

# 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.

|                            |         |                   |  |
|----------------------------|---------|-------------------|--|
| Sub Form                   | PC12016 | COVER SHEET       |  |
| <b>FOR OFFICE USE ONLY</b> |         |                   |  |
|                            |         | Submission Number |  |
| Entered                    |         | Initials          |  |
| File Ref                   |         | Sheet 1 of        |  |

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

| SUBMISSIONS CAN BE  |  |
|---|--|
| <b>Mailed to</b>  | Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240   |
| <b>Delivered to</b>   | Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton   |
| <b>Faxed to</b>   | (07) 859 0998<br><i>Please Note: if you fax your submission, please post or deliver a copy to one of the above addresses</i>   |
| <b>Emailed to</b>   | <a href="mailto:healthyrivers@waikatoregion.govt.nz">healthyrivers@waikatoregion.govt.nz</a><br><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> |
| <b>Online at</b>  | <a href="http://www.waikatoregion.govt.nz/healthyrivers">www.waikatoregion.govt.nz/healthyrivers</a>   |
| <b>We need to receive your submission by 5pm, 8 March 2017.</b> |  |

| YOUR NAME AND CONTACT DETAILS   |                   |     |
|---|-------------------|-----|
| Full name: Vanessa Donald   |                   |     |
| Full address: 20 Katelyn Place, RD5, Taupo, 3385                                    |                   |     |
| Email: <a href="mailto:vanessa@gardonlimited.co.nz">vanessa@gardonlimited.co.nz</a> | Phone: 0275090301 | Fax |

| ADDRESS FOR SERVICE OF SUBMITTER  |                   |     |
|---|-------------------|-----|
| Full name: Gerard and Vanessa Donald  |                   |     |
| Address for service of person making submission: 20 Katelyn Place RD5, Taupo        |                   |     |
| Email: <a href="mailto:vanessa@gardonlimited.co.nz">vanessa@gardonlimited.co.nz</a> | Phone: 0275090301 | Fax |

| TRADE COMPETITION AND ADVERSE EFFECTS <i>(select appropriate)</i>  |
|--|
| I <b>could not</b> gain an advantage in trade competition through this submission.   |
| I <b>am directly</b> affected by an effect of the subject matter of the submission that: <ul style="list-style-type: none"> <li>(a) adversely effects the environment, and</li> <li>(b) does not relate to the trade competition or the effects of trade competition.</li> </ul> |

**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.)*

Policy 7: Preparing for allocation in the future/Te Kaupapa Here 7: Kia takatū ki ngā tohanga hei ngā tau e heke mai ana

**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 )*

**Our Commitment to the Environment and Sustainability**

Gardon Limited is in the business of farming: producing food for the world. As a consequence, Gardon is custodian to large holdings of land in New Zealand through private ownership and long-term lease agreements. Kaitiaki, our role as custodians of the land and natural resources, is a key focus of what we do and the decisions we make. We are committed to taking a long-term perspective.

Our role is to consider how we protect and preserve the land for generations to come, whether that is for our family or for other New Zealanders to enjoy and live from in the future. The way we do business must be sustainable. Natural resources are precious; need to be managed sparingly and with a view to provide opportunities for generations to come.

We are committed standing true to our value of "look after what looks after you" in all our business actions and decisions. We are committed to be best practice in our environmental management systems and practices, integrating environmental impact and sustainability assessment considerations in all business decisions.

**Our Operations**

Gardon Limited owns 5 dairy farms in the Taupo area, a combination of freehold and Maori lease land, milking over 6,500 cows. We have three farms that fall in the proposed Priority 2 zone and two farms in Priority 3 zone. We also have a number of dairy support blocks – two of which are in the proposed Priority 3 zone.

Our operation employs over 40 staff and makes a significant contribution to the local community in terms of the ongoing trade with local suppliers. We also lease dairy support land that is primarily in the Lake Taupo Catchment. We have developed 5 large scale dairy farms over 15 years and have also worked with Maori land owners to effectively transform non-productive land into valuable and productive farming assets.

We run our farms at a level 3 production system, with an average stocking rate of 3.5 cows/effective hectare. Our Nitrogen Reference Points range between 27 and 79 and the Nitrogen Conversion Efficiency scores range between 23 to 33% (inside the recommended 10 – 45% indicative range. Currently we have engaged a farm environmental consultant to verify the nitrogen reference data for each of our farms.

**What We Have Done Already**

We achieve low levels of nitrogen leaching risk and acceptable levels of nitrogen conversion efficiency across our farming operations by:

- Investing in farm systems and building our staff capacity to allow us to make good decisions with

the necessary data to take into account sustainability (approx cost \$15K pa)

- Building feed pads at each farm at a cost of approx \$240,000/farm
- Building 4 new dairy sheds and operating systems with in shed feed systems (approx cost of \$1,350,000/farm)
- Fencing all waterways (cost of \$60,000 over 5 year period)
- Investing in our effluent management systems and installing pod systems at 3 farms to increase the nutrient spreading area and effectiveness (approx cost of \$140,000/farm)
- Ensuring fertiliser application is driven by soil testing results and applied on an as needed basis – to reduce cost and also to mitigate any unnecessary environmental impacts
- On farm policy of 4 hours on feedpad over winter per day
- Growing winter crop at each farm (approximate cost of \$250,000 per annum)
- Wintering off 400 cows at each farm for 50 days on our dairy support blocks
- Growing lucerne, barley and winter crop at our dairy support blocks and using this supplementary feed in the dairy operations
- Engaging a Farm Consultant to fully review and assess our effluent management systems and complete a Warrant of Fitness for each farm – this cost approximately \$10K in 2017 and will form the basis of our Environmental Management Plan for each farm
- Securing consents to take water and then work on reducing our water usage (cost of \$21,000/consent and then ongoing monitoring costs)

### **Moving Forwards**

In the future, Gardon Limited will continue to work with an Farm Environmental Consultant to develop a farm by farm Environmental Management Plan and then an overall 20 year plan for our land and farming activities, defining targets for our environmental footprint and ensuring compliance with all current laws and regulations.

We will partner with industry experts and leaders to ensure we are well informed and build our internal capability and knowledge to inform our decision-making. We will also engage contractors that are aware of their environmental responsibility and conducting their business activities legally, ethically and sustainably.

Our aim will be to use resources wisely, produce at an economic and sustainable level and measure the productivity of our land use, considering the wastage and footprint generated. We see an initial cost to establish these plans of \$30K in 2017 and then an ongoing cost of \$10K per annum, excluding any capital work needed.

We are concerned about the following issues with Plan Change 1:

#### **Inequity**

- The majority of the proposed costs to the Healthy Rivers Plan Change 1 will be borne by land owners and farmers where the benefits stand to be gained by the whole NZ community.
- Land owners and farmers will stand to incur additional direct costs of compliance, record keeping and advisory support, plus indirect costs of loss of potential options to use land, loss of land value and long term increase in operational costs. This will also have a disproportionate impact on rural communities and hence Maori and lower socio economics groups in our community. This is inequitable and discriminatory.

**We would like to see a more equitable share of the cost of compliance through implementing a system similar to the Lake Taupo Catchment nitrogen credit allocation. This would ensure a fairer share of the cost to the whole NZ community and also provide opportunities for land owners to consider their land for alternative use in the future. It also helps to rectify issues of discrimination and inequity.**

#### **Opportunity and Kiwi Ingenuity**

- The proposed scheme change provides no opportunity for trading or finding out of the box alternative uses for land i.e. trading rights to emit contaminants so the overall level of contamination is the same

or less but a better economic use of the land is achieved.

**We are particularly concerned about the proposed stage 2 changes, which are not noted in this plan change but are part of the overall strategy. We do not agree with this strategy and ask that further consultation is conducted before any decision is made to accept stage 2.**

#### Time for Compliance

- The dairy industry is well organised in recording and reporting information for Nitrogen Pages and other relevant supply information.
- Nitrogen Reference Reporting has now been established and a supply requirement of Fonterra for 3 years or more.
- We are concerned that other sectors do not have the required information or background records to establish meaningful and true reference points to cap contamination to land.
- We are concerned that once a reference point is accepted and capped for land, this will provide an upper limit on the productive use of this land now and in the future.

**We ask for more time to obtain fair and true reference points for land use and to support this with greater education for producers in recording and keeping accurate records.**

#### Rural Professionals

- The proposed Plan Change relies on the support of suitably trained and experienced rural professionals – we are not convinced that there is an adequate supply to implement the plan effectively.

**We ask that more time is given to train and recruit an effective supply of rural professionals to support the Plan Change.**

We support the views of Federated Farmers in concept and are particularly concerned about the following aspects of Plan Change 1:

- The significant negative effect on rural communities.
- The cost and practicality of the rules.
- The effect that the Nitrogen Reference Point will have on my business and my economic wellbeing.
- The Farm Environment plan requirements leading to unnecessary and costly regulation of inputs, outputs, normal farming activity and business information.
- The costs and practicality of the rules and requirements for the Farm Environment Plan.
- The plan significantly exceeding the 10 year targets in many attributes and areas.
- The lack of science and monitoring at the sub catchments level.

We have also reviewed and support the submission that has been lodged by DairyNZ, which supports the overall intent, provided:

1. The Plan Change retains the intent that full achievement of the Plan Change objectives for water quality improvement, is targeted for 2096, with the Plan Change being the first stage, and
2. All those contributing to contaminant discharges are required to take action, and
3. It is the actions occurring on land that will be used by WRC to assess progress toward the Collaborative Stakeholder Group's aim of ten percent of the way towards the 2096 long term water quality goals in the Plan Change, and
4. WRC sets up a comprehensive programme of work that involves DairyNZ and other research organisations to identify and resolve information gaps in time for the next plan review, and
5. Implementation of the Plan Change is made more effective by continuing to work with all key stakeholders, including DairyNZ to develop robust solutions and
6. By amending the wording of the objectives, policies, and methods and to provide greater clarity and

clearer guidance to farmers about changes expected on farm.

We support the decisions sought by Dairy NZ.

We have also reviewed and support the submission that has been lodged by Fonterra. We support the suggested relief sought.

We wish to be heard at the Hearing and for these issues to be considered when reaching a final decision on the proposed plan change.

We are concerned about the implications all of this will have for my property and for my activity, now and in the future, as described above.

**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:*

We would like to see a more equitable share of the cost of compliance through implementing a system similar to the Lake Taupo Catchment nitrogen credit allocation. This would ensure a fairer share of the cost to the whole NZ community and also provide opportunities for land owners to consider their land for alternative use in the future. It also helps to rectify issues of discrimination and inequity.

We are particularly concerned about the proposed stage 2 changes, which are not noted in this plan change but are part of the overall strategy. We do not agree with this strategy and ask that further consultation is conducted before any decision is made to accept stage 2.

We ask for more time to obtain fair and true reference points for land use and to support this with greater education for producers in recording and keeping accurate records.

We ask that more time is given to train and recruit an effective supply of rural professionals to support the Plan Change.

We support the decisions sought by Dairy NZ.

We have also reviewed and support the submission that has been lodged by Fonterra. We support the suggested relief sought.

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

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

**JOINT SUBMISSIONS**

We will consider presenting a joint case with others at the hearing.

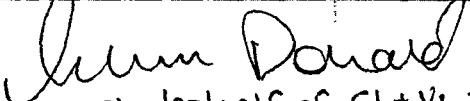
**IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW**

|  |                                       |
|--|---------------------------------------|
|  | 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 | <br>on behalf of GL+VL Donald | Date 8 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.