

**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 -
WAIKATO AND WAIPA RIVER CATCHMENTS**

Submission Form

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

On: The Waikato Regional Councils proposed Waikato Regional Plan Change 1 -
Waikato and Waipa River Catchments

To: Waikato Regional Council
401 Grey Street
Hamilton East
Private bag 3038
Waikato Mail Centre
HAMILTON 3240

Complete the following

Full Name(s): William and Karen Oliver

Phone (hm): 078786448

Phone (wk):

Postal Address: 1240 Rangitoto Rd, R D 2 Te Kuiti

Phone (cell): 0274 644069

Postcode: 3982

Email: oliverwhalantrust@gmail.com

I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

Yes.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 -
WAIKATO AND WAIPA RIVER CATCHMENTS

William J Oliver 6/3/2017

Signature date

Karen M Oliver 6/3/17

Signature date

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

Our names are William & Karen Oliver, and our children are Jack, Molly and Charlie. Our family have farmed at Rangitoto, 12km east of near Te Kuiti for 3 generations and we are presently bringing up the fourth generation on the farm. William is a 6th generation New Zealander Karen a 5th this place is our turangiwaewae. We wish it to be our descendants' turangiwaewae; we have no other place. So we farm for long-term sustainability of the water, environment and a healthy vibrant economy in which to live.

Please recognise this is our own personal Submission and is not to be read as the opinion or view of any other business or position we are associated with.

We farm Sheep, Beef, and Deer, Pine plantation and grow Maize over 1524ha on two farms. Both farms bound directly on to the Upper Waipa River (above Toa Bridge). Waerenga Farm falls into Priority 1 catchment & Three Rivers Farm is in Priority 2 catchment.

Waerenga was one of the very first farms to be settled in the district, 1905, mainly due to the excellent natural flowing water and the abundant native forest, a sign of strong natural fertility. The farm was fenced to take advantage of the natural water supply and has long been recognised as a producer of great stock.

We have run our farms like many other farmers; to leave them in a better condition than from when we started our tenure, 20 yrs so far. We measure this both environmentally and economically. We conserve some 200 ha of native bush (incl approx. 40ha in QE11) at our cost, we do not run systems that are detrimental to the physical parameters/ limitations our farm have. Land use capability is something we consider foremost when considering farm policy.

To achieve our goals around sustainably farming we have invested heavily in infrastructure. We have put in extensive reticulated water systems, access races and fencing land into different land classes. Recently we have done our Land Environment Plan 1 and Farm Environment 2 plans, and even though we believed we were doing an excellent job with our resource management, some very simple but meaningful points were highlighted in these processes. Especially around winter cropping and grazing management which will make a significant improvement to the water quality leaving our farm.

We also farmed in the Taupo catchment from 2008 -2012 in partnership with other family members, on an area just South of Tihoi covering 4500ha. We got a strong understanding of Overseer and grandparenting of nitrate leaching over that period (NDA). We learnt that the Overseer program and grandparenting rewards the polluter, the strong, wealthy and clever. It is onerous on all others. It is a system to be gamed and takes little advantage of land use capability and natural capital. Please do not repeat what we believe to be a mistake; there are more equitable solutions to diffuse contaminants.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

We have been recognised as leaders in our industry, William been asked to attend the inaugural Rabo Bank Master Class in the Netherlands. Silver Fern Farms offered William a position on the prestigious and sort after Fonterra Governance course, the first SFF farmer to get that position, We the won 2014 National Silver Fern Farms Plate to Pasture award. Asked to and hosted the Beef and Lamb AGM in Te Kuiti we were also a presentation farm for Beef and Lamb. William was appointed to the Deer Industry Board 2015, Both Karen and William hold and do other various industry good roles in our community.

When we consider the proposed PC1 document and draw on our experiences from the Taupo catchment, doing all and further learning of the above courses and recently doing FEP for our two farms. We see the proposed PC1 to be a start to the conversation.

The proposed PC1 has issues around equitability in our opinion and needs amendment. Although we cannot know why they voted as they did we think this inequity is represented by the WRC vote on PC1, passed by 1 deciding vote (the outgoing WRC chair).

Areas for most consideration we believe are:

1. NRP as a proxy to grandparenting and how this will affect the landowners' (who contaminate the least) flexibility to change systems in a rapidly changing world, their land value, their balance sheet and therefore bank ability.
2. An environment where following generations will live together under one law.
3. Proposed PC1 total stock exclusion suggestion and the short time frame for compliance.
4. The onerous rules around horticulture.

We look forward to PC1, which will be most disruptive compliance legislation Waikato farmers have faced, following a process that will result in it being equitable, transparent and compliance that is clear and easily understandable by us who have to live it.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought.

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
<i>Objective 1 Long term restoration and protection of water quality for each sub-catchment and FMU</i>	Support with amendment,	We wish for the following generations to enjoy a clean healthy environment, so they can swim and enjoy the rivers as we do.	That the aspirational goals in PC1 are reviewed and remain realistic to what is achievable considering the high rainfall, range of soils including highly erodible and young volcanic soils and growing population that needs to be fed and has aspirations of a better life style than we enjoy. That farmers do not bear all of the cost.
<i>Objective 2. Social, economic and cultural wellbeing is maintained long-term.</i>	Support with amendments.	For our communities especially smaller remote rural ones to be vibrant we need to have an economic environment and rules that enables efficiency and does not put those in it at a competitive disadvantage.	That this objective contains reference to what other regions are doing with their water quality rules and what the proposed National standards are. That legislation and compliance enable us to be competitive with similar industry from other NZ regions, or even competing nations.
<i>Objective 3.</i>	Support with	Setting targets will that are meaningful is a great	While important to monitor all the issues

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
<i>Short term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and FMU.</i>	amendment.	way to start the journey. We note looking at the stream data tables closest to our farms (Waipa Otewa and Mangakewa Lawrence st bridge.) that E.coli is the only contaminant that is currently outside the 80 yr target. Targeting issue specific to the sub-catchment will be more efficient with limited resource, locals will engage more readily than one rule fits all. FEP and best practice and monitoring.	would suggest with limited resource a targeted program specific to the sub-catchment FMU risk will be far more effective in the short term. We feel the PC1 document is taking a one rule fits all policy and is unwarranted and inefficient.
<i>Objective 4. People and community resilience.</i>	Support With amendment	Important to acknowledge that it is the people and the communities especially rural who will bear the cost of implementing PC1. The ability to understand the disruption of PC.1 the compliance with the plans and rules will cause considerable hardship physically, economically and therefore mentally, We witnessed this in the Taupo catchment: Anger, depression, drinking. Mental health depression and suicide are already highlighted as issues for our communities.	That the WRC takes up a monitoring program around health issues and acts to mitigate issues that may arise. Does research in the regions that have already engaged in such a large policy change in to health trends. That the WRC supports local health providers in a way the health provider believes will be effective.
<i>Objective 5. Protecting and restoring tangata whenua values.</i>	Support.	Important for local Maori to be a part of the decision making process. That the treaty claims are settled and finalised in that forum ASAP and the next generations can move forward as one. This discussion is about the future of a healthy environment, not political grievance of the past. To have people with different property rights in a	That Maori land owners have no more legal land ownership rights than any other land owner. Any claims on Waitangi settlement land or any other should be settled in that place, not spill over into PC1.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>sub-catchment which affect others or disrupt water quality goals will potentially cause another whole round of racial grievance and we should not leave that legacy to the following generations. With Maori having a special place in the Governance of the River in the Waikato region Maori should not conflict themselves operationally.</p>	<p>Remove objective 5.b</p>
<p><i>Policy.1. Manage diffuse discharges of nitrogen, phosphorus and microbial pathogens.</i></p>	<p>Support with amendment</p>	<p>Agree with a. and b. under sub-catchment approach targeting the issues and risk that are specific to the areas geography.</p> <p>1.c. progressive sock exclusion, for us stock exclusion feels very immediate (2023) and we will struggle to find the resource to achieve compliance, especially with NRP grandparenting affecting our balance sheets.</p> <p>My role in the deer industry has given me insight in to the level of work, both economic and scientific, the MPI and MfE have put into the proposed national stock exclusion regulations which are still high but achievable.</p> <p>Proposed PC.1 will put us at as serious competitive disadvantage to other farmers in other regions, therefore in conflict with Objectives 2 and 4. This is because of the cost of and maintaining the amount of fencing we would have to do over and</p>	<p>Would ask that Policy 1 c. for stock exclusion is consistent with the proposed national stock exclusion regulations.</p>

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>above the national stock exclusion regulations that other regions will use.</p> <p>It would also be detrimental to our present income because of our present cattle and deer farming policy, Sheep farming would be compatible with PC1 but income for our operation would be compromised.</p>	
<p><i>Policy 2.</i> <i>Tailored approach to reducing diffuse discharges from farming activities</i></p>	<p>Oppose to be amended.</p>	<p>2.a. agree with tailored approach, but see no reference to sub-catchment or FMU, which should be governed by the community adjacent. Point source emitters need to be included in the sub-catchment solution.</p> <p>2.b agree, want to see a lot more monitoring points in rivers and the ability to move some around to identify problem areas.(targeted)</p> <p>2.c establish an NRP for the farm for its present policy but the N allowance for a farm to be related to its Land Use Capability or natural capital. NRP in PC1 as proposed is grandparenting which rewards the polluter and disadvantages those who have cared for the environment to date. That is not equitable. Grandparenting is effectively legitimised theft of another land owner’s natural capital. This capital will be measured on our balance sheets by the banks. Therefore challenges lines of credit will in turn</p>	<p>2.a Reference to sub-catchment control and governance.</p> <p>Point source emitters included in sub-catchment solutions.</p> <p>Reference to the increase in monitoring quantified.</p> <p>NRP not to be used for a grandparenting solution, but for a reference to start the journey and to be used as a measure so high emitters can begin reduction.</p> <p>Tradeable discharge if compatible with sub-catchment targets.</p> <p>Change to stock exclusion as stated by national water policy .</p> <p>Replace with Land use capability and natural capital sub-capital sub-catchment control governance.</p>

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>challenge resource for stock exclusion.</p> <p>NRP grandparenting also puts the polluter at a greater advantage when buying their neighbour with a lower NRP, they have by default been given a stronger balance sheet but also the natural capital (the right to leach N) of that property and other neighbours granted a low NRP because of grandparenting, take the NRP across the fence and utilises it to change up farm production. These scenarios are endless as we learnt in the Taupo experience.</p> <p>2.d. Level of diffuse discharge to be as per Land Use Capability or natural capital. If an emitter needs a higher level of discharge and the sub-catchment agree they can lease discharge rights off someone else.</p> <p>2.e stock exclusion within 3 years from when farm environment plan is provided. This will be both physically and financially impossible for us with the large amount of running water on our properties.</p>	Remove 2.c, 2.d and 2.e
<p>Policy.3. Tailored Approach to reducing discharges from commercial vegetable growers.</p>	Oppose	<p>We have serious concerns from where our vegetables will come from if we limit entry, exit or growth in the industry. Importing vegetables creates higher risk around bio security. It looks like this proposed policy will create a quota system for growers raising concerns about monopolistic or</p>	<p>Land Use Capability with FEP governed by sub-catchment should have autonomy for decision making. There are many areas that geographically have ability to grow vegetables so the discharge fits into a sub-catchments</p>

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		oligopoly behaviour in pricing.	profile. We need to allow for new technology, crops and market tastes.
Policy.5. Staged approach	Support with clarification	Support this approach in principle however want clarification over how sub-catchment FMU management will apply and be governed. Would suggest strong local engagement. Provision for timely and transparent information and data on progress for each sub-catchment.	Want to see provision for sub-catchment governance reporting periods and targets. Ability for provision in time line of execution to provide for Objectives 2 and 4.
Policy.6. Restricting land use change.	Oppose.	Land use should be subject to its ability to environmentally sustain that use. To restrict land use change makes no acknowledgement of new technology and changing markets. For example wool was the biggest income for Waerenga in the early1970's it is now the lowest, (this year is negative return after paying the shearing contractor) after Bull beef and venison, both not considered as farming option in the 1970's. We live in a time of huge technological disruption and we see the production of synthetic milk, meat coming our way. We need to remain viable; we may need to move in to some new field of production not yet known. Again this policy conflicts with objectives 2 and 4, evolution is all	Land use should be governed within the sub-catchment on the basis of land use capability and natural capital. As long as it fits within the parameters of the sub-catchments targets/goals, land use change should be consentable. The sub-catchment governance should have leave to consider new technologies, systems and crops, which may mitigate discharge of contaminants.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>about having the ability to adapt our communities as do our farming businesses need to be able to change and reinvent ourselves or become redundant and extinct. Do not make us into luddites.</p>	
<p>Policy.7. Preparing for allocation in the future.</p>	<p>Support with amendment</p>	<p>Agree with sentiment of policy but would ask for 7.b to be removed.</p> <p>We do not want to leave the next generations to live with another 80 years of ethnic grievance, which may be reverse grievance then. All treaty settlements must be settled in that place and compensation given and finalised. This is about the environment and clean water.</p>	<p>Remove Policy7.b.</p>
<p>Policy.8. Prioritised implementation.</p>	<p>Support with clarification.</p>	<p>Note that at the two closest river measuring stations downstream from our farms are already reaching their 80 year targets except E.coli. (Waipa River Otewa. Mangakewa Laurence st bridge). Sub- catchment management need to target limited resource to the appropriate risk contaminant.</p>	<p>Would seek to see wording to give sub-catchment governance ability to target issues with monitoring and community engagement. Use of FEP.</p>
<p>Policy.9. Sub-catchment approach, mitigation and planning, co-ordination and planning.</p>	<p>Support with clarification.</p>	<p>Sub-catchments need to have autonomy to target appropriately. FEP will help with engagement and practice change.</p> <p>Community involvement would be consistent with objectives 2 and 4.</p>	<p>Sub-catchments should have own autonomous governance and control tasked with meeting given targets set by WRC.</p>

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>Sub-catchments can target risk and issues specific to the catchment. With limited resources we need to target funds for cost benefit. Our catchments issue is E. coli; FEP and best practice is going to make quickest gains there.</p> <p>Winter cropping and grazing management were quickly identified in our FEP where simple mitigation will bring significant change to contaminant loss.</p>	
<p>Policy.10. Provide for point source discharges.</p>	<p>Support with amendment</p>	<p>Critical to have significant infrastructure that provides work and services to our communities and they must be supported to be viable. They also must be a part of the solution in the sub-catchment in which they operate.</p>	<p>Point source measured and monitored and must be a part of the staged solution in their respective sub-catchment to meet PC1 goals.</p>
<p>Policy. 11. Application of best practice applicable option and mitigation or off set of effects to point source discharges.</p>	<p>Support with amendments.</p>	<p>Industry and those who discharge contaminants must all be included as a part of the solution. Off set of contaminant discharge should be a last resort and only within the sub-catchment where the discharge occurs. Otherwise communities in a catchment may be threatened economically as wealthy point source polluters buy up off sets to pollute in another sub-catchment. This behaviour will conflict with objectives 2 and 4.</p>	<p>Off set must be absolute last resort and be a very high standard to be consented. For infrastructure of significant sub- catchment and regional importance only. Town waste water treatment systems for example.</p>
<p>Policy. 16. Flexibility of development</p>	<p>Oppose entirely.</p>	<p>We must live by the same rules. Waitangi settlements should be settled and finalised in that forum and not be run into other unrelated forums.</p>	<p>We want this policy removed.</p>

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
of land returned under Te Tiriti O Waitangi settlements and multiple owned Maori land.		<p>PC.1 is about water quality and Maori have a significant influence in the governance of the Waikato river quality already and must therefore understand its importance. They should not conflict their integrity by setting such a high standard at governance level then operationally living by a different standard.</p> <p>We should not leave the next generations with a legacy of ongoing racial divide.</p> <p>Under the sub catchment approach land use capability and natural capital means there will be ability to full utilise your asset/ resource as any other entity in the sub-catchment.</p>	
Policy. 17. Wider context of vision and strategy.	Support. With amendment.	Bio diversity and wetlands very important part of our eco-system. Rating and who pays to be considered and clarified transparently.	Would ask that maintenance and pest control are included and to be funded by UAC as part of rates.
Implementation. 3.11.4.1 Working with others	Support with clarification	Ask to be paid for by UAC as part of rates.	
Implementation 3.11.4.2 Certified Industry Scheme. Implementation.	Support	Gives credibility and independent professionalism.	

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
3.11.4.5 Sub-catchment scale planning	Support with amendment	<p>Giving decision making and autonomy back to the people in the sub-catchments will encourage more local engagement and understanding - therefore decisions the local community can identify with.</p> <p>Each sub-catchment has its own challenges and risks and local engagement is more likely to bring success. A one rule fits all policy will cause animosity and dysfunction. For our sub-catchment the only issue as per chart in Part A pg 65 and 66 is E. coli</p>	Ask that sub-catchments be given own governance and autonomy to achieve set levels of contaminant discharge.
Implementation. 3.11.4.6. Funding and implementation.	Support. With clarification.	<p>Cost to be shared by all rate payers and not targeted, We will have significant compliance and ongoing repairs and maintenance costs to achieve what PC1 proposes on our properties. Everyone will benefit from clean water.</p>	That UAC is used as the rating system to pay for the management and governance of PC.1
Implementation. 3.11.4.7. Information needs to support future allocation	Support with clarification	<p>Important to have more monitoring stations in streams and rivers especially for identifying where E. coli is entering the water.</p> <p>Important to track the gains and losses along the journey and adjust. Understand that quicker improvements in water quality have been made in some regions than modelled and therefore significantly less disruption and cost may be required. Stock exclusion for example. Use of sediment traps and wet lands may prove to be a</p>	<p>Seek that data be made readily available and transparent, not edited</p> <p>Ask that reporting standards are a part of proposal.</p>

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		far more beneficial way to clean the water and provide bio-diversity.	
Implementation. 3.11.4.8. Review of chapter	Support with amendment	New technology such as virtual fencing or forage may make significant change to our ability to control diffuse contaminant.	Include sub-catchment governance.
3.11developing allocation and framework for next regional plan.	Support. With amendment	Would like to see sub-catchments as a part of this discussion.	Clarification on reporting standards.
Implementation. 3.11.4.10. Accounting system and monitoring.	Support. With amendment	Important to have transparent legible information, would like to see more monitoring points in streams and rivers.	Clarification on reporting and data collection standards.
Implementation. 3.11.4.11. Monitoring and evaluation of the implementation of chp 3.11	Support.	Must assess and understand the progress being made. I believe from my understanding of farm systems and doing FEP there are significant gains to be made by changes to what is now best practice. Implementation may mean we do not have to implement some of the onerous stock exclusion rules as proposed.	That sub-catchments have autonomy to consider new technology and support uptake.
Implementation. 3.11.4.12. Support research and dissemination of best practice guidelines to	Support with Change	New technology such as virtual fencing or new forages will be the kind of game changers that will bring the big wins in the implementation of PC1. Use of FEP so farmers uptake best practice and understand their part in the solution.	

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
reduce diffuse discharges		More advanced and more mobile water testing capability will help identify where the high risk issues are.	
Rules. 3.11.5.1	Support with change.	Pt. 2. The current proposal is impractical and prohibitively expensive for us. We also do not have the resource or capability to meet this standard in the time frame. We would contest the cost benefit. This policy will put us at a competitive disadvantage to regions who adopt the proposed national stock exclusion regulations National water policy. We will provide information at the hearing.	Pt 2 .Stock exclusion should be as proposed national regulations.
Rules. 3.11.5.2. Permitted Activity Rule – other farming activities	Support with change.	Pt. 2. The current proposal is impractical and prohibitively expensive for us. We also do not have the resource or capability to meet this standard in the time frame. We would contest the cost benefit. This policy will put us at a competitive disadvantage to regions who adopt the proposed national stock exclusion regulations National water policy. We will provide information at the hearing. Pt.3 NRP. We disagree with grandparenting. Resource should be allocated as for Land Use Capability or natural capital. Grandparenting is	Pt 2 .Stock exclusion should be as the proposed national stock exclusion regulations. Pt.3. amended so grandparenting is not a part of PC1 in any form. As per Schedule B. Land use capability to be standard for diffuse contaminant capacity.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>the legitimised removal of ones capital to another, in this case from farmers who have chosen to look after their land and environment are disadvantaged by having their natural capital and right to farm (nitrogen utilisation), removed (stolen) and given to polluters. If the polluters chose to capitalise their farm system and pollute they have been financially rewarded for that risk.</p> <p>Under sub-catchment approach N should be allowed to be leased between properties and only leased on an annual basis requiring FEP consents issued by Sub-catchment board.</p>	<p>Remove 4.a and 4.c</p> <p>NRP to be leasable on annual consent basis.</p>
<p>Rules. 3.11.5.3</p> <p>Permitted activity rule. Farmers with a farm environment plan under a certified industry scheme.</p>	<p>Support with change.</p>	<p>Grandparenting and the use of the overseer model is easily gamed and abused. We experienced this in the Taupo experience. Overseer was not designed for this function, its output is quantitative not qualitative.</p> <p>As above oppose stock exclusion as PC1 proposal.</p>	<p>Pt.3 be amended as to the proposed national stock exclusion regulations.</p>
<p>Rules. 3.11.5.4</p> <p>Controlled Activity Rule Farming activities with a farm environment plan</p>	<p>Oppose.</p>	<p>Oppose NRP as a proxy for grandparenting. N leaching and stocking rate be granted in accordance with sub-catchment capability and restrictions, with regard to land use capability or natural capital.</p>	<p>Pt.2. be amended as suggested no grandparenting.</p> <p>amended as to proposed national water policy for stock exclusion</p>

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
not under a certified scheme.		<p>As above oppose stock exclusion as proposed in PC1. As schedule A</p> <p>Oppose NRP being used as a form of grandparenting as schedule B.</p> <p>Consent length to 25yrs as for point source discharge consents.</p>	<p>Change to natural capital land use capability in regard to sub-catchment capability and clean water parameters.</p> <p>Change consents to 25yr time frame.</p>
<p>Rules.</p> <p>3.11.5.5.</p> <p>Controlled activity existing commercial vegetable production.</p>		<p>Important we have vegetables at affordable price. Important for objectives 2 and 4.</p> <p>The ability to enter and exit an industry should be easily done. New entrants deliver innovation and healthy competition. Otherwise we will end up with a quota like system which harbours monopolistic and oligopoly market behaviour.</p> <p>If we do not grow vegetables here where will they come from? Imported vegetables increases risk around bio-security, the larger the volume the bigger the risk now our native fauna.</p> <p>We have a growing population. Sub-catchment management will bring capacity for this important industry to provide.</p>	<p>Restart the discussion for this important industry. I am not a vegetable grower, so am not conflicted in my opinion.</p>
<p>Rule.3.11.5.7</p> <p>Non complying activity rule.</p>	Oppose	<p>Sub-catchment governance approach is the best forum to manage land use change. Best land use and land use capability within the catchments capacity. We need to be able to adapt take advantage of new technology and changing</p>	<p>Change to sub-catchment management /governance control.</p>

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>markets. Forages, virtual fencing.</p> <p>Wool was the biggest income source for Waerenga in the early 1970's now it is the lowest. We cannot predict the future; we can be given the ability to adapt within healthy environment legislation.</p> <p>This is critical to our ability to stay viable. Now bull beef and venison are our biggest sources of income, policies not of any significance in the past.</p>	
Schedule.A.	Support with clarification.	Clarification of definition and dates clause.f	N monitoring is important but priority should be given to the contaminant of most concern in each sub-catchment.
Schedule.B.	Oppose.	<p>N needs to be monitored but oppose NRP and its use as a Grandparenting tool.</p> <p>As above comments on the inequitable outcomes from grandparenting, I lived in the Taupo catchment.</p>	<p>Concentrating on best management practice and closer more intensive monitoring of streams and rivers.</p> <p>Land use capability to be standard for diffuse contaminant capacity.</p>
Schedule.C. Stock Exclusion.	Oppose	<p>As above totally oppose PC1 proposal on stock exclusion. In our topography with the number of weeping springs this PC1 for us would be beyond our resource.</p> <p>Forestry is not the answer. Still have to set back from streams. Turning \$12000/ha land in to \$2500/ha . Horizons work is showing that sediment</p>	Stock exclusion should be as the proposed national stock exclusion regulations

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>loss over 25yr rotation that is greater than life stock on sedimentary soils.</p> <p>PC1 proposed stock exclusion puts us at a huge competitive disadvantage to farmers in other regions or indeed countries where they get subsidised and significant government grants.</p> <p>We need to be given consents for intermittent stock crossing of streams at fords. Building bridges and culverts in some of our access points is prohibitive and would cause significant disturbance while constructing. The cost benefit would be negative when considering time the animals would be crossing every year.</p>	
<p>Schedule.1. Requirements for FEPs</p>	<p>Support</p>	<p>Believe FEP will educate farmers on best practice and this Rule alone will bring the most significant difference to diffuse contaminant discharge off farms.</p> <p>We have identified some major high contaminant loss areas and will make significant difference to E. coli, sediment and N loss off the farm. Grazing of winter crops.</p>	
<p>Schedule.2. Certification of Industry schemes</p>	<p>Support</p>	<p>Will give robust transparent and equitable monitoring and planning for farmers.</p> <p>Farmers and their industry working for each other and the environment.</p>	

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
		<p>Note that compliance does come at a cost and time. Ask that efficiency is considered and that WRC costs are covered by all rate payers.</p> <p>Monitoring and standardisation where possible across schemes are reviewed constantly.</p>	

Yours sincerely
William and Karen Oliver

[Print Name:](#)

WilliamJ Oliver

KarenM Oliver

Signature

6/3/2017_____
Date