

**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
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Complete the following

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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.

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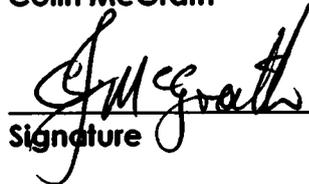
I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

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Jenene McGrath


Signature _____ date 8/03/17

Colin McGrath


Signature _____ date 7/3/17

Karen McGrath


Signature _____ date 7.3.17

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.

I am a deer, sheep and beef cattle farmer, in the Ohaaki sub-catchment. My husband (Les Carrington) and I purchased the 23.5ha property at 753 Oruanui Road, Taupo in February 2007. We now have been farming the property for 10 years.

Prior to February 2007, my brother Colin and I owned and farmed a 27.5ha property at 259 Tuhingamata Road Taupo. Colin and his wife Karen purchased my share in February 2007. This property has been owned and farmed by family members since December 1988 (28 years). This property is also in the Ohaaki sub-catchment.

We also have an interest in the family farm, a 186.7 ha property at 1281 Mapara Road, Taupo, which according to the map is also in the Ohaaki sub-catchment, although a third of the property is in the Taupo catchment. It appears that the boundaries have not been clearly defined, and some clarification is required.

The family have been farming the Mapara Road property for 51 years, my brothers and I have been farming the property for the last eight years. Over the years, livestock options have changed, originally sheep and beef cows, then sheep and bull beef fattening, then sheep and dairy heifers, then sheep and winter dairy cows, and lastly sheep and deer breeding. Farming will continue to evolve and change due to differing reasons. The first change was the result of a severe drought the beef breeding cows were sold, the second was behaviour issues with the bulls, and lastly deer replaced the dairy cattle due to the Lake Taupo catchment issues. With a desire to reduce the environmental footprint breeding hinds were moved onto the farm in the 1997/1998 year. This was a proactive decision to do the right thing and as the benchmarking occurred after the start of the transition to deer farming and the reduction in cattle, the result was a low nitrogen discharge allowance of 14 kgs/ha.

The property was benchmarked in the period 2001- 2005 years using Overseer version 5.4.3 with the greatest discharge for the entire property at 2,594 kg or 14 kgs/ha. Using the same model the total nitrogen discharge for the property for the 2015/2016 year is 1,700 kgs or 9kgs/ha.

The reasons the nitrogen discharge is low are due to many factors including the following:

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- **Our father died in September 2010 and two of my brothers and I took over the running of the farm. We all have regular day jobs so the farm operation has been less intensive. We have reinvested the income generated back into farm improvements such as fencing, fertiliser, cropping and re-grassing paddocks as well as building and yard repairs.**
- **The climate has not been kind; we have had a series of droughts:
2009/2010 had a significant autumn drought or prolonged dry period continuing into May.
2010/2011 had a significant spring – summer drought or prolonged dry period from October to January.
2011/2012 was a good season, but livestock numbers and production was affected by the previous droughts.
2012/2013 was one of the most severe droughts in at least 40 years, and in some areas 70 years.
2013/2014 had a significant drought or dry period, and livestock performance was affected by the previous year's drought.
2014/2015 again had an autumn drought or dry period which again affected livestock performance.
2015/2016 a severe El Nino weather pattern was predicted in September 2015. Another drought was the last thing we needed. Due to the previous droughts, in the autumn of 2015 we decided not to mate our older hinds and to cull them in the spring, dropping stock numbers. Also due to the previous drought the fawning was well down on expected (239 fawns compared to 320 this year) a 25% reduction on expected. The lambing percentage was also well down just 50% of the 2016/2017 result. As a drought was forecast prudent management dictated that no additional stock be acquired to offset the shortfall.**
- **The other reason for the drop in nitrogen discharge is that deer have a significantly lower nitrogen emissions than other livestock.**

I have processed the 2015/2016 data through the latest version of Overseer and the annual nitrogen discharge is 4,160kgs. This is a huge difference to the 1700 kgs, using the same data as calculated on the older 5.4.3 model; on a per hectare basis it is 22 kgs/ha compared with 9kgs/ha.

If a new “Nitrogen Reference Point” is established for this property based on the 2014/2015 or 2015/2016 years the future farming profitability of the property will be a disaster. For example, the 2016/2017 budget on Overseer version 5.4.3 estimates the nitrogen discharge will be 2085 kgs, or 11kgs/ha. At an increase of 2Kgs/ha we would be at least 10% above our Nitrogen reference point but I would expect it would be greater if the data was processed through the latest version of Overseer. This would be a problem as we need to be farming at this production level, (90% fawning and 145% lambing) to be profitable long-term.



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With reference to the Lake Taupo catchment, our nitrogen reference point of 14kgs/ha is on the low side; most of the dry stock farms range from 16 to 22 kgs/ha.

The major problem with establishing a nitrogen reference point property by property is; Farmers who have proactively put good measures in place – selected low nitrogen leaching livestock options – so they can farm to a low nitrogen leaching level and a low environmental footprint – find themselves penalised for doing the right thing. Meanwhile, high-emitting land users are effectively rewarded, and will continue to be rewarded.

If Overseer is to be used as a monitoring tool: I would suggest that the Nitrogen Reference Point is the same for all dry stock properties. It would have to be set at a level that is achievable, and would create a level playing field, rather than different levels for different properties. Similarly, dairy farms should have the same reference point for all dairy farms.

The other major downside to individual nitrogen reference points is that the Overseer model is constantly changing and being improved as scientific results become recognised. This means to compare reference point data with monitoring data on the latest version, the reference point data would have to be updated every time a change was made to the Overseer model. It would be much simpler to have one reference point for dry stock farming and another for dairy farming.

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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
<p>Provision 3.11.5.4 Controlled Activity Rule</p>	<p>I Oppose the whole of this section</p>	<p>The reasons for this are:</p> <ul style="list-style-type: none"> • This proposal will impose significant costs on my farming activities for little benefit, to the waterways. • The costs associated with paying for the preparation of a nitrogen reference point and preparation of a Farm Environment Plan. These costs would have no benefit to the farming operation and little benefit if any to addressing the issues with the Waikato River. • The results of the NRP will be low due to the drought in the 2014/2015 year and also prior years. 	<p>I seek that the provision is: Deleted in its entirety / amended as set out below</p> <p>As an alternative I propose</p> <p>Properties without water bodies should not be required to prepare Farm Environment Plans</p> <p>We would propose that the nitrogen reference point and associated monitoring be removed.</p>

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		<ul style="list-style-type: none"> • The results of the NRP will be low as deer have a low environmental footprint compared with beef cattle. • Nitrogen leaching from the property for the 2016/2017 year will exceed the NRP purely due to a decent natural increase from both the breeding ewes and hinds as a result of the prior season 2015/2016 not being affected by drought. • The properties have no waterbodies. • I oppose the need to place controls on properties with no waterways. From reading the articles in the papers presented by such as Dr Doug 	<p>The nitrogen reference point, (if it is required at all), be calculated by consultation with industry bodies such as beef & Lamb, Federated Farmers, Deer Industry NZ and Dairy NZ at levels for Dairy farming and dry stock farming. These levels must be practical and achievable, based on good farming practices in each sector. These will need to be adjusted for changes in Overseer as changes are made to the model.</p>

JRM

[Signature]

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		<p>Edmeads, it appears that nitrogen is not a major issue in the Waikato River catchment. Therefore placing restrictions on livestock farming that this plan dictates, will create compliance costs associated with processing data through the Overseer model and will have no direct link with improving the water quality in the river.</p> <ul style="list-style-type: none"> • However, properties with waterways should be required to complete Farm environment plans to identify improvements to the management of waterways on their properties. 	

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Provision Schedule 1: Farm Environment Plan	I oppose	<p>The reasons for this are:</p> <p>I oppose the requirement for Farm Environment Plans to be prepared for properties with no waterways.</p> <p>Cultivation of slopes greater than 15 degrees. I believe 15 degrees is an extremely low standard. You can drive non 4 wheel drive vehicles around slopes a lot steeper than 15 degrees.</p>	<p>Remove the need for farm environment plans for properties with no waterways.</p> <p>The section 2(f) A description of cultivation management, including:</p> <p><u>needs to be changed to</u></p>

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		<p>Cultivation of only slopes less than 15 degrees would be impossible as even our relatively gentle rolling paddocks have slopes greater than 15 degrees. We have not had any issues with sediment run off from cultivation on slopes around the 25 degree mark.</p> <p>Some advisors may suggest that you can use direct drilling of seed and other no-tillage practices. We have tried these options and the results are unsatisfactory, with unwanted brown top back dominating the pasture. It also does not remove old bull holes etc.</p>	<p>A description of cultivation management of properties with waterways, including:</p> <p align="center">Or</p> <p>A description of cultivation management for cultivation within 50 metres of a waterway, including:</p>

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<p>Schedule B: Nitrogen Reference point</p>	<p>I oppose</p>	<p>The results of the NRP will be low due to the drought in the 2014/2015 year and also prior years.</p> <p>The results of the NRP will be low as deer have a low environmental footprint compared with beef cattle.</p> <p>Nitrogen leaching from the property for the 2016/2017 year will exceed the NRP purely due to a decent natural increase from both the breeding ewes and hinds as a result of the prior season 2015/2016 not being affected by drought.</p> <p>I oppose the requirement that the Nitrogen Reference point must be</p>	<p>I would suggest that the nitrogen reference point and associated monitoring be removed.</p> <p>The nitrogen reference point if required, be set by consultation with industry bodies such as beef & Lamb, Federated Farmers, Deer Industry NZ and Dairy NZ at levels for Dairy farming and dry stock farming. These levels must be practical and achievable, based on good farming practices in each sector. These will need to be adjusted for changes in</p>



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		<p>calculated by a Certified Farm Nutrient Advisor. Many farmers have agricultural and other qualifications and with training would be able to enter the required data into the Overseer model. The farmers are going to have to collect this data and present it to an “advisor” the option should be available to complete the data entry.</p> <p>Currently for the Lake Taupo catchment, I prepare a budget plan through Overseer version 5.4.3 which is given to Waikato Regional Council, I periodically, about every 4 months, replace budgeted data with actual data so I know the result before the year is complete. I would suggest that this is</p>	<p>Overseer as changes are made to the model.</p> <p>The requirement to use a certified farm nutrient advisor needs to be removed.</p>

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		<p>the only way for farmers to stay under the nitrogen reference point over a period of time.</p> <ul style="list-style-type: none"> • Farmers need to be able to process their own data into the model. They may need assistance and training to start with. • Farmers need the flexibility to change livestock options. We would like to increase beef cattle finishing numbers. We will be able to do this once we have more new grass paddocks established. • We may need to increase beef cattle numbers to deal with issues such as internal parasites resistance. We are 	




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		<p>currently having to drench at high dosage rates, as recommended by research under taken by Deer Industry New Zealand, to effectively deal with internal parasites. It is a significant issue.</p> <ul style="list-style-type: none"> • As we age we may find the deer more difficult to farm and need to look to beef cattle to replace deer. The nitrogen reference point needs to be high enough to allow changes in livestock classes. • It would be crazy if a farmer had to sell a sheep and deer farm and buy another farm so a change in livestock mix could be made. Which is exactly what 	

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		<p>individual property nitrogen reference points will make happen.</p>	
<p>3.11.5.2 Permitted activity Rule</p>	<p>I Oppose</p>	<ul style="list-style-type: none"> • Currently all farming is a permitted activity. • The proposed changes put significant restrictions on farming properties. • From the information sent out by the Waikato Regional Council, most of the small farm property owners in my area read the pamphlet and said <u>“this does not concern us as we do not have waterways”</u> there was no mention of the other compliance matters. 	<ul style="list-style-type: none"> • ALL properties <u>without waterways</u> be a permitted activity. • A separate set of rules needs to be drafted for properties with no waterways. • The need for nitrogen reference points be removed. • The maximum discharge of 15kgs of nitrogen/ ha/year be removed.




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		<ul style="list-style-type: none"> • Grazing of crops in situ, is current practice on many farms. If there are no waterways adjacent to the winter crop there will be no runoff issues to deal with in a Farm Environment plan. • Restrictions on stocking rate to no greater than the stocking rate of the land at 22nd October 2016. This is extremely controlling for small blocks, many of which will have low stocking rates. This restriction is unnecessary. • A maximum of 15kg nitrogen/hectare/year be removed. 15kg/hectare/year would be reasonable for many properties if the Overseer 	<ul style="list-style-type: none"> • Removal of the requirement to provide livestock, fertiliser and feed data annually to Waikato Regional Council. • Removal of restrictions on stocking rates for properties under 20ha. • Removal of the “<u>no winter forage crops are grazed in situ</u>” for properties without waterways. • Removal of “<u>no part of the property over 15 degrees slope is cultivated or grazed</u>”, for

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Other Issues		<p>model was 5.4.3, but not for the current version of overseer.</p> <ul style="list-style-type: none"> • The boundaries are not clearly defined. The integrated map that the Waikato Regional Council directs inquiries to includes properties that are 95% in the Taupo Catchment. • What is being done about the non-farming issues? Headlines in the Taupo Times 17th February 2017 "<u>in the 2015/2016 year we had five spills into our waterways due to blockages or breaks and four since July 2016</u>" This is just Taupo. 	<p>properties with no water ways.</p> <ul style="list-style-type: none"> • Boundaries be clearly defined • Non farming issues be dealt with.

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		<ul style="list-style-type: none"> • We support the development of a sub catchment approach as proposed by Farmers for Positive Change. • The withdrawal of a significant portion of the lower catchment, brings into question the process so far. 	<ul style="list-style-type: none"> • Put the plan change on hold, so that it can be developed further. • Including rules for properties that do not have waterways.

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Yours sincerely

Jenene McGrath


Signature _____ Date 8/03/17

Colin McGrath


Signature _____ Date 7/3/17

Karen McGrath


Signature _____ Date 7.3.17