

PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



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

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

SubForm	PC12016	COVER SHEET	
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		Submission Number	
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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 to one of the above addresses
Emailed to	healthyivers@waikatoregion.govt.nz Please Note: Submissions received by email must contain full contact details.
Online at	www.waikatoregion.govt.nz/healthyivers

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

YOUR NAME AND CONTACT DETAILS

Full name: James Thomas Findlay
 Full address: 45 Morris Road, Hamilton 3216
 Email: findlay@wave.co.nz
 Phone: 07-856 3443 Fax: —

ADDRESS FOR SERVICE OF SUBMITTER

Full name: James Thomas Findlay
 Address for service of person making submission: 45 Morris Road
Hamilton 3216
 Email: findlay@wave.co.nz
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- I am / am not directly affected by an effect of the subject matter of the submission that:
- (a) adversely affects the environment, and
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Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1 (Continue on separate sheet(s) if necessary).

Rule 3.11

Rule 3.11.3 Policy 1

Policy 2

Policy 6

Rule 3.11.4.2 Certified Industry Scheme

Rule 3.11.4.3 Farm Environment Plans

Rule 3.11.4.6 Funding and Implementation

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(Select as appropriate and continue on separate sheet(s) if necessary).

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

MY SUBMISSION IS THAT

Tell us the reasons why you support or oppose or wish to have the specific provisions amended. (Please continue on separate sheet(s) if necessary).

See Attached .

I SEEK THE FOLLOWING DECISION BY COUNCIL

(Select as appropriate and continue on separate sheet(s) if necessary).

- Accept the above provision
- Accept the above provision with amendments as outlined
- Decline the above provision
- If not declined, then amend the above provision as outlined

Submission:

Whilst supporting the overall vision to improve water quality and requiring all citizens to be responsible around the resources available, I submit that the approach being taken by the Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments is ill founded and will:

- 1. Create annoyance and frustration in the rural sector that will create distrust between the farming community and the Waikato Regional Council. The disharmony could result in defiance of the rule and deliberate non-compliance.**
- 2. Require a bureaucracy to implement the plan that will be unsustainable and become a burden on the ratepayers in the region. There is an estimated 11,500 units in the catchments**
- 3. The Plan Change 1 controls on farm management systems will limit the productivity of the region that underpins the region's economic base and the economic base of New Zealand.**
- 4. The costs to the individual farmers will be excessive in many instances where waterways are required to be fenced off and the newly created wasteland managed by the farmers.**

The approach to reducing contaminant losses from pastoral farm land implemented by Chapter 3.11 requires:

- stock exclusion from water bodies as a priority mitigation action
- Farm Environment Plans (FEP) (including those for commercial vegetable producers) that ensure industry-specific good management practice, and identify additional mitigation actions to reduce diffuse discharges by specified dates, which can then be monitored
- a property scale nitrogen reference point to be established by modelling current nutrient losses from each property, with no property being allowed to exceed its reference point in the future and higher dischargers being required to reduce their nutrient losses
- an accreditation system to be set up for people who will assist farmers to prepare their Farm Environment Plan, and to certify agricultural industry schemes
- Waikato Regional Council to develop approaches outside the rule framework that allow contaminant loss risk factors to be assessed at a sub-catchment level, and implement mitigations that look beyond individual farm boundaries to identify the most cost-effective solutions.

Questions/comments:

- 1. Who determines what are good management practices and what the KPI's that determine good management?*



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Questions/comments:

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2. *Who will develop and monitor the accreditation system that will accredit the personnel deemed competent to prepare the FEP?*
3. *The use of Nitrogen Reference Points from modelling lacks accuracy and to place controls on the management of the farm is unfair.*

3.11.3 Policies

Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens.

Manage and require reductions in sub-catchment-wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by:

- a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase; and
- b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges; and
- c. Progressively excluding cattle, horses, deer and pigs from rivers, streams, drains, wetlands and lakes.

Questions/Comments:

1. *Is the discharge only measured by programmes such as Overseer® or are water samples taken at all discharge points into waterways?*
2. *The cost benefit of fencing off river and minor waterways is likely to be expensive. The fencing of areas will leave large waste areas along river/waterway banks that will be ideal places for weed growth. The farmer is then required to manage the weeds in an area that has been removed from any farming activity. This cost in some cases will be excessive.*
3. *The Policy clearly shows that a farmer who has created watering dams for livestock will now have to fence them and install troughs. This is unhelpful as the dams, while watering stock, are not primary sources of e-coli and sediment loss to the major waterways.*

Policy 2: Tailored approach to reducing diffuse discharges from farming activities.

Manage and require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities on properties and enterprises by:

- a. Taking a tailored, risk based approach to define mitigation actions on the land that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm Environment Plan either associated with a resource consent, or in specific requirements established by participation in a Certified Industry Scheme; and
- b. Requiring the same level of rigour in developing, monitoring and auditing of mitigation actions on the land that is set out in a Farm Environment Plan, whether it is established with a resource consent or through Certified Industry Schemes; and
- c. Establishing a Nitrogen Reference Point for the property or enterprise; and
- d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and
- e. Requiring stock exclusion to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026.

Questions/comments:

- 1. Paragraph "b" above clearly states that there will a level of rigour involved in the development, monitoring and auditing the FEP. This is a fundamental requirement if the FEP are to be completed and it is the cost of the annual monitoring and auditing the FEP that is of concern. It is estimated that WRC will need to employ approximately 30 full time farm management consultants all requiring vehicles and administrative support staff*
- 2. The establishment of the Nitrogen Reference Point with an inaccurate computer model is unfair on the farmers and the community.*
- 3. It might also be questioned how the WRC is referencing the phosphate leaching that I, according to the Plan Change 1" is of equal polluting status of nitrogen, sediment and e-coli.*

Policy 6: Restricting land use change

Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted.

Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted.

Questions/Comments:

- 1. The change in land use is unclear, other than FEP reports that appear to provide data to reference maximum stock numbers. Is a change where a farmer has additional improved land and seeks to increase stock numbers a change in land use? Is the establishment of a covered feed-pad on a dairy farm and intensification of land use? Increased productivity and evolving management systems have always part of the innovative New Zealand farmer.*
- 2. The requirement for the land use changes demonstrate an enduring decrease in existing discharges is too open-ended as there are no minimum targets –a zero discharge is not practicable.*

3.11.4.2 Certified Industry Scheme

Waikato Regional Council will develop an industry certification process for industry bodies as per the standards outlined in **Schedule 2**.

The Certified Industry Scheme will include formal agreements between parties. Agreements will include:

- Provision for management of the Certified Industry Schemes;
- Oversight, and monitoring of Farm Environment Plans;
- Information sharing;
- Aggregate reporting on Certified Industry Scheme implementation; and
- Consistency across the various Certified Industry Schemes.

Questions/comments:

- 1. The preparation of the FEP as per Schedule 1 and the Certified Industry Scheme together with the Auditors capable of interpreting the data requires specialist people who understand the whole science of farming and the interaction of management systems. I am of the opinion*



that the personnel who developed the policy had little concept of the technical analysis that is required if the FEP are to be considered a useful tool in managing and improving the rivers swimmable status.

2. *Federated Farmers commissioned a report and its general conclusion was that it would cost between \$4,000 and \$5,000 to prepare a FEP, a Certified Industry Scheme would be additional and the Auditing and oversight of both the FEP and the Certified Industry Scheme will incur additional costs.*

3.11.4.3 Farm Environment Plans

Waikato Regional Council will prepare parameters and minimum requirements for the development of a certification process for professionals to develop, certify and monitor Farm Environment Plans in a consistent approach across the region.

A Farm Environment Plan will be prepared by a certified person as per the requirements outlined in Schedule 1, and will assess the risk of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens and specify actions to reduce those risks in order to bring about reductions in the discharges of those contaminants.

Waikato Regional Council will develop guidance for risk assessments, auditing and compiling Farm Environment Plans.

Waikato Regional Council will take a risk based approach to monitoring Farm Environment Plans, starting with more frequent monitoring and then moving to monitoring based on risk assessment.

Robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring will be required.

Questions/comments

1. *What independent body will be contracted to authorise suitable people to prepare the FEP and other plans including the Overseer assessments?*
2. *Has the WRC completed a cost assessment of the project? The cost assessment will include the numbers of professionals required to undertake the work and to carry out the annual monitoring.*

3.11.4.6 Funding and implementation

Waikato Regional Council will:

- a. Provide staff resources and leadership within the organisation for the implementation of Chapter 3.11.
- b. Seek to secure funding for the implementation of Chapter 3.11 through the annual plan and long term plan processes.

Questions/Comments:

1. *There are various comments and questions in the above sections relating to staff numbers and the likely cost.*
2. *Has the rating base been informed of the cost and the effect of the bureaucracy on the annual rates.*
3. *To manage the FEP and have them as meaningful plans the level of audit and monitor will be high.*



Conclusion:

The development and the management of the Farm Environmental Plans and the Certified Industry Schemes is an unsustainable business.

The WRC and the planners have failed to consider the magnitude of the bureaucracy required to develop and manage the processes.

There is thought to be in excess of 11,000 properties in the catchment areas that will require plans, annual monitoring and auditing.

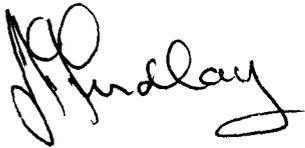
The details required will limit productivity growth in the region.

I am of the opinion that the farming community have, over the last 25 years in particular, have taken a responsible approach towards improving the environment and with some further encouragement and modern reporting systems within the dairy industry will further understand their role.

The creation of a bureaucracy that has the power to control farm systems is not warranted.

Alternative recommendation:

Continue to work with the farming community to develop best farm practice activities in their business.



A handwritten signature in black ink, appearing to read 'J. Mulvey'. The signature is written in a cursive style with a large initial 'J' and a long horizontal stroke at the end. Below the signature is a solid horizontal line.

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

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Signature: 

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Submission

Decision Sought

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Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1 (Continue on separate sheet(s) if necessary).

Schedule "B" - Nitrogen Reference Point.
Sub paragraphs: "a" to "g"

Table 1: Data input methodology for ensuring consistency of Nitrogen Reference Point data using the Overseer[®] Model.

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(Select as appropriate and continue on separate sheet(s) if necessary).

- Support the above provisions
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See attached.

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WRC Submission – Plan Change 1.

Schedule B – Nitrogen Reference Point.

I submit that the establishment of a Nitrogen Reference Point using the Overseer® programme is wrong and no reference point should be recorded for use at all, or at least, until a reliable accurate transparent measure is established.

Plan No 1 recommendation	Comments to support my submission
A property or enterprise with a cumulative area greater than 20 hectares (or any property or enterprise used for commercial vegetable production) must have a Nitrogen Reference Point (NRP) calculated as follows:	There is no consistency in recorded NRP between properties and between professionals trained in the use of Overseer. Overseer relies on assumptions that have been developed from other assumptions with estimates and a few facts relating to location.
a. The Nitrogen Reference Point must be calculated by a Certified Farm Nutrient Advisor to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined through the Rule 3.11.5.7 consent process.	As a farm consultant I have prepared a number of Overseer reports. To complete the programme accurately a detailed knowledge of the farm and the management systems are required. I am aware that the fertiliser companies and the Fonterra field representatives often complete the reports with limited knowledge of the farms specifics. The output variation in results can be up to 30%. Even with detailed farm data the outputs are a guide only.
b. The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period specified in clause f), except for commercial vegetable production in which case the Nitrogen Reference Point shall be the average annual nitrogen leaching loss during the reference period.	I cannot understand this paragraph as it suggests that an Overseer calculation is completed monthly. The Nitrogen leaching factor can vary during the year.
c. The Nitrogen Reference Point must be calculated using the current version of the OVERSEER® Model (or any other model approved by the Chief Executive of the Waikato Regional Council).	Overseer was not developed for this purpose. We have not been provided with any alternative models and I do not believe there are any alternatives.
d. The Nitrogen Reference Point data shall comprise the electronic output file from the OVERSEER® or other approved model, and where the OVERSEER® Model is used, it must be calculated using the OVERSEER® Best Practice Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B Table 1.	Again, Overseer is a model that is continually updated as they attempt to refine the assumptions. I am concerned that there is a suggestion to use the "Standard Data" in schedule B. The use of standard data such as standard livestock weights and general soil type information from the 1:50,000 soil maps. The use of general standard data will only add to the inaccuracy.
e. The Nitrogen Reference Point and the Nitrogen Reference Point data must be provided to Waikato Regional Council within the period 1 September 2018 to 31 March 2019.	Does the WRC have sufficient qualified staff to receive and analyse the data for its accuracy and its outcomes??
f. The reference period is the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable production	The use of the 2014/15 & 2015/16 years as benchmarks will add to the distortion of the results as they were the two years of low milk payout and the

in which case the reference period is 1 July 2006 to 30 June 2016.	farm inputs verses outputs were generally out of line.
<p>g. The following records (where relevant to the land use undertaken on the property or enterprise) must be retained and provided to Waikato Regional Council at its request:</p> <ul style="list-style-type: none"> i. Stock numbers as recorded in annual accounts together with stock sale and purchase invoices; ii. Dairy production data; iii. Invoices for fertiliser applied to the land; iv. Invoices for feed supplements sold or purchased; v. Water use records for irrigation (to be averaged over 3 years or longer) in order to determine irrigation application rates; vi. Crops grown on the land; and vii. Horticulture crop diaries and NZGAP records. 	<p>Will the WRC have a suitable qualified bureaucracy to interpret the data requested against the NRP?</p> <p>The data required could be considered irrelevant as the stock sale/purchase invoices do not always identify breed, animal weights and type.</p> <p>Dairy production data is general it does not state what is required – fat, protein, MU's, SCC etc.</p> <p>Fertiliser invoices will be of use if the analysts understand the interaction of the elements applied in relation to the soil fertility status at the time.</p> <p>Different crops have different nutrient requirements and have different effects on the nutritional and production effect in an animal and then the animals production of excess nitrogen in urine etc.</p>
Table 1: Data input methodology	This is wrong if the Overseer programme is to have any credibility.

Conclusion:

The use of a nutrient management programme based on assumptions is not considered accurate to determine a farmers operation and long-term business objectives.

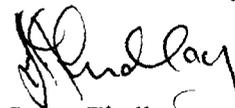
The requirement for additional data to support the NRP requires trained agricultural professionals to interpret the information. OTHERWISE the information provided and the data collected is just a bureaucratic waste of time and effort.

The professional rural consultants required to interpret the data annually would total at least 30.

The Nitrogen Reference Point must be removed from the plan

An alternative recommendation:

Continue to work with the farming community to develop best farm practice activities in their business. Encouragement and involvement has more positive effects than bureaucratic controls.



James Findlay
Farm Management Consultant.

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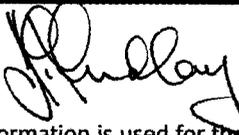
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