs which do extensive damage, which could easily be confused by untrained eyes to damage by stock and make planting too expensive because of very high losses of plants.

Our Nitrogen reference point for the easy hill country LUC4 -7 sits in the low 20's despite extensive cropping and that reflects stocking rate (2.8/ha on milking platform) silage made and exported to flat to rolling farm, the amount of work done to protect native areas and the effect of slope reducing leachable nitrogen. The Flat to rolling land sits between the late 30's and early 40's and this reflects that very little land is retired from land use and higher stocking rate 3 cows / ha on milking platform, higher production, and greater loss due to urine patches inability to spread, and that a proportion of effluent is exported from the rolling farm to the flatter farm to on less risk contour and proximity to effluent pump.

The Mokau farm has the tick to go ahead with conversion, this means that one of the blocks on the self-contained farm in the Waipa catchment will become a grazing block of youngstock and sheep only and provide feed for wintering. Total peak cow numbers will drop by 150 in the Waipa catchment, youngstock numbers will remain unchanged we have a road and bridge crossing as this lies in a gully (and despite multiple traps and diversions and wood chip treatment) will hugely loading potential and risk of contaminants getting to water in heavy/prolonged rainfall events, as crossings will be irregular instead of daily use. The Mokau farm will have a lower stocking rate than either of the current farms aimed at 2 cows /ha to take in to account a shorter growing season. I had hoped to keep this farm as a drystock/grazing unit but it does not service its debt as a drystock farm, nor can we match feed with numbers at the right time.

We are progressive farmers and have built up the business to provide for our 4 children and 6 staff, and my parents, and we will continue to grow the business we have looked into other farm operations such as goats which would fit better if we could farm them outdoors but the industry is very restricted in growth opportunities and hugely expensive to enter. We are always looking to reduce waste out of the system, and look at opportunities to diversify. We take farms performing less than their potential and make them profitable operations while protecting and improving natural areas over time. I need to know, as does any new land owner, if land use is to be restricted in the future what those will be so that I correctly value future properties. Banks are very

quick to lose faith. An awful lot of debt could become quickly unserviceable in a very short space of time, and this debt would not be recoverable. This plan change signals that loss would likely happen and in its current form immediately, care needs to be taken as to not destroy sub-catchments and their communities which is not the intention of the vision and stratedgy. In my studies I learned that pine forestry depleted 20% more water than pasture and native forest, less water means contaminant loads increase on the natural flows. Nor are pines suitable for most of land this plan aims to retire as a harvestable crop. If you want to know what pine forestry does to communities just look to Taumaranui it was a thriving town that continues to die. Having bees kept on our property, this year has been a very poor season for Manuka honey, the earnings are not always good and should not be over valued by plan makers.

The land use change that has happened has mainly occurred through bad central government policy and its enterprises actions, as a region we should not be afraid to have our hands out for compensation for those policies, that now need to be rectified.

I am in support of the objectives of the plan, in general it is the actions and policies that are lacking in realism and fail the objectives. Some values need small changes in wording as to not mislead the general public and ensure they respect the inherent natural dangers of waterways, (A higher number died in our rivers than at surrounding beaches).

Lastly I have grave concerns with the definitions in this plan, you need to ensure that any literate person can understand what they are meaning as it pertains mostly to farmers you need to be very clear and use the same language that farmers use and not be misleading in any way.

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
- Not in keeping with the vison and strategy and failing the objectives.
- Not consistent across sectors
- The cost and practicality of the rules.
- The effect that the Nitrogen Reference Point will have on my business and my economic wellbeing and that of my community.
- 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, to avoid unnecessarily hardship, catchment work needs to be done before spending at farm level on slopes over 15 degrees.
- The allowance given to central government to no longer deal with treaty miscarriages.
- Not enforcing the central government to manage the pests in care of DOC and maintain/renew fencing of its natural state land parcels.

I wish to be heard at the Hearing.

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 informed concerns more specifically in the table below. Having been involved with helping some members of the CSG, I believe some of the intent has been lost, and that because of Council not allowing enough time to allow much needed sub-catchment work and continued forcing to a strict time table, that the plan will have unnecessary unintended economic consequences. Additionally not enough consideration for rapid urban sprawl and its effects, caused by unbearable housing costs in Auckland shifting people south in the last 6 months inciting a very real land change use risk to water quality. I am also concerned that central Government has not been held accountable (and refused upon request) for its part in water quality changes and must be part of the solution. Waikato water use is part of other regions daily lives.

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
20	3.11.1	Support in Part	That the actual Plan sets limits based on actual ground truthed data.	Some sub-catchments lack of actual data of water quality from uplands to lowlands, means that limits are set based on a guess and no criteria around timing or weather patterns to deepen understanding of data collected. With not enough knowledge of background levels and Natural area sources. NRP setting is not applicable in all sub-catchments – attenuation could mean ability to for further growth (ease/compensate for economic losses in other areas) in some areas and higher restrictions in other attributes. Because of this, the whole 1st 10 years of the Plan fails the Vision and Strategy.
22	Ecosystem Health	Support in Part	Change word clean to Healthy living water, "clean water" in my mind is sterile and devoid of life.	Need to clearly identify what water quality maximises ecosystem health, so not to overshoot or miss pollutants that are detrimental to Mahinga Kai.
23	Natural form and character	Support in Part	Missing quality add bullet point Rivers are a powerful force	Rivers are not always safe and need to be respected in high flows is also part of its mauri.
24	Mahinga Kai	Support in Part	4th bullet point Misleading to naïve persons The river should be safe to take food "in non -hazardous flow conditions", both fisheries and kai	Again undermines the danger of river systems.
26	Use values Commercial, municipal and Industrial	Oppose in Part	The word assimilative is not appropriate Decision sought delete the word assimilative	Water data shows it does not assimilate, water quality is changed in attributes both measured and not measured in the plan. If it were true water quality would not be degraded past towns. Some micro-organisms will absorb some pollutants but will also release them again in certain unquantified conditions.

27	**Objective** 3.11.2 Objective 1	**Support in part**	**Agree with the objective it's the description needs better definition. By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and natural water and removal of koi karp will result in achievement of the restoration and protection of the 80 year water quality attribute targets**	Huge reliance will be needed on the land and plants and mechanical and engineered interventions to reduce and attenuate losses from mans activities on remaining natural water systems. Water in a waste system is still water so needs differentiation to natural unmodified water courses which are indicated in the values. Anywhere man has changed will need man to do things to it to fix it. This is why farmers like to remove sediment out of drains because we know it will cause problems further downstream when flood events occur and the entire amount is lost into the natural system, putting nutrients and organic matter back onto paddocks not in water where it causes problems. Koi Karp is recognised as a problem in lakes in the plan but not recognised in other waterways which stir up sediment in the bottoms of waterways, they have to go to get the water quality the community wants.
27	**Objective 2**	**Support**		
27	**Objective 3**	**Support in Part**	**Support the Objective but Actions proposed fail Objective 2 and Objective 4**	NRP and some stock exclusion actions fail objective 2 Better understanding needed of sub catchment problems.
27	**Objective 4**	**Support**		Need to signal what those future management approaches will be, and to do that you need to know actual sub-catchment problems are and target those.
28	**Mana Tangata**	**Support in part**	**Add on to b.** **b. new impediments to the flexibility of the use of tangata whenua ancestral lands are minimised by central government providing for all offsets to achieve water quality for the catchment.**	The region must not accept central government passing treaty related costs onto future generations that past heads of state have caused. I fully support this amended version.
30	**3.11.3 policy 1**	**Support in**	**The Activity rules reflect this policy**	Soil type and rainfall makes a huge difference in estimated losses, this signals to higher intensity farms

		part	**especially b and c, and** **change b)** **For each soil type and rainfall band in the catchment, with above average to high levels of contaminant discharge to water bodies to reduce their discharges where possible.**	they need to look to see where improvements in management and infrastructure can be made and landowners will aim for the easiest wins first. Where possible might mean they have done all they can and further reviews of the plan, and understanding of the sub catchments will indicate if land use change is required. c. Underline Progressively which will aid the sheep, beef and deer farmers to target the critical source areas first, rather than destroying their (due to sheer scale of properties and low income) business in the first 10 years. 10 years for exclusion rules as they currently stand in the plan is not enough time if sheep, beef and deer are to survive the process.
30	**3.11.3 Policy 2**	**Oppose in part**	**Change C. –Run overseer to indicate nitrogen losses sources for the property or enterprise in the same sub-catchment for the past 5 years. Estimate what reductions could be made by changes in management without affecting profit and supply this and the highest number in the FEP. Identify areas where good practice management is not occurring in regards to N and Feed inputs.** **Change E** **Not progressive enough** **Definition of Wetlands (functioning wetlands in past 5 years) and is 4% of wetlands catchment or portion there of when in intensive land use.** **Add F** **Outside catchments using Waikato water for consumption or power will contribute to a retire land-use fund.**	C Overseer assumes good practice activities. Indicates possible improvements which is what is actually needed to be known. No action to calculate actual losses from poor management, ie the real number. E Takes a lot of time and money to fence off waterways, and add in reticulation which reduces stock entry to waterways, dairy can go further but only because dairy has already done so much, but to take into account some properties like my own have a lot of "wetlands" and seeps and is impractical to fence all of them (was a lifetime plan not a 10 year plan) but those that can effectively help reduce N loss and (indicated by science of those at 4% of its catchment) farmers can buy into that, it has to work in the catchment. Most dairy farmers are comfortable with stock exclusion. It is the wetland definition and size dimensions that make wetlands effective that we want

			Catchment work required before total exclusion at farm scale.	hard data on so we can prioritise. Need to identify likely areas in catchments or catchments themselves that need to be retired from types of land use before spending money unnecessarily on steeper land at farm level. More than half of my farm area falls into this steeper land type, all streams regardless of size have been fenced and we are progressing through swamps, and sediment ponds. All swamps are in the steeper land class. Getting vehicle access for materials is limited by the weather conditions. F To help plant steep land in forestry and provide money to bring forward as an income source reimburse effected land owners for a public good works. The income achieved at harvest in 25 years should offset the forward payments paid out any money over that amount goes to the land owner. The Paid back money grows the fund.
31	**Policy 3**	**oppose**	**c) Impossible to implement as enterprise location changes who gets to keep the reference point land owner or leasor???**	How can they keep that reference point does it stay with all old parcels does it move and get zeroed??
31	**Policy 5**	**Support**	**Concern about confusing information from Central Government**	Central has different timeframe and different overall vision, although the removal of extreme events out of data is more practical, I doubt we can achieve those results, urban and industrial consents for extra discharge allowed past that date and pest fish problems. How will you sort it?
32	**Policy 6**	**Oppose in part**	**As Per Federated Farmers submission**	Overly focused on N Only looks at top 15 cm should be able to incorporate below that depth as per supporting science. Generally failure due to lack of consideration of sub catchment issues which is not all N problem.
33	**Policy 9**	**Support**		

33	**Policy 10**	**Oppose**	**Need consistency in rules**	Farming cannot cure water quality alone. All need to progress.
33	**Policy 11**	**Support**		
34	**Policy 12**	**Oppose in part**	**Change point b. Drop out model and monitor** **Point d. Only for this 10 year period.**	Actions is what counts No rule difference between sectors/businesses in regards to investment and lifespan of investment
34	**Policy 13**	**Support in part**	**B add on ...in the receiving water quality *will meet requirements predicted that will required at that future date*; and**	Need to change in long term consent process where water quality must continually improve if we are to meet targets of the plan.
35	**Policy 16**	**Support in part**	**If they can attain offset from government to mitigate increase including 30% error in overseer.**	Every land owner would like this treatment, but this is treaty side issue and Central Government must make the amends not their fellow community who lose equal quantity of same land, to the development which could be 30% higher than predicted. Seek this as a whole community support collectively for government to offset the contaminant load with more at risk land bought and retired.
37	**3.11.4.5 sub catchment scale planning**	**Support**		
37	**3.11.4.5** Funding and Implementation	**Oppose in part**	**The public good of Waikato water extends past our boundary in both water supply and power and those other areas should support as a fee/kw or/litre to further improve and compensate lost income from due to enforced land use change in the future.**	User and benefit pays because it costs us as a region in ways we didn't anticipate.
37	**3.11.4.7**	**Oppose in part**	**iv) Ways to lower pest species contamination and elimination**	Feral Pests and water pests also aid contaminant issues and need controlling and work needs to start now on solutions and control.
37/38	**3.11.4.8**	**Oppose**	**Allow more time, allow flexibility, use**	You are on a consent pathway you don't need

			real measurements, don't rely on model, attenuation work in horizons shows wide variation between soil types, be catchment specific.	allocation yet. More knowledge will improve management solutions. You need everyone in the catchment working towards the end goal including small properties before allocating. Allocating is last resort after the real data are in.
38	**3.11.4.10**	**Support in part**	**Need more specific data, intersects of different land use and losses.**	Current monitoring network is not very good at indicating what's happening, need both rainfall intensity water data and sampling and dry weather (swimming) data. Could involve catchment communities in this to lower costs.
40	**Rule 3.11.5.2** Permitted Activity Rule – Other farming activities	**Oppose in Part**	**Change day to year ending**	Know of properties that stocking rate varies hugely from day to day. Like trucking firms farms, that overnight stock, and small blocks that take on Works animals for a few days or weeks.
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.	Council has underestimated the total amount of time consultants have to do these plans, they have their other jobs to continue which are of value to land users. The plan won't be operative in time to allow all those farm plans in priority 1 to be completed. Does not allow to document activities already done at or above good practice. Has no reference to what good practice not considered by overseer which is a fertiliser calculation tool Nitrogen reference point could be off by 30% either direction. Overseer does not account well for types of herbage grazed especially those that go beyond the first 15 cm and capture more N, and plants that effect the rumen

				bacteria or N content in the rumen which in turn effect the amount of urea in the urine. N Reference years cannot be classed as normal years both in terms of payout and in pasture growth. Has requirements around sediment and phosphate actions and none around N, where as the management of N has huge implications of actual N loss as leachate and gas. Should also indicate likely normal farm practise in regards to drought, flood and low temp to give a range in likely out of N rather than a singular number or give a pick of past 5 years. Focus's too much on stocking rates where 10% above if the feed is there without extra inputs has no effect on your number. Overseer should be run to figure out what the upper limit of stocking rate is without effecting N leaching. Soils play a big part in N number, there is not the soil scientist out there to ground proof, having multiply soils makes the whole overseer calculation costly and difficult total area on soil maps of any one soil. Greenhouse gas loss should also be documented because that is coming. Soils in S map have low reliability of being accurate, the only way to get accurate is intensive soil profiling and as there are only a few people trained in the country to do this impossible, soil test data is more able to tell the story of where the soil is at, animals build up organic matter in top layers. Schedule C stock exclusion is contradictory to FEP– all water need not be fenced the whole length to have gains have on farm indications that clarity massively improved from brown to clear in winter rains by fencing off half of the total length of fenced swamp/seep is big enough. Support FEP of other actions, you will get improved clarity and e-coli improvements with cattle/deer. But sheep dung will still contaminate in certain conditions as will feral goat which no actions on non- farm land is proposed. In

				the spring when every day bar 1 in a month we had rain, the water was several inches deep even on slopes greater than 25 degrees in any high rain event the N loss to water is going to be higher than stated in overseer. No point in fencing waterways off if some other rule comes in about certain slopes be retired in the next tier of the plan, causing unwarranted financial additional financial pain. Regeneration of swamps occurs in cattle only situations as long as paddocks are not overgrazed have proof of this. Rotational grazing protects pasture cover and soil thus lessens losses. If feed becomes rank (poor feed quality) the animals are less inclined to go in single wire areas, even when physically able, even though absolute exclusion is not attained, even full 8 wire + batten and deer fences don't ensure exclusion. Permitted Activity Rules change would like the option of getting into a consent for surety while saving costs that occur in a certified scheme. If NRP keep 5 year average with a buffer for typical drought/flood/cold years built in, not rolling, easy to have 3 very weird years in a row using overseer without taking into account such considerations will see timing of applications bring out weird numbers when conditions are different to 10 year average, but that in reality would not have an effect on N loss because conditions are perfect just not the same as a "typical " year. Overseer treats the month something occurs very differently. Losses are due to conditions like ground temperature and plants in active growth as climate changes the month that this occurs is more variable. Overseer is a fertilizer tool don't use it to Figure NRP, Better to ensure more preventative actions for increasing intensity For first 10 years. I have seen large improvements, less flooding by the rotational style, improved pasture and protection of

				bush, of farming we undertake in comparison to set stocking low pasture cover and lower stock numbers. Costs to my neighbours and town as people destock and plant more forestry which kills towns and less stock in processing plants would mean a great number of job losses in my local town.
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 neighbours including All of the above points stated in Rule 3.11.5.3 No stated length of how long the consent is granted for. Not enough trained people, in farm systems especially in sheep and beef sector to undertake this work. No prioritisation of what areas to be tackled first. If already low loser of contaminants can you get a 35 year consent like urban areas?]
44	**Rule 3.11.5.5** Controlled Activity Rule – Existing commercial			

	vegetable production			
45	**Rule 3.11.5.7** Non-Complying Activity Rule – Land Use Change	**OPPOSE**	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	Does not cover urban sprawl one of the very real causes of why intensive farming moves to less suitable areas. Wrong rule should be Restricted discretionary because it is possible to change main land use to more intensive use in part and reducing and mitigating elsewhere and still output less Nitrogen.
46	**Schedule A:** Registration with Waikato Regional Council	**Support in part**	More time to register for new land purchases	Reality check require in time frames.
47	**Schedule B:** Nitrogen Reference point	**OPPOSE**	Amend Schedule B as requested by Federated Farmers in their submission. Second Option for first 10 years improve on farm practices, for a number of farmers there are a number of gains available with out setting limits, and instead of ruling farmers, rules on sellers of fertiliser, and rule farm consultants to prove they understand and promote good practice to avoid inappropriate use and land use rather than a model that will up your loss number because you applied on the 1st of May instead of the 30th of April.	This proposal will impose significant costs on my farming activities including Increasing pressure by banks to sell a property that is based on a number that could be very wrong. Ok to indicate what farms and areas need attention most for suitability but not as a rule at this point in time Lost the Intent of the CSG which was to lower the top losers of N and improve everyones property management. Collecting a number does not do that. Have not been able to model our farm properly yet because of the lack of options to select from, getting a poor guess result. Very hard to get the same number out of every

				consultant even when using the exact same information. No one knows a farm like the farm owner. Does not model the dairy's individually very well will be basically forced to average the number across the properties. Could lead to inefficient use of land due to grazed off stock not guaranteed to be able to be grazed at graziers property forever. Leading to land suitable for intensive land use now having to be producing less product. Impacts on ability to help out adverse event farmers, leading to more volatile stock prices, from large kill events at works followed by not enough stock to kill the next season. Rolling average then becomes an ever decreasing number that forces people off land. Real issue is land use and no way planned to forward pay people to plant trees so they have an income which in many cases they would not get in their lifetime. Pushes people into Herd Homes, cut and carry which has large greenhouse gas implications and the next issue. Don't have exact numbers of stock on each month for those years and 10% either way does not change the number. No relevance to farm practice between areas, some pockets of ecosystems and soils have very different outputs to neighbouring farms rainfall can differ significantly, rainfall has large effect in overseer. Can make a bad farmer look good and a good farmer look bad. **How do you treat lease land if we lose a lease can we take that loss to another piece of land, some of the lease land is intended for housing, if that land was poorly cared for ie no stock exclusion**

JMM 16

				general bad practise how does a new lease holder understand what the real N number is?
50	**Schedule C:** Stock Exclusion	**OPPOSE**	Amend Schedule C as requested by Federated Farmers in their submission.	I have been fencing the steeper country, well above 25 degrees they have to be hand drilled and hand rammed, extremely hard on the body pulled muscles in gluteus maximus and suffered from "frozen shoulders" through trying to fence in dry, stony ground and slippery ground. Would prefer to use sediment traps and fence off lower close to boundary wetlands that always flow with water. It is difficult to tell what waterways are classed as always having surface water in them some areas can be dry for years and then flow very wet, and wetland rule should have better definition and not too broad at first so we can progressively fence off those wetlands that will give the biggest gains first. Getting access to some of these areas is very difficult and as there is a reserve on the boundary that is an extended seep for several hundred meters and the biodiversity and fish life in the main stream is vibrant. Hill country has many more small seeps, and karst systems mean that water comes up and disappears again making it difficult to electric fence and get power to. As a dairy farmer with sheep I have options, but am not convinced this will achieve the water quality because of sheep e-coli amount and the high number of feral animals that destroy the understory of bush and in heavy rain soil and their fecal matter gets washed into the streams anyway. Time frame is too short to get it all done, especially for my sheep beef and deer neighbours, some of which mean they will not be able to pass on to the children that want to farm, and because of debt incurred will not have enough money to retire on

9/10/17

				either, because of this there farm immediately becomes devalued thanks to the N reference point, getting borrowed funds to do the work will be difficult when that number is a 1/3 or more of the property land value and does not add to actual capital value of the land. Sheep country needs cattle to run through occasionally to improve the quality of the grass after in goes to seed. This is done with low stocking rates in dryer months when these areas are much less prone to erosion and allows for recovery of grasses before winter heavy rains.
51	**Schedule 1:** Requirements for Farm Environment Plans	**OPPOSE**	Amend Schedule 1 as requested by Federated Farmers in their submission. .	All of what is in 3.11 .5.3 Stock numbers, how do you give evidence for stolen stock? Dead animals buried in those ref years killed for dogs? How can we account for things not in Overseer yet and not provided for in the plan? Yet can have huge effect on the output of N? How do we account for attenuation when there has not been the science done yet and the overseer

9/11/18

				numbers and residence time of groundwater changes things? How can we trust that you will ever get round to measuring what's actually happening, rather than using FEPs as a set of rules for operation, which does not take into account climatic variability? No ascertaining of effects of current below best practice and what that means to the real N number, phosphate loss. For example Under unfenced bush soil loss is high because ground is bare some of our old bush has zero soil and other areas very thin top soil. Other places near margins are rich in organic matter from stock camping, or because of different rock ie near limestone versus over greywacke.

19