

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.

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

SubForm	PC12016	COVER SHEET	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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 <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 my email must contain full contact details. We also request you send us a signed original by post or courier.</i>
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 Gifford Patrick and Robin McFadden		
Full address 181 Jay Road , R.D.2 Reporoa 3083		
Email g.r.mcfadden@clear.net.nz	Phone 0272814364	Fax

ADDRESS FOR SERVICE OF SUBMITTER

Full name Gifford Patrick and Robin McFadden		
Address for service of person making submission 181 Jay Road , R.D.2 Reporoa 3083		
Email g.r.mcfadden@clear.net.nz	Phone 0272814364	Fax

TRADE COMPETITION AND ADVERSE EFFECTS *(select appropriate)*

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SUBMISSION POINTS: General comments

I wish to be heard and I do not wish to appear with anyone else.

I oppose Plan Change 1;

A/ because it does not meet the Vision and Strategy (V&S) “Prosperous communities “standard

B/ because it concentrates, on nitrogen (N) when phosphorous (P) is the factor that limits growth in most of the River. P is far easier to control than N, further control of P would make the whole river P limited, and any farmer will tell you that N will not grow vegetation in the absence of P.

C/ the River will never be drinkable without treatment because of arsenic, the V&S sets out the Kai in the River should be good to eat, however the Upper Waikato River has heavy metals from geothermal fluid, arsenic adheres to the stems of water cress and mercury builds up in the fish so that only leaves swimmable. Swimmable is E.coli, and sediment and algae for clarity. One look at Table 1.11 shows that there are no problems above Hamilton. The main impediment to swimming is the Waipa River both for E.coli and sediment.

Rivers, draining swamps lower down are adding discolouration. The towns of Te Awamutu, Otorohanga and Te Kuiti sewerage plants also appear to release a lot of E.coli.

D/ Given B and C, the emphasise on N requires that 230,000 hectares and even 400,000 hectares be retired from farming into trees to reach the N target. For what environmental achievement and what happens to the prosperous communities

E/ Objective 5, Policy 16. This is no more than a commercial rort, I have no difficulty with Treaty Land but there should be allowance for social cases of non-maori land as well. The inclusion of multiple-owned Maori land is where the rort comes in. A lot of this land is very well run and are very prosperous farms. A rort.

F/ you cannot sell a secret.

Consultation, the Collaborative Stakeholders Group met in secret and the release of information was limited and therefore did not allow the CSG members to fully inform their public, I went to all the meetings it was unbelievable how tight the meetings were controlled, while at the meetings you sat 6 to a table and had six person debate, there was no open general debate allowed.

The consultation was a farce; now I know how Maori feel.

I own with my wife, Robin, a dairy farm in Jay Road Reporoa of 148 ha, of which 110 ha is effective and 38 is retired for 999 years under the Paeroa South Soil Conservation Scheme. We employ a young couple to share milk our herd of approx. 320 to 340 cows giving a cow stocking rate between 2.7-3.1. The farm is very rolling land, of the 110ha effective only 12 ha cannot be mowed or traversed in a 4 wheel drive ute and production is very dependent on the weather (summer rain).

We also have a run off at Te Toke of 70 ha of Maori owned land in various titles that is what I run. We have our rising 2year olds there, winter the milking herd when they are dry there for 6 weeks , hopefully bring home 2 cuts of silage and sometimes the calves go there.

Having 2 cuts of silage instead of 1 is a new development, this allows me to give up the summer crop (I have not grown a winter crop for 35 years) and will hopefully, not have to buy PKE.

We run the farm as a biological farm, the definition of a biological farm is pretty vague but it is definably about the biology in the soil, it is not conventional or organic, we define a biological farm as maximum clover growth.

Our nutrient reference point is around 24 kg of N a hectare.

All our stream are fenced and have been around 1989 as part of the South Paeroa Conservation Scheme, the minimum distance from fence to stream is 5 metres, most is over 20 metres with some up to 100 metres.

After visit from the discussion group (local farmers), they classed the farm as hard, I was surprised, I had not thought of it like that, we have owned the farm for 43 years and I must confess I love it.

Ten years ago our system was 200 kg of nitrogen and undersowing the whole farm with quick growing annual ryegrass, the first year it went like a rocket, after 3 year it had all turned to custard as the Argentinian stem weevil multiplied up on the annual ryegrass and overwhelmed the perennial ryegrass lowering the grass production and therefore the milk solids production. Because I was involved in research into mitigating nutrient loss, we became a biologic farm.

At that time I was Project Leader for the research projects of the Rotorua Lands and Lake Trust (RLLT) which was a joint venture between Te Arawa Federation of Maori Authorities and Rotorua/Taupo Federated Farmers to obtain monies from the Ministry of Primary industries, Sustainable Farming Fund to do research into ways to intercept the nutrients, Phosphorous (P) and Nitrogen (N) .We considered the following graded in terms of political acceptability;

1/Farm systems (wintering pads, high sugar grasses etc.-outside our possible resources

2/ Animal biology (reduction of N in Urine) outside our possible resources

3/ P movement over ground and in water

4/Stream Attenuation (watercress)

5/ In lake nutrient harvesting (algae and vegetation) - outside our possible resources

6/Soil Biology (increasing the depth of the root zone, and the soil biota to recycle nutrients).

2 of the 3 we did went well 3/ P movement over ground and in water and 4/Stream Attenuation (watercress) worked like a charm however in those early days 92003-2009, the Regional Councils were the only ones with money , all the research was about compliance, not mitigation. So they just faded away.

Number 6/ Soil Biology.(increasing the depth of the root zone and the soil biota) promise, however any research was fanatically opposed by only 3 agricultural scientists. One was a major scientist that controlled access to a large industry fund and one was Doug Edmeades. My own farm consultant said I was trying to overturn 100 years of science, I was gobsmacked. The clover cycle is a well-known fact, The whole New Zealand system is farmers put phosphorus fertilizer on the grow clover that fixes nitrogen in its roots and when the clover roots die, grass takes up N for its own growth.

It was amazing how much influence the 3 or 4 scientists had on the funders of agricultural research, they stopped our research dead in its tracks however RLLT did manage to do one year trial between a high stocked, high N user conventional farm and less stocked no N, biological farm, both farms had at \$7 a kg of milk solids, a surplus of \$3500, both produced 1500kg milk solids .

The biological farm at 35 kg of N per ha, leached half the of the conventional farm.

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 effect that the Nitrogen Reference Point will have on my business and my 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

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.

SUBMISSION POINTS: Specific comments

Page No	Reference (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Say what changes to Plan Change 1 you would like	Give Reasons
40	Rule 3.11.5.2 Permitted Activity Rule – Other farming activities			
41	Rule 3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	OPPOSE	Amend 3.11.5.3 as requested by Federated Farmers in their submission.	

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42	Rule 3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	OPPOSE	Amend 3.11.5.4 as requested by Federated Farmers in their submission.	
44	Rule 3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production			
45	Rule 3.11.5.7 Non-Complying Activity Rule – Land Use Change	OPPOSE	Amend 3.11.5.7 as requested by Federated Farmers in their submission.	This is the most stupid of all the rules; it locks the whole region up for ten years. It is to mainly control N loss, for what environmental gain. Junk science!
46	Schedule A: Registration with Waikato Regional Council	Support		

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47	Schedule B: Nitrogen Reference point	OPPOSE	Amend Schedule B as requested by Federated Farmers in their submission.	<p>At seventy two years of age it is highly likely I will have to sell my farm in the relatively near future and the years I have spent lowering my nutrient loss will only lower the value of my farm.</p> <p>I lease 70 hectares of Maori owned land on 4 different titles , 3 of them will require NRPs I run the whole lease in with my home farm, I have no idea how I am going to provide the degree allocation to the individual titles as required and for what environmental purpose?</p> <p>There has to be a scooping of farms and stock but simple way such as the Sustainable Farming Plan as was done in the Upper Waikato would suffice and be far cheaper and quicker.</p>
50	Schedule C: Stock Exclusion	OPPOSE	Amend Schedule C as requested by Federated Farmers in their submission.	<p>Stock exclusion is not a problem for me now as I was part of a Central Government scheme 30 years ago. At that time the cost was \$100,000 for my farm the cost now would be \$200,000. I could not raise that sort of money.</p> <p>The Central Plateau is made up of pumice soils, the pumice is free draining and of the flats is deep gullies with steep sides and productive land is easily fenced.</p> <p>Other areas are the opposite, shallow gullies with</p>

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				steep sides and plenty of gullies, there needs to be different rules for them.
51	Schedule 1: Requirements for Farm Environment Plans	OPPOSE	Amend Schedule 1 as requested by Federated Farmers in their submission.	I support that there be a Farm Environment Plan however it does not need to be to infinite detail as suggested, seems more to be able to prosecute than achieve change i.e. prosecution before mitigation

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