

**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 on behalf of Taupō Lake Care Inc. by Jocelyn Reeve.

TLC Hearings submission PC1

Summary:

Introduction - Taupō Lake Care (TLC):

1. Taupō Lake Care Inc. (TLC) represents pastoral farming in the Lake Taupō catchment. Our membership ranges from small and medium sized family farms to large scale private and Maori Ahuwhenua economic authorities operating sheep, beef and deer farming businesses. TLC is committed to kaitiakianga, achieving sustainable, viable farming – environmentally, economically, socially and culturally.
2. Summary:
 - a. Participated in Vr5.
 - b. Members make permanent reductions, Lake Taupō Protection Trust deals (in perpetuity).
 - c. Awards received, sheep milking, Taupō Beef & Lamb.
 - d. Research
 - e. Newsletter

Background Introduction – Chapter 3.10 and Plan Change 1:

3. Our area of expertise is Chapter 3.10, commonly referred to as Variation 5 – Lake Taupō Catchment which has been operative since 2011.
4. Summary:
 - a. Rules are similar.
 - b. Riparian areas already fenced.
 - c. No silver bullets from research to date.
 - d. Mitigations not yet in Overseer.
 - e. Time taken to get research into Overseer
 - f. Farms amalgamated or converted to forestry.
 - g. People are the key to success.

Benchmarking/Nitrogen Reference Point:

5. Our submission is to delete the Nitrogen Reference Point and thus the use of Overseer™ for regulatory purposes. We feel the randomness and inflexibility of the allocation method is grossly unfair.
6. Summary:

- a. Not flowing into future allocation.
 - b. Overseer not regulatory standard. Updates make it unstable. Workarounds in lieu for important activities are best guess. Level of accuracy not suitable for compliance purposes, but good for on farm purposes.
 - c. Creates an asset.
 - d. Social and economic reasons. Short term.
7. We recommend Schedule B clause (e) be changed to *The Nitrogen reference Point analysis (inputs and outputs) must be published to WRC ~~within the period xx to yy~~ on request for compliance and auditing purposes.*
8. We recommend that the NRP and its role of holding nitrogen leaching at or below the current rate be incorporated in the FEP.

Farm Environment Plans:

9. We submitted that WRC to develop a measurement system that targets e-coli and phosphorous as a precursor for the whole farm FEP.
10. We are interested in exploring the idea of giving a rating score that rewards good farm practice (GFP) as outlined by WRC officers and Rob Dragten in the Section 42A report¹.
11. Summary:
- a. Flexible. Able to target actions by catchment or sub-catchment.
 - b. Use audit grades to incentivise mitigations and give value to produce.

The 5-year rolling average:

12. Assuming the retention of the NRP, we support the 5-year rolling average.
13. Summary:
- a. Flexible. Able to adjust in responsa to seasons.
 - b. Incentives compliance.
 - c. Can be used when technical changes in Overseer influence the output.
 - d. Overseer automatically upgrades the NRP file with new versions.
 - e. Any “banking” permanently saves N sooner.
14. Possible 5-year rolling average rule (assuming the NRP is retained):
- a. A farmer may choose to use the 5-year rolling average option.

¹ As an approach to reducing contaminant losses from farms in the Waikato and Waipa catchment under PPC1 Sec 42A pp 61-66 (63-68 in the document)

- b. The farmer will notify WRC or their Certified Industry Scheme provider (if operating under that scheme) of the intention to operate under the 5-year rolling average rule.
 - c. Starting at least 2 years after registration, the average nitrogen leaching rate of the NRP year, the previous 4 years and the current year must not exceed the NRP year.
 - d. All 5-year rolling average data is calculated using the current/latest version of Overseer.
 - e. Auditing by WRC will be at a minimum of 4 yearly intervals.
 - f. The farmer will advise WRC or their Certified Industry Scheme provider (if operating under that scheme) of their TAND each year.
15. We feel this rule makes it clear that the 5-year rolling average is optional. By restricting the start time to at least 2 years after registration we think a farm will have, at a minimum, Overseer files for the two benchmark years and the two years after registration to use with the current year's plan for the first rolling average. Thereafter the rotation would drop the benchmark years in the following years. Including the NRP as a sixth year will ensure the rolling average is correct.
16. PC1 does not address auditing or how often annual returns will be made. Given the large number of properties/enterprises in the Waikato and Waipa catchments, we suggest a minimum of 4 yearly intervals to ensure auditing is practical for WRC. Providing the TAND in annual returns follows the practice of other organisations such as Inland Revenue. The detailed records are retained by the business and required to be presented on request during an audit.

Catchment Boundaries:

17. Our submission relates to catchments that bound onto the Waikato and Waipa catchments, not the catchments and sub-catchments within PC1 river catchments.
18. **Summary:**
- a. V5 definition.
 - b. Land title boundaries not suitable and conflict with V5.
 - c. Prefer retain geographic boundary and allow property/enterprise to elect which set of rules used.
19. Possible rule:
- a. The owner of a property/enterprise operating in both the Waikato/Waipā catchment and another catchment will elect to operate their property/enterprise exclusively under one catchment rules.
 - b. In the case of nitrogen trading activities in the Taupō catchment trades will only apply to the area of the property/enterprise within the Taupō catchment.
20. This is obviously a national issue. We request that WRC initiate discussion with regional councils to develop a common solution.

Farmer use of Overseer: Certified Farm Environment Planner and Certified Farm Nutrient Advisor:

21. Summary:

- a. Both the NRP and FEP need updating during the year.
- b. Not practical use consultant every time.
- c. Overseer is promoted as farmer friendly.

22. We believe a suitable qualification for farmers to use Overseer for their own property is warranted.

Our experience is that some farmers or farm managers prefer (and are able) to do their own NRP and FEP. We feel that PC1 fails to exploit this expertise and aptitude to achieve the goals of this project.

23. We envisage a system similar to the taxation system where the farmer handles the day to day finances, the accountant does the tax report and submits the results to IRD. Similarly, with PC1, the farmer handles the day to day environmental monitoring/planning and the Certified Farm Environment Planner/Certified Farm Nutrient Advisor does the audit report and submits returns to WRC.

Full submission:

Introduction - Taupō Lake Care (TLC):

24. Taupō Lake Care Inc. (TLC) represents pastoral farming in the Lake Taupō catchment. This society was formed in 2000 and incorporated in 2002. Our membership ranges from small and medium sized family farms to large scale private and Maori ahuhenua economic authorities operating sheep, beef and deer enterprises. TLC is committed to kaitiakianga, achieving sustainable, viable farming – environmentally, economically, socially and culturally.
25. TLC participated in the development of Chapter 3.10 of the Regional Plan (Vr5) to restore and maintain Lake Taupō water quality at the 2001 levels by 2080. This is being achieved through a cap and trade mechanism including a 20% reduction in the catchment's nitrogen leaching from manageable sources.
26. Some TLC members have entered into agreements with the Lake Taupō Protection Trust to reduce nitrogen leaching from their properties in perpetuity, committing to achieving the 20% reduction sooner than anticipated in Vr5.
27. All our members operate their enterprise below their benchmarked cap providing a voluntary reduction annually. These permanent short-term reductions are in addition to the long-term reductions achieved by the Lake Taupō Protection Trust.
28. The number of awards received by catchment farmers acknowledges their high standard of farm management. Waituhi-Kuratau incorporation pioneered milking sheep in 2004/5. Taupo Beef and Lamb are trading on their environmental status, endorsed by the WRC Environmental Tick.
29. TLC is a proponent for research and education projects which achieve nitrogen-leaching reductions on farm. TLC is also interested in exploring economic development opportunities within the catchment.
30. TLC assists WRC by providing a regular newsletter for farmers and other interested parties and facilitating the nitrogen market (as requested). TLC is always happy to work with WRC staff to achieve common benefits.

Background Introduction – Chapter 3.10 and Plan Change 1:

31. Our area of expertise is Chapter 3.10 – Lake Taupō Catchment, operative since 2011. To our eyes, there are similarities between PC1 and Chapter 3.10.
32. Particularly relevant is the way PC1 allocates a grand parented nitrogen cap, based on historic nitrogen leaching as measured by Overseer™ and requires a farm environment plan, again using Overseer to ensure the business operates below the property's nitrogen cap.
33. Chapter 3.10 specifies the version of Overseer to be used and WRC has obtained dispensation with the model's owners to continue using that version. This has been an asset; facilitating the certainty for farmers that they are complying with their consent. Trading (offsetting) is also dependent on the consistency provided.
34. In the Taupō catchment riparian areas were retired from grazing in the early 1980s or earlier.
35. In Taupō we have seen small to medium family farms either amalgamated into corporate farms or converted to forestry. Ultimately the NDA (or NRP) becomes a social change agent.
36. In Taupō, it is essential that WRC personal have good rapport with farmers. The expertise and experience of land owners and managers is the key to the success of the project. PC1 losses some mahina kai me wai kanikani value in attempting to control both inputs (fencing and stocking rates) and outputs (NRP).

Research:

37. Over the last 19 years and numerous research projects no mitigation silver bullets have been found for us. In the last 19 years Overseer has been refined, incorporating a greater range of animals, irrigation and monthly stock accounting. But the research in the Taupō catchment in conjunction with Vr5 has not resulted in new mitigations being inserted into Overseer.
38. Currently, TLC is researching nitrogen leaching from grazed lucerne to obtain data with the view to insertion in Overseer. This research has been ongoing for ten years, with the final data becoming available to Overseer Ltd next year. Lucerne could be in Overseer 18 months after that, if the data is accepted by Overseer Ltd.
39. The chances that new mitigation research will become available in the next 10 years, the life of PC1, for insertion in Overseer is low.

40. The Parliamentary Commissioner for the Environment makes the point that there are a number of mitigation options currently not in Overseer (urease inhibitors, plantain, chicory, dietary salt and some crops), and that the model needs upgrading to an international regulatory standard model.

Benchmarking/Nitrogen Reference Point:

41. Our submission is to delete the Nitrogen Reference Point and thus the use of Overseer™ for regulatory purposes. We feel the randomness and inflexibility of the allocation method is grossly unfair.

42. Instead we believe the NRP concept should be accommodated in the GFP standards.

43. The major issues we have identified are:

- a. the intention to transfer to another assessment system in ten years' time;
- b. the use of the NRP and Overseer™ as a regulatory tool; and
- c. the impact on economic and social values in the catchments.

Anticipated change for future allocation:

44. If the intent of PC1 is to introduce a cap and trade regime the NRP is justified, but this is not the case. In fact, the intent is to move to another (currently unknown) '*anticipated management approach*' (Objective 4). The NRP will not be the criteria for the future allocation '*Land use type or intensity at July 2016 will not be the basis for any future allocation of property-level containment discharges. Therefore, consideration is needed of how to manage impacts in the transition.*' (reasons for adopting Objective 4). This is elaborated in Policy 7a '*Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body...*' and '*(...like land is treated the same for the purposes of allocation).*'

45. This plan change should set up a system that can morph into the future management approach. The NRP is merely arbitrarily holding nitrogen leaching at the 2014 to 2016 rate (with reductions for high emitting properties). It is not intended as a precursor to the anticipated management approach.

46. Presumably a new measure will come in at the next review which will be unrelated to the current NRP. All the work done to establish and manage the NRP system will be redundant.

NRP and Overseer:

47. Overseer will be used to set the NRP. This number limits or caps the farm/enterprise nitrogen leaching at either the 2014/15 or 2015/16 year rate using the version of Overseer available at the time of registration. The standard needed to achieve regulatory standard Schedule B calculation is high. This means establishing and setting the NRP will entail extra work to achieve regulatory standard accuracy.
48. Our experience with NDA benchmarking, as the NRP process is called in Chapter 3.10, is that a considerable amount of time is spent assessing and reassessing the inputs and outputs to obtain the accuracy needed.
49. Workarounds need to be published and available publicly. Workarounds address factors not in the current version and how the factors will be used in conjunction with the Overseer file to reflect the reality. They often err on the high side.
50. In the section 42A report the officers argue (in respect to the 5-year rolling average) that the accuracy of Overseer is over rated. *“The implication is that annual diffuse N loss can be accurately determined by Overseer and overs and unders can be managed at a farm scale on an annual basis. This implies a level of accuracy in Overseer which, in WRC’s understanding, exceeds the model’s capabilities.”* In our opinion they are voicing an opinion that highlights the argument that the model is not currently at a regulatory standard.
51. If *“The use of a five-year rolling average implies a numerical nitrogen leaching loss will be used to determine compliance, which is practicably unenforceable.”* What is the value of the NRP?
52. As the Overseer version changes at least annually, this means any NRP number will only be relevant for the life of one version, probably only 6-12 months. PC1 does not address the need to cater for NRP changes due to version changes, it merely refers to *‘the current or latest version’*.
53. We believe that, in practice, there will have to be a system to formally update all NRPs with each version change regardless of whether the change affects a property or not. If the registered NRP is altered by WRC. as Overseer versions change, property owners must be notified of the results and those results will have to be subject to appeal. Currently PC1 does not cover the right to query or appeal a WRC decision on the updated NRP. The risk of error is high given the complexity of farming operations, the changes available for inputs in Overseer and the disconnect between the WRC operator updating the NRP and the consent owner.

54. At this stage management of the Taupō NDA remains calculated in version 5.4.3, meaning the output from other versions are irrelevant and there is a stability in the NDA from year to year.
55. Unfortunately, using one version year on year is not acceptable to Overseer Ltd. The new version, Overseer^{FM} will update files automatically. But there will always be a need to ensure the file still reflects to the original farming practice.
56. There is a report made for WRC on the difference between Overseer version 5.4.11 and version 6.0.0² using the actual data from 108 farms out of 118 farms benchmarked in the Taupō catchment. The impact of the version change in nitrogen leaching was an increase of 16% on average. The range, however, was between 36% below and 54% above that 16% average. This range is significant and is an indication of the uncertainty of the use of Overseer for regulatory purposes.
57. The important question here is does the Overseer model provide a guarantee similar to that provided by the Land Transfer system for land titles. By the time you take into account the workarounds and the changing versions, probably not.

NRP as an asset:

58. The Nitrogen Reference Point (NRP) creates an asset attached to a property. In Taupō this can be traded; sold or leased within the catchment. It has a monetary value.
59. The NRP has a specific numerical value that defines the ability to farm in the same way as contour, climate and location does.
60. The NRP, its supporting data and Overseer file will have to be available for any property sale, lease or change of management, so future owners/managers can continue to comply with the regulations. There is nothing in PC1 that covers availability and security including the accessibility to an individual's intellectual property of the NRP and the accompanying documents.
61. Our experience indicates that accessing documents from former owners, or even owners before that, can be difficult especially if the transfer of the benchmark data is omitted in any agreements.

² Not publicly available. Geoff Mercer (2012), Benchmarked farms of the Lake Taupo Catchment: Differences between Overseer versions 5.4.11 and 6.0.0. A preliminary comparison Report prepared for Waikato Regional Council

Economic and social values:

62. Our experience of a regulatory cap is in a cap and trade regime where the version of Overseer is static. This supports trading, innovation and efficiencies giving flexibility and certainty for our businesses. On the other hand, the cap has impacted on capital values, promoted farm amalgamation, depopulation, triggered stress, and penalised low impact properties.
63. The NRP and the uncertainty of the 10-year timeframe of PC1 will limit business activity. The bankability and inability to trade is of particular concern. In Taupō we have the certainty of a 25-year consent. No such certainty is included in PC1. Banks are averse to supporting short term farming operations.
64. We see the ability to trade nitrogen as an asset being managed by WRC for the benefit of wider community; nitrogen is able to move around the catchment according to need, regardless of whether the reason is financial, personal or environmental - the best use for the greatest benefit.
65. While in Taupō we can trade to change our NDA, in PC1 the NRP is static, lowering or boosting the valuation in accordance to the property's relative potential. The NRP will be a critical factor in setting the land valuation. In our experience farm valuations dropped (in excess of \$1mil in some cases) once the Nitrogen Discharge Allowance (NDA) was established. Properties with an NDA below the valuer's assessment of its capability is proportionately reduced more than those with an NDA above their LUC are increased.
66. We recommend Schedule B clause (e) be changed to *The Nitrogen reference Point analysis (inputs and outputs) must be published to WRC ~~within the period xx to yy~~ on request for auditing purposes.* This will reduce WRC workload and administration costs. It clearly states the purpose and use of the relevant files, and minimises risks with file maintenance.
67. We recommend that the NRP and its role of holding nitrogen leaching at or below the current rate be incorporated in the FEP.

Farm Environment Plans:

68. In our submission on PC1 we asked that WRC to develop a measurement system that targets e-coli and phosphorous as a precursor for the whole farm FEP.

69. We are interested in exploring the idea of giving a rating score that rewards good farm practice (GFP) as outlined by Rob Dragten in the Section 42A report³.
70. We can see that the 21 GFP Principles could have the flexibility of including a risk rating, possibly specific to each FMU or sub-catchment, in order to ensure targeted actions for the relevant FMU or sub-catchment receive greater recognition.
71. We would like to see the audit grading incorporating incentives developed in conjunction with processors and others. The “WRC Environment Tick” used in the Taupō catchment by Taupō Beef and Lamb is an example of how the rating score could be developed as a win win opportunity in PC1.

The 5-year rolling average:

72. The 5-year rolling average is recommended by Overseer Ltd, allowing some years to exceed the NRP if others are below the NRP. This gives the rules some flexibility.
73. Assuming the retention of the NRP, we support the 5-year rolling average.
74. Our experience suggests a cap without the 5-year rolling average causes a 10-15% reduction in nitrogen leaching. Severely reducing flexibility for farm management and critically reducing the profitability of low nitrogen leaching properties.
75. It is not possible for a farm to operate at a specified numerical number annually. Factors outside the control of the manager impacts on the operation. Examples include climate fluctuations, strikes, international markets, and financial constraints. Historically, farmers maintain a buffer to cater for such factors. It is very common, for example, to conserve excess feed in the summer for a buffer to cover winter shortages.
76. We do not believe the 5-year rolling average will make a significant impact on nitrogen leaching for any catchment. Every year a property will be managed to stay within the average, usually incorporating a buffer below the average. The advantage is the ability to exceed the average on occasion.
77. The 5-year rolling average incentivises farmer compliance as they are regularly monitoring their nitrogen leaching outputs.

³ Rob Dragten, As an approach to reducing contaminant losses from farms in the Waikato and Waipā catchment under PPC1. Sec 42A Block 2 pp 61-66 (63-68 in the document)

78. The 5-year rolling average could be a management tool when an Overseer version change impacts disproportionality on one aspect of the FEP. WRC Officers argue that a change in the Overseer version should not change the relativity between the NRP data and the current activity on the same property, but the following situations have the potential to do so:
- a. The farming operation has changed since the benchmark years and rate for a certain activity changes disproportionately to the whole operation;
 - b. When a workaround for a certain aspect differs from the Overseer rate when it is inserted into Overseer;
 - c. Correcting an error during early implementation of the rules.
79. No farming operation is a steady state operation. Farmers are continually balancing multiple factors, both on-farm and off-farm, for their desired outcomes. Even if the farm manager is not changed the farm management goals will over this first ten-year period in PC1.
80. Our knowledge of workaround rates indicates they can create anomalies that can be managed through the 5-year rolling average. For example: the initial workaround rate for lucerne was 19.5 kg/ha/yr. as a result of our cut and carry research, it has been reduced to 5 kg/ha/yr. If a farmer made a decision based on the original workaround rate and changed to alternative activities permitted by the high NRP that farmer. when a lower rate is inserted into Overseer, is suddenly operating above the revised property NRP and has to change the operation (overnight).
81. In the sec 42A report the officers argue that under the 5-year rolling average every property will be required to do a reassessment of the NRP, irrespective of the size of the NRP. This is true regardless of whether the 5-year rolling average is available or not. We note that new versions of Overseer automatically update existing files.
82. We agree that *The rolling average approach implies the ability for a farmer to "bank" nitrogen as a result of emitting less than the NRP in one year, so that they can "exceed" the NRP in a subsequent year.* However, this is a simplistic understanding of the approach. Firstly, any "banking" is advantageous as it is a permanent saving because it is impossible to travel back in time to use that nitrogen; early savings mean greater savings for the river in that year. Secondly, any spike over the average can only happen occasionally because that spike needs to be accounted for in the following years until it is no longer in the rolling average. What is more, the

years before the spike need to be below the average so the rolling average stays at or below the NRP.

83. Possible 5-year rolling average rule (assuming the NRP is retained):
- a. A farmer may choose to use the 5-year rolling average option.
 - b. The farmer will notify WRC or their Certified Industry Scheme provider (if operating under that scheme) of the intention to operate under the 5-year rolling average rule.
 - c. Starting at least 2 years after registration, the average nitrogen leaching rate of the NRP year, the previous 4 years and the current year must not exceed the NRP year.
 - d. All 5-year rolling average data is calculated using the current/latest version of Overseer.
 - e. Auditing by WRC will be at a minimum of 4 yearly intervals.
 - f. The farmer will advise WRC or their Certified Industry Scheme provider (if operating under that scheme) of their TAND each year.
84. We feel this rule makes it clear that the 5-year rolling average is optional. By restricting the start time to at least 2 years after registration we think a farm will have, at a minimum, Overseer files for the two benchmark years and the two years after registration to use with the current year's plan for the first rolling average. Thereafter the rotation would drop the benchmark years in the following years. Including the NRP as a sixth year will ensure the NRP is correct for the version being used.
85. PC1 does not address auditing or how often annual returns will be made. Given the large number of properties/enterprises in the Waikato and Waipa catchments, we suggest a minimum of 4 yearly intervals to ensure auditing is practical for WRC. Providing the TAND in annual returns follows the practice of other organisations such as Inland Revenue. The detailed records are retained by the business and required to be presented on request during an audit.

Catchment Boundaries:

86. Many of our members operate properties and/or enterprises that include land in the Waikato and/or Waipa catchments. Operating a business under two different management systems, including two versions of Overseer and two management plans, will be complex.

87. Our submission relates to catchments that bound onto the Waikato and Waipa catchments, not the catchments and sub-catchments within PC1 river catchments.
88. The definition of the Lake Taupō Catchment boundary in the Regional Plan is *“For the purposes of Chapter 3.10 of the plan, the Lake Taupō Catchment includes all land within the geographical catchment which slopes and/or drains into Lake Taupō, as shown in the Waikato Regional Plan Lake Taupō Maps. **Note:** if a property spans the catchment boundary full records and management details for that farming entity will be required in order to assess activities within the catchment. there is no intention to require compliance with the Lake Taupō Catchment rules outside the catchment shown in the Map.”*
89. The PC1 rules, as written, effectively support title boundaries between sub-catchments by stipulating the whole property or enterprise is in a sub-catchment if at least 50% of the property or enterprise is in the sub-catchment.
90. The Section 42A report⁴ discusses the possibility of changing the catchment boundaries to follow land title boundaries and concludes that is not the solution because the boundary would change as subdivision and/or ownership of the land changes.
91. We concur because of the conflict with the established definition of the Taupō catchment boundary. Chapter 3.10 of the Regional Plan allows trading within the Taupō catchment. If the boundary moves the ability to trade will move also.
92. Given the range of different enterprises that straddle and/or operate in the Waikato/Waipā and Taupō catchments, in both size of the operation and proportion of their enterprise in the Taupo catchment, we believe the better option would be for each enterprise/property owner to elect to operate under one catchment rules for the entire enterprise/property. The catchment boundary would then be maintained as a geographic feature and the enterprise/property would be operated in a manner that suits the particular property/enterprise. In the Taupō catchment case, if electing to operate land in the Taupō catchment under PC1 rules, any advantages such as trading will only apply to the portion in the Taupō catchment.
93. Possible rule:

⁴ Sec 42A part A & B paragraph 494

a. The owner of a property/enterprise operating in both the Waikato/Waipā catchment and another catchment will elect to operate their property/enterprise exclusively under one catchment rules.

b. In the case of nitrogen trading activities in the Taupō catchment trades will only apply to the area of the property/enterprise within the Taupō catchment.

94. This is obviously a national issue. We request that WRC initiate discussion with regional councils to develop a common solution.

Acronyms:

95. Our requests for national acronyms are self-explanatory. We know that having more than one acronym for the same thing is confusing.

Farmer use of Overseer: Certified Farm Environment Planner and Certified Farm Nutrient Advisor:

96. The NRP underpins the FEP. Just like a financial budget, the FEP must be updated as circumstances change during a year. Other than new Overseer versions there are factors beyond the farmer's control; eg. climate fluctuations, market requirements. It is not practical to continually referring to a consultant every time during the year when the FEP is updated. The delay, financial cost and time involved means using a consultant is too costly.

97. Overseer is promoted as farmer friendly.

98. We requested that a qualification be added to the Certified Farm Environment Planner and Certified Farm Nutrient Advisor requirements that allows the operator of an enterprise or property to take the role of the Certified Farm Environment Planner and Certified Farm Nutrient Advisor for that enterprise or property.

99. Our experience is that some farmers or farm managers prefer (and are able) to do their own NRP and FEP. We feel that PC1 fails to exploit this expertise and aptitude to achieve the goals of this project.

100. We believe a suitable qualification for farmers to use Overseer for their own property is warranted.

101. We envisage a system similar to the taxation system where the farmer handles the day to day finances, the accountant does the tax report and submits the results to IRD. Similarly, with PC1,

the farmer handles the day to day environmental monitoring/planning and the Certified Farm Environment Planner/Certified Farm Nutrient Advisor does the audit report and submits returns to WRC.