SubForm	PC1201 6	COVER SHE	ET
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		Submission Number	
Entered		Initials	
File Ref		Sheet 1 of	

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.

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

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 Please Note: if you fax your submission, please post or deliver a copy also		
Emailed to	healthyrivers@waikatoregion.govt.nz Please Note: Submissions received my email must contain full contact details. We also request you send us a signed original by post or courier.		
Online at	www.waikatoregion.govt.nz/healthyrivers		
	We need to receive your submission by 5pm, 8 March 2017.		

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☐ I wish to s	peak at the hearin	ng in support of m	ny submissions.			
* I do not wi	sh to speak at the	hearing in suppo	rt of my submissions.			

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

SUBMISSION POINTS: General comments

We run a 270 hectare hill country drystock farm, running Dairy grazers, Jersey bulls & Sheep,

We oppose the Waikato Regional council's Plan change 1 in its current form for the following reasons,

- 1, Having a Nitrogen Reference Point (NRP) by the way of Overseer for farms is totally unfair as it rewards the existing polluters (Grand Parenting) and disadvantages farmers like ourselves who have got a low environmental footprint by careful fertiliser use and low stocking rates. Having a low NRP will hugely impact on land values as its greatly reduces the ability to farm to its potential and to adjust farming practices to meet changing markets. There is no recognition for the differential in N leaching between drystock farms and dairy farms, Grand parenting favour businesses that already have a high environmental impact. This runs counter to a "Polluter Pays" principle, because those farms with the lowest environmental footprint are bearing a much larger burden as a result of PC1 rules.
- 2, Compliance & mitigation requirements such as fencing & reticulating water up to 25 degrees for hill country will create unsustainable costs which have been proven in the various reports untaken recently by various organisations such as Federated Farmers & Baker Ag.

We believe that PC1 should be amended to exclude stock up to 15 degrees slope & only excludes stock over 15 degrees if break feeding is done.

Also PC1 should be amended to allow stock to cross water bodies has long as it is done in one continuous movement and not done more than once or twice a week, this will save a huge huge cost and is far more practical than building structures like culverts that are likely to blow out in severe floods and cause a lot of sediment to be discharged into the waterways.

Focusing on mitigating critical source areas of farms will be far more effective in cleaning up waterways than fencing off and building structures over waterways that are impractical because of slope and can be done for less cost.

3, We believe that one size does not fit all, what might work for the pumice soils of Taupo might not work for the clay soils of the Waikato, so a Sub-catchment based management approach should be adopted. This approach allows the identification of problem areas specific to each of the four contaminates to each sub-catchment and allows farmers to work together to make reductions in

those areas that need improvement. With regular water testing it should be easy to find out what properties are causing the most problems.

- 4, The ten year plan does not provide enough assurance of ongoing compliance to justify capital expenditure. PC1 signals "future allocations", that discussion needs to happen at the start of any plan, not TEN YEARS down the track.
- 5, Hill Country Sheep & Beef farmers were severely disadvantaged in the forming of PC1 by only being allowed one member out of twenty four on the Collaborative Stakeholder group despite Sheep & Beef farmers being custodians of 43% of the waterways in the Waikato & Waipa catchments. Our representative was consistently overruled in matters that were critically important to the sustainability of Hill Country farming.
- 6, If the PC1 plan is adopted in its current form we will definitely see the demise of a lot of rural communities through families being forced from their properties because its uneconomic to farm or by not having the money nor time to be involved in community organisations such as, School BOTs, Volunteer fire brigades, Sport coaching etc etc.

The intention of the Waikato River Authorities Vision & Strategy is to have "Healthy Rivers" (which every person wants) and where "Prosperous communities are sustained" which we won't have if this plan is adopted in its current form.

7, Farm environment plans (FEP) should be written by Farm owner/ Occupier, as they know their properties best, education, guidelines, support & monitoring can be done by certified professionals & WRC. This is another way of reducing some of the compliance costs to the Farm owner.

We are definitely against having to hand over our annual accounts to the WRC each year as we feel that is a total breach of our privacy and we are sure any business whether rural or urban would feel this way.

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Signature A M. Dordd	Date 6/03/2017
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Personal information is used for the administration of	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.