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

I am director of Shabor Ltd, a company farming operation set up by 2 friends. The objective of the company was to have enough scale so our children, who all have Ag. Degrees could come through a farm secession programme.

We farm on 2 properties, 1 at Whakamaru, 193ha. Deer velvet operation running approximately 1200 velvet stags, cutting over 5 ton of velvet for the Asian market (in sensitive 1 catchment) and the 2^{nd} is at Oparau and outside the catchment at present. Oparau runs 5000 ewes, 80 cattle and 600 breeding hinds on the 982ha, property.

The success of the company relies on both properties being fully integrated.

When the development at Oparau started 3 years ago we invited the land care trust to help us with the environmental plan for the deer unit. http://youtube/odY9ABfTrk4 -Developing a deer farm with best environmental practice. We also completed stage 2 Beef and Lamb LEP.

We privately conserve 200ha of Native bush.

This year with the help of the Waikato Regional Council we have signed a contract to fence off some significant streams which is the start of the protection of Aotea Harbour.

The uncertainty of which PC1 creates is having a detrimental effect on our children committing to coming through farm succession with us.

I am continually asked 'if I invest, will I have a viable business in 10 years '. I simply do not know. Has dry stock farming on Class 5 & 6 land got an economic future under vison and strategy of Healthy Rivers?

Stephen John Borland.

Director, Shabor Ltd.

I wish to speak at the submission process.



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 Center HAMILTON 3240

Complete the following

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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.

8-3-17.

I wish to be heard in support of this submission.

Signáture

date



The specific provisions my submission relates to are: State specifically what Objective, Policy, Rule, map, glossary, or issue you are referring to.	My submission is that: State: • whether you support, or oppose each provision listed in column 1; • brief reasons for your views.	The decision I would like the Walkato Regional Council to make is: Give: precise details of the outcomes you would like to see for each provision. The more specific you can be the easier it will be for the Council to understand the outcome you seek
Farm Environment Plans Provision 3.11.4.3	I support Farm Environment Plan. Provision 3.11.4.3 The reasons for this are: Having completed stage 2 Beef and Lamb LEP it was easy to identify the stock ratio on this farm was incorrect. We removed 400 cattle and replaced them with 1600 ewes. It also identified areas that needed stock exclusion and we are working towards those goals now.	I seek that the provision is: amended as set out below As an alternative I propose The time frame is very tight to complete as we are yet to receive information of suitable qualified Farm Environmental Planners

Objective 1 and Policy 5	I support Objective 1 The reasons for this are: I agree with the vison and strategy for cleaner healthier rivers, But am concerned about the uncertainty around not knowing what happens after 10 years. We are making considerable investments now with the uncertainty that they will comply after the life of Plan Change 1.	I seek that the provision is amended as set out below As an alternative I propose If you have an 80 year vision and spend 14 million dollars of ratepayer money on it, surely we as farmers should be given certainty beyond the 10 years. Perhaps a full land use study that covers the full 80 years be done.
Policy 6 Restrictive Land Use Change Rule 3:11:5:7	I oppose. The reasons for this are, The value of my land and the ability of future generations to develop a farming business are removed. (as has happened in Taupo) I feel that LUC or natural capital approach is a far better method of assessing land use. Example: Our 193ha. Flat to rolling Velvet Farm at Whakamaru will have a NDA of approx. 14 and if we disperse the deer we could only farm sheep as deer do not emit nitrogen. The future of this farm if we to exit the deer industry would be dairying.	I seek that the provision is Deleted in its entirety.

Sub Catchment 3:11:4:5	I support with amendments. The reasons for this are: It gives responsibility and leadership back to the farmers to address their own catchment issues around the 4 contaminates. It points the finger at the points source of contaminates. The example is at Raglan with the Whaingaroa Harbour care and has started at Kawhai and has also started at this farm for the Aotea Harbour.	I seek that the provision is that all rules that relate to farm level are amended to a sub catchment approach with any consequential amendments arising from the submission process.
Objective 2 Social Economic and Cultural wellbeing is maintained in the long term.	Support with amendments. I want to see a more robust economic analysis completed for this plan change. If you look at this councils experiment (Lake Taupo Catchment) it simply eliminated small communities.	A long term projection completed on the impact to the people and communities and amendments after the submission process.

Stock exclusion rule 3:11:5:1, 3:11:5:2, 3:11:5:3, 3:11:5:4	I support with amendments.	I seek that the provision is: amended as set out below.
	The reasons for this are: That the fencing rules comply only with the National Water Accord that recommend that slopes up to only 15% be fenced. As a deer farmer the costs are prohibitive and our science providers tell us there is minimal additional benefit. Above 15% deer farmers have lighter stocking rates. Our science providers also tell us that running deer above 15% causes less sediment loss than pine forestry plantation. The timing is very tight for priority 1 catchments	Follow the National regulations for Stock Exclusion
Policy 1 and Policy 2 and schedule B regarding Nitrogen Reference Point.	I Oppose. Sets farm values on the NRP. Low emitting farms like Deer farms are economically and severely treated. It is reward for the worst polluters that are currently in the catchment. Just another form of grand parenting. Doesn't allow farmers to adapt to market forces. Overseer, as you well know, is too variable and inaccurate to be relied upon as a regulatory tool.	Remove completely. Could allocate all dry stock farms around 25 units of Nitrogen. Better use of Farm Environment Plan.

Quisur 1 8-3-2017