

# 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	
<b>FOR OFFICE USE ONLY</b>			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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

SUBMISSIONS CAN BE	
<b>Mailed to</b>	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
<b>Delivered to</b>	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
<b>Faxed to</b>	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy also</i>
<b>Emailed to</b>	<a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a> <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>
<b>Online at</b>	<a href="http://www.waikatoregion.govt.nz/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>
<b>We need to receive your submission by 5pm, 8 March 2017.</b>	

YOUR NAME AND CONTACT DETAILS		
Full name; Allen and Jo Johnstone		
Full address; 3 Mokau Rd, RD 3, Te Kuiti 3983		
Email; wallacejohnstoneltd@gmail.com	Phone 07 878 8418	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Allen and Jo Johnstone		
Address for service of person making submission 3 Mokau Rd, RD 3, Te Kuiti 3983		
Email wallacejohnstoneltd@gmail.com	Phone 07 878 8418	Fax

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
<input checked="" type="checkbox"/> I wish to speak at the hearing in support of my submissions.
<input type="checkbox"/> I do not wish to speak at the hearing in support of my submissions.

I could not gain an advantage in trade competition through this submission.

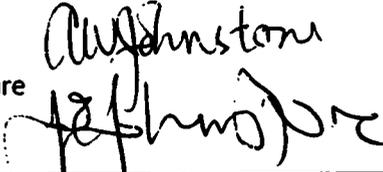
SIGNATURE

OF

SUBMITTER

*(or person authorised to sign on behalf of submitter)*

*Signature is not required if you make your submission by electronic means*

Signature 	Date 3/03/2017.
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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.

## **SUBMISSION POINTS: General comments**

*Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.*

*Our names are Allen & Jo Johnstone and along with our family we are based on our farm at "Puketutu", 11km south of Te Kuiti. Our farming company Wallace Johnstone limited is a family based Agribusiness that is involved in Sheep, Beef, Dairy, Forestry and agricultural contracting. Our business motto "Generations of Excellence" is an important part of who we are. We passionately believe that we are only caretakers of our land and that we will leave the land in a better condition than we found it. We farm for the long-term sustainability of our environment.*

*"Puketutu" is our sheep & beef property which has been in the Johnstone family since 1926. Our property is part of the West Coast catchment. This property is over 2000ha of hill country ranging from easy to steep hills with broken contour and a multitude of waterways and bush outcrops. We winter approximately 14,500 stock units consisting of 8,000 sheep, breeding and finishing system on the hills and a 1,500 cattle trading and dairy grazing operation on the easier contours, however good management practices adopt cross over grazing of both areas at certain times of the year, meaning cattle are grazed in areas where water ways are not fenced to the proposed specifications of PC1. We do not know our Nitrogen reference point at this stage, but would assume it is around 20 kg N/ha/yr. We do not currently focus on this in our management plans which focus more on sustainability as a whole.*

*We have retired approximately 300ha of native bush and have planted thousands of native trees over many years. We have fenced all major waterways and planted riparian strips where practical. However to comply with the proposed PC1 changes many more kilometres of fencing would be required in areas which would have negligible environmental benefits. This farm has excellent infrastructure including reticulated water systems and lanes. Our hill country is well fenced into appropriate land classes. All of this is considered when setting our farm policy. We are currently doing our Farm Environment Plans 1 & 2.*

*We also farm a 1500 cow Dairy Farm at Otewa near Otorohanga, which is part of the Waipa River catchment. This 300ha property was purchased in 1982 originally as a sheep & beef farm before we converted to Dairy in 1995. Since then 146ha of neighbouring land has been purchased. Our farm bounds the Waipa River and we are part of a Waipa River Management project which was set up to address issues of flood protection, soil conservation and river management. We have thoroughly enjoyed being part of this partnership and enjoyed seeing the benefits to the river and our farm. All our waterways on this farm are fenced off and riparian planted where appropriate. We are committed Fonterra suppliers and have recently completed our Sustainable Milk Plan.*

*We are passionate about our environment and believe we perform in a profitable and efficient manner through sustainable management of our properties.*

*We are concerned about the proposed implication of nitrogen reference points, which are effectively grand parenting rights to pollute, based on past levels.*

*Also we have concerns about the level of stock exclusion being pushed too far. We are supportive of stock exclusion from water ways but not the extent to which it has been proposed, particularly around hill country.*

*The other area of concern is the uncertainty of what happens at the end of the 10 year tenure. Not knowing where this will go after that period makes investment in any of those mitigations for the first 10 years uneconomic.*

*We support the submission that has been lodged by Federated Farmers and Beef & Lamb. We are 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 our business and 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 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*

*We wish to be heard at the Hearing.*

*We are concerned about the implications all of this will have for our property and for our current activity as described above. We set out our concerns more specifically in the table below.*

**SUBMISSION POINTS: Specific comments**

Page No	Reference	Support or Oppose	Decision sought	Give Reasons
41	<b>Rule 3.11.5.3</b> Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	<b>OPPOSE</b>	Amend 3.11.5.3 as requested by Federated Farmers in their submission.	<i>As per Schedules B, C &amp; 1 below</i>
42	<b>Rule 3.11.5.4</b> Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	<b>OPPOSE</b>	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	<i>As per Schedules B, C &amp; 1 below</i>
44	<b>Rule 3.11.5.5</b> Controlled Activity Rule – Existing commercial vegetable production			
45	<b>Rule 3.11.5.7</b> Non-Complying Activity Rule – Land Use Change	<b>OPPOSE</b>	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	<p><i>The value of land in the region will be significantly reduced due to the inability to convert systems to more profitable ones, putting further pressure on rural communities.</i></p> <p><i>Alternate land uses such as forestry may be considered environmentally beneficial now, however long term implications such as harvesting and weed regeneration will have negative environmental impacts.</i></p>

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47	Schedule B: Nitrogen Reference point	OPPOSE	Amend Schedule B as requested by Federated Farmers in their submission.	<p><i>We oppose the grand parenting of the Nitrogen Reference Point (NRP) as it allows existing high discharge rates to continue and limits the flexibility of other enterprises which may have low emission rates. This rewards existing polluters.</i></p> <p><i>The approach of bench marking nitrogen losses to historic levels (2014/15 or 2015/16) will create uncertain outcomes. Farming practices will change, driven by results of the latest version of OVERSEER. Higher dischargers have no incentive to reduce. Farmers in other catchments will farm to increase their NRP to increase farm values and potential production.</i></p> <p><i>Application of the NRP will produce significant inequalities between neighbours leading to animosity which is not a good recipe for a resilient rural community.</i></p> <p><i>We have concerns over the accuracy of OVERSEER modelling for dry stock and in particular to trading properties which are apparently very low at +/- 30% error rate at best, assuming input data is correct.</i></p> <p><i>The suitability of OVERSEER as a regulatory compliance tool was never its design function. OVERSEER is a "what if" scenario model which is to be used for qualitative not quantitative purposes. OVERSEER models show how nutrients move around the farm and what greenhouse gases are produced, but does not predict water quality.</i></p>

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50	Schedule C: Stock Exclusion	OPPOSE	Amend Schedule C as requested by Federated Farmers in their submission.	<p><i>This requirement to exclude cattle through permanent fencing is very broad and will create variable environmental and financial outcomes over hill country which by its nature is not intensively farmed.</i></p> <p><i>Fencing on hill country is expensive and often limited to ridges and natural fence lines. Steep lines can only be fenced manually unless earth moving equipment is used to create suitable lines leading to more soil erosion issues hence marginal net environmental benefit.</i></p> <p><i>Maintenance and weed control is expensive on this type of land which will only increase under PC stock exclusion rules.</i></p> <p><i>Water reticulation, especially on hill country is very expensive due to pumping heights and the inability to get machinery into steep areas.</i></p> <p><i>Improvements in water quality from excluding cattle, through permanent fencing from permanently flowing water bodies, on extensive hill country are not proven. More sub-catchment information is required.</i></p> <p><i>Other approaches such as tailored farm specific critical source management, targeted riparian planting, and stock management approaches are likely to result in more cost effective and improved environmental outcomes.</i></p> <p><i>The definition of water bodies and slope are still unclear and require further elaboration in order for farmers to be able to determine exactly what areas on the farm must become compliant.</i></p>

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				<p><i>As an alternative we propose that the rules be amended so that the requirement to exclude cattle through permanent fencing be tailored on a farm by farm basis (via FEP), district by district, and sub catchment basis where there is a scientifically proven water quality issue in relation to stock access to water bodies and where the rules are tailored to specifically address the issue, i.e. Seasonal restrictions to cattle grazing steep hill country in certain areas will be more beneficial than fencing difficult water bodies</i></p> <p><i>We propose that the national stock exclusion rules are used for this plan change in particular the rules for over 15 degrees of slope, streams being 1 metre or more wide before exclusion is required and stock crossing used less frequently than once a week being allowed.</i></p> <p><i>We also seek that these rules are included in this schedule along with "best practicable option" and "mitigation measures" which are allowed for in the Farm Environment Plans for steeper land and/or where fencing is impracticable i.e. utilisation of silt dams where practical.</i></p>
51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission.	<p><i>We support the principle of this Schedule. We believe that Farm Environment Plans (FEP) are an important part of farm management practices for sustainable farming and formally set out objectives, implementation and timeframes which the majority of farmers are already doing but just need formalising.</i></p> <p><i>The application of schedule 1 as proposed has the potential to greatly reduce farm flexibility in times of climatic and market fluctuations on trading properties. There needs to be room within the plan to allow for such extreme events, for example allowing cattle into sheep only areas in a drought.</i></p>

<b>Page No</b>	<b>Reference</b>	<b>Support or Oppose</b>	<b>Decision sought</b>	<b>Give Reasons</b>
				<i>There appears to be no low cost appeal processes available. If staff interpretation of rules, and therefore acceptance of an environment plan is debate-able.</i>