

**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.

Andrew Jolly

7/3/2017

Signature

date

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Introduction

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

My name is Andrew Jolly and I come from a family that has been farming for almost a hundred years in the catchment. I currently work and live in the catchment and have an interest in farms both inside and outside the catchment. I currently work for Beef + Lamb NZ working with hundreds of farmers in the catchment much of which is about engaging farmers in environmental stewardship and working with WRC to gain an understanding around the environment space.

Over my years working with dry stock farmers I have seen an immense amount of work done in the environment space as farmers gain greater knowledge of how to reduce their environmental foot print. Dry stock farmers have continued to improve and innovate in this area and have shown that they are typically low emitters when comparing them to other enterprises.

I have also observed communities that have been decimated by environmental regulation, causing farmers to sell or significantly reduce their income meaning they have had to seek employment out of the region, the Taupo catchment is a good example of this and would I hate to see this replicated in the Waikato Waipa region.

I have followed the CSG process for as long as it has been running and have ran many events for farmers to engage with what is happening. The information that has been given out over the last two and half years for farmers to be consulted on has been minimal and disappointing. The representatives on the CGS and technical leaders group are not reflective of the land use in the catchment, notably there is only one dry stock representative on the group when dry stock makes up over twenty percent of the catchment. There was also Dairy NZ employees on the technical leaders group when this is meant to be an impartial group and fair to all sectors and stakeholders.

My personal concern is I hope to one day go farming but with the draconian rules that have been set this makes this less likely as it reduces flexibility and profitability of the farming operations reducing the likelihood of succession and a viable dry stock sector within the region. We must continue to allow farmers to innovate and come up with their own solutions which should be through a farm environment plan. We must provide farmers with the information on how to do this rather than setting unrealistic targets for them. I support improving water quality but in an achievable and sustainable way, but I do not feel that this plan will meet the vision and strategy that the community and regional council is after, my submission points are as below.

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

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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.

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 / OPOSE	REASON	
Objective 1 - Long term restoration and protection of water quality for each sub-catchment and fresh water management unit and any consequential amendments arising from this submission point	Support this objective with amendments	I support the long term objective of have clean water ways. However, I have concerns that if it cannot be modelled, can it actually be achieved. This will put farmers out of business trying to achieve something that is not achievable	Restore water quality standards to an achievable level using the guidelines set by the national policy statement of freshwater. Water quality standards and values should be set by communities that feed directly into the waterbody. Amend table 3.11-1 so that numerical targets account for events such as floods which is when water bodies are used for swimming and ma hinga kai.

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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	
Objective 2 – Social, economic and cultural wellbeing is maintained in the long term and any consequential amendments arising from this submission point	I support this objective with amendments	I believe it is critical that we maintain long term social economic and cultural values of the region. However I feel that the plan does not achieve this as small rural towns such as Te Kuiti have been modelled to show that there will be a reduction of employment due to this plan.	RELIEF SOUGHT Retain the objective, but change the mechanism in which this achieved. Alternatives to current rules are further on.
Objective 3- Short- term improvements in water quality in the water quality in the first stage of restoration and protection of water quality for each sub -catchment and fresh water Management unit and any consequential amendments arising from this submission point.	I support this objective with amendments	I support that we need improvement of water quality. However we need water quality data to back this up to show were we are at and be able to model where we need to be and how we can socially and economically get there.	Provide economic data out to all stakeholders which demonstrate how we can meet targets in a realistic fashion. This should be demonstrated for each sub catchment and not just a overview of the whole region
Objective 4 – People and community resilience and any consequential amendments arising from this submission point.	I support this objective in principle	I support the objective of people and community resilience but this must be able to be modeled and achievable This plan is only set out for a 10 year period which does not provide farmer certainty outside that time frame which therefore makes it very difficult	As per previous objective economic data should be provided out to all stakeholders which demonstrates how we can meet targets in a realistic fashion. This should be demonstrated for each sub catchment and not just an overview of the whole region

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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:
	for a community to build resilience.	
Objective 5 Mana Tangata-protecting and restoring tangata whenua values and any consequential amendments arising from this submission point.	<p>I oppose this section B of this objective.</p> <p>The ownership of the land should not determine what rules are applicable.</p> <p>Flexibility should be based on contaminant impact from the activity regardless of who owns the land.</p> <p>We should be addressing contamination loss and this should not be influenced by who owns the land.</p>	This policy should be removed

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<p>The specific provisions my submission relates to are:</p>	<p>My submission is that:</p>		<p>The decision I would like the Waikato Regional Council to make is:</p>
<p>3.1.1.3 Policy 1a and all sections relating to the 'grand parenting' of existing use/farming methods, N levels etc. and any consequential amendments arising from this submission point that are referred in the plan for NRP.</p>	<p>SUPPORT / OPPOSE</p> <p>I strongly oppose this policy</p>	<p>REASON</p> <p>I strongly oppose "grand parenting" as it penalises low emitters and farmers that have been environmental sustainable over decades and rewards the polluter.</p> <p>If a property's Nitrogen reference point (NRP) is lower because of previous good management practice, having a NRP allocated over the designated years severely disadvantages farmers with their flexibility and value of the property compared to someone that has a high NRP that has previously demonstrated bad environmental stewardship.</p> <p>This rule also creates negative behavior outside the catchment. We have already now seen farmers outside the catchment increasing their N loss to increase their NRP because of this notified rule, this is not good for our environment or our industries.</p> <p>Using OVERSEER as regulatory tool is not what it is designed for and does not model what N actually goes into water which means it is not a fair reflection of what it is trying to achieve in holding farmers to an N loss number.</p>	<p>RELIEF SOUGHT</p> <p>The nitrogen reference point should be removed from the plan in its entirety</p> <p>As an alternative I propose that like land should be treated equally within each sub catchment. Rules should not reflect on past land use or ownership but future/intended land use.</p> <p>Use of farm environment plans should be used to determine what a reference point should be. This should be backed up by science and modelling to reflect that this is achievable.</p> <p>Principles below should be adhered to.</p> <ul style="list-style-type: none"> - Like land should be treated the same. - Flexibility of land use must be maintained - The allocation system should be technically feasible, simple to operate and understandable - The natural capital of soils should be the primary consideration

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	<p>The accuracy of OVERSEER is said to be as low as 50%, this is not fair to hold farmer's lively hoods account to something that is this inaccurate.</p> <p>The years that were chosen are reflective of low production years in some regions due to droughts therefore are unnecessarily hamstringing farmers that were severely affected in those two years.</p>	<p>when establishing an allocation mechanism for nutrient loss</p> <ul style="list-style-type: none"> - Appropriate timeframes must be set to allow for transition from current state to one where allocation of nutrients applies
<p>Farm Environmental Plans 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.6, 3.11.5.7 and any consequential amendments arising from this submission point.</p>	<p>I support with amendments</p> <p>B+LNZ have developed a great resource in the Farm environmental plan (FEP) and should be used to help inform and engage farmers on environmental stewardship. These are very effective in helping farmers identify and manage critical source areas.</p> <p>With no implementation plan at the time of writing this it is of concern that the standards being applied are not realistic and will be very costly to stakeholders, this needs to be articulated clearly to farmers and stakeholders.</p> <p>Industry bodies such as beef + lamb NZ need to be involved but cannot be expected to pick up the costs to implement WRC plan.</p> <p>FEP should be focused on reducing contamination loss, not implementing generic practices that are costly and do not reduce overall nutrient emission.</p>	<p>Implementation plan is released and consulted on.</p> <p>Amend FEP requirements -</p> <p>Change stock exclusion standards to the nationally recommended standards which have been recommended in February 2017.</p> <p>Time frames recommended should be deleted and set through the FEP, so it makes it more likely for adoption and implemented.</p>

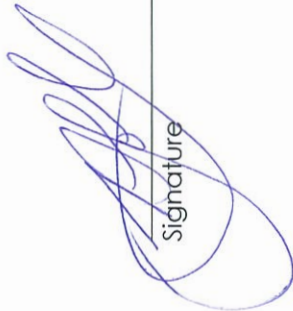
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<p>The specific provisions my submission relates to are:</p>	<p>My submission is that:</p>		<p>The decision I would like the Waikato Regional Council to make is:</p>
<p>Stock exclusion 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.6 and any consequential amendments arising from this submission point.</p>	<p>Oppose</p>	<p>I agree that some waterways need to be fenced and full stock exclusion should apply. However there are more practices that can be implemented that reduce contamination loss i.e. having water reticulation maybe just as effective as fencing off water courses. Definition of 25 degree slope is unclear how this works and should be addressed in the implementation plan which we have not seen.</p>	<p>Change stock exclusion standards to the nationally recommended standards which have been recommend in February 2017. Use a FEP to determine the level of what stock exclusion is required which should be determined by the amount of contamination losses.</p>
<p>Partial withdrawal of the catchment (Hauraki).</p>	<p>Oppose</p>	<p>WRC needs to make this plan inclusive of all areas affected and withdrawing part of the region as this has created uncertainty and inequity for stakeholders involved.</p>	<p>The plan should be withdrawn until the catchment is all inclusive.</p>
<p>The specific provisions my submission relates to are:</p>	<p>My submission is that:</p>		<p>The decision I would like the Waikato Regional Council to make is:</p>
	<p>SUPPORT / OPOSE</p>	<p>REASON</p>	<p>RELIEF SOUGHT</p>

Yours sincerely

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Andrew Jolly



Signature

7/02/2017

Date