

# SUBMISSION FORM

## ON THE PROPOSED PLAN CHANGE 2

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TO: Manawatū-Whanganui (Horizons) Regional Council

SUBMISSION ON: Proposed Plan Change 2 – Existing Intensive Farming Land Uses

**Submissions must be received at Horizons by 5pm Monday 21 October 2019.**

Please note that all submissions are public. They will be published in full and summary formats, on the Horizons website and in documents that are available to the public and media, following the close of the submission period.

- Please post your submission to Private Bag 11025 Manawatū Mail Centre, Palmerston North 4442; or
- Deliver your submission to the Horizons offices at 11-15 Victoria Avenue, Palmerston North; or
- Please email your submission to [submissions@horizons.govt.nz](mailto:submissions@horizons.govt.nz)

### SUBMITTER DETAILS

Full name:

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(Please note that Horizons will use this email address to correspond with you during the plan change, unless an alternative method of service is indicated below.)

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number (daytime):

0274413359

2019/796

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### SUBMISSION DETAILS

1. We could not gain an advantage in trade competition through this submission.
2. We own an organic dairy farm, 250 ha, 320 cows. Tararua River Management, South East Ruahine and Upper Manawatu River Schemes.
3. We run an organic dairy farm certified to international organic standards. Under our baseline analysis we are able to meet the 20 year target. Since that baseline was generated, we have reduced stocking numbers and changed effluent management with the purchase of an effluent tanker with an injection system so nutrient is applied over entire farm. We are progressively planting up shelter belt areas and any river terrace slopes with various species of trees, more native tree/plant species being grown to benefit the environment and our herd. Hard to put a cost on how much the plantings have cost us, many hours of personal physical labour. Continued introduction of multi-species pasture; no irrigation; very low rate, controlled application of dairy effluent/nutrient.
4. In the future, as in previous years and at our own cost, we will continue to be certified organic, improve/invest in environmental projects with more tree planting, more multi-species pastures/paddocks. We have already done a huge amount to improve how this farm operates, not using any applied nitrogen inputs, as well as running a biological system. The farm has a feed pad that is only used during adverse weather events to preserve soil structure. Not all LUC land classes will allow for the type of operation we run.
5. The existing nitrogen rules in the One Plan are affecting my property and farming. Under baseline measurements, despite not using any nitrogen fertilisers and the lower stocking rate, we are very close to the 20 year leaching limit. Not all farms have the ability to reduce leaching to the extent that this farm has. While there are farms that will be well under their requirement this will not apply in all cases. We believe a whole catchment approach should be taken to arrive at an overall result. The work we have already done has made it difficult to sell the farm at a realistic value because of our lower production levels. We have first-hand knowledge of this from two attempts to sell.
6. I am concerned about the following issues with PC2 in particular with potential costs being imposed on this farm. These will add to already high costs, future cost of remaining compliant through consenting processes are unknown. With talk of in the region of \$80-10,000 and some farms having to spend \$30-40,000 adds yet more stress to an already stressed industry.
7. I support the submissions that have been lodged by DairyNZ and Federated Farmers. I am particularly concerned about the following aspects of Plan Change 2:
  - a. The significant negative effect on rural communities.
  - b. The cost and practicality of the proposal, including the cost of obtaining consent, the cost of any Assessment of Environmental Effects required, the potential cost if the consent application is notified, and the cost of mitigation activities for reduction of nitrogen and other nutrients.
  - c. The effect that meeting the Table 14.2 Cumulative Nitrogen Leaching Maximums (CNLMs) will have on my business and on my family's and my community's economic and social wellbeing.
  - d. The uncertainties for my business if I am required to submit and comply with a Nutrient Management Plan (and/or Overseer budget) on an annual basis, and the ongoing uncertainty about how my farm will be impacted by future Overseer version changes.

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- e. The lack of science and monitoring at the sub catchments level and the lack of relationship between Table 14.2 and the CNLMs, the N leaching from my farm, and the desired water quality objectives.

8. I wish to be heard at the Hearing.

9. I am concerned about the implications all of this will have for my property and for my current activity as described above. I set out my concerns more specifically in the table below.

Reference (e.g. Policy, or Rule number)	Support or Oppose	Decision sought Changes to Plan Change 2 you would like	Give Reasons
<b>Policy 5-8:</b> Management and regulation of intensive farming land use activities affecting groundwater and surface water quality	<b>OPPOSE</b>	Amend Policy 5-8 as requested by DairyNZ and Federated Farmers in their submission.	I support the amendments to focus this policy on "management" as I support the focus on management (which is a broader range of actions as opposed to simply regulating).  I seek a reasonable consenting pathway for existing intensive farming activities as proposed in DairyNZ and Federated Farmers' submissions.
<b>Method 5-12:</b> Innovative Land Use Research	<b>OPPOSE</b>	Amend Method 5-12 as requested by DairyNZ and Federated Farmers in their submission.	I support council working with industry and other groups to look at innovations to reduce nitrogen leaching, where these are financially viable and practical options for famers. However, I am concerned that the focus of this method is on finding ways to achieve the CNLMs in Table 14.2.  I agree with DairyNZ and Federated Farmers that the focus should be on finding reasonable low nitrogen leaching options but without locking in the CNLMs in Table 14.2 or requiring farmers to meet these numbers.
<b>Method 5-13</b> Provision of Information	<b>OPPOSE</b>	Amend Method 5-13 as requested by DairyNZ and Federated Farmers in their submission.	I agree that it would be helpful for farmers if Council published information about Overseer version changes and if we were able to use models other than Overseer to estimate nutrient losses.  However, I am very concerned that Council's proposal to retain the LUC approach through Table 14.2 is that this will result in future plan changes. That continues the uncertainty we currently face and is unacceptable to farmers. I do not know how future version changes to Overseer will impact on us, or our ability to meet the LUC numbers.  I agree with DairyNZ and Federated Farmers that this method needs to be changed and agree that a reasonable consenting pathway for farmers, not based on LUC, needs to be provided.
<b>Policy 14-3:</b> Good management practices	<b>OPPOSE IN PART</b>	Amend Policy 14-3 as requested by DairyNZ and Federated Farmers in their submission.	I am concerned about how good management practices will be defined, interpreted and applied by Council and other plan users. I am also concerned about what it will mean for farmers who cannot meet the controlled activity rules.  I support DairyNZ and Federated Farmers' submission that the policy needs to be changed to provide a reasonable consenting pathway and greater certainty for farmers.

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<b>Policy 14-5:</b> Management of intensive farming land uses	<b>OPPOSE IN PART</b>	Amend Policy 14-5 as requested by DairyNZ and Federated Farmers in their submission.	<p>I consider that greater certainty is required for farmers as to when the rules apply from, what is treated as "existing" farming and what year we are at in terms of Table 14.2.</p> <p>I support the changes proposed by DairyNZ and Federated Farmers to clarify this and provide certainty, as well as a reasonable timeframe to achieve any nitrogen reductions required.</p>
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<b>Policy 14-6:</b> Resource consent decision making for intensive farming land uses	<b>OPPOSE</b>	Amend Policy 14-6 as requested by DairyNZ and Federated Farmers in their submission.	<p>I am concerned about the lack of consenting pathways for farmers who cannot meet the LUC numbers in Table 14.2.</p> <p>Table 14.2 numbers do not change, despite Overseer version updates that model new numbers on farm. This is very frustrating and upsetting as these numbers change despite no variation to our farm system, and also with no consequential updates to Table 14.2 to reflect the new outputs as a result of the Overseer version change.</p> <p>I support the changes sought by DairyNZ and Federated Farmers because they propose a reasonable consenting pathway while still achieving the water quality objectives.</p>
<b>14.1 to 14.2A Rules – Agricultural Activities</b>	<b>OPPOSE</b>	Amend 14.1 to 14.2A Rules -Agricultural Activities as requested by DairyNZ and Federated Farmers in their submission.	<p>I am very concerned that as drafted, Plan Change 2 will not provide a pathway for many farmers. This will create significant anxiety, cost and uncertainty for the rural sector. For example, we would not be able to continue to farm organically without a consent as our markets rely entirely on fulfilling realistic environmental standards. This would mean that high quality organic food production would be displaced by food production from producers with potentially lower environmental standards.</p> <p>I am also concerned about the significant cost if we were to have to apply for a discretionary activity consent. Our business needs certainty to survive. The planned changes don't give any certainty as to the requirement for discretionary activity consent, nitrogen reductions required or the cost of applying for a consent - that may not even be granted.</p> <p>I agree with the DairyNZ and Federated Farmers proposal because it provides greater certainty for farmers while at the same time requiring reasonable nitrogen reductions and moving towards improving water quality.</p> <p>I agree that Plan Change 2 is an interim solution, which again adds more uncertainty, and that a more durable and appropriate solution needs to be a priority for the council and the whole community.</p>
<b>New definitions</b>	<b>N/A</b>	Amend definitions as requested by DairyNZ and Federated Farmers in their submission.	I support the new definitions proposed by DairyNZ and Federated Farmers.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.