

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1

WAIKATO AND WAIPA RIVER CATCHMENTS

Submission Form

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

On: The Waikato Regional Councils proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments

To: Waikato Regional Council

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Complete the following

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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

I wish to be heard in support of this submission.

DB Henderson 6-3-17

Signature date

Brief Description of Farm: We own a 600ha farm just south of Hamilton at Rukuhia. The farm consists of peat and silty loam soil types and we run a beef and a stud cattle operation as well as cropping. We currently crop: maize, brassicas, grass, fodder beet and chicory. The farm has been in the family for three generations and there are plans for it to continue into the next generation. We are in the priority 2 sub catchment.

We agree with and support the vision and strategy:

- Recognize that freshwater and its cultural, recreational and ecological values in the catchments are degraded
- Require the restoration of water quality within the Waikato river so that it is safe for people to swim in and take food from over its entire length.

WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

Provision; Conversion from farming to forestry could be required to achieve long term aspirations.

I wish to amend this provision

The reasons for this are:

1. This would cause severe economic problems for farmers who would lose their income until the trees are ready to harvest. At this point there could be no value in the trees as they are a one off cut. This does not spread risk over many years for volatile prices.
2. If there was more forestry in rural areas there would also be less employment opportunities and the flow on affect would be loss of communities. More people would head to the urban areas and still need feeding with less productive land providing the foods for their plates. This may mean more food would need to be imported – not very sensible from an economic, food safety or conservation perspective.
3. Currently New Zealand is known for its beauty and attracts tourists. Turning large areas of land into forestry will change this and perhaps reduce tourism.

I seek that the provision is: Amended as set out below

As an alternative I propose that forestry only be done in small areas of farms so that it does not affect the livelihood of the farmer and employment. Also that it takes place in areas and on a scale where it will not affect the beauty of the landscape, but could be done where it will add beauty.

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Provision: Restricting land use change

I oppose this provision

The reasons for this are:

1. This affects the basic rights of freedom of choice in New Zealand. Land owners should be able to do with their land as they wish as long as it is farmed sustainably.
2. This will affect the value of our farm. Currently we are a beef and cropping farm amongst many dairy farms. If we or others are not able to convert to a more profitable farming operation such as dairying our land value will drop.
3. In beef, markets change all the time and we have our highs and lows in commodity prices. The only way we can survive these changes financially is by having flexibility to change to other farming operations. This provision would prohibit this flexibility and therefore will have a huge effect on our ability to stay financially viable.
4. This provision unfairly affects farmers that have under developed land such as us. Peat is improving all the time as a soil. The more it is farmed the more it improves and production increases. Restricting land usage will stop farmers from making the land more sustainable.
5. This provision restricts succession planning for our children. Suddenly our block is not economically viable if land usage is controlled by the state!
6. This provision restricts the motivation of improving the land you have got as you cannot aspire to change to other operations. This will discourage more young people from going into farming.
7. There will be a reduction in the profitability of farming in New Zealand. If farms are not able to intensify and cannot change to more profitable operations the production off the land will not increase. Surely this will affect export earnings.
8. New Zealand is a small country and depends on overseas markets for exports with such state control over the land there be no flexibility to respond to overseas markets.
9. Beef farming is affected that in a good grass year you can run more cattle but in a drought you have to run less. Restricting land usage takes the flexibility out of this system and means you cannot change to increasing the cropping area to fill the gap.
10. These regulations do not take into consideration the soil type, pasture composition, rainfall, contour of the land, temperatures etc.

I seek that the provision is: Deleted in its entirety

As an alternative I propose: Allowing farmers to do with the land as they wish based on market forces and sustainability.

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Provision: Nitrogen management adopts a grand-parenting approach

I oppose this.

The reasons for this are:

1. Farmers are being unfairly treated. Those high users/ high polluters will continue to be able to be high users/ high polluters and those farmers who have been low users/ low polluters will not be allowed to increase their usage of nitrogen or increase their stocking rate. This penalizes those farmers that have already made an effort to conserve resources and now will not be able to increase their production.
2. Beef farming has good and bad years financially; they are not as stable as the dairy industry. Often farmers will put less fertilizer on in a bad year and more in a good year. This provision would make it impossible for farmers to keep the fertility of their farm up to maintain production.
3. The grand-parenting years that have been chosen are years that the Waikato was in drought. This means that our stocking levels had been reduced due to less grass. Financially this was more demanding on the farm and there was less cash flow hence less fertilizer was put on the farm. This means at the years being chosen for grand-parenting are not representative,
4. Concerns around the use of overseer as the tool to model and manage Nitrogen leaching, which has huge variability. Overseer can be exploited and will reward the polluters to the detriment of our rivers while at the same time punishing the low Nitrogen leaching farmers, a real live example of this is what's happening in Canterbury. We believe Overseer is not accurate on the peat land as the nitrogen gets soaked up by the organic matter. More research is necessary before this can be used in practice.

Quote from Robin Boom, Agronomic Advisory Services. Printed in Coast and Country, March 2017. Pg11

"Another interesting paper presented by Victoria university researchers promoted the Land Utilisation and Capability Indicator approach. One site they looked at, the Massey university Tuapali farm, Overseer had predicted 8kg/ha N was lost, whereas the actual amount of N measured was only 2.37kg/ha. The LUCI model was more accurate for both nitrogen and phosphorus losses compared to Overseer.

In my view Overseer is an excellent model for predicting nutrient losses from the root zone, but that is all. Using Overseer for grand-parenting N losses, allowing bad polluters to continue to be the worst polluters and penalizing good farmers and restricting future development of underdeveloped farmland is inequitable and wrong. Setting catchment limits based on LUCI or some other land use suitability/ capability model where every farmer and landowner are on an equal footing makes more sense to me. And as the science improves and accumulation of hard data from monitoring grows, then adjustments and changes can be made along the way."

I seek that the provision is amended as set out below

As an alternative I propose: That every farmer is given a set limit on stocking rates and nitrogen use based on the pasture cover, soil type and contour of their farm. This means all farmers will be treated the same.

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Provision: Reducing contaminant losses from farms.

I wish to amend

The reasons for this are:

1. Fencing off drains and planting trees down the drain banks is a great expense especially to beef farmers who are not making great profits.
2. Some fencing on hill country farms seems ludicrous because it takes away so much land. Some common sense needs to be used by the people writing these restrictions.
3. No winter forage grazed in situ.
 - We disagree with this as it is unprofitable as you cannot run as many cattle
 - Crops cannot be worked in rotation to keep the soil fertile
 - These crops are more nutritious for the cattle giving them a better balanced diet.
4. Cultivation must be 5m from the waterway. This again reduces profitability of the farm.
5. We have concerns about long-term control of weeds on the water banks that have been fenced.
6. Drains need to be cleaned otherwise there can be flooding and washouts which will also cause deterioration of the land and fertilizer will be washed down stream.

I seek that the provision is: amended as set out below

As an alternative I propose that:

1. Subsidies are given for fencing and planting up drains.
2. That winter forage crops can be grazed in situ.

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Provision; Farm management plans

I support this but with some more explanation

The reasons for this are:

1. Farm management plans should be for a maximum of 10 years unless there is a major change to the land such as somebody new has bought the farm, leased the land or land use has changed.
2. The plans should also be for 10 years because the changes that farmers will be making on the farm will be long term changes. This will also help to keep the costs down and time spent writing and reviewing the plans.
3. The farmer needs flexibility to change land usage when required e.g. droughts, succession planning or in financial difficulties.
4. If leaching on the farms is going to be measured/ modelled. This will be an additional cost – who will pay??

I seek that the provision is amended as set out below

As an alternative I propose that the plans be for a maximum of 10 years, but have the flexibility to be reviewed more often if circumstances change.

Main points

1. Droughts: we need flexibility to cope.
2. Move from different types of farming e.g.crops to beef depending on profitability
3. Trying to improve soil to increase profitability
4. Not being able to change to dairying will affect income, value of farm, succession planning for children, and ability to employ staff.
5. Cannot increase stocking rate as peat improves or increase the management of pastures.

Major implication:

1. Loss of opportunity for us and NZ earnings
2. Loss of freedom of choice – state control
3. Lack of diversity.
4. Loss of income and value of asset.
5. Loss of opportunity to increase staffing/ labour
6. Loss of opportunity to use new technology
7. Lack of opportunity to make farm more profitable for family succession

Yours sincerely

Print Name:

DB Lamb 6-3-17

Signature Date