

Te Aroha Federated Farmers Submission on Healthy Rivers Wai Ora Plan Change One

Te Aroha Federated Farmers is a district branch of Waikato Federated Farmers and represents approximately 200 farming businesses in the greater Te Aroha area.

Although our businesses are based in the Waihou-Piako river catchments, we have significant concerns around the proposed healthy rivers Plan Change One. As the Eastern river catchments will be the next to be regulated, we wish for a practical and sustainable outcome for all segments of our community.

- We support Waikato Federated Farmers submission and proposed alternative framework.
- Our own farms and what we have done:
 - E.g. FEP, extended effluent areas, effluent storage, fenced side drains, farm mapping, GPS fertiliser applications.

Our submission will address six concerns that we have around the proposed plan.

1. Land use restrictions

- Put land to most appropriate use – good farming practice, sustainable, profitable and environmentally sound, and contributing to local community.
 - E.g. Government has recognised the value of Pukekohe soils.
 - E.g. Our Waikato Class I soils suitable for food production.
- FEP's – all three of us have completed the process. From that plan, minimum standards on sub-catchment and farm-by-farm basis.
- Course of outcome – list of tailored actions to achieve desired outcomes.
- Support certified industry scheme, as a permitted activity or ~~controlled activity~~.
- Proposed PC 1 would make it difficult to change land use.
 - Why would a business change if consenting process was onerous or prohibitive?
 - Why would you change to food production systems if it was unprofitable?
- Farm technologies – they are evolving, e.g.:
 - Use of herd homes and feed pads
 - Lined effluent ponds for storage
 - Accurate effluent spreading techniques
 - GPS monitored fertiliser applications
 - Animal genetics/efficiency

2. Slope/stock exclusion

- Difficult to assess – paddocks are not uniform.
 - What percentage of paddocks are above or below 15 degrees?
- We don't agree with slope being the best indication of stock exclusion.
 - Stocking rate would be a better trigger point (stock units per hectare).
- Strongly object to 10 metre buffer on council controlled drains.
 - Create major management issues for land owner and regional council.
- 5 metre buffer for cultivation is excessive, especially on flat land and for any permanent or temporary waterway.
- Use of farm-specific environment plan to identify and determine tailored actions and identify areas for stock exclusions.
- Land use capability (LUC) in the context of a FEP would be suitable to identify soil type and topography to determine tailored farm actions but should not be used for regulatory requirement around allocation of contaminants or nutrients.

3. Nitrogen

- We support that high emitters above the 75th percentile must reduce to below the 75th percentile.
- Allow low emitters headroom to adjust farming practices to make system changes to maintain profitability and get better environmental outcomes.
- We don't believe Overseer is suitable as an on farm regulatory tool.
 - Would like to see forensic monitoring of farm-specific upstream and downstream points to identify critical source contaminant issues at a sub-catchment level.

4. Urban/Rural

- Proposed plan appears to focus heavily on the rural community with little regard to urban point sources.
 - Improvements in water quality needs to be in all sectors of the community.
 - Desired outcome of implemented PC 1 is better water quality for all.

5. Social costs

Triple bottom line P.P.P. (People Profit Planet)

- Proposed plan has a big focus on planet or environmental outcomes, and neglects the effect on economics, people and communities.
- Ripple effect is not only on the farm. Also, downstream from farming businesses in rural communities and associated stakeholders.
- Report from the Technical Leaders group to the CSG.
- Effect of afforestation on Ruatoria, East Cape.
- Loss of profitable family farms due to loss of business confidence
 - Increased cost of compliance
 - Erosion of property rights
 - Loss of choice of most appropriate land use
 - Locked in through 'grand-parenting' of nutrients
- Supermarket syndrome
 - Where is our food going to come from? Imported from countries with lower environmental standards.
- Mental health
 - Wellbeing levels in rural communities are currently an issue, and some of these proposals will only add to the problem.

6. E. coli

- We acknowledge that this is an issue in most of the sub-catchments.
- Use of technology to identify the sources of E. coli to develop strategies to better address the sources of contamination.
- Other sources of E. coli
 - E.g., bird life, humans, introduced fish species, industrial discharges.

Conclusion

As Te Aroha Federated Farmers, we would like to see a fair and equitable outcome that works for all communities, so we can have a degree of confidence when Plan Change Two commences in our catchment.