

**WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 -  
WAIKATO AND WAIPA RIVER CATCHMENTS**

**Submission Form**

Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

**On:** The Waikato Regional Councils proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments

**To:** Waikato Regional Council  
401 Grey Street  
Hamilton East  
Private bag 3038  
Waikato Mail Centre  
HAMILTON 3240

**Full Name(s):** Tony Egan, Managing Director  
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I am not a trade competitor for the purposes of the submission but the proposed plan has a direct impact on my ability to farm. If changes sought in the plan are adopted they may impact on others but I am not in direct trade competition with them.

**I wish to be heard in support of this submission.**

**If others make similar submissions, I would consider presenting a joint case with them at the hearing.**



Signature

8/3/17

date

## WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 - WAIKATO AND WAIPA RIVER CATCHMENTS

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RE: Submission on a publically notified proposed Regional Plan prepared under the Resource Management Act 1991.

To Whom It May Concern;

Established in 1993, Greenlea continues to be a family owned and operated beef export business. With two plants operating from the Waikato, Greenlea has a turnover of \$360 million, 460 staff, and exports to around 50 countries. In the 2016 season processed 234,000 cattle and 112,000 calves.

The future success of the dairy and red meat industries will require embracing “clean food” and sustainable, environmentally responsible farming. This direction will create a marketing advantage and position New Zealand’s products to achieve a premium from consumers. We therefore understand and support the need for a Healthy Rivers initiative.

The meat industry is already embarking on this journey with a forward-looking consortium of companies coming together to form the Red Meat Profit Partnership (RMPP), a primary growth partnership. Never before in New Zealand’s history have six competing meat processors joined forces to determine a course of action. The RMPP has already produced a national on farm verification programme that is being rolled out to sheep and beef farmers. This programme requires third party verification and includes acceptable environmental outcomes and compliance with regional council requirements. This New Zealand Farm Assurance Programme (NZFAP) will support and underpin a collaborative marketing campaign that will tell the New Zealand red meat story. As an industry we can drive positive change that not only achieves compliance but also supports future growth and prosperity. This scenario is a win for farmers, industry, our communities and the environment. The specific provisions of PC1 that this submission relates to are:

1. The whole proposal in its entirety; and
2. Without limitation, the specific provisions which relate to application of the Nitrogen Reference Point (Schedule B, and Schedule 1) and its applications through rules 3.11.5.2 to 3.11.5.6

### REASON FOR THE SUBMISSION

Greenlea’s submission wishes to highlight the need for flexibility and fairness in terms of land use in an increasingly volatile world, where market drivers will continue to evolve over time. We believe

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that land use capability needs to be assessed as much for future potential as its historical use. Inherent productivity needs to be a key driver to maximise returns for the primary sector and with modern technology this should be able to be objectively measured. An objective assessment criteria based on sustainability for the region as a whole makes more sense than locking in practices, if the region is to continue to prosper.

Our business has had to constantly evolve over the past 24 years, and we have survived by being adaptive to both land use change and market drivers. This in turn has created value for our farmer suppliers and NZ's economy. The Healthy Rivers Plan Change 1 in its current form appears to limit flexibility and make change more difficult to achieve. It seems to reward certain farmers and penalise others based on previous land use and stocking rate. This suggests to us that a more equitable and balanced approach is needed if the objective of Healthy Rivers is to be achieved and the future potential of the region protected.

GREENEA SUPPORTS THE INTENT OF PC1 BUT OPPOSES PROVISIONS WHICH SEEK TO REDUCE FLEXIBILITY IN FARMING OPERATIONS AND LAND USE

DECISION SOUGHT:

- 1 Delete requirements for land use activities to not exceed their historic nitrogen discharge levels, when this is below 20kgN/ha/yr
- 2 Enable lower leaching land uses (below 20kgN/ha/yr) to increase discharges up to 20kgN/ha/yr
- 3 If nitrogen is to be allocated then base the allocation system on the natural capital of soils taking into consideration the assimilative capacity of freshwater