

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

YOUR NAME AND CONTACT DETAILS		
Full name New Zealand Association of Resource Management (NZARM)		
Full address C/- Gisborne District Council, P O Box 747, Gisborne		
Email Kerry.Hudson@gdc.govt.nz	0275040801	Fax NA

ADDRESS FOR SERVICE OF SUBMITTER		
Full name Kerry Hudson (President NZARM)		
Address for service of person making submission P O Box 747, Gisborne		
Email Kerry.Hudson@gdc.govt.nz	0275040801	Fax NA

TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>
<input type="checkbox"/> I could / <input checked="" type="checkbox"/> could not gain an advantage in trade competition through this submission.
<input type="checkbox"/> I am / <input checked="" type="checkbox"/> am not directly affected by an effect of the subject matter of the submission that: (a) adversely effects the environment, and (b) does not relate to the trade competition or the effects of trade competition. Delete entire paragraph if you 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.)

Background:

1. The Waikato Regional Councils proposed plan change 1 provides for farming to be subject to regulation under the proposed plan change. As part of the regulatory process, Farm Environment Plans will be required within parts of the Waikato region.

Schedule 1 Section A(2)(d) of the Waikato Regional Council Proposed Plan Change 1 states (in part):
A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner.

The Farm Environment Plan shall identify all sources of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants.

The Farm Environment Plan must clearly identify how specified minimum standards will be complied with.

The requirements set out in A apply to all Farm Environment Plans, including those prepared within a Certified Industry Scheme.

This schedule applies to all farming activities, but it is acknowledged that some provisions will not be relevant to every farming activity.

A. Farm Environment Plans shall contain as a minimum:

.....
(d) An assessment of appropriate land use and grazing management for specific areas on the farm in order to maintain and improve the physical and biological condition of soils and minimise the diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens to water bodies, including:

- (i) matching land use to land capability; and
- (ii) identifying areas not suitable for grazing; and
- (iii) stocking policy to maintain soil condition and pasture cover; and
- (iv) the appropriate location and management of winter forage crops; and
- (v) suitable management practices for strip grazing.

2. Certified Farm Environment Planners.

The proposed change has the definition of a Certified Farm Environment Planner as:

Certified Farm Environment Planner: is a person or entity certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a Certified Farm Environment Planner and has as a minimum the following qualifications and experience:

- a. five years' experience in the management of pastoral, horticulture or arable farm systems; and
- b. completed advanced training or a tertiary qualification in sustainable nutrient management (nitrogen and phosphorus); and
- c. experience in soil conservation and sediment management.

I SUPPORT OR OPPOSE THE ABOVE PROVISION/S

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

- Support the above provisions
- Support the above provision with amendments
- Oppose the above provisions

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.)

The New Zealand Association of Resource Management (NZARM) is an incorporated society with membership drawn from professional people engaged in the management of natural and physical resources. The goal of the Association is to promote the philosophy, science and practice of resource management in New Zealand, with particular emphasis on land and water resource management.

The Executive committee of NZARM makes the following submission in respect of the proposed plan change.

NZARM agrees with the provisions set out in Schedule 1 Section A(2)(d), which requires that a Farm Environment Plan contain as a minimum, a number of requirements, including the following:

An assessment of appropriate land use and grazing management for specific areas on the farm in order to maintain and improve the physical and biological condition of soils and minimise the diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens to water bodies, including:

- (i) matching land use to land capability*

However, the skill set prescribed in the definition for Certified Farm Environment Planner does not include training to carry out or interpret land use capability (LUC) at farm scale level. The only complete land use capability information available over the area covered by the proposed change is the 1:50,000 Land Resource Information (LRI) national database. Using 1:50,000 scale mapping at farm level requires interpreting the data to be relevant to farm scale (often 1:10,000 scale or finer). This means that the 1:50,000 LRI data needs to be ground truthed to farm scale in order to provide realistic information. This is particularly relevant on hill country, and requires a degree of specialist training and experience in land use capability mapping. This training was historically undertaken by Ministry of Works and Development in the 1980s. Landcare Research is the custodian of the LRI database, but they do little to ensure the updating or maintenance of the database, and do not carry out any training on land use capability. Over the last 15 years, land use capability mapping training in New Zealand has been primarily undertaken by expert soil conservation consultants (Garth Eyles – See the Proof, and Norm Ngapo – Waioara Soil Conservation Ltd), and the training has specifically targeted Land Management staff of Regional Councils. This training involves a 3-day training course, with a strong emphasis on training Council staff on field mapping techniques so they can proficiently ground truth the national 1:50,000 LRI maps. In addition, the third day of training covers the process of matching of land use to land capability. The courses have been run on an annual basis, and are supported by the Land Managers Group of Regional Councils as part of the required skill set for Land Management Officers. Up until this calendar year, the courses have attracted funding from Ministry of Primary Industries as recognition of their value to New Zealand's primary production.

The New Zealand Association of Resource Management submits that Certified Farm Environment Planners should provide certified evidence of having undertaken and completed specialist training in land use capability mapping, and also submit at least 2 LUC farm maps that they have prepared, for peer review by expert Catchment Management staff of Waikato Regional Council.

This will require suitable training courses to be offered to staff and consultants for upskilling on LUC mapping at farm scale level, so that ground truthing of the LRI National Database can be undertaken. Peer review of at least 2 LUC farm maps by expert Catchment Management staff of Waikato Regional Council, should also be included to confirm that the Farm Environment Planner is able to carry out LUC mapping.

This will ensure that Certified Farm Environment Planners have a skill set which includes being able to ground truth the 1:50,000 LRI maps at farm scale, and to use this information to match land use to land capability. This will mean that they have the necessary skills to fulfil the requirements set out under Schedule 1 Section A(2)(d)(i).

The New Zealand Association of Resource Management is able to provide assistance to Waikato Regional Council in co-ordinating the availability of suitable training courses to upskill rural professionals and assist in setting up appropriate systems for peer review of LUC farm mapping if necessary.

The New Zealand Association of Resource Management wishes to be heard in support of their written submission.

Signed:

Kerry Hudson

President NZARM

Date: 6 March 2017

I SEEK THE FOLLOWING DECISION BY COUNCIL

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

- Accept the above provision
- Accept the above provision with amendments as outlined below
- Decline the above provision
- If not declined, then amend the above provision as outlined below

Amend as follows:

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.
- I do not 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.
- No, I have not attached extra sheets.

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 6 March 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.

Additional sheet to assist in making a submission

Section number of the Plan Change	Support /Oppose	Submission	Decision sought
Please refer to title and page numbers used in the plan change document	Indicate whether you support or oppose the provision.	State in summary the nature of your submission and the reasons for it.	State clearly the decision and/or suggested changes you want Council to make on the provision.