

**BEFORE COMMISSIONERS APPOINTED BY THE WAIKATO REGIONAL
COUNCIL**

IN THE MATTER of the Resource Management Act 1991

and

IN THE MATTER of Proposed Waikato Regional Plan Change 1 – Waikato and Waipā
River Catchments.

ORAL SUBMISSION by Jocelyn Reeve.

1. My aim has been to strike a good balance between aspirational goals and practical on-farm implementation. Something workable, realistic and pragmatic rather than perfection. Something that gives people ownership and control in their role for the greater good.
2. At present PC1 has rules in three areas.
 - Physical – fencing, stocking and cultivation rules
 - Computer modelling – the Nitrogen Reference Point (NRP)
 - Standards– the Farm Environment Plan (FEP) and Good Farming Practice (GFP)
3. None are specifically tied to each other nor is there an indication of precedence over each other; although the FEP probably covers the other areas.
4. I am looking to
 - Reduce the administrative work load.
 - Improve flexibility in the requirements to target great results more efficiently.
 - Retain and build on expertise in all sectors.
 - Identify incentives and rewards.
 - Avoid creating boom and bust scenarios.
5. I am pleased the officers agreed to use guidelines as a better option. Guidelines offer the flexibility to target specific mitigation changes for any particular site. An example not considered in PC1 is the nitrogen leaching from gorse. Nitrogen leaching from gorse is considered higher than dairy. A specific property or catchment with a lot of gorse could, under the guideline system, prioritize gorse removal above some other activities in the GFP guidelines.
6. It is important to minimise the administrative workload. The officers report (sec 42A report) did not comment on my suggestion to use a random sample to calculate the 75-percentile figure. I see this as a good way to reduce administration. A 10% random sample is considered sufficient to obtain a representative output. The data collection is less, therefore the calculation of the 75-percentile will be quicker and importantly data using the same

version of Overseer will be used to calculate the rate. That means the rate can be announced sooner.

7. I have suggested that Schedule A be achieved through a questionnaire in conjunction with the rates assessment notice. So much of the data required is already in WRC records. It would be much more helpful to ask if council records are correct, as happens with other organisations, than to create another data base. Usually people only have to advise the organisation of any corrections or missing information.
8. Based on my understanding of the various alternatives to allocate, monitor, audit and mitigate diffuse discharges to waterways, I think the audit system and use of GFP advocated by the WRC officers has merit. The audit system rewards good environmental actions which encourages further action, and it can be used for market promotion. The GFP offers flexibility to target certain mitigation actions unique to a property or catchment. Importantly, the GFP can be transitioned to the next allocation system in 10 years' time.
9. By pure chance neither benchmark year for the NRP is typical for our farm.
10. We already had a Land Improvement Agreement (LIA) registered on the property in favour of WRC. In 2016 we entered into an Environmental Programme Agreement (EPA) with WRC, also registered on our title. Under those two agreements we have the bulk of the 13 kms of streams fenced on both sides with riparian strips totalling approximately 45 – 50 ha. The areas under these two agreements are retired from grazing for 99 years. The riparian areas not under those agreements have no protection at all.
11. By the time PC1 is implemented our farm will have two more documents to comply with; our NRP followed at a later date by the consent and a FEP.
12. Under our lease I anticipate we will have to obtain the consent to farm (not the leasee). The NRP is specific to our property; we cannot purchase, off-set or combine our NRP because it is specific to our property. As landowners, we had to develop and sign the EPA. Our leasee could not develop and sign the EPA and no doubt the same will apply with the NRP and consent.
13. That means our leasee will have to maintain records of daily comings and goings from their property to ours in order to comply with our NRP. We can alter our lease agreement to ensure

the leasee manages the farm within the constraints of the consent, but crucially, we remain responsible and the leasee will still have to differentiate between the two properties .

14. For years I have been responsible for weed control and planting in our riparian areas. It is a thankless task and a health and safety risk. I would really appreciate it if someone could research how to control blackberry and other weeds brought in by birds.

15. The failure of PC1 to address the negative impacts of the plan is disappointing. Blackberry is the main weed on our property but nitrogen fixing weeds, such as gorse and broom, which return nitrogen to the soil through leaf litter, are high nitrogen leaching plants. Targeting these plants on our road sides and riparian areas would be my first choice for nitrogen mitigation because productive land is retained and access to waterways is enhanced. The officers' proposal to use GFM gives an opportunity to address weed and pest control in conjunction with the goals of PC1.

Thank you for the opportunity to present my thoughts.



Photo: Riparian area. Stream is on the left side. Foreground carex sedges, middle rear toitoi.