

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.

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

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyivers@waikatoregion.govt.nz <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>
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	Mary-Ann Mathis		
Full address	6 Paraonui Road RD1 Tokoroa		
Email	matham@xtra.co.nz	Phone	078869493
		Fax	

ADDRESS FOR SERVICE OF SUBMITTER

Full name	Mary-Ann Mathis		
Address for service of person making submission	as above		
Email	matham@xtra.co.nz	Phone	078869493
		Fax	

TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)

/ X I could not gain an advantage in trade competition through this submission.

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SUBMISSION POINTS: General comments

I own a 105 ha dairy farm in the Upper Waikato Catchment currently milking about 300 cows. Our family has been here since 1965. Four families reside on the farm. It is located in the Pokaiwhenua catchment area.

I run the farm as a conventional spring calving farm. We are immediately adjacent Tokoroa town and work to maintain a sound relationship with our urban neighbours. Our most serious issue is that of ecoli contamination at our borehead (the farm is immediately downstream of the outlet for the Tokoroa sewerage plant into Whakauru Stream. The test results for 1994 and 2004 are attached (Appendix 1) For this reason we have a UV treatment system on our water supply for the dairy shed, the four houses on the property and the stock drinking water to prevent coliform outbreaks. (photo attached Appendix 2) This ensures safe water for our farm but has an on-going cost and maintenance requirement. Historically, our water has high levels of P and N due to its proximity to the sewerage works outflow and the shallow level of the water table.

The Whakauru Stream bordering our property has been fenced off for many years. There are no stock crossing points. Fencing the stream has been a done mainly for stock safety. However, the main issue with the stream now is the presence of grey willow and rubbish from town which is effectively altering the flow of the water. In recent years the Stream has started to seriously silt in some areas and undercut its banks in others. This has caused slumping of the stream banks and planting along the stream to collapse across it. The channelling of large amounts of stormwater from the town has exacerbated this process. (see Appendix 3 attached) We have cleared as much of the willow from the sides as we are able to and periodically ensure blackberry does not establish. Environment Waikato and the South Waikato District Council have both been informed of the concerns with the Stream and a team is coming from Environment Waikato next month to clear the willow from the Stream. Our contribution is to remove the waste and burn it. The trout which were present in the Stream a few years ago are now not there as a result of the poor quality of the water after it leaves the town.

Our Nitrogen use dropped in the past two years from 99 kg/ha/year to 57 kg/ha/year largely as a response to having a more favourable weather situation. The Nitrogen conversion efficiency rose from 31% to 36% according to Fonterra's Overseer modelling- largely as we did not grow a forage crop. This reduced the nitrogen leaching risk. Soil tests are done biennially and fertiliser applied as recommended.

This is a well-established dairy farm which has always aimed to improve the environment. Initially, the main focus was weed control and the removal of rubbish. A number of years ago an in-ground effluent system was put in to enable farm effluent to the pump from a sump to a travelling irrigator. This covers 33% of the farm. As a further backup \$42,292 was spent in 2013 to build an effluent pond to hold 3-6 months effluent. This is mainly used to hold water which is pumped onto pasture during summer.

We have an on-going tree planting programme growing many of our own trees and have planted areas subject to pugging in more robust pasture to minimise this. The farm is regularly used by school groups for farm-related activities and stock handling. It has been a Focus Farm for DairyPush and continues to be a monitoring farm. We have also worked with DairyNZ and AgFirst to develop a Sustainable Milk Plan.

Our stocking rate has been decreased as a result of several years of drought, a low milk payment response to reduce costs and due to the effect of a neospora outbreak which resulted in many cows aborting their calves. This is not sustainable financially and we will increase the stocking rate back to about 320 cows. The farm supports two staff and the owner. Decreasing the stocking rate will result in being unable to employ so many people.

In the future, I plan to continue to develop this farm using changes in technology and management practices to ensure the farm size remains viable. It is intended to retain the farm for the benefit of our extended family. Living so close to town, we need to ensure a good relationship with our urban neighbours. In order to continue to farm this land we need surety in consents and the rules imposed for a long period of time. We need to have flexibility in such things as stocking rates, growing crops for stock feed or sourcing outside feed when needed in order to cope with market demands and the vagaries of different seasons.

I am concerned about the following issues with PC1

- Grandparenting of stocking rates. If either 2014-15 or 2015-16 are used these dates are not a fair representation of the long-term stocking of this property due to weather, market return, stock health issues and mating performance over those times. I believe a fairer method to determine stocking rate would be a five year rolling average. There needs to be some flexibility to determine this level not to randomly pick two years. This farm would be particularly disadvantaged should the current proposal be accepted.
- Imposing extra costs on the property in terms of monitoring and reporting will affect our ability to be sustainable. For example, our current practice of soil tests biennially is effective as soil tests change very little over time. Being required to employ approved consultants will add another level of costly bureaucracy. We already gather much of the information required through Fonterra and this would be more realistic in practice.
- Setting N reference points and demanding a marked improvement over time is counterproductive when the property is already performing well in this area. A carrot and stick approach has always proven to be less successful in creating the changes desired than other methods.
- Setting a level for cultivation at 15° slope is impractical in rolling country.
- Demanding 5 wire fencing along waterways is expensive and impractical in terms of controlling weeds along the streambank. A better approach would be to follow the lead of the Dairy Accord with two wire fencing and its definition of what constitutes a waterway.
- Setting levels expected for improvement across the board is unrealistic. The property may already be performing well and so has less scope to show major change or it may be affected by other land users in the area such as the case with our proximity to the sewerage plant of the town.
- There needs to be a consistent policy platform across all contributors including the urban area.

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 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	Rule 3.11.5.2 Permitted Activity Rule – Other farming activities			
41	Rule 3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	OPPOSE	<p>Amend 3.11.5.3 as requested by Federated Farmers in their submission.</p> <p>Combine FEP with current requirements of Fonterra to stop duplication of bureaucracy costs. FEP accepted on merit- may be drawn up by number of people including farmer</p> <p>Make dates for FEP acceptance longer to allow time to research and verify</p> <p>Give flexibility to N reduction- too restrictive</p>	<p>This proposal will impose significant costs on my farming activities including The tight timeframe to collect and verify data, especially if FEP needs to be modified</p> <p>Needs to be flexibility with Overseer- it is a model only. Needs to allow for adverse weather events, major market issues etc. Having only registered FEP experts creates a climate for price hiking.</p> <p>Time needs to be allowed to meet N leaching limits- better to create a process of improvement over time which most farmers try to do anyway than imposing arbitrary levels which may be impossible or uneconomic to meet especially in this area where many farms are still in an early development phase. The ability for Environment Waikato to make an ad hoc change to the model is also of concern.</p> <p>I am also concerned that this is not practical because we need certainty to be able to invest in the changes imposed on us and some flexibility to cope with weather events and other events such as stock health</p>

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				issues.
42	Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	OPPOSE	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including</p> <p>The tight timeframe to collect and verify data, especially if FEP needs to be modified</p> <p>Needs to be flexibility with Overseer- it is a model only. Needs to allow for adverse weather events, major market issues etc.</p> <p>Having only registered FEP experts creates a climate for price hiking.</p> <p>Time needs to be allowed to meet N leaching limits- better to create a process of improvement over time which most farmers try to do anyway than imposing arbitrary levels which may be impossible or uneconomic to meet especially in this area where many farms are still in an early development phase.</p> <p>The ability for Environment Waikato to make an ad hoc change to the model is also of concern.</p> <p>I am also concerned that this is not practical because we need certainty to be able to invest in the changes imposed on us and some flexibility to cope with weather events and other events such as stock health issues.</p>

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44	Rule 3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production			
45	Rule 3.11.5.7 Non-Complying Activity Rule – Land Use Change	OPPOSE	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	This proposal will impose significant costs on my farming activities including the inability to adapt my farm for changes in either market-driven activities eg from dairy to dairy beef or for changes in my lifestyle. This is a family farm close to town and it may be a personal choice to change to grazing stock. The opportunity cost to intensify or change land use is important especially as this is an urban margin property. As parts of the land are being developed we need to go through a process of clearance, cropping for weed control and contouring and then into permanent pasture.
46	Schedule A: Registration with Waikato Regional Council			
47	Schedule B: Nitrogen Reference point	OPPOSE	Amend Schedule B as requested by Federated Farmers in their submission. There should be some flexibility to the determination of the base years.	This proposal will impose significant costs on my farming activities including As outlined above 2014-5 and 2015-16 have been years when this property has been destocked because of management issues, weather and market

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			<p>Other influences need to be accounted for</p> <p>Other alternatives to Overseer need to be considered. It is a model and so provides a generalised understanding of systems but these are often found to be faulty in practice.</p>	<p>returns. Using these as a base for the NPR will have a significant financial impact. At a normal stocking rate of 30 more cows a \$6 payout for milk would make a difference of \$72,000 a year return.</p> <p>The potential inability to farm at the current level would make this land decline in value as it is below the national average size for a dairy farm. This could result in several million dollars of investment being lost.</p> <p>Being required to limit N also limits the funds available to reduce other losses.</p> <p>The proximity of this property to the Tokoroa sewerage outfall makes the levels of N, P and E Coli high in our base groundwater. We already have the cost of countering this for stock and human health</p> <p>Farmers need to be able to illustrate their ability to improve environmentally using other science. As technologies improve so will the parameters used.</p>
50	Schedule C: Stock Exclusion	OPPOSE	<p>Amend Schedule C as requested by Federated Farmers in their submission.</p> <p>Fencing waterways has caused other environmental issues.</p>	<p>This proposal will impose significant costs on my farming activities including weed and pest control. The build up of willow in the Whakauru Stream which has occurred since it has been fenced will cost Environment Waikato and myself several thousands of dollars to clear and then to prevent the willows from re-establishing.</p>

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
				<p>Requiring the fencing any intermittent waterways is not practical. It is also subject to the personal view of the agent concerned. It is also affected by urban stormwater channelling which artificially puts a lot of water through the farm at times.</p>
51	<p>Schedule 1: Requirements for Farm Environment Plans</p>	<p>OPPOSE</p>	<p>Amend Schedule 1 as requested by Federated Farmers in their submission.</p> <p>Proposal requires a duplication of what is already being done</p>	<p>This proposal will impose significant costs on my farming activities including the duplication of monitoring which is already required by Fonterra.</p> <p>The avoidance of cultivation on land over 15⁰ would make most of this land unfarmable. The value of the land would then plummet as would the productive return of the land.</p> <p>FEP requirements will add significant cost to my operation- estimated additional \$3000-\$10,000 based on advisors and farm management time. Nutrient budgets and nutrient management plans are things we have done for a number of years in conjunction with the fertiliser companies.</p>

South Waikato Vets

19 Swanston Street
TOKOROA

Fax: 07 886 7264

Type of Sample: Potable Water

Collected by: customer

Your Order No.: M Mathis

Received on: 02/11/04

Collected on: 31/10/04

Tested on: 02/11/04

RESULTS REPORT

The samples were analysed as described in the test methods below:

Sample Name	Lab No	Total Coliforms MPN/100 mL	E. coli MPN/100 mL
1 M Mathis, Bore Head	04/0015799	144.5	42.9

Sample comment: Samples were received intact and at 20°C.
Results are based on the sample as received.

Analyst Comment: This water exceeds bacteriological standards as described in "Drinking Water Standards for New Zealand 2000" - Maximum Acceptable Value for E. coli is NIL / 100 mL.

Test Methods - Water Bacteriology

Test	Procedure	Reference
Total Coliform	Enzyme Substrate Test (QuantiTray [®]), ONPG hydrolyzation at 35°C after 24 hours; MPN readings from IDEXX MPN tables	APHA, 9223 B, 20 th Ed., 1998
E. coli	Enzyme Substrate Test (QuantiTray [®]), Fluorescence after 24 hours at 35°C using long-wavelength UV (366 nm) light; MPN readings from IDEXX MPN tables	APHA, 9223 B, 20 th Ed., 1998

DCO

- Gordana Aleksic M Sc, Laboratory Manager
- Donna Clarke, NZCS, Laboratory Technician
- Shobna Farn, B Sc, Laboratory Technician

Mary Anne

Coliforms & especially E. coli should be 0.

Steve

Report Number: 04b09049

Printed: 3 November 2004

ATTENTION : Steve Whittaker
South Waikato Vet Services
71 Chambers Road
TOKOROA

Phone 07 8866413

LAB-PRO

Batch Result Listing

Page: 1 of 1

Printed: 25/11/94

Description ...: Water

Received: 17/11/1994 16:00

Tested at: 18/11/1994 @ 08:30

Client ID: **Paranui Road**

Report No # 94b000280

Results Report

----- SAMPLE : 94/001501 -----

Presumptive coliform : **5400** MPN/100mL

Faecal coliform : **1.1** MPN/100mL

Results are based on sample as submitted. This report shall not be reproduced except in full.

*Shouldn't have any
faecal coliforms.
At risk of getting
any faecal bacteria
that cause diarrhea.*

Method Reference: APHA

J O'Grady Laboratory Signatory



Appendix 3 UV filter for farm water

