

# 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
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	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 <b>Please Note:</b> if you fax your submission, please post or deliver a copy also
Emailed to	<a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a> <b>Please Note:</b> Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.
Online at	<a href="http://www.waikatoregion.govt.nz/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>

We need to receive your submission by 5pm, 8 March 2017.

## YOUR NAME AND CONTACT DETAILS

Full name Kevin and Jane McDonald		
Full address 25 Jay Road R D 2, Reporoa 3083		
Email KairuruNZ@gmail.com	Phone 073338068 02040474078	Fax

## ADDRESS FOR SERVICE OF SUBMITTER

Full name Jane McDonald		
Address for service of person making submission 25 Jay Road, R d 2, Reporoa. 3083		
Email KairuruNZ@gmail.com	Phone 02040474078	Fax

PLEASE INDICATE WHETHER YOU WISH TO BE HEARD IN SUPPORT OF YOUR SUBMISSION
<b>Yes</b> I wish to speak at the hearing in support of my submissions.
<input type="checkbox"/> I do not wish to speak at the hearing in support of my submissions.

I could not gain an advantage in trade competition through this submission.

SIGNATURE	OF	SUBMITTER
(or person authorised to sign on behalf of submitter)		
Signature is not required if you make your submission by electronic means.		

Signature : Jane McDonald



Date 07-03-2017

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.

**SUBMISSION on Healthy Rivers Plan.**

**McDonald Family, Kairuru Polled Herefords, 25 Jay Road, Reporoa. 3083.**

**Contact: Jane Phone 073338068, 02040474078.**

**Email: KairuruNZ@gmail.com**

**Our FMU Priority Level is 1.**

**Our nitrogen reference Point is 36.**

**We give support to the submission they have lodged by Federated Farmers.**

**I wish to be heard at the Hearing.**

**Situation:**

We own a 200 ha mainly beef property, with some sheep in the Reporoa Valley. Our farm is a large Rhyolytic dome with medium- steep sidelings, and rolling contour on top and around the base. There are 10 hectares of irrigated flats bordering the Mangakara Stream which runs for 1 kilometre through the rear of property.

The farm is home to the Kairuru Polled Hereford Stud established in 1979.

90-100 stud cows, selling high genetic merit R2yr bulls to the beef industry throughout New Zealand. Approx 90 stud calves, 25 r2yr heifers, 35 r2yr stud bulls for on farm sale. In addition, 100 hereford x friesian calves reared on farm and carried to 2 ½ years, (so depending on time of year either 2 or 3 mobs of different age groups) 300 friesian calves reared to 100 kg and sold, 200-300 sheep, All silage supplements are made on farm, with excess sold. Some grazing of neighbours stock during surplus times.

**Environmental aspects of the property**

The Mangakara stream flowing through the property, was retired from grazing access in 1992.

It was fenced, a new water supply installed, and planted with slow growing natives and exotics to create an aesthetically pleasing and effective buffer for the stream. **The Environment Waikato and Conservation Department schemes of the time paid 6/7ths of the costs.**

It is now a beautiful reserve.

However blackberry covers the stream banks, shades the stream and prevents access to the stream for most of its length and it is a haven for possums, and wildfowl. A neighbour shot 52 possums there recently. Possums are known to harbour TB, and wildfowl are a recognised source of salmonella and E. coli. Wild willows have spread wherever there are no large trees to block light. They are known to suck water out of a stream and reduce flow rates.

**Family Aspects:**

The farm is owned by Kevin (age 66 and Jane McDonald age 60), with son and daughter-in-law involved in day to day running.

Succession planning is underway but that is under threat under the new regulations introduced.

The farm also supports two adult children with congenital issues who will require full-time lifelong support. For us succession planning requires that the farm is able to adequately support parents to retire, son and his wife and family to continue to make a living, and two other children to be supported lifelong.

### Stock Balance

This farm already has a very efficient balance of stock, suited to the contour of the land. Sheep, and younger cattle, run on the steeper country at a light stocking rate. The 2 year steers leave the farm prior to the dry months, with the breeding herd, young stud cattle, and younger steers retained for winter months. The irrigation block is on 10 ha flat land with a soil type that normally produces little grass from Dec to April.

### Cropping and Cultivation

Aproximately 8 hectares of tall Kale crops are grown for winter feed. With very cold winters causing low-zero grass growth for several months, these are essential for the adequate nutrition and health of stock. The Kale paddocks are returned to grass by cultivation, because this is essential to the economy of this farm. The new cultivars, and crop rotation provide renewal of the farm over a period of years, ensuring on-going high quality of pastures. Other paddocks are undersown (drilled) with new cultivars of grass after the summer dry to ensure adequate hi-quality grass going into winter. To improve drainage, paddocks which are compacted are ripped periodically, allowing better grass establishment.

### Future plans

We are currently trying to increase land area to improve economies of scale. We plan to increase the Hereford herd to supply bulls to the dairy industry as well the beef industry.

If we have to sell the present farm because it becomes uneconomic under these rules, we would have to subdivide into smaller blocks which would be used as runoffs for dairy grazing, or by dairy neighbours to extend their milking platform.

### OUR CONCERNS:

We are concerned about the Plan Change 1 rules for the following reasons:

1) The nitrogen reference point :

- a. The cap and the plan to reduce it in progressively brings uncertainty and inflexibility to the running of our farm, The nitrogen cap restricts our decision making, and prevents us making the best use of our land from both an agricultural and economic perspective.
- b. It affects our succession planning. The proposal for the nitrogen cap to be lowered again in future will make our operation uneconomic, and prevent us taking the steps we need to ensure farm succession takes place.

With the average age of sheep and beef farmers between 54 and 60 (according to Beef and Lamb), farm succession is considered one of the biggest threats to the industry and was called a 'ticking time-bomb' by Beef and Lamb, Rabobank and BNZ representatives at a 2015 succession seminar we attended.

The nitrogen cap will either delay, or prevent altogether, the sale of many farm properties from father to sons or daughters. Many will exit the industry, unable to make the leap into high priced land, and still be financially viable. This will put downward pressure on land prices, and equity. This will cause banks to come under stress. No-one will want to farm uneconomic farms, so some people will not be able to sell their land.

There will also be a huge loss to the New Zealand economy from lack of succession.

**The family farm unit, a fundamental farming entity, considered the most efficient farming system, is under threat.**

- c. The reference point being only taken over 2 years will cause problems for people who have de-stocked or reduced inputs over the last two years, maybe for health, aging, or financial reasons, or drought. It is most unfair that they are now restricted to the same levels from now on. The reference point should be taken over at least 5 years to even out annual fluctuations from changes in stocking policies and weather conditions.
- d. It would therefore be better to set a standard reference point for everyone, which people can go up to but not exceed.

- e. There must be a clause which allows farmers to negotiate when hardship will result.  
There also needs to be leniency from prosecution where hardship will result from these policies. People cannot comply if they can't afford to. This is a massive assault on the viability of farm businesses, and it cannot be underestimated the stress it is causing and will cause.
2. The restriction of land over 15 degrees not to be cultivated.  
a. I can't believe this rule! I mean most farm land in New Zealand is over 15 degrees slope. And paddocks have varying slopes all over them. I just don't understand how this will ever be measured.  
The agricultural class 'rolling land' encompasses land that has slope much greater than 15 degrees. Yet this document says rolling land is 3-15 degrees which from a farming perspective is flat land. It shows the people who made this policy have no idea of the practicalities of what they are proposing.  
**Questions:** What are we trying to achieve with this?  
**Where is the science that shows that all land over 15 degrees slope causes a problem to the waterways when cultivated?**  
There will be a large amount of farmland over 15 degree slope that can be cultivated without causing runoff into waterways.  
On our own farm, the majority of the cultivable land flows down onto paddocks that do not drain directly into a river or stream. Therefore any runoff water with sediment is retained in the paddocks, not carried into waterways.  
The paddocks that do drain into the stream on our farm have large planted riparian buffer strips. So what's the problem with this scenario?  
This rule has the potential to set agricultural production back in a very big way.  
Loss of income from this will reflect through the whole economy from reduced yields of pasture..
- b. It will mean we will have to reduce stocking rates. If we cannot return our crop land to high quality pasture, which after cropping, requires cultivation to break up the soil, we will have to reduce stock, and this will impact our income. Because we need our farm to succeed to the next generation, we will not be able to support the two families on this land if stocking rates are reduced. This will break up our family which needs to support each other to enable survival.
3. The social and economic impact on rural communities of these policies has not been considered.  
We all want healthy rivers, yes, so people can swim and fish, but farmers are a part of the community too, in fact, they make up the majority share of rural communities in New Zealand. They also collectively provide a huge input to the economic wellbeing of this country.  
**Questions:** Can you explain why a policy goal for economic and social well being of the community has been enacted, when the very policy will lead to such pain and suffering for farmers and those in related industries.  
Surely farmers are part of the community for whom economic and social wellbeing is important, and wellbeing is not just about good water, but also about justice and fairness and many other things? If obtaining good water brings about economic and social hardship for people, how is that fair?  
a. i) Farmers often work in isolation, long physical hours, often in terrible weather causing fatigue stress.  
ii) Sheep and beef farmers can have large fluctuations in schedules, resulting in financial stress, after working a year and finding that reduced schedules means they get less income than they budgeted.  
iii) They have stress on them from OSH requirements, with the fear of prosecution if an employee makes a blunder causing injury or loss of life. (The best safety efforts cannot completely remove danger from farming activities.)  
iv) They have to adequately feed their stock all year, even in severe weather events, which from experience is very stressful.

- v) A nitrogen cap will restrict their options to supplementary feed, and financial losses meaning they cannot purchase supplement, causing more stress.
  - vi) And if they break the rules under this plan, they are liable for prosecution and threat of jail, even more stress.
- b. Some farmers will be forced to sell their land, as it will become uneconomic to continue.  
A reduction of farm prices will be the result.  
This will lead to a drop of equity for many, forcing them to sell also.  
There will be marriage break-ups, depression, and suicides, because many farmers will be trapped, feeling there is no way out.  
Those who bought over recent years with high mortgages and lower equity will be very vulnerable.  
I remember the 1980s when the Lange Government introduced Rogernomics. The policies led to a sudden drop in prices, equity and an increase in farmer suicides, so there is proof that this is what happens in these scenarios.
- c. The viability of rural communities will be affected too. Related industries will also feel the pain.

There has got to be a better way.

The benefit of healthy rivers is to the whole nation, so a significant proportion of the cost must be borne by the whole nation.

4. The stock exclusion rule:
- a. The practicality is that the cost of doing this will be prohibitive for most farmers.  
This will also lead to depression for many, and suicide. The people who have introduced this plan will be personally responsible for the health and lives of affected farmers because they have been warned of the consequences of these policies in the submissions. If they proceed it will be on their heads.
  - b. Farmers do not intentionally set out to pollute the rivers. Most have simply farmed according to current practices, guided by farm consultants, in ignorance of the consequences to the water. Remember there was no science of waterways till recently.  
So they are not to blame for this predicament, as many would like to imply. They are victims of it.
  - c. We happily retired our stream from stock access because it was subsidised 6/7ths.  
I believe that farmers would embrace some of these ideas as we did, if a significant share of the costs was paid by NZers.  
The loss of farm value caused by PC1 is the same effect as chopping a piece of land off the farm for public works.  
There is provision under an act of parliament for compensation to landowners for public works that take a portion of their property.  
Provision needs to be made in this situation too.  
EG: In another situation: the government supported South Canterbury Finance, a \$billion business empire that went into receivership, to prevent the economic fallout to the rest of New Zealand economy. PC 1 will also have economic fallout to all of New Zealand, and the banking system will be undermined.
  - d. Booming weed, possum, rat, stoat and wildfowl population will mean contamination of waterways still occurs, possibly at a lesser extent than if stock have access, but a greater threat is to the TB eradication scheme, on which our exports depend.  
Weeds will proliferate eg gorse, (A nitrogen producer) and willows, which suck the water out and reduce flows.

5. Inaccurate data being used is a major concern to us.

Question: What data are we basing this whole project on? Is it actual data? Or made up (modelled) data? We need to see the data. Farmers have a right to be properly informed of the science behind this project.

- a. Overseer is not accurate, and depends heavily on the weightings of the inputs and actual data entered into it.

For example when the practitioner entered in our beef cattle as normal beef cattle, we had a much higher nitrogen reading. When the actual weights of the animals were entered, to properly reflect the high performance of stud stock, it came down significantly. And there's a lot of variation in real life that's not reflected in a computer model.

People's livelihoods depend on this, so that's a major concern.

- b. The monitoring and reporting of the rivers water quality is also of doubtful accuracy.

Especially we read today in Farmers Weekly of Northland rivers streams and lakes being reported on the MfE website as being the least swimmable in the country (based on computer modelling and regional council monitoring)

but Northland Regional Council testing revealed that 93.5 % of the samples were fit for swimming.

- c. Surely the first step must be to identify accurately where action will be most effective, based on real data.

- d. Ideally there must be government money made available now to test the water bodies accurately.

- e. The different soil types make a huge difference to the way water enters the river system. Some soils drop out, and others produce cloudy, muddy water.

- f. There are projects underway to use planted areas as a trap for runoff before water enters the water body. If a farm, or farming community, can use these practices, surely it would make better sense to assist people financially to do this, rather than getting them to fence remote areas, where wild animals who also use the streams as of right will be excluded, leading to death, a cruelty issue.

6. Farm Environment Plan.

- a. The cost of this exercise will add yet another financial burden on us. Estimates are that it will be \$6000.

There are so many compliance costs with this plan.

- b. I am appalled to learn that regulations have been already been passed into law when there is so little preparation in terms of competently trained people to implement these plans.

Question: How many people with a working understanding of farming will be available to do justice to the magnitude of this task?

We can be liable for prosecution if we don't comply, so there is a huge burden of responsibility on the WRC to employ properly trained people with an understanding of the practicalities of farming.

These

people will effectively be putting some people out of business so there is no margin for error.

7. Problems with not being able to change land use. If we sell and the purchaser may be a dairy farmer wanting to use the better land to increase his milking platform. Or as a dairy grazing block. If this option is not available, it will restrict who we can sell our land to.

8. Question: When is the pollution from cities into the rivers from runoff, and storm water going to be addressed?

Also from specific processing industries? Also from roads with diesel and petrol runoff? Why have all farmers been targeted, when there is a massive problem with storm water runoff from towns?