

# 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	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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

SUBMISSIONS CAN BE	
<b>Mailed to</b>	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
<b>Delivered to</b>	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
<b>Faxed to</b>	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy also</i>
<b>Emailed to</b>	<a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a> <i>Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.</i>
<b>Online at</b>	<a href="http://www.waikatoregion.govt.nz/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>
<b>We need to receive your submission by 5pm, 8 March 2017.</b>	

YOUR NAME AND CONTACT DETAILS		
Full name: Jos van Loon		
Full address: 693 Huihuitaha Rd RD1 PUTARURU 3481		
Email <a href="mailto:Jos@deltafarms.co.nz">Jos@deltafarms.co.nz</a>	Phone 07-8835610	Mob. 027-2725776

ADDRESS FOR SERVICE OF SUBMITTER		
Full name: As above		
Address for service of person making submission		
Email	Phone	Fax

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
<input checked="" type="checkbox"/> I wish to speak at the hearing in support of my submissions.
<input type="checkbox"/> 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**

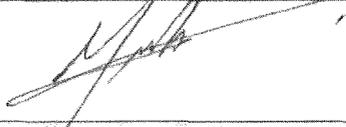
**OF**

**SUBMITTER**

*(or person authorised to sign on behalf of submitter)*

*Signature is not required if you make your submission by electronic means.*

Signature



Date 06-03-2017

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

I own together with my wife a 300 Ha dairy farm milking 1050 cows and it also carries 60 bulls. We also own a 50 ha support block which supplies maize silage to the dairy farm and provides winter grazing and grass silage. We have a split calving herd on this farm. I will refer to this farm as the Delta Farm. Furthermore we own with our 4 children and one of their partners a 75 Ha dairy farm which milks 270 cows. There is a conventional spring calving herd on this farm. I will refer to this farm as the Kinlac farm.

It would be fair to say that we are profitable farmers operating in the top quartile financially. Our farming system is best classified as a 'intensive' system 5. Intensive is a word often easily used and one I don't use myself very often. We pride ourselves on our effluent systems and our approach to farming. For this we have invested in effluent storage and application systems \$650,000 on the Delta farm and \$ 250,000 on the Kinlac farm. Our usage of solid traditional fertilizers have gone down by approximately 50-60 %. Basically, nutrients in manure are captured well, are plentiful because of the more intensive system and are spread extremely effectively in the growing season after being stored in the less favourable months when you take soil and plant growth into consideration. For that we have invested heavily in storage systems. The outcome of this all is that on the Delta farm we are leaching about 32 kg N per ha and on the Kinlac farm 26 kg N per HA.

This Kinlac farm was purchased in 2013 and we made the capital expansion in the 2014-15 season. The N reference is taken in the year after we made the commitment to invest another \$950,000 in new facilities over and above the \$250,000 mentioned above. This is massive for a small farm. This capital was spent on a new cowshed, covered feedpad and concrete silage storage. We are really committed here. Our 4 children have all money invested in this farm and 2 of them have borrowed large amounts of money to invest in here.

My concern is with the grant parenting of the 26 Kg N per ha. A 75 ha dairy farm would not be easy to sell at the moment. With our capital spent it would even be harder. But with a low figure of 26 kg N per ha it would be impossible to sell. Had we chosen to pile on the Nitrogen in the form of urea, it possibly would have had a N reference of 50 + per ha, it would be a different story. Than this farm would still sell on the market. Why are we being disadvantaged by being so environmentally sustainable in our farming systems?

Our strategy is to take the farm from the 2014-15 season producing about 80.000 kg milksolids to a farm producing 125.000 kg milksolids. In the 2017-18 season. This season(16/17) we will produce about 115.000 kg Milksolids. This makes sense and this level is needed to get an acceptable return for the investments made. Now our N reference may well come out a little higher than 26 in the next few years. What will happen than? Are we than illegal and forced on the 5 year average rule to bring us back to 26?

A solution for us would be:

- Some breathing space is needed for the farms that have been leading the environmental issues.
- Bigger and faster gains should be expected from farmers on the top end of the scale in terms of N leaching.
- Farms like Kinlac who have invested in a clear farming change need new reference years that truly reflect the status quo position for the 'new' situation. The 26 Kg N reference may or may not be a true reflection of what is taking place. It is a reference taken at the start of a system change to which we were financially committed.

I want to make it clear that we are in this for the long term and are happy with our farming system at the moment. We are proud of the low levels of leaching achieved and we believe we can stay low. But there simply is no breathing space and this is a real risk to the business.

In the future, I plan to step back from actively farming our businesses and this coming season will see our oldest daughter Fiona enter the business. While we are operating at the prime of our life, the new generation will only learn by making mistakes and learning of them and improving their skills that way. In the meantime this would most likely have a negative impact on financial performance but also on the environmental performance because the N leaching is heavily related to the production sent out the gate. Once again no breathing space at all for us.

I wish to be heard at the Hearing.

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
	Schedule B. Nitrogen reference point	Oppose	Developing farms should not be restricted to a N reference of being the highest of the 2 years specified. I suggest the N reference is the highest of a 5 year period.	As described above large financial decisions were made, and our farm is a developing farm.
	Schedule B. Nitrogen reference point	Oppose	The 2 year period is too short for any farm. This needs to be extended to 3 or 4 years for a status quo farm.	A lot happened climate wise and payout wise in the years available to us for a N reference. Unlikely those years are a true reflection of what is taking place in reality.
	Policy 3.11.5.4 Matters of control iii	Oppose	Farmers with N reference point in the bottom quartile should be able to fluctuate by 5 Kgs N upwards. Say you are 26 N reference, then up to 31 is still a very acceptable outcome.	Farms that have already made changes to their farming practices over the last 10 years and are now handed out a low N reference point. We have no idea if they now go over on a 5 year rolling average what will happen to the business. Why do farmers who have been practising best practise over the last 10 years need to be restricted more than people in the middle or even upper quartiles.
	Policy 3.11.5.4 Matters of control iv	Oppose	Farmers with a very high reference point in the upper quartile shouldn't be given till 1 July 2026. I suggest 1 July 2020.	We currently have all the tools in the toolbox to make the decisions on farm to have a real impact on the N leaching on the high farms. Why punish the leaders in best practise in the industry by delaying decisions for the farmers not following best practise. I feel punished myself now for having done the right thing.