

Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments.

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

On: The Waikato Regional Councils proposed Waikato Regional Plan Change 1 -
Waikato and Waipa River Catchments

To: Waikato Regional Council
401 Grey Street
Hamilton East Private
bag 3038 Waikato
Mail Centre
HAMILTON 3240

Full Name(s): NORTH WAIKATO FEDERATED FARMERS

Phone (hm): 07 824 6162

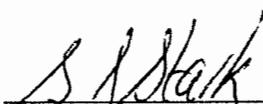
Postal Address: 785 Rutherford Road, R. D. 2, Taupiri 3792

Phone (cell): 0274 722 020

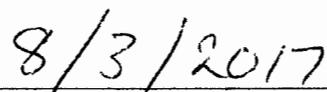
Email: pukemorestation@xtra.co.nz

We are not trade competitors for the purposes of the submission but the proposed plan has a direct impact our members' ability to farm. If changes sought in the plan are adopted they may impact on others but we are not in direct trade competition with them.

I wish to be heard in support of this submission.



Chairman
North Waikato Federated Farmers



Date

1. INTRODUCTION

Our North Waikato Federated Farmers members value good water quality and continually strive for its improvement. Large sums of money have been spent to install and upgrade farming systems with this goal in mind. Our landowners live and work on the land and want to be able to continue to do so to provide for their economic and social well-being while looking after the environment.

We are supportive of the staged approach over 80 years of Plan Change 1. However, we have concerns with some of the objectives, policies, methods and rules in this Plan Change.

2. Nitrogen Reference Point

While OVERSEER may be helpful for on-farm management planning, it is not fit for purpose as a regulatory tool. In many catchments, nitrogen is not an issue. By having a blanket rule limiting nitrogen, no flexibility is available to already low N emitting landowners to earn money required to fund other costly mitigation, i.e. fencing, water reticulation, feed pads, etc. This is a grandparenting approach that rewards high emitters and punishes low emitters

Resolution Sought:

Adopt an effects and science based sub-catchment approach to addressing contaminants that are relevant to each farm, not a blanket restriction of one particular nutrient that may not even be relevant to the water bodies in that sub catchment. Any reference to NRP in Schedule B should be used in an information capacity for best practice, not in a regulatory capacity.

3. Pest Fish

Koi carp are now common throughout the lower Waikato and Waipa catchments. Koi carp are the third most widely introduced species in the world. Their method of feeding stirs up sediment reducing water clarity, uproots aquatic plants, reduces native biodiversity and releases nutrients which can lead to algal blooms. Local landowners have no control over poor water quality caused by pest fish, even though they may have excellent mitigations in place on their properties.

Resolution Sought:

Amend Plan Change 1 for WRC to implement an eradication program of pest fish, more particularly, koi carp as a high priority for water quality improvement.

4. Mitigation Costs

As shown in the Federated Farmers case studies and the Baker Ag Report, 2016; Hill Country farmers, in particular, are facing a huge financial burden with the blanket rule approach. This may be unnecessary and financially crippling for, in some cases, little to no benefit to water quality. We have particular concern regarding the costs of fencing of all permanently flowing waterways and water reticulation.

Resolution Sought:

That the policy proposals for excluding stock from waterways as set out in the Government's recently announced Clean Water Package 2017 should be implemented as an interim measure. More detailed proposals be developed as appropriate to the particular sub catchment later, and then implemented through a sub catchment based plan change.

5. Sub Catchment approach

We support using a sub catchment approach. It is inappropriate to place high mitigation costs on landowners before sub catchment analysis is completed. The improvement of water quality should be tailored to the sub catchment and its particular issues, not the blanket rule approach taken in this Plan Change document.

Resolution Sought:

We seek that the plan change should not be implemented until the scientific data around which contaminants are causing water quality decline is available for each sub catchment and appropriate mitigations can be decided and implemented at a sub catchment level.

6. Protection of Key Infrastructure

Our drainage and flood protection assets are essential in the North Waikato due to the topography of this area. A vast amount of investment has been made in these assets which protect farmland, roads and highways, electricity transmission and railroads, etc. Lake Waikere and the Whangamarino Swamp are part of our core flood protection scheme.

Local landowners have no control over contaminants from other catchments entering those water bodies in their sub catchment through the operation of the flood scheme. When the Waikato River, carrying contaminants from other catchments, enters these receiving waters through the operation of the flood protection scheme, the water quality may be negatively impacted. This is outside of the control of local landowners who may have excellent mitigations in place on their properties.

Resolution Sought:

Recognize the importance of the flood control scheme locally, regionally and nationally; and that, at times, water quality may be poor due to the operation of this key infrastructure.

7. Objective 5 and Policy 16

We support all people in the region working together for good water quality. We don't support flexibility for one group of people over another. This would then disadvantage those who are not allowed the same flexibility and creates further inequities. We consider if Maori feel disadvantaged from past legislation, perceived inequities not be dealt with in an ad hoc way through a regional plan change, but through central government where legislation is made and altered.

Resolution Sought:

Objective 5: Delete ~~b) new impediments to the flexibility of the use of tangata whenua ancestral lands are minimised; and~~

Policy 16: Delete in its entirety

8. Policy 17

While we support positive effects from mitigations for good water quality, we consider matters outside the scope of the plan change should be just that, outside of the plan change. If we would include anything outside of the plan change, it would be koi carp. This Planning document should not be used as a pseudo NPS for Biodiversity. Our concern is that this clause will drive further costs to landowners through farm environment plans and resource consents because consideration must now be given to them by their inclusion.

Resolution Sought:

Policy 17: Delete as written and insert: Eradicate pest fish from waterways prior to landowners paying mitigation costs to reduce sedimentation and microbial pathogens, and improve water clarity; all of which are undermined by the presence of koi carp in our waterways.

9. Schedule I. Rule 3.11.5.3, 3.11.5.4, 3.11.5.6 and any consequential amendments arising from this submission point.

There appears to be no low cost appeal processes available. If staff interpretation of rules, and therefore acceptance of an environment plan/resource consent is debate-able, there is the possibility of inconsistency across the region.

Resolution Sought:

An independent panel needs to be available to aid in deciding contested points between staff and farmers. Environment plans/resource consent disputes need to be settled without the expensive need to appeal to Environment Court.