From: Andrea Gabites <andi_gabites@hotmail.com>
Sent: Wednesday, 8 March 2017 9:31 a.m.
To: Healthy Rivers
Subject: Submission on Plan change 1
Attachments: WRC Plan Change 1 Submission.pdf

Categories: Receipt SENT - need log this in s/s

To whom it may concern,

Please find attached out submission on the Waikato regional council proposed Waikato regional plan change 1 Waikato and Waipa river catchments.

Cheers,
Andrea Gardner
Sent from Outlook

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
401 Grey Street
Hamilton East
Private Bag 3038
Waikato Mail Centre
Hamilton 3240

Full Name: Maihiihi Farmers Group; representing Michael and Katrina Cumpstone, George and Theresa Cawte, Rob and Michelle Coles, Angus and Marjorie Martin, Thomas and Sandra Bolger and Rawiri and Andrea Gardner. Contact information below provided for group spokesperson Andrea Gardner.

Phone (HM): 07 8732800

Phone (WK): 07 8781068

Postal Address: 92 Paewhenua Road, RD2, Otorohanga

Phone (Cell): 0211738530

Postcode: 3972

Email: andi_gabites@hotmail.com

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

We wish to be heard in support of this submission.

Signature Date 7/3/17

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WAIKATO AND WAIPA RIVER CATCHMENTS

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To: Waikato Regional Council
401 Grey Street
Hamilton East
Private bag 3038
Waikato Mail Center
HAMILTON 3240

Complete the following

Full Name: George Adrian Cawte
Teresa Louise Cawte

Phone (Hm): 07 873 2710

Phone (Wk): 027 873 2710

Postal Address: 115 Tauraca Valley rd
RD5 Otorohanga 3975

Phone (Cell): 027 361 4308

Postcode: 3975

Email: tree.george@farmside.co.nz

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.

G Cawte. 7-3-17

Signature **date**

beef+lamb new zealand

The Maihiihi Farmers Group represents a small number of family owned and run properties in the Maihiihi District. These are represented by dairy operations from 1000Ha total down to 60Ha effective, mixed Dairy and Beef operations of 230Ha and Sheep and Beef operations of 3500 acres with 1500 acres effective and the balance in native bush.

As a group we are in full agreement that the status quo with regards to water quality cannot be maintained but have concerns that Plan change 1 as it stands is not in balance with the practical, economic and scientifically justifiable outcomes attainable. Individual points will be discussed in the submission below.

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

The specific provisions my submission relates to are:	My submission is that:	The decisions I would like the Waikato Regional Council to make is:
Section 3.11.2 Objectives Policy 1 Policy 6	Agree	
Page 42 Section 3.11.5.4 (5) Nitrogen reference point OPPOSE	Nitrogen and Phosphorus are not associated with direct human consequences when found in waterways. Nitrogen and phosphorus are nutrients that can feed phytoplankton growing in the waterways, it is these phytoplankton that are the food source for algal blooms which have a direct negative effect on human health. The Phytoplankton can only grow in slow moving water such as the man made lakes created by the positioning of hydro-electric dams on the Waikato river. The limiting nutrient for phytoplankton growth is phosphorus not nitrogen. As such we oppose the use of the nitrogen set point and ask that it be removed from the plan.	Removal of monitoring tools for nitrogen. More emphasis on phosphorus as the main farming mitigation tool for aiding reduction of phytoplankton. Removal of the hydro-electric dams on the Waikato river, land that has been deemed unsuitable for intensive farming production could be modified as solar farms to harness another renewable resource for electricity generation without risk to human health as a major contributor to algal bloom events.
Page 47 Schedule 8 Use of OVERSEER model, Nitrogen reference point. OPPOSE	Grand parenting of nitrogen reference point (NRP) is an unfair system that rewards people with higher nitrogen leaching by continuing to allow them to have higher leaching levels than others running the same farming system ie dairy farm with NRP 40 vs NRP 30. Grand parenting allows for no manipulation of stock classes on farm, this is particularly important in sheep and beef operations where changing stock class' on farm to suit an ever changing and fickle meat market is an important tool to try to maintain farm profitability and debt servicing long term. The years used to determine NRP (14/15 & 15/16) were the lowest dairy pay out years in a decade, this led to wide scale reduction in stock numbers, feed use and fertiliser applications hence the data collected for these years is not reflective of normal farming practice in this sector and to cap farmers to these levels is putting undue financial pressure on farmers trying to service their debt but also detrimental to	Remove the current nitrogen set point determination and develop an upper limit for nitrogen leaching that is based on data relevant to the sub catchment and current land use; this would mean potentially a different cap for dry stock farming vs dairy farming in the same area but would allow different farm management practices to be employed year to year as long as the upper limit was not breached. Development of a purpose built software that will have all the functionality needed and the potential to withstand the extensive upgrading in these functions over time as mitigations are developed to provide farmers with meaningful figures that can be used to aid in development and implementation of farm environment plans.

	any service industries or towns relying upon income from the farming sector. The current plan treats all farms across all fresh water management units the same, there is no accounting for variations in soil type or nitrogen management within the water aquifers ie in our area nitrogen leaching into ground water encounters anaerobic conditions, processing of the nitrogen by bacteria in these aquifers produces nitrogen gas that is disseminated into the environment yet the rules are the same as for areas with aquifers with aerobic conditions. There is a lack of scientific data to show what actually happens to the nitrogen once it starts moving through the soil structure, what time frames this is over and at what speed. Analysis of these things would allow for meaningful mitigations to be implemented for control of nitrogen losses especially through wet periods of the year rather than applying mitigations that may help or may be of absolutely no use. OVERSEER was not designed to be the environmental regulatory tool that it is being used for. The figures it produces are based on a lot of assumptions that are not backed up by concrete scientific research and trial data. There is an overarching view in the regional councils plan that technological and scientific advances are going to be developed as the years go by which will be able to be used to reduce nitrogen, phosphorus, sediment and E.coli in the waterways. It is questionable whether OVERSEER will have the functionality to accurately account for all of these when it is stretched currently to analyse the basic level of information it is currently processing for each farm. An example is the variation in Nitrogen formed by clover fixation, this can vary widely in OVERSEER even in farms side by side running similar systems.	
Page 42 **Section 3.11.5.4 (5d)** **Stock exclusion**	The practicality and economics of fencing and providing water reticulation to all hill country will render some farming ventures uneconomical. Some waterways cannot feasibly be	Farm Environment plan to allow where fencing of waterways is impracticable to allow grazing of these areas by cattle, horses, deer where it is essential for pasture

OPPOSE	fenced due to their meandering nature and natural obstacles such as boulders. The alternative for these paddocks is to be solely used to graze sheep but this is detrimental to the grazing management of the grasses present. Sheep will not graze the stalky reproductive head of the grass species on hill country, without grazing by cattle the grasses present will not be as vigorous and disease free which will affect the number of sheep able to graze that paddock the following season. There has been allowances in the modelling data that the collaborative stakeholders group looked at that allowed for non-compliant activities when there were benefits and the non-compliance was over a relative short period. For example waterways that are in forestry blocks are significantly impacted by harvest for a period of 2 years.	management, it is for a short period of time (<20% of the year) and this is done at time of little risk for soil erosion and nitrogen leaching (summer/autumn). Under the above example the waterway in question will be in a compliant state for at least 80% of the year.
Page 31 Policy 5 Policy 7 Policy 10 OPPOSE	The regional council have presented for submission the first stage of a plan where despite 2 years of investigation and modelling, including economically crippling land use change, the end point determined by the vision and strategy is unobtainable, is this legal? The plan to attain the vision and strategy of council will result in significant land value loss, this affects the ability of farmers to maintain their financial integrity with lending institutions or engage in succession planning. Towns that rely on farming with no other significant industry will dissolve ie Otorohanga. The council has allowed conversion in the last few years of land around Tokoroa to dairy farming that should not have been allowed.	Plan change 1 should be the only plan for now and needs to be amended as per the above submissions. Any future additions to Plan 1 need to be socially, economically and environmentally viable, the current ideas based on the CSG modelling should be discarded and new work conducted over this 10 year period to improve the science base and develop new mitigations to achieve the councils goals. Agriculture needs to be treated with as much importance as other regionally significant industry. Farms that should not have been allowed to be converted should be returned to native bush and the farmers payed out at current market value for their land.