

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	
FOR OFFICE USE ONLY			
		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

FORM 5 Clause 6 of First Schedule, Resource Management Act 1991

SUBMISSIONS CAN BE	
Mailed to	Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240
Delivered to	Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton
Faxed to	(07) 859 0998 <i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>
Emailed to	healthyivers@waikatoregion.govt.nz <i>Please Note: Submissions received by email must contain full contact details. We also request you send us a signed original by post or courier.</i>
Online at	www.waikatoregion.govt.nz/healthyivers
We need to receive your submission by 5pm, 8 March 2017.	

YOUR NAME AND CONTACT DETAILS		
Full name : Dairy Goat Co-Operative (N.Z) Ltd		
Full address : 18 Gallagher Drive, Hamilton 3240		
Email Tony.Giles@dgc.co.nz	Phone 021 851 590	Fax 07 839 2920

ADDRESS FOR SERVICE OF SUBMITTER		
Full name: Tony Giles		
Address for service of person making submission : Dairy Goat Co-Operative (NZ) ltd, PO Box 1398, Hamilton, 3240		
Email: Tony.Giles@dgc.co.nz	Phone (07) 839 2919 Mobile (021) 851 590	Fax (07)839 2920

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<input checked="" type="checkbox"/> I could not gain an advantage in trade competition through this submission.

THE SPECIFIC PROVISIONS OF PROPOSED PLAN CHANGE 1 THAT MY SUBMISSION RELATES TO

*Please state the provision, map or page number e.g. Objective 4 or Rule 3.11.5.1
(continue on separate sheet(s) if necessary.)*

Please refer to the attached submission

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

(select as appropriate and continue on separate sheet(s) if necessary.)

Support the above provision with amendments

MY SUBMISSION IS THAT

*Tell us the reasons why you support or oppose or wish to have the specific provisions amended.
(Please continue on separate sheet(s) if necessary.)*

Please refer to the attached submission

I SEEK THE FOLLOWING DECISION BY COUNCIL

(select as appropriate and continue on separate sheet(s) if necessary.)

Accept the above provision with amendments as outlined below

Amend as follows:

Please refer to the attached submission

PLEASE INDICATE BY TICKING THE RELEVANT BOX WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION

I wish to speak at the hearing in support of my submissions.

JOINT SUBMISSIONS

If others make a similar submission, please tick this box if you will consider presenting a joint case with them at the hearing.

IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW

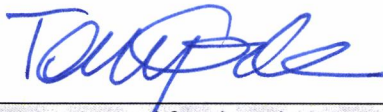
Yes, I have attached extra sheets. (5 in total)

SIGNATURE OF SUBMITTER

(or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature



Date

28/02/2017

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.

PLEASE CHECK that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.



18 Gallagher Drive, PO Box 1398, Hamilton 3240, New Zealand
Phone (64 7) 839 2919 Fax (64 7) 839 2920 Website www.dgc.co.nz

Chief Executive Officer
Waikato Regional Council
Private Bag 3038
Hamilton 3240
New Zealand

28 February 2017

Healthyrivers@waikatoregion.govt.nz

Dear Sir/Madam

**Proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments
Submission from Dairy Goat Co-operative (N.Z) Ltd**

Dairy Goat Co-operative makes the attached submission on Proposed Plan Change 1 – Waikato and Waipa River Catchments. Attached are:

- A completed version of Form 5 as provided on the Waikato Regional Council website; and
- A document containing the detail of our submission.

Yours faithfully



**Tony Giles
Chief Executive Officer**

Attachments:

- Form 5
- Detailed Submission from Dairy Goat Co-operative
- Letter from Overseer Chief Executive, Dr Caroline Read

Submission: Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments

Dairy Goat Co-operative is a New Zealand farmer owned Co-operative established in 1984. It specializes in the development, manufacture and international marketing of its own-brand goat milk nutritional powders for infants and children. It owns and operates its entire core manufacturing processes, enabling tightly controlled production of high quality milk formula for infants and children.

Hamilton based, Dairy Goat Co-operative is an export focused business that sources goat milk from its shareholder suppliers in Northland, Waikato and Taranaki. The proposed Waikato Regional Plan change is significant for Dairy Goat Co-operative because 26 of our 73 shareholders farm in the Waikato Regional Council area, many within the Waikato river catchment.

The co-operative is committed to the enduring health and wellbeing of current and future generations of children. Dairy Goat Co-operative markets and distributes its products in over twenty countries. It is an international leader in researching the functional benefits of Goat milk for paediatric nutrition, and has published clinical research trials internationally.

Submission Points

Dairy Goat Co-operative is generally supportive of the prime objective of the proposed plan change to improve the health of the Waikato River catchment. Dairy Goat Co-operative submits that achieving this should occur in a manner that recognises and supports good behaviours by landowners, past, current, and future, and maintains and improves the well-being of the Waikato community as a whole.

Dairy Farming

Dairy Goat Co-operative notes that the proposed plan change defines dairy farming as being “the farming of dairy cows on a milking platform for milk production”. Dairy Goat Co-operative supports the retention of this definition due to the significant differences in farm management, animal management practices and potentially in contamination loss, between cow based dairy systems and the environmental impacts of other dairy systems. Dairy goat farming should be considered as livestock grazing other than dairy farming.

The suppliers of the Dairy Goat Co-operative have worked hard to ensure their farming operations are sustainable, and their impacts on the environment are minimal. Many of the concerns noted in the proposed plan change, and the resulting regulation, are likely to be less relevant to these farmers due to the majority of dairy goats being in housed situations. This is a key difference in management systems between dairy goat farming and most other pastoral farming occurring within the catchment. The ability to capture and control the nutrients associated with the goats, and the manner in which pasture is managed and harvested, is almost unique to such systems.

Equity

Dairy Goat Co-operative submits that historic pro-active environmentally sound actions by land managers should be recognised and rewarded, and certainly not disadvantage those that have taken early action in any way. Farming families supplying the Dairy Goat Co-operative have opted to use a specific type of farming system, and have undertaken riparian fencing and planting on their farms. They have invested significantly in effluent systems, solids storage, and management systems that leave them with reduced options for future contaminant loss mitigation. They have acted early.

There are likely to be other land managers who have not yet recognised or taken action to address the range of contaminants they currently lose to the Waikato catchment, especially contaminants other than nitrogen. This lack of action to date provides these land managers with a greater range of mitigations they can implement in the future.

Dairy Goat Co-operative is concerned that this difference in action/inaction could result in those land managers currently losing more contaminants gaining an advantage over time, especially when allocation of contaminant discharge rights occurs. Should all land managers be required to reduce contaminant losses proportionally, those who have acted responsibly in the past would be disadvantaged.

Dairy Goat Co-operative submits that the Proposed Plan Change must ensure that the impacts of change are equitably shared, with recognition of historic activities taken by land managers to reduce contaminant loss, and the reduction in mitigation options that have already resulted. To do otherwise would be both unfair and send perverse incentives to land managers. This would then likely result in a lack of early uptake of best practice in the future unless required using regulation.

Dairy Goat Co-operative also submits that in any consideration of future allocation of contaminant discharge rights, that this issue (recognition of past positive actions) and the need for fairness and equity should be key guiding principles

Overseer

Overseer is proposed as the model that will be used to benchmark nitrogen loss levels of properties (Nitrogen Reference Point (NRP)), and will be used to inform decisions by Council when considering applications to change land use (e.g. is it likely that the proposed land use will have a higher or lower level of N loss than the current land use).

DGC supports the use of a single equilibrium model, such as Overseer, to benchmark nitrogen loss levels of properties. Dairy Goat Co-operative submits that the current proposed Overseer model approach does not work at present for the dairy goat system. Dairy Goat Co-operative has been working with the organisation that manages the Overseer model (Overseer Limited) to gather the data required to develop the model to the extent that it can model dairy goat management with a degree of surety. At this time the necessary changes have not been made to Overseer to do so. Communications from Overseer Limited indicate that these modifications are unlikely to be made for at least 12 months, if not longer.

A communication from the Chief Executive of Overseer Limited, Dr Caroline Read, is attached to confirm our assertion and technical conclusions on this point.

Dairy Goat Co-operative submits that given the current agreed lack of ability of the Overseer model to model the dairy goat system those land managers currently operating such systems, or who wish to move towards or away from such systems to other land uses, will be disadvantaged. Their property's initial NRP may be significantly different from the reality, and in the absence of good information on current or potential N losses, the ability to change land uses will be constrained.

Dairy Goat Co-operative believes that this may prevent what could be sensible future land use change, and places an unfair barrier before this sector. Dairy Goat Co-operative submits that the Waikato Regional Council should explicitly address this issue by providing an equitable alternative pathway for the dairy goat sector until such time as the Overseer model is able to be upgraded.

Stock Exclusion

Stock exclusion is a key component of the proposed plan change. Schedule C (1) states:

"1. The water bodies must be fenced to exclude cattle, horses, deer and pigs, unless those animals are prevented from entering the bed of the water body by a stock proof natural barrier formed by topography or vegetation."

Within the body of the proposed plan change the terms stock and livestock are used. Neither are defined. This results in a lack of clarity as Schedule C (3) states:

"3. Livestock must not be permitted to enter onto or pass across the bed of the water body, except when using a livestock crossing structure."

In reading the document it is unclear whether only those stock types stated in Schedule C (1) must be excluded from water bodies, or whether ALL (undefined) livestock/stock must be excluded, have crossing points etc. Dairy Goat Co-operative submits that this lack of clarity must be resolved, and that:

- A common term be used throughout the document at the least in relation to stock exclusion from water bodies and other associated rules etc;
- That this term be included in the definition; and
- That this refer to cattle, horses, deer, and pigs, as per Schedule C (1) only, and not include goats and sheep.

There is general agreement that sheep and goats are much less likely to enter water bodies than cattle, deer, horses, and pigs. This is the rationale for only these four specific stock types being explicitly addressed in Schedule C (1). It is also generally accepted that in the rare instances sheep and goats do enter water bodies they have minimal environmental impacts. This is supported within the Section 32 report for the Plan Change.

Dairy Goat Co-operative requests that the submission points above be addressed along with any other resulting amendments to the proposed plan change that are required.

- Dairy Goat Co-operative wishes to be heard in support of this submission.

David Hemara
General Manager
Strategy and Commercial
Dairy Goat Co-operative (NZ) Ltd
PO Box 1398
Hamilton 3240

27 February, 2017

Dear David,

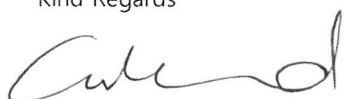
Thank you for your recent correspondence and our discussions regarding the Dairy Goat Co-operatives (DCG's) use of the OVERSEER nutrient budgeting tool.

I would like to acknowledge the issues the DGC are experiencing with OVERSEER; particularly around the difficulties in modelling the net nitrogen loss for cut-and-carry milking goat operations.

Thank you for working with us to identify and specify the issues your industry is facing. While we will work over the next 12 months to improve the user experience; it is important to note the science required for modelling changes will take some time to deliver.

I would like to thank you for your ongoing support of OVERSEER. I look forward to providing you with an update on this matter as soon as possible.

Kind Regards



Dr Caroline Read
Chief Executive
Overseer Limited