

This submission was emailed @ 1:31pm on the 8-3-17 - as requested here is hardcopy - (signed).

Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

Submission form on publicly notified – Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE

Mailed to	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
Faxed to	(07) 859 0998 Please Note: if you fax your submission, please post or deliver a copy also
Emailed to	submissions@waikato.govt.nz Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.
Online at	www.waikatoregion.govt.nz/healthyrivers

We need to receive your submission by 5pm, 8 March 2017.

YOUR NAME AND CONTACT DETAILS

Full name Graeme and Yvonne Hathaway		
Full address 459 Settlers Road R D 2 Reporoa		
Email ghathaway@xtra.co.nz	Phone 0272183127	Fax

ADDRESS FOR SERVICE OF SUBMITTER

Full name J A Dekker Ltd		
Address for service of person making submission 459 Settlers Road R D 2 Reporoa		
Email ghathaway@xtra.co.nz	Phone 0272183127	Fax

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

- I wish to speak at the hearing in support of my submissions.
- I do not wish to speak at the hearing in support of my submissions.

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

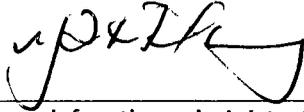
SIGNATURE

OF

SUBMITTER

*(or person authorised to sign on behalf of submitter)
Signature is not required if you make your submission by electronic means*

Signature: Y T Hathaway



Date 6/3/17

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

We have farmed in the Reporoa district for over 30 years. Our dairy farm is within the Priority 1 area as identified by this plan. We own a 143ha dairy farm milking 400 cows, as well as a 11 ha runoff and a 200ha runoff (Priority 3) which runs all of our young stock, carryovers, and winters our dairy herd over winter.

Our current stocking rate on the dairy farm is 2.8 cows per hectare, we are unsure of what our Nitrogen reference point is as there is much variation with each season and all the elements that contribute to this are changing on a regular basis. We have full compliance for fencing off all our waterways on the dairy farm. Although we have had some assistance with fencing off the waterways of our runoff, we have had extra financial costs of labour, materials and cost of time for our staff and ourselves in the ongoing quest to meet this compliance.

In the future, we are unsure about the plans for our farm but we would like to remain the only decision makers in regards to how we utilise our land. We are committed to maintaining stock free waterways and protecting our environment and will continue to comply with current regulations surrounding our industry.

I am concerned about the following issues with PC1 including the day to day implications for our farming operation, and the increased financial outputs in order to comply with the stated changes in the Plan Change 1. The time frames for compliance are unrealistic within our farming operation and do not take into account the variations in each season such as a drought. We are concerned about the fact with all the compliance it well exceeds the 10 year targets and are many cases unachievable. Also the science that has been attributed to the plan does not correspond in all the facts that have been presented.

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

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

I am concerned about the implications all of this will have for my property and for my current activity as described above. I set out my concerns more specifically in the table below.

SUBMISSION POINTS: Specific comments

Page No	Reference (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Say what changes to Plan Change 1 you would like	Give Reasons
40	Rule 3.11.5.2 Permitted Activity Rule – Other farming activities			
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.	<p>This proposal will impose significant costs on our farming activities including: Being compliant with new fencing requirements will require huge financial costs in time, labour and materials replacing fences that currently meet industry regulations.</p> <p>I am also concerned that this is not practical because some of our farm is around 15 degree, and although this is not ideal, we would like to be able to put some of this land into crops and or regrass on a rotational basis.</p> <p>The Nitrogen leaching requirements do not take into account the seasonal changes that affect farming such as excessive rainfall or drought which drastically changes our N levels due to our porous pumice soils.</p>

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42	Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	OPPOSE	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including: Being compliant with new fencing requirements will require huge financial costs in time, labour and materials replacing fences that currently meet industry regulations. I am also concerned that this is not practical because some of our farm is around 15 degree, and although this is not ideal, we would like to be able to put some

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				<p>of this land into crops and or regrass on a rotational basis.</p> <p>The Nitrogen leaching requirements do not take into account the seasonal changes that affect farming such as excessive rainfall or drought which drastically changes our N levels due to our porous pumice soils.</p>
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.	<p>This proposal will impose significant costs on my farming activities including taking the rights of farm owners to use their own land for the farming activity that best suits the land, financial and personal circumstances. It reduces the farm owner's ability to manage the land in the best practical way for themselves and the environment.</p> <p>I am also concerned that this is not practical because seasonal changes in both farming and personal situations vary and it is impractical for landowners to sign away any right they have to change their farming operation.</p>

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46	Schedule A: Registration with Waikato Regional Council			
47	Schedule B: Nitrogen Reference point	OPPOSE	Amend Schedule B as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including not having the ability to fertilise our land that is the most practical and economical for the land use in order to grow the grass that is required to feed our animals to the perform at the best of their ability. Areas of the farm that are performing poorly can be developed using appropriate levels of fertiliser, this impacting on the animals producing performance and the financial bottom line for our business and our livelihood.</p> <p>The impact nitrogen loss restrictions will have on the resilience of our farming business and our ability to be market leaders with our raw product is both financial and against good farming practise and have far reaching impact in the way we run our operation and being able to maintain our business integrity.</p> <p>The impact of nitrogen loss restrictions will impact on our ability to change your farming system so that we can put other mitigations in place that reduce losses of sediment, phosphorus, or pathogens, and will decrease our ability to fund such environmental mitigation.</p> <p>I am also concerned that this is not practical because seasonal changes in both farming and personal situations vary and it is impractical to ask landowners to take on further financial and physical burdens in</p>

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				order to meet unrealistic targets.
50	Schedule C: Stock Exclusion	OPPOSE	Amend Schedule C as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including financial, staff and time restrictions, in order to meet the newly proposed changes.</p> <p>Most NZ farmers have already fenced their waterways to current standards at a great cost to the farmer. These fenced waterways are often overgrown and plants and weeds are creeping into the waterways, reducing water flows. Some waterways are meant to be maintained by local council which often doesn't occur so farmers have to take it on themselves to maintain these as well as all the other tasks required of them.</p>

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51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including whether these plan requirements are actually feasible for example avoiding cultivation of land which is greater than 15 degrees.</p> <p>Farm environmental plans will prove to be costly and the regulation around who will do these plans and conformity of plans across the board (one size does not fit all).</p> <p>I am also concerned that this is not practical because of seasonal changes and the changing landscape of farming varies so much month the month season to season, an environmental plan will be ineffective as a snapshot of any farming operation. Also individual plans could benefit some more than others. Farmers that have in the past not changed their fertiliser regimes at all to help reduce nutrient leaching will have high nitrogen inputs and this will be reflected in their FEP. The farmers who have been working consistently to reduce these levels and trying be as environmentally aware as possible will have their FEP based on lower levels and therefore be disadvantaged by individual FEP's.</p>