

# 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 <b>Please Note:</b> if you fax your submission, please post or deliver a copy also
<b>Emailed to</b>	<a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a> <b>Please Note:</b> Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.
<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 Brian & Paulette Johns		
Full address 1875 State Highway 3 RD1 PIOPIO 3971		
Email <a href="mailto:paulettejohns@clear.net.nz">paulettejohns@clear.net.nz</a>	Phone 07 8778 021	Fax

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Brian & Paulette Johns		
Address for service of person making submission 1875 SH3 RD1 Piopio 3971		
Email <a href="mailto:paulettejohns@clear.net.nz">paulettejohns@clear.net.nz</a>	Phone 07 8778 021	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 8 March 2017

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**

We own a 159Ha dairy farm plus we lease a further 33Ha to support our operation. We milk around 430 cows on a spring calving, system two farm near Piopio.

We purchased this farm in 2012 and have structured our operations to suit the farms natural capabilities. We are a low input dairy operation running approximately 2.7 cows/Ha and grow all the food needed for our animals on the farm or the attached leased land with the exception of one truck load of hay per year for wet winter days. We rear our replacement calves on farm until they are one year old. We measure how much grass is grown in every paddock every week and we have soil tested every paddock and re-check them on a systematic basis to ensure we apply only the nutrients the farm needs. We are low users of Nitrogen. Our Nitrogen leaching risk has been calculated at 54 and our conversion efficiency at 40%. In the 4.5 years we have been on this farm we have completed a number of environmental projects including construction of a lined effluent pond, purchased a new effluent irrigator, fenced all remaining waterways, installed water meters, developed and are continually working on implementing our riparian management plan and installed further culverts. To date we have spent around \$90,000 on these projects.

We have plans to continue to improve our farm efficiency and environment as and when we can afford to.

In the future, we would like to think that if opportunities arose for us to expand our operations that it would be possible for us or our children to do so. We feel strongly about the environment and our farming heritage. The land is our livelihood and we want to protect and preserve it. We are also conscious that over time peoples' wants and needs change leading to change in demand for various agricultural products. Therefore, our ability to change our operations to meet these demands needs to be preserved too.

We are concerned about the following issues with PC1:

- The costs of implementing this plan change will not be able to be offset by increasing the sales value of our core products of milk and meat as these are commodities dependent on world pricing mechanisms.
- The inaccuracies which may exist in the Overseer model we will be required to use.
- The lack of real data, proven science and practical tools for mitigating surface run-off or leaching of nutrients.
- The lack of information about the council's plans for rolling out this plan change to the sub-catchments and whether they will properly and fully assess the needs of each of those catchments before imposing restrictive rules.
- The risk that we spend a lot of money and effort on projects which subsequently prove to be ineffective in achieving the plan change objectives.
- We are already farming in an environmentally friendly way, being only a System 2 operator. Increasing our costs to comply with PC1 could potentially make it uneconomic to farm this land. For example, to get the perfect Riparian planting in place we would need to spend around \$50,000 per year for the next 10 years and then maintenance from then on of around \$20,000 per annum and that is assuming we do most of the work ourselves. To improve our effluent system to the best it could possibly be would cost a further \$90,000. To provide a herd home for wintering the cows would cost

close to \$1,000,000. To prepare and maintain the Farm Environment plan could cost \$15,000 plus ongoing monitoring costs not to mention increased rates to pay all the compliance monitoring work that will need to be undertaken.

We support the submission that has been lodged by Federated Farmers and all of the concerns they raise in respect of Plan Change 1:

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**

<b>Page No</b>	<b>Reference</b> (e.g. Policy, or Rule number)	<b>Support or Oppose</b>	<b>Decision sought</b> <b>Say what changes to Plan Change 1 you would like</b>	<b>Give Reasons</b>
40	<b>Rule 3.11.5.2</b> Permitted Activity Rule – Other farming activities			
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.	<p>This proposal will impose significant costs on my farming activities including the cost of establishing, implementing, monitoring and auditing the plan.</p> <p>While the idea of having an individualised Farm Environment Plan is good, the plan itself must be practical. It must be able to be amended as new information and quantifiable science developments occur that are specific to each individual farm.</p> <p>We are also concerned that this is not practical because Overseer is not proven to be appropriate for use in this way. It needs more proven science added to it as science and field trials become available.</p> <p>A good example of a model not being an effective tool happened to us recently with The Lines Company and a pump connection we have. Each year their model was calculating our maximum demand for that connection at a higher level despite nothing changing at that pump connection. I tried to get them to accept the fact that it was impossible to have the demand calculated by the model. Finally, when they installed a smart meter this miscalculation by the model they were using became instantly apparent and the maximum</p>

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				<p>demand has been reset to exactly what the pumps Kilowatt rating is.</p> <p>What we need to improve our Farm Environment is a system for measuring exactly what we are emitting, leaching or running off both immediately upstream and downstream of our farm NOT a model. THEN, we need a portfolio of tools to help us mitigate these contaminations of fresh water within a reasonable time and in an affordable way.</p> <p>The consequences of a model miscalculating the four contaminants of fresh water on our farm are potentially significant and enduring.</p>

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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.	<p>This proposal will impose significant limitations on my farming activities including not being able to expand our operations if neighbouring property becomes available. This then limits our ability to remain competitive, profitable and relevant in the industry.</p> <p>We are also concerned that this is not practical because there are still areas of underdeveloped and under utilised land in our district and restricting land use change will effect the ability of young New Zealanders to ever purchase their own farm.</p>
46	Schedule A: Registration with Waikato Regional Council	Support		The council should have good information about all the activities being conducted in the region.
47	Schedule B: Nitrogen Reference point	OPPOSE	Amend Schedule B as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on our farming activities and at this stage we do not know exactly which levers to pull or what actions to take to reduce our level from its current point given that we are already Low input farmers.</p> <p>If we have to put a herd home on the farm that will cost around \$1,000,000 and will not result in any significant production or income increases.</p> <p>If we need to expand our effluent spreading area or systems that will cost \$90,000. Also for no corresponding increase in production or profit.</p>

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				<p>If we needed to immediately retire land and riparian plant all the possible areas we could then that would cost around \$500,000 plus have significant cost associated with managing those plantations over their life.</p> <p>We would need to fund these improvements with debt as we do not have a spare \$2,000,000 in cash. The debt servicing on such a loan would add a further \$110,000 at current low interest rates and would put our whole business in economic jeopardy.</p> <p>I am also concerned that this is not practical because the science to mitigate is not good enough yet.</p>
50	Schedule C: Stock Exclusion	OPPOSE	Amend Schedule C as requested by Federated Farmers in their submission.	<p>We have managed to fence all waterways on this farm and feel quite proud in that achievement. It has come at a cost but we can be confident that all stock are out of waterways. This is helping to preserve the river banks and drain edges however, it is now causing us significant problems with weed and pest infestations. In particular, convolvulus and Japanese walnuts. Also, rats, rabbits and hedgehogs which carry the ever present threat of Leptospirosis.</p> <p>I am also concerned that this is not practical on steeper drystock farms.</p>



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51	<b>Schedule 1:</b> Requirements for Farm Environment Plans	<b>OPPOSE</b>	Amend Schedule 1 as requested by Federated Farmers in their submission.	<p>This proposal will impose significant costs on my farming activities including having to use non till methods to re-grass hill paddocks instead of traditional methods. We have our own seed drill so having to hire someone else to do this will significantly impact our costs over time. We do not crop hill paddocks but would periodically need to re-grass them due to insect and other damage.</p> <p>Our nutrient budget is currently done in conjunction with our fertiliser provider and we are not sure whether this is PC1 compliant or not.</p> <p>I am also concerned that this is not practical because tilling is an effective tool for restoring paddocks for grass production.</p>