

8 March 2017

Chief Executive  
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Waikato Mail Centre  
Hamilton 3240

By email: [healthyivers@waikatoregion.govt.nz](mailto:healthyivers@waikatoregion.govt.nz)

Dear Sir

**NZGSTA SUBMISSION on the  
Healthy Rivers/Wai Ora Proposed Waikato Regional Plan Change 1**

**About the submitter**

The New Zealand Grain and Seed Trade Association (the Association) is the national trade body representing companies comprising breeders, producers, processors, marketers, exporters and importers of seed.

We have 78 members geographically spread around New Zealand, with several member companies operating in the Waikato region.

The grain and seed sector is vital to our national economy, both through its seed multiplication exports and provision of grass, vegetable and grains used in the local horticulture, arable and pastoral industries.

The Association has a connection to the land which makes us keenly aware of the environmental benefits of improved river water quality however measures to achieve this must be sensible and practical in application.

The Waikato Regional Plan has proposed a no cultivation rule within 5m of a waterbody and for land with a slope greater than 15°. These proposed rules will significantly and negatively impact arable and mixed cropping activities in the Waikato.

**Feedback**

The following submission responds to **Rule 2 - Other farming activities (low-risk properties)**, >20ha with >6 stock units/ha OR arable cropping, and in particular the three parts of this clause listed below:

- 2. no land >15° slope cultivated or grazed AND*
- 3. no soil cultivation occurs within 5m of a water body*
- 4. no winter forage crops grazed in situ*

### **What does this mean?**

The proposal means that if farmers wish to continue cropping there will be major ramifications for their cropping ability and profitability. Not only does the proposal restrict current farming practices there will be a significant loss of production, especially for maize, oats, barley, chicory, fodder beet, turnip and other brassica crops, in the Waikato area.

### **3. no soil cultivation occurs within 5m of a water body**

The Association considers that the current industry-agreed cultivation set back distance of 2m from permanent waterways is sufficient with good farmer acceptance and cooperation.

The proposed 5m no cultivation zone, 250% larger than current good agricultural management practice of 2m, appears arbitrary and subjective, moreover no scientific or legal evidence has been provided for the usefulness of the proposal. We can find no evidence to support this arbitrary proposed distance.

Also, it appears the proposal is the most stringent of the regional or district plan provisions.

The main issue with the setback distance is the loss of valuable cropping land which in turn will make farmers less competitive.

In relation to maize which is a vital crop for many of the Waikato region's dairy farmers the additional set back distance effectively means 6.5 rows (76cm row width) of maize are lost or the equivalent of \$10 net profit per lineal metre for 6.5 rows (maize silage crop) or \$7 net profit for maize grain (ref. Pioneer 2016 catalogues, economic analysis of growing maize).

The cost of maize silage is cost competitive at current pricing levels, however, with the potential WRC plan change, it may force the price of the feed higher as growers returns decrease with reduced growing areas. One adverse impact could see farmers searching for other cheaper and imported substitutes which may in turn cause other environmental issues potentially increasing biosecurity risks.

Maize crops play another important role in the environment. Maize can extract nutrients from deeper in the soil as well as reducing excess soil nutrients from paddocks due to their high growth rates in a short period and requirements for large amounts of nutrients. (Ref: Pioneer brand Products – Reducing the Environmental Impact of Dairy Farming on Water and Soil Quality – a case for maize silage. R.J Densley et.al. 2013).

In regards to maize, increasing the proposed buffer distance may in fact have an opposing effect of allowing more soil nutrients to move towards waterways when if the crop had been grown it would have intercepted and locked up the excess nutrients. In this regard, we see the 5m setback as not helpful, nor supported by science or current practices that are currently working appropriately.

A decision to proceed with the proposed 5m setback distance would also lead to weed management control issues. Weed control will become more costly and it will be impractical to keep the area clean of weeds. It is the Association's view that it is far better to have a crop growing in a controlled farming environment rather than the added complication of difficult to control weeds.

### **2. no land >15° slope cultivated or grazed**

Further clarification/definition is required on the proposed 15-degree slope restriction. It is likely that a considerable amount of cropping land will be affected by the blanket requirement. We would like to see the science to support that particular gradient being the cut off measurement? It is also

important to understand in writing how this will be interpreted i.e. does it refer to one area in a paddock and then the entire paddock is affected? Is it an average of the paddock and how is this calculated and by who? What will be the accepted mitigating factors to provide for a permitted activity above 15-degree slope?

#### ***4. no winter forage crops grazed in situ***

The Association has an issue with this part of clause 2 as it is non-specific and too general as it may refer to a wide range of forage options. It may be referring to a type of intensive grazing to be avoided to minimise surface runoff and increased leaching impact. This clause needs to be explained in more detail. The two questions it raises are:

- i) What is a forage crop and how is this determined?
- ii) When is winter and who determines this period as wintery conditions can occur at any time of the year?

A Forage Crop is determined as any feed that is accumulated and fed to animals by the animal foraging and may be conserved as silage or hay. By definition, this then includes pasture species as well as other crops that have been grown in the past for winter feed.

Clarification and interpretation is required within this clause to provide specific understanding of how it should work. Therefore we object to its current status and inclusion.

#### **Summary and recommendation**

The WRC proposed plan change is likely to have an impact on NZGSTA member interests and activities by its **limitations on cropping areas and potentially restricting areas that can be cropped in the future.**

The proposed set back distance of 5m will be problematic and costly for arable farmers and their cropping business in the Waikato region.

A more workable approach would be to not regulate the setback distance at 5m but to have the status quo 2m guideline which is supported, adequate and based upon best farming practice. This would also provide arable farmers with certainty for the future and not rob or devalue their crop productivity or hinder their farming opportunities and profitability.

We would welcome seeing the science to support 15-degree slope being the cut off measurement.

The NZGSTA supports environmentally sustainable farming practices. This submission objects to the current framework due to the potential limitations that may be placed upon cropping farmers by introducing regulations that are lacking in supporting empirical scientific evidence.

More thought into appropriate strategies and more research to support improved farming activities is required before the likes of these regulations can be introduced.

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# PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



Mandatory questions form for submissions on Proposed  
Waikato Regional Plan Change 1 – Waikato and Waipā River Catchments.

Important: Save this PDF to your computer before answering. Please check or update your software to allow for editing. We recommend Acrobat Reader.

FORM 5, Resource Management Act 1991

SubForm	PC12016	COVER SHEET	
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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 by email must contain full contact details.</i>
Online at	www.waikatoregion.govt.nz/healthyrivers

## YOUR NAME AND CONTACT DETAILS - please ensure these details match those on your original submission

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## TRADE COMPETITION AND ADVERSE EFFECTS (select appropriate)

- I could /  could not gain an advantage in trade competition through this submission.
- I am /  am not directly affected by an effect of the subject matter of the submission that:
- (a) adversely effects the environment, and
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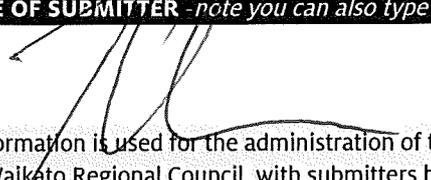
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- I wish to speak at the hearing in support of my submissions.
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## JOINT SUBMISSIONS

- If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

## SIGNATURE OF SUBMITTER - note you can also type your name to certify the above information is true and correct

Signature: 

Date: 2/3/17

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.

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