
HEALTHY RIVERS SUBMISSION FOR J B FYERS LIMITED

SUBMISSION FORM:

This submission is 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

OWNERS DETAILS

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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.

Signature:

Date:

BRIEF DESCRIPTION

We are sheep and beef farmers in the northern Waikato. The majority of the farm is hill country (2nd rate land) with multiple streams running through the property. We have a majority of breeding sheep but also have breeding cattle. All streams on the property run into the Maire stream catchment, we are on the border of the priority 1 catchment and believe our water to have a high quality.

PROVISIONS THAT AFFECT OUR BUSINESS

We agree that cleaning the waterways is beneficial to the environment. But we believe our water is of high quality standard due to the difficulty of stock getting in the water bodies. We agree with the majority of the policies and implementations put forward in this Plan However some are illogical and would be detrimental to the environment. The following provisions we believe to be unnecessary due to our high quality of water.

Provisions: Schedule 1. Schedule C

These provisions involve stock exclusion from bodies of water through stock exclusion. I oppose this provision due to the following reasons:

- No current water reticulation systems in place on the farm. The farm relies heavily on the streams to provide water to the stock in all paddocks, implementing a water reticulation system would have large capital costs and constant operating costs that are not currently feasible for us.
- The land is hill country making fencing inconvenient/impossible in places. Land would have to be modified to allow fences causing detrimental environmental effects from sediment in the water ways from falling debris from the modified land.
- Due to the large number of streams a lot of fencing is required in difficult areas to fence this will mean a large capital cost to the farm and ongoing maintenance costs throughout the farms lifespan. Being relatively new farm owners these cost are economically unfeasible.
- Also the time frame in which the fencing has to be implemented by is too short. Due to the large number of waterways a lot of fencing is required and due to the large expenses a lot of fencing progress will not be possible within this time frame.

We believe this provision should be scrapped due to it being unfeasible economically for us at this point. If it is not to be scrapped then alterations may be required to be made to the provision. Possibly setting a stocking rate limit, to reduce the intensity of stocking around waterways. Or reducing the angle of fencing as the current 25°

Provisions: Schedule B Nitrogen Reference point

This provision requires farmers to have a calculated nitrogen reference point

- We believe that Nitrogen and Phosphorus levels are low in our streams and therefore is not an issue.
- The required on going test are additional costs which are not necessary for our water ways.
- The reference period is arbitrary and not a fair representation of the farms.
- There will be a high demand and limited supply of Certified Farm Nutrient Advisors which is likely to further increase costs, to get the initial Nitrogen Reference Point certified before March 2019.

We believe that the Nitrogen reference point is only required in waterways where high nitrogen and phosphorus is an issue otherwise it is a lot of wasted time and money. So for our waterways we believe schedule B should be deleted.

Provisions: 3.11.5.4 Schedule 1 Farm environment plan

These provisions involve the creation of a farm plan to be made

We oppose these provisions for the following reasons:

- The blanket requirement to exclude livestock (3).
- Grandparenting of the Nitrogen Reference Point as it allows existing high discharge rates to continue and limits the flexibility of other options, which may have low emission rates. This rewards existing polluters.
- The length of the Resource Consent needs to be long enough to ensure the financial costs of complying can be spread over a sustainable period of time to provide certainty for the capital investment required and to maintain land values through the confidence that the farming activity is able to continue long term.
- This will incur a large cost which will not be paid off for many decades.

Resource consents should be and the cost they will incur need to be investigated before this is put forward to farmers

Provisions: 3.11.5.1, small and low intensity farming activities

We oppose this provision due to the following reason:

- The blanket requirement to exclude livestock (2) our cattle amount is usually small with a low stocking rate and we have high water quality therefore deem exclusion unnecessary.

We believe exclusion is unnecessary due to the water quality already being high with no stock exclusion.

Provisions: 3.11.5.2 extensive operators permitted

We oppose this provision due to the following reasons:

- As previously stated the fencing of all waterways on this property is simply not viable due to the contour of the land. Land changes will need to be made which would be detrimental to the environment.
- The date for clause 3 is arbitrary and should not be used. Farmers were not aware of this date and the farm may have been under utilized for many reasons (drought, old age). This will affect the resale of the farm as it controls what the future owners have to do.
- We oppose clause 4(b) as it allows existing high discharge rates to continue if they have been set as part of the Nitrogen Reference Point. This rewards existing polluters.
- We oppose clause 4(c) no cultivating/grazing land over 15 degrees as the majority of this farm exceeds this slope and there is no scientific evidence of grazing on this land affecting water quality in this sub- catchment.

Suitable nitrogen discharge rates should be set depending on the sub catchments taking into account existing nitrogen levels and improvements required for the sub catchment (appropriate scientific calculations will need to be made for discharge rates). Clauses 3 and 4 (c) should be scrapped as no evidence

Provisions: Policy 4

Setting activities to continue with lower discharge or further change in the future to discharge being required. We oppose this policy for the following reasons:

- We believe that the discharge in our waterways has always been of a high quality due to the lack of koi carp present and low stocking rates.
- The uncertainty around the future plans of healthy rivers is worrying. The plan needs to be properly created so investments can be properly made, rather than in the future having to sacrifice land to turn into forestry.

We want this policy scrapped as it is very ambiguous. If nitrogen levels have to be lowered this may mean land taken out of action by conversion to forestry. This will lower the farm value and decrease income. If investments for improvement are required, it is desired that the future of that investment is certain and will not be changed in the future.

Provisions: 3.11.5.7-

We oppose this provision due to the following reason:

- This greatly devalues the property by impeding change of use of land, changing stock/stocking rates is necessary to allow the farm to be profitable in the future. For example if it is no longer profitable to farm sheep on hill country the farm dynamics will have to change either with changing stock rates or farming a completely new animal

We move that this provision be scrapped