

**Before an Independent Hearings Panel**

**The Proposed Waikato Regional Plan Change 1**

**IN THE MATTER OF** the Resource Management Act 1991 (RMA)

**IN THE MATTER OF** the Proposed Waikato Regional Plan Change 1, Block 3 hearings

**J H Cotman**

**Submitter to Plan Change 1 (and Variation 1).**

**Presentation to Hearings Panel**

**September 2019**

**Please find attached my presentation.**

This Submission discusses;

- ❑ Solutions - Key Building blocks to direct the Plan Policies.
- ❑ A brief summary of my background that I base my expertise on.
- ❑ Expand on the experience of a Farmer instigated Primary Stakeholders Catchment Trust (Inc) along with the hurdles we faced with WRC developing our Catchment Management Plan.
- ❑ Finally urge you to deregulate & simplify the 'New Plan' by empowering landowners (the decision makers) to work toward achieving the 'V & S'

- 1.1. I appreciate the opportunity to present to you today and before providing a little of my background and experience that provide substance to my views a few quick comments
- 1.2. I submitted to PC1 and followed this up when Variation 1 was added back into the process.
- 1.3. By now you have heard numerous presentations from many parties pointing out many of the difficulties I too found with the intent to implement PC1 as proposed.
- 1.4. My submissions have been clear from the outset in that:  
  
Overbearing regulation will not achieve the 'Vision & Strategy' but instead 'Self Determination' by an engaged farming community will lead along the pathway of continuous improvement. Good planning would allow for this.
- 1.5 **We need a clean sheet approach to deliver a Plan that is resilient, is achievable and meets the all important economic, social, cultural and environmental results that we can deliver.**

## Catchment Planning Building Blocks

- WRC willingness to openly share their water quality expertise & information while; - listening to and accepting other science expertise.**
- Catchment by Catchment water quality analysis that measures and identifies risks.**
- Farmer led Catchment Groups (NZ Landcare Trust/DairyNZ/Beef & LambNZ, HortNZ)**
- Permitted Certified Industry Schemes where appropriate to encourage uptake.**
- Consideration of a range of solutions/mitigation options (Decision Support Matrix)**
- Farmers to prioritize possible solutions aligning with GFPs.**

- 2.1 Contrary to much of what I attempted to wade through in the SEC 42 Reports there is a simple recipe for achieving action. It is not rocket science but can be a measured achievable process.
- 2.2 If we are to make progress the skill base within this Region should be more constructively focused and utilised. Clearly WRC has a significant skill base of water quality science. Measuring and reporting on WQ will provide the support for decision making options.
- 2.3 Farmers have the on-farm skill base along with an understanding of how to effect change and further develop our FEPs – led through effective action on GFP's.
- 2.4 The start point should come from analysis of Catchment Water Quality, identifying priority issues that lead to cost effective mitigation at catchment or farm scale.
- 2.5 To build on this the Plan should provide for **Permitted Activity Status for FEPS** including;  
Farmer Initiated FEPs  
Farmer led Catchment Groups.  
Certified Industry Schemes.
- 2.6 Its important to establish the parameters (Key Metrics) and allow for Aggregate reporting.
- 2.7 Ensure that a non-intrusive, cost-effective audit processes can be developed.
- 2.8 I support the submission made on behalf of PLUG on 17<sup>th</sup> July that set out the need for; Permitted CIS, Aggregate Reporting, Cost effective TPA of Farm Plans and the further Submission made in 3<sup>rd</sup> phase hearings in August. Largely supportive too of Fed Farmers.



### **Personal Statement**

***I'm lucky to have a broad based experience in the reality of forging a living in NZ's Primary Sector & contributing to NZ's well being. I hope that this experience can be used to assist your deliberations.***

- 3.1 My background and experience – are the drivers of my views and suggestions.
- 3.2 Next to my family my most cherished jewel is our ownership and stewardship of a reasonably challenging dairy farm at Waerenga (North Waikato) This wasn't gifted, nor inherited, but became our pride & joy 46 years ago through hard graft, often going without any frills of living and like many, facing down interest rates of up to 20%
- 3.3 We nurture the farm seeing this as an extension to our very being. It is our treasure our taonga! On a very personal note I like to think my Grandfather born in a Workhouse in England eventually emigrating to NZ for a better life for his family would feel vindicated.  
  
Yep I'm proud of my heritage and also take pride in the multi-culture society we embrace in the Waikato.
- 3.4 While I'm sure we haven't got everything right on-farm we have been receptive and adaptive to implementing well researched good practice options to look after & enhance the land we own.

## A Sense of Community

*I see around me a strong sense of community and a set of core values, of stewardship, of kaitiaki, that I believe make up the fabric of much of Rural Waikato.*

- 4.2 These values should be enhanced through good policy making not diminished through unintended consequences of rules that are poorly crafted. PC1 lost its way!
- 4.3 I've been privileged to gain broad experience across the rural sector working for, working with and playing a part in the evolution of much that which is great within the community.
- 4.4 A quick look across my experiences I hope, lead to a sense of the drivers of and to the conclusions my submissions take.
- 4.5 While still actively involved on-farm I've been fortunate to have been invited to participate with many environmental enhancement opportunities.
- 4.6 At the forefront of these has been the need to manage for economic reality while enhancing the long-term sustainability of our footprint.

## *My Experiences*

- Leadership /Chairmanship positions within Waikato***
- Partnerships with AgResearch – Farmer Learning Groups.***
- Special Projects Coordinator for NZ Landcare Trust***
- Inaugural signatory in setting up Waikato River Trust***

- 5.1 I've been able to develop some strong relationships with some very talented people in other disciplines. Leadership roles and partnerships. The work alongside AgResearch for instance (a Government Funded Project) provided their research team with a real- time understanding of how farmers think, how we act and how we take up knowledge in order to turn this into actions. It was a time where farmers taught the science team many of the basic instinctive decision-making management practices that farming requires. (Dr Mark Paine Thesis)
- 5.2 During this time, I was approached by the CEO of NZ Landcare Trust who enlisted me to assist with the set up NZ Landcare Trust NZ-wide. I spent 5 enjoyable years assisting communities set up Catchment Groups that tackle a variety of local issues. Stream Care was the number one focus for most groups. My role was to engage farming groups to ensure the Trust was relevant across sectors. NZ Landcare Trust is a great initiative that continues to work alongside local communities. I will come back to this in my conclusion.
- 5.3 I was fortunate to be invited to join a small group of inspirational people in the Waikato from where the Waikato River Trust idea was formulated. – Aim to plant natives along the length of the Waikato River- A far sighted idea that continues to work diligently slowly achieving its Grandiose aim. It will take time but time is on our side as the Armageddon is not coming.

## *My Experiences*

- Chair of NZ Farm Environment Trust (6yrs)***
- Appointed Director to Wairarapa Moana Ki Pouakani Inc. 13yrs***
- Current Director Waikato Farmers Trust***
- Current Chair of Primary Stakeholders Catchment Trust (Inc)***  
***(Interest in Lake Waikare/Whangamarino Catchment)***

- 5.6. I was approached by the great late Gordon Stephenson to get involved within the Waikato Farm Environment Awards. interest in this sphere grew - assisting set up and eventual leadership of the nationwide NZ Farm Environment Trust - a pretty rewarding time - farmers teaching farmers how to improve their environmental footprint. I have a handout of the finalists from the recent Waikato Awards - a beacon to action.
- 5.7. Particularly proud of my appointment as a Director & the 13 years involvement with Wairarapa Moana Ki Pouakani Inc. We focused initially on building the business base (4m kg/MS) to ensure the Shareholders are rewarded for their ownership and investment in the farms at Mangakino. Along the way we made sure we looked after the environment including fencing and retiring appropriate areas. One of my highlights was convincing the Board to allow me to encourage Shareholders to plant native trees in retirement areas each time we held the AGM's on-farm. I have a really good video record of one of the AGMs when the cameraman asked the Shareholder if he had come along to receive his nice dividend. The answer was-no, I really came to plant some trees in the 'Memorial Grove'.  
I'm chuffed too that the Board has embraced environmental leadership taking the ethos forward into the top performing Dairy Company Miraka.
- 5.8. This demonstrates that if we provide the example, the incentive & opportunity great things will happen. I hope you can provide incentive and opportunity for great things to happen within the construct of this Plan.
- 5.9. The Waikato Farmers Trust is a Charitable Trust working to support the Rural Community across a broad range of activities (current focus on the increasing incidence of stress/mental health)
- 5.10. The Primary Stakeholders Catchment Trust is a Landowner farmer led Trust focusing on Catchment Management. My next comments will add some further context.

**My submissions advocated for farmer initiated catchment management planning as a mechanism to identify actions relevant to the key risks.**

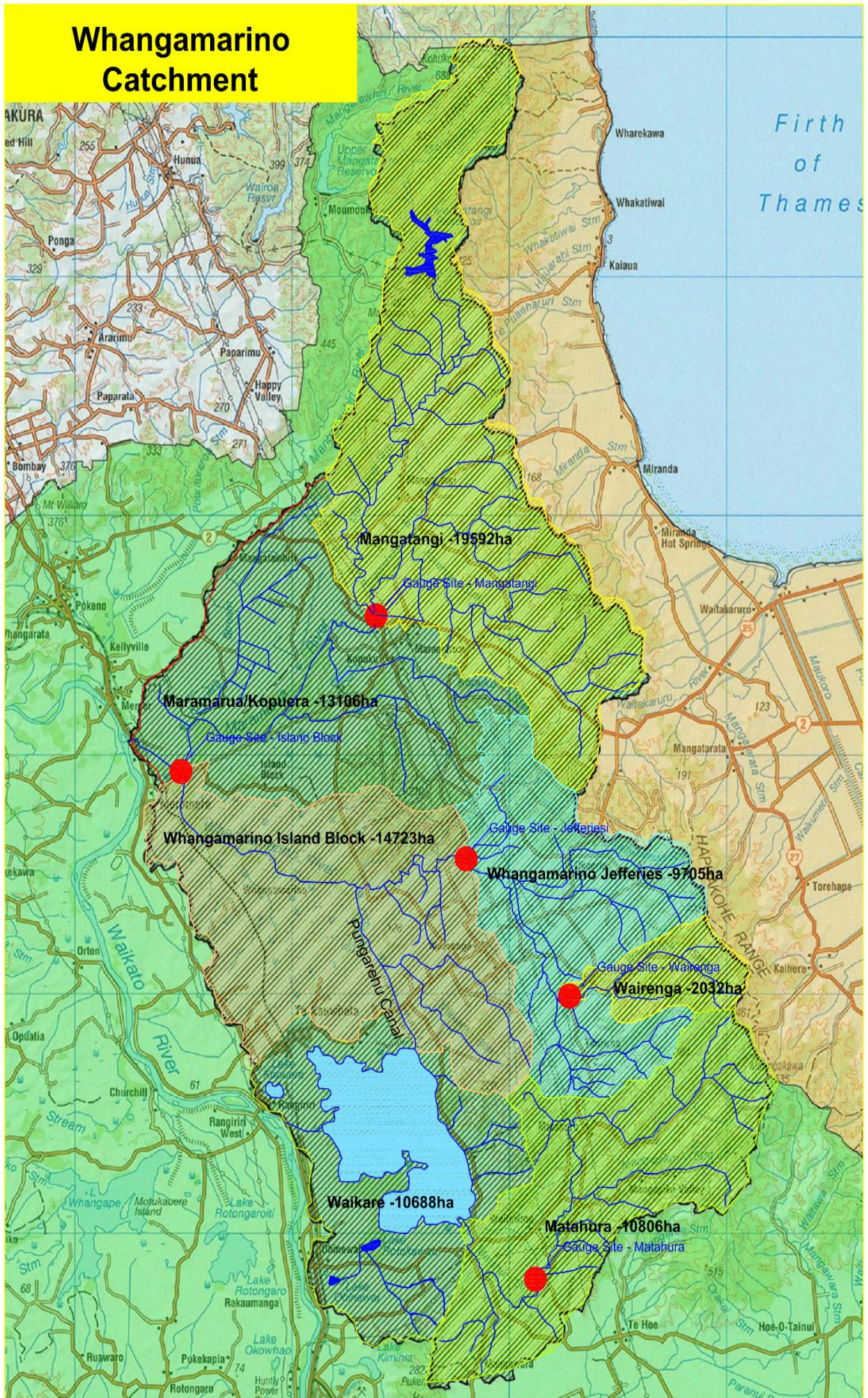
**Working Example of Catchment Planning Lake Waikare/Whangamarino Catchment**

**Formation of a Farmer-led 'Primary Stakeholders Catchment Trust Inc'**

- 6.1. Moving on to my current experience as Chair of 'Primary Stakeholders Catchment Trust. This is an example of Catchment Planning in action. (Albeit, it also demonstrated the difficulty of working constructively alongside WRC)
- 6.2. To set the scene: Year 2017. For the previous 2 years WRC had been developing a Catchment Management Plan for the Waikare /Whangamarino (Priority 1) Catchment in discussion with a number of parties that they believed were stakeholders in this catchment. Unfortunately during that time they did not recognise the landowners as key stakeholders!
- 6.3. Once we became aware farmer/landowners questioned the lack of representation & formed the 'Primary Stakeholders Catchment Trust (Inc)' (See Catchment next slide) Note Related - Sub Catchments, Matahuru, Waerenga, Waikare. Maramarua, Whangamarino.
- 6.4. All combine to enter Waikato River at Mercer as integral stepping stones for the overall Catchment. Considering these as connected parts that make up the whole picture to us seems logical and provides a more complete but community focused view.



# Whangamarino Catchment





# Primary Stakeholders Catchment Trust (Inc) (Lake Waikare-Whangamarino Catchment)

## Our Core Values

**Recognising that people within our Community are our treasure – our Taonga**

**Striving for long-term economic & social vibrancy within local communities**

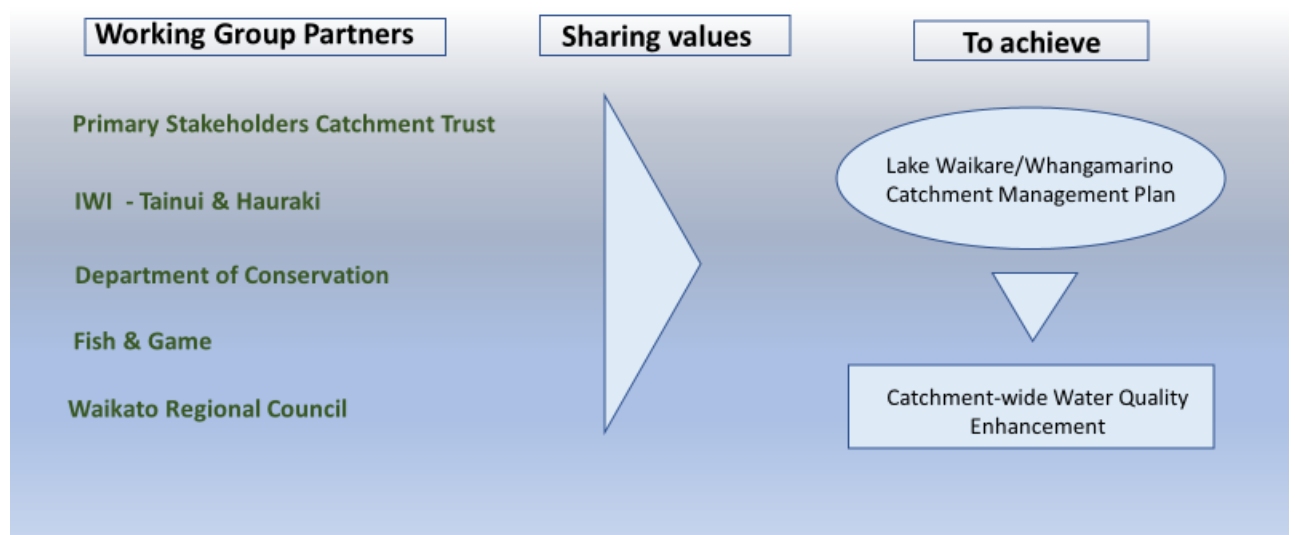
**Promoting our Culture of ‘Stewardship’ of our land and resources**

**Respecting the intrinsic values of water as one of our key resources**

**Using validated, achievable methodology to maintain or mitigate resource care**

- 7.1. Thus the Trust was set up. A current membership of over 150 local farms – double that in people numbers. The initial meeting at Waerenga Hall had over 70 farmers turn up. So yes we do want to be engaged.
- 7.2. PSCT is an Incorporated Society and have these ‘Core Values’
- 7.3. We also developed our ‘Statement of Intent’ which sets out our ‘Culture’ of ongoing ‘Stewardship of Land’. We see ourselves as ‘People of the Land’ a concept similar to Tangata Whenua beliefs around land tenure.
- 7.4. We set about engaging with Council and other parties who were already at the table.

## Lake Waikare/Whangamarino Catchment Leadership Group



- 8.1 We successfully pushed forward and sought inclusion into the process through a collaboration of key stakeholders.
- 8.2 Reached agreement to be at the 'Top table' along with others that take a major interest in what the CMP contains.
- 8.3 Note participants.

Real gains through Improving relationships as we progressed and debated the hard questions.

In particular we forged a constructive working relationship particularly with Iwi & DOC. (F & G appeared to be an outlier)

Overall it was very encouraging to see many shared 'values' (debated, and agreed)

## Leadership Group achieved –initial successes

**An Agreed Vision – (abbrev.)**

**'using effective land water & resource planning to conserve, enhance and restore where appropriate the river, lake and wetland environment'**

**Key Strategic Aims - to lead toward improved Water Quality**

**Implementation**  
**Water Management**  
**Soil & Land Management**  
**Biodiversity**  
**Economic, Social & Cultural Value**

**Key Objectives – Guide to implementing each Strategic Aim.**

**These are the essential decision support tools**

- 9.1 Our year's work did achieve some really good alignment on the more important strategic Directions development of a CMP should follow.
- 9.2 A Robust Vision that meets the wider community needs.
- 9.3 Agreed Strategic Aims.
- 9.4 I think a major achievement was the agreement on a robust set of 'Objectives' that provide substance to the Strategic Aims.
- 9.5 Next step should be a subjective analysis of the catchment water quality to develop meaningful actions based on agreed Strategy & Objectives.
- 9.6 PSCT took the lead on this.

## Proposed Catchment Water Quality Analysis (Start point)

### Lake Waikare/Whangamarino Catchment (example)

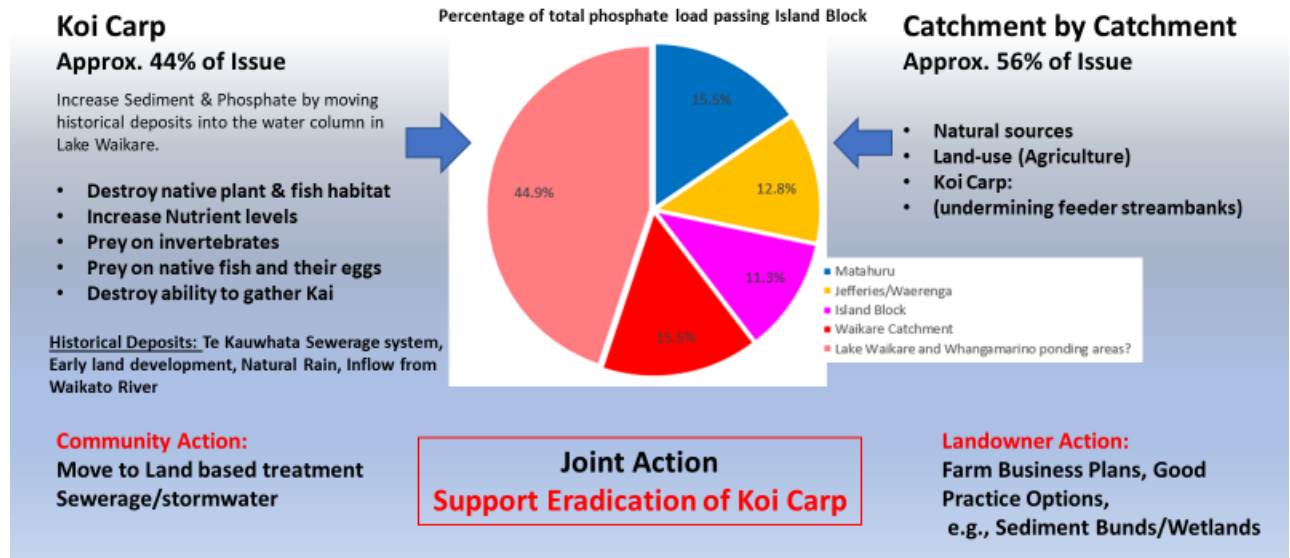
**Our Trust initiated a review existing WRC water quality data for our catchment. (Forensic Analysis by Dr Doug Edmeades)**

**Analysis identified likelihood of Koi Carp being number one Issue. Approx.44%**

**Notably PC1 does not identify this as a most significant W Q issue**

- 10.1 We engaged Dr Doug Edmeades to peer review the existing info, Mountains of Consultant speak, to distil down to most immediate water quality issues.
- 10.2 A 16 page precis was delivered. Readable - succinct.
- 10.3 We now had a starting point for the CMP to begin development as per the problem solving process we submitted.
- 10.4 Importantly using WRC water data the beliefs of many local Iwi and many local farmers were supported in an analysis that could attribute a huge adverse effect on water quality through the 'work' of Koi Carp.
- 10.6 I'm aware many farmer submitters have made similar points regarding Koi and reiterate the importance to landowners for action to be instigated by DOC (& WRC) to deal with these. This must be the number one cab off the rank. Time for the talk feast to move to action on the ground.

## Sources of Sediment & Phosphate in Waikare & Whangamarino



An extrapolation from the Review.

- 11.1 Of significant interest is the huge unaccounted nutrient/sediment load coming from Lake Waikare. Approx 44% unaccounted from WRC data.
- 11.2 Local farmers & local Iwi already understood that Koi are the main culprit.. Many peer reviewed publications state that Koi add significantly to the Nutrient burdens within the lake environment and are eco-terrorists in the extreme. – Many years of research and investigation – little real action!! (I attach an exert from a trial on Lake Ohinewai that finished in 2014. While it acknowledged the Koi water quality connection like all other trials it went no further).
- 11.3 Everything points to eradicating Koi as being the 'best bang for the buck' and should rightly be first cab off the rank for concerted action. Seems simple, however the Bureaucratic process does not do simple well!
- 11.4 Frustration is overwhelming amongst fellow farmers. 'A proof of concept' project on a closed system has been proposed with private funding made available to get it underway DOC along with WRC, can not even join hands with the farmers and support this initiative.
- 11.5 PC1 does not provide any real directive over this issue. It is remiss and missing in action. I encourage you to remedy this. WRC through PC1 should hold DOC to account.

## OUR CMP Bureaucracy v Realism

- ❑ Frustratingly, WRC control mechanisms kicked in...
- ❑ Push back against inclusion of the review into our CMP.
- ❑ It appeared to us that WRC needed to meet predetermined timelines thus pushing the CMP forward Adopted as the final Plan regardless of our concerns.  
Including
  - Consultants 'Sanitising' our work.
  - No robust issue analysis
  - No measures of success
  - No linkage to our farming operations.

Disappointingly, our experience is that Council led Catchment Management Planning will not meet community expectations, not achieve the necessary buy-in and thus fail.

- 12.1 For some obscure reason WRC pushed back against the inclusion of this document into the CMP (Which they now saw as 'their CMP') Disappointingly WRC appeared to see the Dr Doug Edmeades Review as some sort of threat rather than the start point as we saw it. This was in spite of the report being reviewed by the WRC Water Quality science team
- 12.2 Likewise It is unfortunate that the bureaucratic timetables also got in the way with WRC signing off the CMP prior to any due diligence to build the link between the CMP and our on-farm management practices.
- 12.3 The outcome has been the negating of the goodwill that had been built up during an intense year long program of work farmers willingly and unpaid contributed to in the belief that a credible Catchment Plan could be implemented.
- 12.4 Our Trust intent had been to use the Doug Edmeades report as a start point for full engagement with fellow farmers across the catchment and link this to the Catchment decision matrix we proposed.
- 12.5 This would enable farmers to lead the process and not only the big picture catchment issues develop actions relevant to decide on their farming practices that would fit the context of the identified Catchment issues.
- 12.6 We now have hit the pause button awaiting some direction from you regarding ownership and leadership from within a forward looking Planning process.

# Developing Farm Environment Plans based on a Catchment Focus.

## Empowering Farmer Leadership.

- 13.1 Yes we can make a Catchment approach fit into the planning framework. Mandate farmer Leadership & develop an uncomplicated reporting process that recognises farmers efforts and provides some assurance to the public and policy makers that progress is underway.
- 13.2 Farmer leadership can achieve momentum. The Plan should support & Permit this.
- 13.3 We have superb support networks that only require a shifted emphasis in funding streams to be ready to assist engagement and managing change.
- 13.4 One option I recommend is for The Plan to provide support to NZ Landcare Trust to assist Farmers set up Catchment Groups. I table a paper outlining the current successful adoption of catchment groups in Southland. This is an excellent model. I recommend Commissioners ask Dr Nick Edgar CEO from NZ Landcare Trust to discuss what the Trust could achieve.
- 13.5 You are no doubt also well aware of the success of the Pomahaka Landcare Group.
- 13.6 The NZ Environment Awards Trust & the information exchange between farmers & indeed others such as Council & Farm Advisors and our Bankers is hugely successful. The Plan should acknowledge this as another link in the chain.
- 13.7 We have our sector organisations willing and ready to assist. We can fit into PA CIS. We have direct signals (incentives) from our marketing organisations. (Fonterra, Miraka, Synlait,) etc along with self funded support from DairyNZ, Beef & LambNZ Hort NZ. We just need your endorsement that Permitted FEPS are recognised within the planning framework.
- 13.8 I gratefully back the work Federated Farmers have invested into presenting an Alternative Approach and see their leadership as essential to guide the way forward for farmers.



# Draft Catchment Management Reporting



14.1 Reporting does not need to be complicated.

14.2 Unfortunately bureaucracy does not appear to do simple things well.

14.3 I've struggled reading through the various Sec 42 documents and quite honestly find them a strange mixture of fiction and personal belief.

14.4 It appears that the writers are now relitigating PC1 but offering more of the same.

14.5 My submissions have been resolute and focused since day one asking for a clean sheet approach.

14.6 Part of that approach could include simple processes similar to 'Shared Values Reporting' as per this slide.

## Catchment Management PSCT recommended Decision Support Matrix



15.1 I also support this concept promoted by the Hill Country Farmers Group who are also members of the Primary Stakeholder Catchment Trust.

15.2 This is a simple yet robust 'problem solving' process.

This process sets out to provide:

Measurable & achievable Objectives

Robust analysis

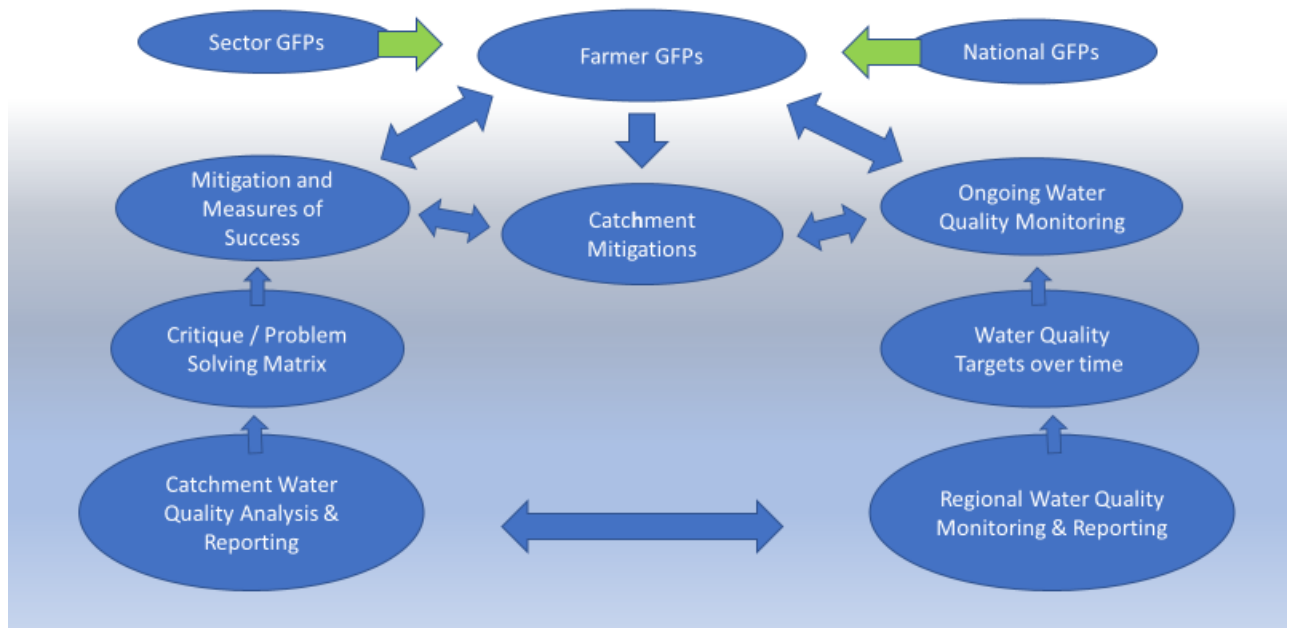
Relevant and effective methods/options

Are we succeeding in meeting Objectives (Step 1)

This is logical to farmers thought process – links to on-farm planning.

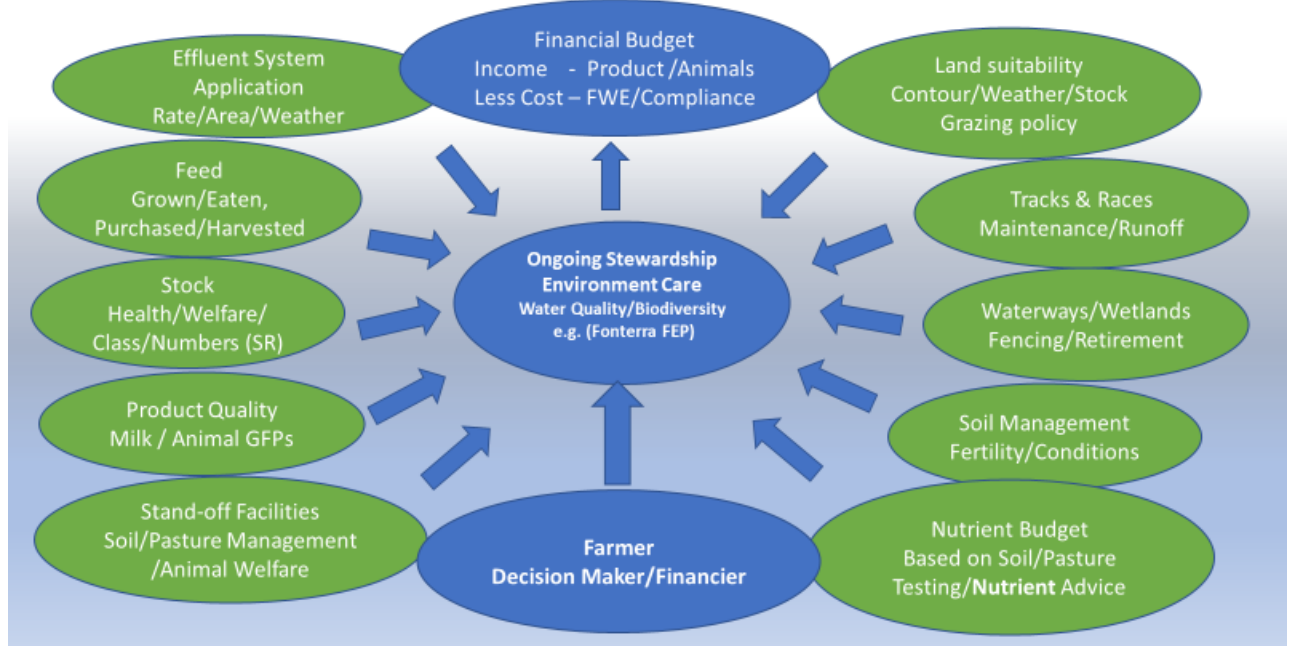
15.3 On-farm decision making is already complex and interconnected and options must be well informed.

## Farmer Led Catchment Water Quality Improvement



- 16.1 These two slides were part of PLUG's submission in Block Two Hearings.
- 16.2 Encourage self discipline starting with WRC providing the Region with trustworthy reliable water quality data that provides a realistic vision of current WQ state and future achievable WQ state through a number of diverse indicators.
- 16.3 Ensure targeted monitoring is undertaken to develop workable Catchment or farm scale mitigations.
- 16.4 I repeat -this is where WRC expertise should focus.
- 16.5 Ensure that all sources affecting WQ/biodiversity are included in the WRC reporting (Urban, Rural & other influences such as Koi Carp)
- 16.6 Allow for design of logical processes that fit within 'a business framework'

## Existing Interconnected On-farm GFP (Planned Decision Making)



- 17.1 FEPs should not become regulated doctrines. I implore you to not add a further layer of bureaucracy across an already complex system.
- 17.2 You are no doubt well aware of the myriad of decisions already required across the farm business.
- 17.3 Our task is to build on these to firstly understand the priority water quality challenges for the Catchment and secondly identifying actions at the property scale that fit within their on-farm GFPs.
- 17.4 An uncomplicated risk assessment approach could support the on-farm GFPs and allow for a reporting matrix that can provide the basis an assurance type process. (Aggregate reporting would be a cost effective efficient reporting tool)
- 17.5 On a personal note please consider the adverse effects to my ability to continue to farm (I believe I already farm sustainably) and the knock on adverse effects to the community around me if unnecessary regulations (and cost) are imposed.
- 17.6 My business is relatively small n the world of dairy. We do however provide a good living for another family on-farm, we do support many local businesses, we take an active interest within the community
- 17.7 As I stated in my opening Statements our farm is more than our home or living space, it is an intrinsic part of our soul.

## Commissioners

- ❖ I believe that your task is simple.
- ❖ Do not continue with the PC1 approach.
- ❖ Overhaul and redirect our limited resources into an uncomplicated, effects-based Catchment Planning that focus's on core catchment water quality issues.
- ❖ Allow farmers to fully utilize their inherent management skills and expertise by trusting and empowering self-discipline and action.
- ❖ Allow farmers to make land use decisions based on GFP's aided by good science.

### (Agriculture Waikato Region - Golden Goose)

- 18.1 Remove the needless regulatory approach.
- 18.2 Remove NRP regulation from the debate. By all means encourage the use of Nutrient Budgeting but ensure that one of the tools we use, Overseer, is recognised as a support tool only.
- 18.3 Kick any N allocation regime out to pasture. Current Trends are favourable. Thanks to ongoing farmer efforts.
- 18.4 Readdress & simplify Hill Country fencing/grazing requirements perhaps using a stock intensity approach.
- 18.5 Allow for sensible transition between land use options.
- 18.6 Encourage Ag Sector organisations and WRC to continue to support farmers through offering timely advice backed by good science to continue the trend of improved outcomes.

**Importantly, please do not hamstring the 'golden goose'.**

**We are not environmental bandits!!**