

---

**To:** Waikato Regional Council  
Private Bag 3038  
Waikato Mail Centre  
Hamilton 3240

**Submission on:** Proposed Waikato Regional Plan Change 1: Waikato and Waipa River Catchments

**Date:** 3<sup>rd</sup> March 2017

**Submission by:** Maurice and Karen Forlong

29 Ohakuri Road  
R.D.1,  
Atiamuri

Phone: 07 3332044  
Mobile 027 4825271  
Email the4longs@xtra.co.nz

---

**SUBMISSION POINTS: General comments**

Our property is located in the Tahunaatara sub-catchment. We have farmed this property for 23 years, we invested some of our best working years here - it is "home", our children were schooled here, left and have returned to farm with us. The property was recently converted when purchased and is still to this day is a "work in progress". It is 236ha at present milking 400 cows on approx. 140ha eff plus a varying number of beef cattle on the remainder. It is a testament to our passion for farming and our commitment to the "land" and our hope for future generations to enjoy it, protect it and prosper from it.

We have fenced the Tahunaatara where it dissects our farm, along with other small contributories to it. We have bridged the tahunaatara at huge cost (180k) so as to utilise the land effectively without consequence to the river, and we have invested in effluent management (\$120k) to protect both the soil and the water. Fertilizer and in particular nitrogen are spread often and sparingly so as to allow plant utilization, not leaching. Our practises are well considered, both financially and environmentally for one doesn't prosper without the other.

**We have seen and support the submission that has been lodged by Federated Farmers and are particularly concerned about the following**

- The significant negative effect on rural communities
- The cost and practicality of the rules.
- The effect that the Nitrogen Reference Point will have on not only my business but that of all farm owners and long term effect to our 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 lack of science and monitoring at the sub catchments level.

Below we wish to expand 5 key areas of concern.

➤ **Objective 2: Social, economic and cultural wellbeing is maintained in the long term.**

**Oppose: Inequitable**

**Summary and reasons for this submission**

We believe that Social, economic and cultural wellbeing will not be maintained if the Council insists on following through with PC1 in its present state in an endeavour to satisfy the "Vision and Strategy for the Waikato River" as set out in the Waikato-Tainui, Raupatu Claims Settlement Act 2010, Section 1.3k which requires water quality to be "safe to swim in and to take food from over its entire length".

According to the OECD world river database the Waikato River is one of the cleanest rivers in the world ....yet you find it necessary to attribute costs in the vicinity of \$500 - \$600m annualised to achieving a lofty goal, where "Economic" wellbeing will be challenged for one sector of the community as it is targeted for this funding. The "social" impact this has had and will continue to have on this sector, where they are portrayed so poorly that social "outcast" springs to mind. If we then add in Alison Goffin's ACC policy team report of 2014 where environmental considerations and sustainability have been identified as being specifically linked to negative farmer wellbeing, the word "maintained" becomes fascial. To nail this point home what "culture" as an organisation are you leading, standing on your seemingly moral high ground... sacrificing one sector (agriculture) for the benefit of another (iwi) – is that not history repeating itself, just in the reverse, have we not evolved to see that two wrongs don't make a right and that good leadership through collaborative action leads to greater change than a "tyrannical authoritarian" approach. Dairy is already showing strong leadership with over 1b spent on environmental improvements – would you not be better to stand beside them.

**Relief sought:** We support the "intent" of the Plan Change to maintain and improve water quality our suggestion is that there is room to continue to work collaboratively on an ongoing basis under the realisation that this is everyone's challenge "rural, urban, iwi...all who live within the reaches of the Waikato River" and thereby moving towards your objective while minimising social disruption.

➤ **Rule 4: Farming activities with a Farm Environment Plan not under a certified industry scheme**

**Oppose in part: Flawed around consistency**

The principal of a FEP is without doubt good and something we would go so far as to say that although not necessarily a "written" document one that is in no doubt part of the cultural fabric of most farming businesses, as it is ours. We are caretakers of the land for future generations both environmentally and economically and it goes without saying that one does not survive inter generationally without the other, as and when new understanding and techniques become available farmers are not slow to up take and implement if that will see better stewardship and long term return to their lifetimes work.

Our opposition to this rule stems from reservations around both capacity and consistency.

Industry Professionals that are qualified/available and moderated to fulfil obligations pertaining to FEP's are to be "created". Who and under what capacity does the WRC guarantee that these IP's will be able as a body to guarantee consistency of instrumentation, interpretation and industry professional empathy and understanding that will allow engagement with individual farmers who's, by geographical nature and individual characteristic of their farms and farming business require a hugely diverse and equally comprehensive understanding of "good management practise", encompassing what falls from the heavens to what falls through the soil while all along understanding the economic implications of drought, export price volatility and financial constraints.

**Schedule 1 - Requirements for Farm Environment Plans** is a "micro-managing" process that will add considerable cost and time to achieve nothing more than what is already in place for us and many other farmers – we behave responsibly in our farming operation! It removes the licence to operate as an individual farmer, we have and do consider setbacks and riparian management, we do consider cultivation and slope and to even consider inclusion of anything around the nature of "effluent management" into this is nothing more than an insult.

**Relief sought:** Our recommendation here is you are led by a process that recognises farm-specific goals, one of consultation and working with farmers, those that understand the intricacies of their land and their businesses in the pursuit of gradual improvement, where KPI's and benchmarks are their own and theirs to improve against.

➤ **Rule 7: Land use change.**

**Note: Provision is made in Objectives and Policies for some flexibility for development of tangata whenua ancestral lands. This is to recognise that flexibility has been restricted in the past due to legal and/or historical impediments.**

**Oppose in part: Inequitable**

When dispensation is given to one it should be given to all. Our challenge with Rule 7 is how does the plight of tangata whenua ancestral lands differ from that of our own (...and many other farming identities) and why should some members of the farming community due to privileged information be awarded the right to continue to operate under a **Certificate of Compliance (CoC's)** – has WRC acted "fairly and transparently"? Due to the age of our country and very nature of the industry few properties in the past would rarely if ever have been purchased at a "finished" point. Development to further the economic performance, viability and sustainability of a farming entity is part of the intrinsic fabric of most farming enterprises. Without opportunity and development, debt to equity ratio improvement is hampered, realisation of asset worth challenged and future generations of rural New Zealanders lose the chance to grow and prosper. How does that support **Objective 2** pertaining to economic wellbeing?

**Relief sought:** A plan that respects the purpose and opportunity of all land owners as at the date of legislation coming into force. Any land titled to an individual or entity should be unbridled from the "land use change" until such time as that title is sold to an independent party (...no ancestral connection). Parcels of land handed down/sold through family

generations would not be classed as independent. This is not to say that any further development of said lands should not come under a well-documented Management/Action Plan.

➤ **Schedule B: Nitrogen Reference Point**

**Oppose: Inequitable and unsupported.**

Government's goal is to double primary industry exports in real terms from \$32 billion in June 2012 to over \$64 billion by 2025. The Business Growth Agenda is to increase exports as a percentage of gross domestic product from 30% to 40% - to achieve this, New Zealand's primary industries must grow at a rate of 5.5% per annum through to 2025. Do you not wish the "Waikato" to be a part of this!! A 'grand-parenting' approach to the setting of a single nutrient is:-

- a. Inequitable – penalises low emitters, in particular dry stock farmers however this also encompasses dairy farms who have in recent years made significant investment in on farm environmental practises.
- b. Inequitable – "one size fits all" ... we know that within the Waikato River catchment there are huge variations of water quality and that neither of the nutrients, N or P are a "swimming" problem. That some of the worst clarity and sediment issues effecting lower areas of the Waikato River are greatly aggravated by koi carp.
- c. Unsupported through a lack of confidence in the model Overseer on three counts:
  - i. Conflict of interest and impartiality when considering that 50% shareholders in Overseer Ltd are NZ Phosphate Company Ltd (...Ballance Agri-Nutrients Ltd, Ravensdown Ltd, Green Gro Ltd)
  - ii. Flawed from where it is derived - "Overseer reduces to mathematical equations the complexities of different soil types, pasture plants, root depths and rotation lengths" (... Alfred Harris - 1<sup>st</sup> class hons degree in cytogenetics.) He fails to mention climatic impact also.
  - iii. Inputting and Interpretation - When a comment like "*I can help verify or adjust your N reference point if required*" reaches your inbox from those that you know will be one of the "reputable" companies charged with monitoring NRP's and FEP's all confidence in the process goes out the window.

When scientist pits against scientist, each touting the truth...and yet no "one" truth spoken how are we to have belief in a farming future governed by a single figure.

**Relief sought:** Identify individual areas of the catchment that pose the greatest threat to the health of our river. Start there - strategically manage these in the first instance, work to use all resources. We advocate the use of science and innovation to underpin resilient, profitable farming systems. As and when the region can sustain the cost and WRC can quantify results turn to the prioritised list and continue to generate further improvements.

➤ **Schedule C – stock exclusion**

**Oppose in part: Inequitable**

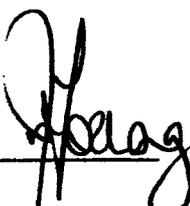
Unless managed accordingly Schedule C will mitigate in part Objective 2 "Social" by social we would take that to mean use of our streams and rivers both in and around the waterways incorporated into PC1. Our personal observance is that once any river/stream or water flowing body is fenced the regeneration of blackberry/broom and uncontrolled willow

infestation renders access impossible. The fencing for stock exclusion is without question supported by all! - The area that needs to be considered is the "cost" of upkeep to maintain "social" availability to our waterways...

- Should a single farm entity be responsible for maintaining in our case 2.5kms of waterway for public use? Our own experience sees "river usage" failing as cost and capacity renders it impossible to maintain, we have examples of people from as far afield as Auckland travelling to enjoy fly fishing on our stretch of the river that do not now bother as access is so limited.
- What is the "queen's chain" responsibility here?
- Should Council/general public – all tax/rate payers not be responsible for the long term maintenance of "social" use waterways.

**Relief sought:** Council answer the above questions and incorporate funding into the Plan to mitigate social loss. Provision for upkeep of fenced area's needs to be incorporated into PC1 with a fair and equitable cost model used.

**We do wish to speak at the hearing in support of my submissions**

Signed:  

Date: 7. March . 2017