

# 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 <b>Please Note:</b> if you fax your submission, please post or deliver a copy also
<b>Emailed to</b>	<a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a> <b>Please Note:</b> Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.
<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		
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ADDRESS FOR SERVICE OF SUBMITTER		
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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 <i>Kenny Thomas</i>	Date <i>7 March 2017</i>
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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**

My husband and I operate a sharemilking business on Graeme and Lyn Lawry's 135ha (effective) dairy farm in Ngahape. This farm milks a peak herd of 500 pedigree jersey cows with associated stud bulls. Replacement heifers are reared off farm. We are located within the Waipa at Pirongia Ngutunui Rd Br sub-catchment (43). The farm relies primarily on pasture based production supplemented with palm kernel expeller, high quality hay and on farm grass-silage. Three full time staff members are employed on farm, along with additional labour during calving and contractors as required. This farm directly supports 4 families (8 adults and 8 children) as their primary source of income.

Sharemilking and contract milking arrangements with farm owners are variable with respect to the financial risk in exchange for increase in day to day responsibilities and on farm investment. The usual progression of a person entering into the dairy farming industry is to begin at a worker level, progress through to manager, contract milker, variable order sharemilker, herd-owning sharemilker and then possibly farm owner. At various points more capital is invested, and the person is required to upskill in HR, finance, animal health and welfare, health and safety, food safety, environmental, mechanical and general maintenance capabilities. Changes/step ups in position and responsibility rarely occur without moving farms. Income is solely reliant on export market driven conditions. Finance from banks is largely driven by the numbers of cows that the operation manages. Because of their low asset base, sharemilkers are particularly vulnerable to market price shocks and compliance burdens.

As variable order sharemilkers with no family connections in the industry, we accept that our personal family operation will have to move location every few years as we progress through the industry. Therefore our submission is partially related to the property we currently farm, and also contains general comments which may relate to any farm we may end up in the Te Awamutu area in the future (next 5- 10 years).

The property we are currently farm is very likely to meet the proposed PC1 rules with minimal change. It has a low NRP compared with the neighbours, the waterways are fully fenced and the effluent disposal (whilst possibly due for an upgrade), meets current requirements. There are a number of springs on the farm, some of which are intermittent. The farm is rolling to flat with approximately 10% steep sidlings (~13ha if counting whole paddocks). No pasture renewal programme currently takes place, therefore no cultivation. Raceway runoff may require some mitigating steps. A certified industry scheme would be the favoured approach for this farm.

However, we have some concerns with the proposed new rules.

The rules lock the farm into the current low input production model and does not allow for any possible adaptation to meet future potential market demands or the impending succession plans. For example, if palm kernel expeller was to be removed as a feed source, summer or winter cropping, pasture renewal, and other feed sources will need to be identified and utilised. Failure to be able to do so or to endure a costly, complicated resource consent process will most likely significantly impact on the economic viability of the farming operation and employment of the 4 families we support. The new farm owner (son) has had experience on other dairy farms around NZ and will very likely want to try a few innovations in the near future.

Due to this succession plan, it is unlikely we as sharemilkers will remain on this property for more than a further year or so. This will mean moving to another farming operation which will have different challenges and benefits. Some of the previous farms we have moved too, have experienced prior neglect and /or inefficient operating practices which are affecting the farm's profitability and viability. If the NRP was calculated during these timeframes, the ability of our business to return the farm to past production levels or even improve beyond, may be curtailed and this will impact significantly on our financial viability. Further if it is revealed that a farm that we just moved to is required to reduce the NRP within a 1 year timeframe (should we move to a priority area 1 catchment, and for whatever reason the farm is considered to be above the 75<sup>th</sup> percentile for that FMU), this would significantly impact on our ability to adapt and maintain operations. The imperative to comply with rapid changes and heavy restrictions on normal farming activities appears to

be particularly unwieldy, bureaucratic and invasive particularly if no basis has been adequately demonstrated by science. Sharemilkers are particularly vulnerable to these rapid changes.

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 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
40	<b>Rule 3.11.5.2</b> Permitted Activity Rule – Other farming activities	<b>Support in general</b>	Please make clear how are other point source emitters which do not have large acreage captured in the plan.	As a general rule of thumb, this is good. But are intensive small area (<20ha) operations such as wholesale plant nurseries which use large volumes of fertilisers and water being monitored too?
41	<b>Rule 3.11.5.3</b> Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	<b>OPPOSE</b>	Amend 3.11.5.3 as requested by Federated Farmers in their submission.	As a sharemilker, the timeframe for change is likely to be crippling as per my general comments.
42	<b>Rule 3.11.5.4</b> Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	<b>OPPOSE</b>	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	As a sharemilker, the timeframe for change is likely to be crippling as per my general comments.
44	<b>Rule 3.11.5.5</b> Controlled Activity Rule – Existing commercial vegetable production			I support the Federated Farmers position on commercial vegetable production.

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45	<b>Rule 3.11.5.7</b> Non-Complying Activity Rule – Land Use Change	<b>OPPOSE</b>	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	As a sharemilker, the timeframe for change is likely to be crippling as per my general comments.  I support the Federated Farmers position on allowing beef/sheep farmers to alter their stocking mix in response to market signals.
46	<b>Schedule A:</b> Registration with Waikato Regional Council			
47	<b>Schedule B:</b> Nitrogen Reference point	<b>OPPOSE</b>	Amend Schedule B as requested by Federated Farmers in their submission.	As a sharemilker, the timeframe for change is likely to be crippling as per my general comments  I support the Federated Farmers position on querying whether N is an issue in the Waikato/Waipā catchment if water quality data suggests that the lower Waikato has a rating of 'A'.
50	<b>Schedule C:</b> Stock Exclusion	<b>OPPOSE</b>	Amend Schedule C as requested by Federated Farmers in their submission.	As a sharemilker, the timeframe for change is likely to be crippling as per my general comments.  I support the Federated Farmers position on aligning with national guidelines. Where boggy areas on our current farm are fenced off the best of our ability, high rainfall events and fluctuations in water tables make this a moveable target. There are rare times this is not a practical option, and it is unfair to subject this situation to the strict liability laws of RMA/plan changes.

<b>Page No</b>	<b>Reference</b> (e.g. Policy, or Rule number)	<b>Support or Oppose</b>	<b>Decision sought</b> <b>Say what changes to Plan Change 1 you would like</b>	<b>Give Reasons</b>
51	<b>Schedule 1:</b> Requirements for Farm Environment Plans	<b>OPPOSE</b>	Amend Schedule 1 as requested by Federated Farmers in their submission.	As a sharemilker, the timeframe for change is likely to be crippling as per my general comments.  I support the Federated Farmers position on targeting controls at a sub catchment level.