WAIKATO REGIONAL COUNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1

WAIKATO AND WAIPA RIVER CATCHMENTS

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

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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.

Penelope Aston	
	7 th March 2017
PENELOPE ASTON	

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

Introduction

Thank you for the opportunity to submit on the Waikato Regional Councils proposed Plan Change 1.

I am planning on returning to farming and have been looking at purchasing a dry-stock farm in the Waikato Region with the future of my children and future generations firmly in mind. Plan Change One has cast a long shadow over the Waikato and gives me little confidence to invest in the Waikato Region given all the uncertainty this Plan Change brings in its current form.

WAIKATO REGIONAL COUKNCIL PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 – WAIKATO AND WAIPA RIVER CATCHMENTS

The specific provisions of the proposal that this submission relates to and the decisions it seeks from Council are as detailed in the following table. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of "or words to that effect". The outcomes sought may require consequential changes to the plan, including Objectives, Policies, or other rules, or restructuring of the Plan, or parts thereof, to five effect to the relief sought.

The specific provisions my submission relates to are:	My Submission is that:		The decision I would like the Waikato Regional Council to make is:			
	SUPPORT/OPPOSE	REASON	RELIEF SOUGHT			
Objective 1 and Table 3.11-1 By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in achievement of the restoration and protection of the 80-year water quality attribute	Support in part with amendments	Whilst I support the long- term restoration and protection of our waters, I believe these targets are aspirational and therefore not realistically achievable given the previous 150 years of population growth and activity in the region, including hydro-electric dams, coy carp, towns' and cities' storm-water runoff and waste water treatment plants, historic unlined landfills along the river edges, current landfills, Huntly Power Station and other point source pollution. Furthermore, the current situation has eventuated as a result of historic Council policies which have allowed contamination of our rivers. It is inequitable therefore that there is a sole focus on discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming businesses which are being identified and targeted as the main focus of the degradation of our rivers.	Amend Table 3.11-1 to include achievable water quality targets which will ensure that farmers and farming communities remain prosperous <u>currently</u> as well as during the intended 80 year period. Amend Objective 1 to include discharges from other point sources of pollution including urban discharges. Amend Table 3.11-1 to record that the numerical targets do not apply during storm and flood events			

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Objective 3.11.2.1 New technology required and further restrictions on land use to achieve the water quality outcomes.	Oppose in Part with amendments	The 10 year life of the plan change provides no certainty about the viability of current and future investment within farming communities and businesses with the plans intention to impose further restrictions on land use in the future.	I seek a 20-30 year approach with clearly established science based interim targets and bottom lines for water quality established up front now which will providing certainty for rural communities and farmers and the viability of their current and future investment.
Objective 2	Support with amendments	Maintaining the long-term social, economic and cultural wellbeing of the Waikato and Waipa communities is essential to the survival of our rural and urban communities and this plan, particularly for dry-stock farmers, does not achieve this.	Ensuring that the economic resilience, sustainability, and vibrancy of people and communities is adequately protected by retaining and strengthening the objective regarding providing for the long-term social, economic and cultural wellbeing of the Waikato Waipa communities.
Objective 3.11.2.2 "Reasons for adopting Objective 2 The full achievement of the Table 11-1 2096 water quality attribute targets may require a potentially significant departure from how businesses and communities currently function, and it is important to minimise social disruption during this transition."	Oppose in Part with Amendments	I oppose in part this objective The plan change in its current form does not ensure the current social and economic wellbeing of the Waikato district given that it anticipates and recognises social disruption (alteration or breakdown of social life in a community) will need to be minimised	I seek that the objectives are amended to state that the Plan will not adversely affect the <u>current</u> social, economic and cultural wellbeing of businesses and communities and that any departure from how they currently function will be minimised and, if not possible, that appropriate financial assistance to achieve the objectives of the plan will be provided or, alternatively, that compensation will be paid.

Objective 4 People and Community Resilience	Support with amendments	This objective in its current form does not provide people and community resilience because it recognises that PC1 will require further plan changes and future increased stringency of land use controls to achieve the outcome sought (Objective 4b).	Delete clause b and amend the objective so that it provides for people and community resilience over the life of the plan in the short term (10 years) and the long term (20-30 years). Certainty needs to be provided now for people and communities with the plan clearly setting out how it intends to achieve the aspirational 80 year outcome.
Permitted Activity Rules	Oppose	Rules 3.11.5.1 and 3.11.5.2 are not consistent with Policy 4 and fail to provide for low intensity and low risk land uses and fails to provide for flexibility for these land uses. I seek that the rules permitting low intensity and low risk land uses and other land uses be amended so that they are consistent with Polity 4 and actually provide for these activities to be enabled including the ability to continue if existing, be established and enabled to be flexible, and that reference to further reduction requirements of contaminants from low intensity and low risk land uses are deleted.	 Amend rules 3.11.5.1 and 3.11.5.2: Amend to include as Permitted Activity land uses with stocking rates at or below 18 stock units and enable stocking rate to increase from current up this standard, or and Delete standards which hold farmers to historic stocking rates of nitrogen discharges. If nitrogen is to be allocated then allocate using land use capability as adopted in the Horizons and Hawkes Bay Regions Delete 6 stock unit standard Delete 4.1 hectares and provide for up to 20 hectares Apply governments clean water recommendations for stock exclusion. Delete standard 4c Rule 3.11.5.2 Amend riparian setback distances so they only apply to flat and rolling land and not hill country (ie slope ≥ 15 degrees)
Land use change provisions and restrictions	I oppose this	Restricting land use change has huge implications for the ability of, in particular, dry stock farmers to respond	Delete in its entirety – It would be more appropriate to gauge land use capability through the Farm Environment Plans (FEP)

Policy 6 Rule 3.11.5.6 and 3.11.5.7 and any relevant points within the plan	factors, to develop and grow their businesses and to maintain the equity and viability of their farming operations. The lower emitting dry stock sector is bearing an unfair and inequitable share of the burden of the recent rapid growth in, and conversion of land to, dairy. The land use provisions have no size exceptions, with regard to regulatory requirements and how they are to be applied and takes no account of the fact that land use change may not have occurred in the past because of land ownership situations.		 Council must allow for flexibility with this policy by removing blanket rules based on existing land use and establishing policies and rules which relate to managing effects which recognise and are based on the underlying soil properties. Land use change should be permitted where environmental effects are minimal or advantageous, such as improvements in biodiversity, sediment retention, phosphorous retention, economic efficiency and optimisation of natural resources (including for smaller land areas (below 40 hectares). Restrictions and an assessment of the effects should not be limited to consideration of the nitrogen discharges as modelled by OVERSEER. Delete nitrogen reference point (grandparenting) clauses and standards. Application of rules need to be low cost, efficient and with minimal bureaucracy.
Nitrogen management application of the Nitrogen Reference Point (NRP) & use of OVERSEER Policy 2 and 7 Rules 3.11.5.2 to - 3.11.5.7(inclusive) Schedule B and all other	I oppose this	I oppose this grandparenting approach (holding users to their Nitrogen Reference Point). The high dischargers have no incentive to reduce and may continue to pollute at the expense of the low dischargers who are being unfairly penalised via significant on farm mitigation expectations,. There is no scientific evidence that a blanket rule	I seek that the Nitrogen Reference Point is removed from the plan entirely but that if it stays that OVERSEER is not relied on solely but is used as part of a range of measurement tools. Ensure where OVERSEER is used that the Best Management Practices are applied including input standards and protocols, applying actual farm specific information and reducing use of standardized input parameters.

areas in PC1 which refer to	for nitrogen restriction will be of any	Remove the requirement for extensive operations (at or
the Nitrogen Reference	benefit.	under 18 stock units) and sheep and beef farmers to have
Point		to manage to a NRP through these provisions including
	It penalises the low dischargers – who	rules as losses are low
	will no longer be able to develop their	
	farms to help pay for the cost of	Adopt a sub-catchment approach to addressing
	mitigating against possible	contaminants that are relevant to each farm, not a
	contaminants.	blanket restriction of one particular nutrient that may not
		even be relevant to the water bodies in that sub
	The years chosen to determine the NRP	catchment
	value were drought years, thus stocking	
	rates were very low – this will mean we	If nitrogen discharges from a property do have to be
	are restricted to carrying lower numbers	allocated then base the allocation system on the natural
	of stock (cattle in particular) going	capital of soils and the water quality outcomes that are to
	forward.	be achieved for each sub catchment. Do not allocate
		based on 2014/15 or 2015/16 land use or,
		grandparenting discharges to these years especially for
		lower leaching land uses such as dry-stock.
		, , , , , , , , , , , , , , , , , , , ,
		Use FEP's to determine what would work best on each
		farm, and science to determine which contaminants are
		an issue in each sub-catchment.
		Amend the rules so that they are effects and science
		based, not based on grandparenting (holding land uses
		and land users to historic leaching rates, stocking rates
		and land uses).
		and land asesy.

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3.11.4.5 Sub-catchment scale planning Insert new Objectives, Policies and Rules to enable, support and incentivise sub catchment planning and land and water management	I support this implementation method Oppose PC1	This is a sensible and practicable approach to controlling contaminant discharge and gives each farm, and catchment, ownership over their future Sub catchment approaches to managing land and water resources are a sensible and practicable approach to controlling contaminant discharge and enables farms and catchments control and ownership over their future.	I seek that the plan change should not be implemented until rigorous scientific data around which contaminants, and their sources, are causing water quality decline is available for each sub catchment. Include new or amend existing Objectives, Policies, methods, and rules to enable catchment groups to manage their land and water resources to achieve water quality outcomes while providing for their economic and social wellbeing and sustainability I seek that the plan change should not be implemented until the scientific data around which contaminants are causing water quality decline is available for each sub catchment.
Stock exclusion Policy 3, Policy 4, Rule 3.11.5.1,3.11.5.2, 3.11.5.3, 3.11.5.4 and Schedule C	I support with amendments	The national waterway accord recommends that slopes up to 15° be fenced, this should also be applied to healthy rivers The Governments recently released Clean Water Reforms 2017 (proposed amendments to the NPS for Freshwater Management (February 2017)) includes recommendations for national stock exclusion, which are much more sensible, pragmatic and achievable. The timing required along with the significant financial input are beyond the financial ability of most dry-stock farming families to achieve (see sample 2014/15 and 2015/16 dry-stock benchmark ANZ Bank Central King Country figures attached). This rule does not support objective 2 of the	Change the stock exclusion requirements so that they are consistent with the Governments Clean Water Reforms (February 2017) – proposed amendments to the NPS for Freshwater Management Change the slope requirements to no greater than 15° as per the Clean Water Report. For cattle and deer on land between 3 and 15 degrees slope change the exclusion requirements so that they only apply to all permanently flowing waterbodies 1m wide or greater. Extend the timelines and give certainty to those farmers with land classed as at risk of erosion to ensure money and resources are not wasted complying with fencing requirements where there is the possibility it may be required to be converted to forestry in future plan changes. Enable individual FEP to present mitigations against

		plan as it would be socially devastating for farming communities and the communities and small townships which rely on dry-stock farmers. At the time of writing there is no clear understanding of how a slope will be classed	contaminants, relevant to each farm, rather than a blanket approach. Any waterway fencing required under PC1 should be significantly subsidised by the Waikato Regional Council and the regional communities, urban and rural, benefiting from improvements to in the waterways. Enable stock to enter waterbodies if they are being actively managed across the waterbody and the waterbody is not crossed by stock more than 3 x per week.
Removal of north-eastern (Hauraki) portion of Plan	Oppose	Removal of a significant section of the lower catchment from PC1 means that it is now not possible to determine whether this plan will achieve its objectives and whether the costs on individuals is appropriate	Place the plan process on hold, or withdraw the plan in its entirety until the lower catchment is re inserted into the plan at which time it can be re-notified as a whole.
Policy2, Rules 3.11.5.1, 3.11.5.2, 3.11.5.3, 3.11.5.4, 3.11.5.5, 3.11.5.6, 3.11.5.7 Schedule 1 and any consequential amendments arising from this submission point	Support with amendments	Application of Schedule 1 Farm Environment Plans (FEP) as proposed have the potential to greatly reduce farm flexibility in times of climatic and market fluctuations on drystock farm systems. There is no provision for low cost appeal process to be made available if FEP is debateable and interpretation of rules are inconsistent. Support the intention of using FEP where appropriate to identify critical source areas on individual farms where necessary and target management actions and	1. Require Farm Environment Plans only in subcatchments where science indicates improvements are required 2. Ensure independent panel available to ensure accountability and to enable contested points between staff and farmers to be settled without expensive appeals to the Environment Court. 3. Change thresholds for mandatory stock exclusion to nationally recommended standards (Clean Water Report February 2017). a. Only applies up to a slope of 15 degrees for deer and cattle b. Only applies to waterbodies 1m or wider for

		environmental mitigation to address issues, if any, dependent on sub catchment requirements. Am concerned around some of the strict standards being applied through the rules and FEPs, including the timeframes.	cattle and deer on land between 3 and 15 degrees slope 4. Accept that fencing required above the 15 degree threshold for intensive farming operation (>18su/ha). eg winter cropping and strip grazing of dairy cows on hill country. 5. Rather than the currently proposed input standards (riparian setbacks, limitations on cultivation etc), mitigations should instead be set on a farm by farm basis and focused on management of clearly identified and measurable "critical source management areas" 6. Rules should be focused on reducing impacts from intensive agriculture >18su/ha rather than applying blanket, blunt and inappropriate rules to all extensive agriculture 7. FEP's should be produced by the landowner with WRC guidance and support as suggested above for Implementation Methods 3.11.5.3 8. Delete 5(a) and enable flexibility in nitrogen leaching from hill country sheep and beef farming, and land uses which are low impact (at or below 20kgN/ha/yr for example or apply natural capital allocation). 9. Timeframes should be deleted, and instead set through consultation with the farmer taking into account amount of WRC subsidy available and the individual farmer's financial constraints, and the sensitivity of the waterbody to any impact.
Policy 16	Oppose	I oppose this policy. The ownership of the land should have no bearing on whether the rules apply or not. The issues addressed in this plan are contaminant discharges and the rules should be the same for all regardless of ownership.	I seek that this policy is removed

2014/15 Accounts Analysis Database Sheep, Beef and Deer -King Country Region

753 h 3,595 2,440								
3,595			475 h	na		#N/A	na	
	56%		2,251	56%		#N/A	#N/A	
	38%		1,640	41%		#N/A	#N/A	
220	3%		131	3%		#N/A	#N/A	
100	270			070		<i>""</i> • • • • • • • • • • • • • • • • • •	// 1 1 // C	
6,414	8.5 \$	SU/ha	4,022	8.5	SU/ha	#N/A	#N/A	SU/ha
VGE	\$ / HA	\$ / SU	AVGE	\$/HA	\$ / SU	TOTAL	\$ / HA	\$/SU
344,731	458	95.9	190,519	401	84.6	#N/A	#N/A	#N/A
								#N/A
								#N/A
								#N/A
								#N/A
								#N/A
								#N/A
								#N/A
	887	104.2		895	105.7	-	#N/A	#N/A
	970	102.4		0.42	111 2		#N1/A	#N/A
001,151	8/8	103.7	447,715	943	111.3	#N/A	#N/A	#N/A
57,198	76	8.9	24,591	52	6.1	#N/A	#N/A	#N/A
28,709	38	4.5	17,182	36	4.3	#N/A	#N/A	#N/A
2,518	3	0.4	1,408	3	0.4	#N/A	#N/A	#N/A
4,622	6	0.7	2,613	6	0.6	#N/A	#N/A	#N/A
5,561	7	0.9	3,526	7	0.9	#N/A	#N/A	#N/A
10,851	14	1.7	7,800	16	1.9	#N/A	#N/A	#N/A
99,500	132	15.5	55,907	118	13.9	#N/A	#N/A	#N/A
9,077	12	1.4	6,243	13	1.6	#N/A	#N/A	#N/A
4,099	5	0.6	122	0	0.0	#N/A	#N/A	#N/A
5,033	7	0.8	2,059	4	0.5	#N/A	#N/A	#N/A
29,129	39	4.5	17,401	37	4.3	#N/A	#N/A	#N/A
12,572	17	2.0	7,215	15	1.8	#N/A	#N/A	#N/A
37,591	50	5.9	27,405	58	6.8	#N/A	#N/A	#N/A
26,241	35	4.1	15,828	33			#N/A	#N/A
15,176		2.4		19				#N/A
29,597	39	4.6	21,630	46	5.4	#N/A	#N/A	#N/A
6,553	9	1.0	4,918	10	1.2	#N/A	#N/A	#N/A
384,026	510	59.9	224,995	474	55.9	#N/A	#N/A	#N/A
				•				
277,125	\$368	\$43.2	222,720	\$469	\$55.4	#N/A	#N/A	#N/A
26,919			18,647			#N/A		
114.981	153	17.9	71.966	152	17.9	#N/A	#N/A	#N/A
,								#N/A
								#N/A
	80	9.3	55,799	117	13.9	#N/A	#N/A	#N/A
3,234	4	0.5	4,734	10	1.2	#N/A	#N/A	#N/A
4,057	5	0.6	2,748	6	0.7	#N/A	#N/A	#N/A
74,468	99	12	47,316	100	11.8	#N/A	#N/A	#N/A
28.583	38	4.5	25.309	53	6.3	#N/A	#N/A	#N/A
								#N/A
85,369	113	13.3	11,282	24	2.8	#N/A	#N/A	#N/A
\$131.254	\$174	\$20.5	-\$145,107	-\$305	-\$36.1	#N/A	#N/A	
	#117	720.0		4500	400.1			
						#N/A		
21.1%			18.0%			#N/A		
400 -	ocordo		04 -	ocordo				
103 re	ecords		21 r	ecords				
	344,731 -40,988 320,100 -95,012 12,226 -330 70,803 56,700 668,231 -7,080 661,151 57,198 28,709 2,518 4,622 5,561 10,851 99,500 9,077 4,099 5,033 29,129 12,572 37,591 26,241 15,176 29,597 6,553 384,026 277,125 26,919 114,981 24,837 29,682 59,865 3,234 4,057 74,468 28,583 180,544 85,369 \$131,254 22,391 44,997 58.1% 21.1%	159 2% 6,414 8.5 S VGE \$/HA 344,731 458 -40,988 -54 320,100 425 -95,012 -126 12,226 16 -330 0 70,803 94 56,700 75 668,231 887 -7,080 661,151 57,198 76 28,709 38 2,518 3 4,622 6 5,561 7 10,851 14 99,500 132 9,077 12 4,099 5 5,033 7 29,129 39 12,572 17 37,591 50 26,241 35 15,176 20 29,597 39 6,553 9 384,026 510 277,125 \$368 26,	159 2% 6,414 8.5 SU/ha VGE \$ / HA \$ / SU 344,731 458 95.9 -40,988 -54 -11.4 320,100 425 131.2 -95,012 -126 -38.9 12,226 16 77.1 -330 0 -2.1 70,803 94 19.7 56,700 75 8.8 668,231 887 104.2 -7,080 661,151 878 103.1 57,198 76 8.9 28,709 38 4.5 2,518 3 0.4 4,622 6 0.7 5,561 7 0.9 10,851 14 1.7 99,500 132 15.5 9,077 12 1.4 4,099 5 0.6 5,033 7 0.8 29,129 39 4.5 12,	159 2% 0 6,414 8.5 SU/ha 4,022 VGE \$ / HA \$ / SU AVGE 344,731 458 95.9 190,519 -40,988 -54 -11.4 -23,772 320,100 425 131.2 258,379 -95,012 -126 -38.9 -95,281 12,226 16 77.1 14,955 -330 0 -2.1 -1,619 70,803 94 19.7 46,428 56,700 75 8.8 35,350 668,231 887 104.2 424,959 -7,080 22,755 22,755 661,151 878 103.1 447,715 57,198 76 8.9 24,591 28,709 38 4.5 17,182 2,518 3 0.4 1,408 4,622 6 0.7 2,613 5,561 7 0.9 3,526 10,851 <td> 159 2%</td> <td> 159</td> <td> 159</td> <td> 159</td>	159 2%	159	159	159

2015/16 Accounts Analysis Database Sheep, Beef and Deer -

Sheep, Beef and Deer -									
	Central King	Country A	VG	ТОР	20%		0	#N/A	
EFF HA	686 h	19		364 h	13		#N/A	ha	
SHEEP SU	3,689	59%		1,500	45%		#N/A #N/A	#N/A	
	· · · · · · · · · · · · · · · · · · ·								
CATTLE SU	2,056	33%		1,471	44%		#N/A	#N/A	
GRAZERS SU	477	8%		389	12%		#N/A	#N/A	
DEER SU	42	1%		0	0%		#N/A	#N/A	
TOTAL SU	6,264	9.1 8	SU/ha	3,360	9.2	SU/ha	#N/A	#N/A	SU/ha
AVGE	AVGE	\$ / HA	\$ / SU	AVGE	\$/HA	\$/SU	TOTAL	\$ / HA	\$ / SU
FARM INCOME									
Sheep Sales	349,838	510	94.8	150,333	413	100.2	#N/A	#N/A	#N/A
Sheep Purchases	-57,933	-84	-15.7	-4,721	-13	-3.1	#N/A	#N/A	#N/A
Cattle Sales	277,652	405	135.0	178,633	491	121.4	#N/A	#N/A	#N/A
Cattle Purchases	-120,020	-175	-58.4	-22,085	-61	-15.0	#N/A	#N/A	#N/A
Deer Sales	5,940	9	140.7	0	0	#DIV/0!	#N/A	#N/A	#N/A
Deer Purchases	0	0		0	0	#DIV/0!	#N/A	#N/A	#N/A
Wool	81,482	119	22.1	39,733	109	26.5	#N/A	#N/A	#N/A
Sundry	74,731	109	11.9	95,961	264	28.6	#N/A	#N/A	#N/A
Farm Cash In	611,690	892	97.7	437,853	1,204	130.3	#N/A	#N/A	#N/A
Plus Change in stock	42,801			22,068			#N/A		
Total Farm Income	654,491	954	104.5	459,921	1,265	136.9	#N/A	#N/A	#N/A
EXPENSES									
Wages	75,594	110	12.1	20,744	57	6.2	#N/A	#N/A	#N/A
An Health	30,090	44	4.8	14,435	40	4.3	#N/A	#N/A	#N/A
Breed/Test	1,504	2	0.2	5,287	15	1.6	#N/A	#N/A	#N/A
Contracting	7,864	11	1.3	9,364	26	2.8	#N/A	#N/A	#N/A
Electricity	5,868	9	0.9	3,190	9	0.9	#N/A	#N/A	#N/A
Feed	12,921	19	2.1	9,271	25	2.8	#N/A	#N/A	#N/A
Fertiliser	98,402	143	15.7	57,530	158	17.1	#N/A	#N/A	#N/A
Freight	9,455	14	1.5	3,909	11	1.2	#N/A	#N/A	#N/A
Grazing	2,625	4	0.4	1,137	3	0.3	#N/A	#N/A	#N/A
Seed	9,507	14	1.5	1,530	4	0.5	#N/A	#N/A	#N/A
Shed	26,061	38	4.2	12,570	35	3.7	#N/A	#N/A	#N/A
Weed & Pest	10,722	16	1.7	5,377	15	1.6	#N/A	#N/A	#N/A
R & M	32,412	47	5.2	15,806	43	4.7	#N/A	#N/A	#N/A
Vehicles	26,156	38	4.2	18,092	50	5.4	#N/A	#N/A	#N/A
Admin	19,594	29	3.1	12,027	33	3.6	#N/A	#N/A	#N/A
Standing	29,283	43	4.7	22,350	61	6.7	#N/A	#N/A	#N/A
Sundry	7,307	11	1.2	13,553	37	4.0	#N/A	#N/A	#N/A
Total Farm Expenses	405,364	591	64.7	226,173	622	67.3	#N/A	#N/A	#N/A
ECONOMIC FARM									
SURPLUS (E.F.S)	249,126	\$363	\$39.8	233,748	\$643	\$69.6	#N/A	#N/A	#N/A
EFS/Ha OFF FARM INCOME	20,171			26,803			#N/A		
OTHER EXP									
Interest	92,572	135	14.8	73,394	202	21.8	#N/A	#N/A	#N/A
Rent	36,055	53	5.8	20,187	56	6.0	#N/A	#N/A	#N/A
Tax	28,189	41	4.5	3,972	11	1.2	#N/A	#N/A	#N/A
Drawings	56,950	83	9.1	53,353	147	15.9	#N/A	#N/A	#N/A
School Fees/Donations	335	0	0.1	347	1	0.1	#N/A	#N/A	#N/A
Life Ins	2,578	4	0.4	3,969	11	1.2	#N/A	#N/A	#N/A
Pre Capital Cash Result	9,817	14	2	83,260	229	24.8	#N/A	#N/A	#N/A
Dlant / Canital Firm	07.000	40	4.4	40.700	0.5	2.0	401/0	418170	//N1/A
Plant / Capital Exps	27,260	40	4.4	12,789	35	3.8	#N/A	#N/A	#N/A
Capital Expenditure	276,562	403	44.2	37,506	103	11.2	#N/A	#N/A	#N/A
Capital Introduced	70,668	103	11.3	3,526	10	1.0	#N/A	#N/A	#N/A
Cash Result	\$53,225	\$78	\$8.5	\$36,490	\$100	\$10.9	#N/A	#N/A	
Depreciation	20,487			14,265			#N/A		
Pre Capital Adjusted Result	32,132			53,556			#N/A		
FWE % TFI (adj)	61.9%			49.2%			#N/A		
INT/RENT %TFI (adj)	19.7%			20.3%			#N/A		
Sample Size	26 r	ecords		5 r	ecords				
	<u> </u>			<u> </u>					