

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	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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

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	healthyrivers@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/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS			
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ADDRESS FOR SERVICE OF SUBMITTER		
Full name		
Address for service of person making submission		
Email	Phone	Fax

TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)
<input checked="" type="checkbox"/> I could / <input type="checkbox"/> could not gain an advantage in trade competition through this submission.
<input type="checkbox"/> I am / <input checked="" type="checkbox"/> am not directly affected by an effect of the subject matter of the submission that: (a) adversely affects the environment, and (b) does not relate to the trade competition or the effects of trade competition. Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

SUBMISSION POINTS: General comments

I own a [insert size and type of property and any other relevant details e.g. 350ha dairy farm milking 250 cows, what FMU you are in, etc].

I [provide details of how you run your farm. e.g. stock rates, Nitrogen reference point is x and why it is that way. What environmental projects you have done , what they cost and the outcome etc].

In the future, I plan to [expand my current operation and why, change by farming type – give details and why, invest in environmental projects – provide details and examples e.g. to invest in a xxx I would need to be able to secure consent for 20 years, , etc.]

I am concerned about the following issues with PC1 [provide details of any concerns you have e.g costs on your business, practically for your farm etc,]

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: General comments

I own in partnership with my wife a 105 ha dairy farm and a support block of 77 ha 7km from our dairy farm.

The farms are located in Reporoa in the upper Waikato region

The farms have on average 280-300 dairy cows on the dairy block and 80 calves and 80 yearlings on the support block. We also grow there 3 ha of lucerne which we want to increase to 6 ha over time.

50-100 ha of silage are made over the 2 farms a year weather dependant.

In the winter the dairy cows are grazed for 2 months on the support block so that the dairy farm pastures can grow in time for calving in August

The dairy farm complies with the Fonterra condition of supply rules which is the dairy factory we supply the milk to.

All waterways are fenced and dairy effluent is spread in accordance with regulations over the farm.

Our farm nitrogen leaching over the last 3 year was 24(2013-2014), 35(2014-2015) and 30(2015-2016)

We are concerned with the aspects of Plan Change 1.

These nitrogen leaching figures are very difficult to calculate due to the complexity of all the factors relating to the outcome of these N reference points. So care should be taken if these figures are used as a benchmark for further regulations.

It is very time consuming and stressful for a small business like ours and it takes a lot of administration skills to calculate.

We are particularly concerned with the following aspects of Plan Change 1:

The significant negative effect on local rural communities which will make people leave our area and shift into the cities, which will mean increased urbanisation of the population and increased pollution of larger cities on our environment and water ways .

Large cities seem to get much more leeway in noncompliance of their systems than individual farmers in the regions who have to spend lots of money on investment in compliance and the danger of large fines and a criminal conviction in case of an accidental breakdown.

- . 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 cost and practicality of the rules and requirements for Nitrogen Reference Point rules and the farm environmental Plan.

The stock excluding for waterways on drystock farmers on steep hill country is impractical and financially unaffordable.

- .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 negative implications all this will have for my properties and for my current activity as described above. I set out my concerns more specifically as follows

Rule 3.11.5.3 Permitted Activity Rule-Farming activities with a farm Environmental Plan under a Certified Industry Scheme

We oppose this rule

Decision sought: Amend 3.11.5.3 as requested by Federated Farmers in their submission

The farm environmental plan is a very difficult and complicated scientifically project that exceeds our capability to develop, in which case we have to use experts which are not available due to the hastily introduction of this proposal.

So more stress and pressure on farmers for fear of noncompliance and resulting penalties.

The Nitrogen reduction as proposed is unfair on our business as we are already low in nitrogen leaching on our farms. But the nitrogen we use is very effective and profitable and no damage to the environment . We think this will have major negative effect on the profitability of our farm and the negative capital value decline as a consequence.

In this proposal the high emitting nitrogen leachers getting reward for causing some of the leaching according to the Overseer Model

It is fairer and easier to monitor for a set nitrogen number loss across all dairy farms. So long as the agricultural scientist can develop an accurate model of doing this, which farmers will be able to understand and implement. The Overseer Model was never designed to serve as a benchmark for environmental regulations.

Rule 3.11.5.4 We Oppose

Amend 3.11.5.4 as requested by federated farmers in their submission

The oppose reason is the same as we reasoned rule 3.11.5.3

Rule 3.11.5.7 Non Complying Activity Rule-Land Use Change .

We oppose this rule Decision Sought

Amend 3.11.5.7 as requested by Federated Farmers in their submission

The reason:

This is a very expensive technical procedure to prove the effects on the environment if we wanted to change land use on our run off from dry stock farming to a dairy farm.

.Our 77 ha support block was a dairy farm before we purchased it at a farm auction.

For lifestyle reasons we changed the farm to Support Block for our Dairy Farm.

In future someone could easily change back to Dairy farming as there is already an existing dairy shed on the farm, without exceeding Nitrogen Reference points or stocking rates. This rule is extremely draconium

To not have this ability to do so will affect very negative on the economic value off this farm.

As in the future more land around the cities will be used for housing in the future. Dairy farms close to the city will be taken out of production and therefore the dairying area will be declining which will effect total dairy production in New Zealand.

Therefore the critical mass in milk production needed for efficient operating dairy factories will be negatively affected, which means lower milk prices for dairy farmers and lower economic activity and downstream profits for rural communities.

So to not have the flexibility to change land use will have big consequences for rural communities and not only for ourselves.

Schedule B Nitrogen Reference Point.

Oppose

Decision sought: Amend Schedule B as requested by Federated Farmers.

The reason is that we are unable to see what that point will look like in practical terms. We are scared that we have to comply with a improbable target which will be lower than we facing now. The immediate effects are grass species that will disappear due to the lack of fertility provided by nitrogen in fertilisers. These high quality grasses are very good for milk production when eaten by a cow. So to lose that will have a substantial effect on profitability of our farming business and also our capital value.

Our nitrogen use is low by comparison, but some years I use more or less weather depending.

If we are to have a nitrogen limit it should be the same limit per/ha for everyone therefore the historically high user of Nitrogen farmers

Schedule 1: Requirements for an environmental Plan

Oppose

Decision sought: Amend Schedule 1 as requested by federated Farmers in their submission.

The reason is that this will impose significant cost on our farming business.

. To employ consultants to advise us on the regulation of the act due to the unique circumstances of every farm. To provide environmental inspectors with the required information according to the new rules.

The time frame to establish the Environmental Plan is too short, and at the moment there are not enough qualified environmental advisors available for farmers to advise.

Some of the rules are impractical like

Stopping of sediment entering the waterways from our farm, there most sediment entering the waterways are normally from earthquakes and extreme high rain fall flooding streams etc.

Avoidance of cropping on slopes steeper >15 which is impossible to achieve many paddocks have different levels within.

The fear of noncompliance and extra stress that it brings on top of all the extra rules and regulations and changes we are facing in a very short time. Dealing with the weather seems the easiest of problems.

Menso Van der Laan

A handwritten signature in blue ink, appearing to read 'Menso Van der Laan', with a wavy, cursive style.