

**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

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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.

If others make similar submissions, I would consider presenting a joint case with them at the hearing.

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INTRODUCTION

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

I am a veterinarian using biologically friendly fertiliser on a hill country property on the eastern side of Lake Waikare, running beef cattle that are born on the property. No erosion has occurred under this fertiliser regime.

I understand that this submission is in relation to the Healthy Rivers Wai Ora Proposed Plan Change 1.

This plan change needs to be developed in collaboration with all New Zealanders. Decisions should be linked to strong and unambiguous national regulation. February Release of the latest government freshwater reforms consultation document "Clean Water" – setting out proposals for improving the swimability of New Zealand's rivers and lakes, should be considered in relation to PC1

I believe other NZ environmental issues relating to water need to be considered alongside HRWO PC1

Other regional council's management of their lakes and waterways.

District Councils management of wastewater and treated sewerage discharges – this relates to discharges to rivers/lakes but there are wider issues in NZ – pollution of Auckland and Wellington harbours not to mention the Auckland beaches that swimming is prohibited at because of contamination .

WDC roading development policy – where banks are cut away and continue to erode over years with sediment ending up in the waterways

The use of the Waikato river for electricity generation – holding of water in Lake Taupo with staged release (which can result in fluctuations in river level of up to 4 metres with resulting damage to ecosystems on river edges)

Irrigation, using water from rivers (eg involvement in drying up of rivers used to irrigate Canterbury Plains)

We must have an environmentally sustainable NZ for our land, animal and human health not to mention the economic wellbeing of our nation.

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"The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to give effect to the relief sought".

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The specific provisions my submission relates to are:	My submission is that:		The decision I would like the Waikato Regional Council to make is:
	SUPPORT / OPPOSE	REASON	RELIEF SOUGHT
3.11.4.4 Lakes Whangamano Wetland	Support with Amendment	Water quality analysis needs to include lake E.coli. levels (or breakdown of types - ie human, water fowl, ruminant) as well as sediment, Nitrate + phosphate levels (we know what comes into lake but not what goes out... ie determine origin of lakes contaminants)	Amended to include Lake E.coli levels @ type then Amend to actively decrease Koi carp numbers in Lake Waikare and connected lowland rivers @ Whangamano Swamp
		E coli levels or type info is missing from a number of sampling sites. Increased typing of E.coli to determine contaminant source for rivers, lakes	

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Schedule B Nitrogen Reference point	OPPOSE	<p><u>OVERSEER</u> was not designed for this purpose. Mathematical models can not predict nature & biology interactions.</p> <p>- new technology - handcare research - working on a non biological bypass to mitigate nitrous oxide after conversion of excess inorganic nitrogen (therefore not leached into water)</p> <p>- biologically friendly</p>	<p>WRC to do leachate analysis on farms identified as discharging/leaching high (or above certain threshold) levels of contaminants.</p> <p>Farm Environment plan developed to mitigate. Retesting leachate to check compliance.</p> <p><u>Incentives</u> for farmers</p>
		<p>fertiliser allows soil biology to use excreted nitrogen + phosphorus so it is not leached. Ruminants eating grass from healthy biologically active soil excrete less nitrate anyway.</p> <p>win win situation - increased soil carbon - increased water storage - more drought tolerance healthy soil biology → nutrient dense fodder → healthy ruminants → less excretion of nitrate → low blood urea nitrogen low milk urea nitrogen more minerals available to ruminants</p>	<p>to increase soil carbon and to use soil biology friendly fertilisers</p>

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Schedule C Stock exclusion	oppose	<p><u>Not practical</u> to fence off waterbodies on hill country</p> <p><u>Cost prohibitive</u></p> <p><u>not proven</u> that excluding cattle by fencing on non-intensive hill country will result in improved water quality</p>	<p><u>Amend</u> to include controlled movement of cattle across a moving water body if event occurs less than 3 times a week</p> <p><u>Apply</u> National stock exclusion requirements that relate to cattle, deer, pigs from permanently flowing waterbodies (either temporary or permanent or natural barrier) on <u>flat</u> + <u>rolling</u> land but <u>not</u> hill country</p>

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Rules 3.11.5.1 + 3.11.5.2	oppose	Needs to be 1 rule incorporating 3.11.5.1 + 3.11.5.2 Erosion is a result of mechanical/physical disturbance of soil or no soil biology (mainly Mycorrhizal Fungae) - which retains soil integrity & carbon (which in turn holds moisture & retains zinc, nitrogen + phosphate in soil and makes available to plant.	<u>incorporate 2 rules 3.11.5.1 + 3.11.5.2</u> amend to include as permitted activity land uses with stocking rates at or below 16 S.U. and enable stocking rate to increase from current up to this standard <u>Delete</u> 6 S-Unit standard Delete 4.1 ha and provide for up to 20 (effective) ha
		Most widespread erosion is mass movement soil slips - widespread in NZ on slopes greater than 15% - rainfall initiated & most extensive in soft rock hill country of N.I. (East Coast, Inland Whanganui, Taranaki, Manawatu) NOT relevant in our catchment [Landscape Research Reference] - Urea + Superphosphate destroy soil biology.	<u>Delete</u> rule relating to no grazing on slopes greater than 15° <u>Incentives</u> for farmers to use non acid forming fertilisers (eg superphosphate) + urea. urea

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3.11.5-4 FEPlan	OPPOSE	<p>Subcatchment information should be used to decide if farms in area are liable to have contaminant discharges</p> <p>Farm Environment plans only need to be produced if excessive contaminant leaching/dischage is identified at a individual farm level</p>	<p>Levels for acceptable phosphate, Nitrate, pathogen & sediment to be established and applied at individual farm level.</p> <p>Leachate testing of individual farms if problem with one or all of contaminants</p>
			<p>at subcatchment level.</p> <p>FEP then developed at individual farm with Farmer ownership.</p> <p>Incentives for farmers to follow biologically friendly fertiliser application</p>

Environmental group - consisting of people with expertise in soil health, water health to advise on suitability of developed Farm Environment Plans

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policy 16	oppose	The same rules should apply to all w2. landowners	I seek that this policy is deleted *

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Yours sincerely

Fiona Mary Ellmers B.V.Sc
Veterinarian & Biological Farmer

 7/3/17

Signature

Date

Signature

Date