

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 Please Note: if you fax your submission, please post or deliver a copy also
Emailed to	healthyrivers@waikatoregion.govt.nz Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.
Online at	www.waikatoregion.govt.nz/healthyrivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS		
Full name Anthony Gordon Wilding		
Full address 543 Rangitanuku Road RD 2 Tirau 3485		
Email the wildthings@xtra.co.nz	Phone 0274900538	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name		
Address for service of person making submission		
Email	Phone	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

A. Munday

Date

2nd March 2016

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

I farm in partnership with my wife Sally a 100 ha dairy farm in the South Waikato carrying 320 cows

We run a system 2 farm with the majority of pasture shortfall met by the growing of summer and autumn brassicas grown on farm. Other shortfall at the shoulders fed in shed to minimise wastage. N reference has been in the mid thirties for some time. We have fenced off two wetlands with extensive native plantings in one of them. All our drains are fenced, have been since 2012. In 2014 we moved from a two pond effluent system to lined storage and irrigating to land. Able to irrigate effluent over 50% of the farm with nozzle and travel speed adjustment delivering from 3mm to up to 20mm if required. Majority at <10mm. Investment made \$130,000.

In the future, we plan to further automate with timers and GPS mapping to record nutrient spreading. We will invest in moisture metres and formally record what we are presently doing to maximise nutrient use while mitigating environmental effect.

I am concerned about the following issues with PC1. I fully accept that our investment is part of business and being compliant But I am concerned about the costs that are potentially going to be incurred initially and then ongoing annually in having a Farm Environment plan. I think having a FEP is necessary but what is being described in the plan with both the consultancy and auditing costs is unnecessarily bureaucratic and costly. I believe that industry can work with Council to develop an industry plan which can then be customised to each farm. I am also keen to see good collaboration between industry and compliance bodies to make sure sound and agreed scientific reference points are used for monitoring. Also whether the desk top calculation through overseer or future measuring tools can be substantiated with physical field monitoring on reference farms in each catchment would not only give greater confidence for farmers but more evidence and transparency to those that wish to judge based on a theoretical model.

I have publicly through DNZ suggested this approach of having monitoring farms for nearly two years.

This I believe will drive the uptake of best practice within the farming sector, our history tells us that. I believe FEP can be industry monitored with an independent audit as a cross check. Once compliance or an agreed standard is achieved by individuals then the compliance audit frequency should lessen along with the costs.

The overall timeframe and staging of the plan I think is reasonable and I believe at the end of the first 10 years we will have learnt so much more and the extension of mitigation knowledge will have lifted the capability of the sector to achieve the more difficult goals of year 10-20.

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 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 plan significantly exceeding the 10 year targets in many attributes and areas
- The lack of science and monitoring at the sub catchments level

I wish to be heard at the Hearing.

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.

Specific Provisions in the Plan Change I wish to Submit on.

Schedule B page 47 f *Nitrogen Reference Point*

I submit that the two reference years 2014/15 and 2015/16 be changed to include the three previous years, 2011/12, 2012/13 and 2013/14 and use an average.

Reasoning for the suggested change

I think having the highest point from two preceding years of a farming downturn is an unfair reference point. Evidence that stocking rates, bought in feed and applied fertiliser were reduced in an effort to survive in those two years. The ongoing reference point will be based on a 5 year rolling average and having that starting point derived from the same methodology seems sensible.

Further comment on NRP.

It is also important to have a target NRP for each sub catchment and a desire to have all land users to that level in the longer term. The present reference point being established by a historic figure is unduly penalising and not recognising good practice and previous mitigation practices by those farmers with low NRP. They would like to see some lenience on compliance or recognition of their N status.