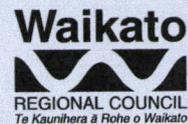


# SUBMISSION FORM

## VARIATION 1 TO PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 WAIKATO AND WAIPĀ RIVER CATCHMENTS



### IMPORTANT NOTE

Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.

**We need to receive your submission by 5pm, 23 May, 2018**

### YOUR NAME, ADDRESS FOR SERVICE AND CONTACT DETAILS (MANDATORY INFORMATION)

Name of Submitter (individual/organisation)	Peter Meier	
Contact Person (if applicable)	NA	
Agent (if applicable)	NA	
Email address for service		
Postal address	192 Jamieson Road, RDI Te Kauwhata 3781	
Phone number/s	Home: 07 026 7668	Business: NA
	Mobile: NA	Fax: NA

### PLEASE INDICATE WHETHER YOU WISH TO SPEAK AT A HEARING

- Yes, I wish to speak at the hearing in support of my submission.
- No, I do not wish to speak at the hearing in support of my submission.

### JOINT SUBMISSION

- If others make a similar submission, please tick this box if you would consider presenting a joint case with them at the hearing.

**TRADE COMPETITION AND ADVERSE EFFECTS (SELECT APPROPRIATE)**

- I could /  I could not gain an advantage in trade competition through this submission. *Refer to last page for further information*
- I am /  I am not directly affected by an effect of the subject matter of the submission that:
- a. adversely effects the environment, and
  - b. does not relate to the trade competition or the effects of trade competition.

**IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW**

- Yes, I have attached 5 extra sheets.       No, I have not attached extra sheets.

**SIGNATURE** - NOTE A SIGNATURE IS NOT REQUIRED IF YOU MAKE YOUR SUBMISSION BY ELECTRONIC MEANS

Signed  Date 20 May 2018  
Type name if submitting electronically

**SUBMISSIONS CAN BE**



Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240



Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton



(07) 859 0998



healthyrivers@waikatoregion.govt.nz *Please note: Submissions received by email must contain full contact details.*

**PLEASE CHECK** that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

**Personal information is used for administration 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.

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

## 1. Trade competition

If you could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of part 1 of Schedule 1 of the Resource Management Act 1991 (RMA).

### 6 Making of submissions

- (4) A person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that –
- a) adversely affects the environment; and
  - b) does not relate to trade competition or the effects of trade competition.

## 2. Privacy information

The Waikato Regional Council will make all submissions and further submissions including name and contact details publicly available at public libraries in the region, Council Offices and on Council's website. Any further submission, under the RMA, supporting or opposing your submission is required to be forwarded to you as well as Council.

Personal information will also be used for administration relating to the subject matter of the submissions, including notifying submitters of hearings and decisions. All information will be held by the Waikato Regional Council with submitters having the right to access and correct personal information.

## 3. Submission Content Review

Please note that the RMA states 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 process 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.

**If you have questions about making a submission, please visit [waikatoregion.govt.nz/healthyrivers](http://waikatoregion.govt.nz/healthyrivers) to see our factsheet about Making a Submission.**

**SUBMISSIONS ON SPECIFIC PROVISIONS OF VARIATION 1 TO PROPOSED PLAN CHANGE 1**

**PROVISION** (e.g. Objective 4 or Rule 3.11.5.1): Please see attached submission

Do you support or oppose the provision?  Support  Support with amendments  Oppose  Oppose with amendments

**DECISION SOUGHT**  
State clearly the decision and/or suggested changes you want council to make on the provision.

**SUBMISSION**  
State clearly the reasons for the decision you want council to make.

The decision I would like the council to make regarding this provision is:

please see attached submission

The reason for requesting this decision is:

please see attached submission

## FULL SUBMISSION TO WAIKATO REGIONAL COUNCIL

### ON THE PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 – WAIKATO AND WAIPA RIVER CATCHMENTS

Peter Meier

Meier Farms Ltd

192 Jamieson Road,

RD1

Te Kauwhata 3781

Signed: \_\_\_\_\_



Date: \_\_\_\_\_

20 MAY 2018

Comments in relation to this submission:

1. This is now a full submission as our farm was in the area named 'variation 1 PPC1'
2. I support the concept of Proposed Plan Change 1 as the first stage of achieving the vision and strategy of the Waikato and Waipa river Catchments
3. I support the four contaminant focus for healthy waterways
4. I support a staged approach to implementation
5. The plan change should be an interim approach allowing time for research and development and innovation around sub-catchment approaches
6. I support that greatest contributors to contamination should reduce sooner
7. I support the requirement of a tailored farm environmental plan

For more detailed information in relation to our submission, please refer to Attachment 1 on page 2, 3 and 4.

**Attachment 1: Plan Change provisions supported or opposed, detail, our proposal and an explanation for our proposal**

	Issue	Plan section, Page #	Support or Oppose	Detail	Our proposal	An explanation for our proposal
1.	Future prosperity of NZ as a food producing country	3 Part A, Page 25 Use values – Primary production	Support	<p>Increased compliance and mitigation cost, lack of science and data, the uncertainty of tools and mitigation measures being fit for purpose, costs of FEP's will affect farm costs. In addition, a heavy reliance on the primary sector to do more than their fair share on cleaning up our water ways will have an impact on farm incomes and, in some cases, viability.</p> <p>This means less spending in the community for products and services. The flow on effect is that it will affect regional and national GDP, exports, food production and employment resulting in a breakdown of our rural communities.</p>	<p>The science of understanding contaminants, such as sedimentation needs to be clearly understood so that compliance measures are fair and commensurate to known impact of the farming activity.</p> <p>There should not be a heavy reliance on one sector to effect water quality change. The burden may mean farming becomes non-viable in the Waikato and will adversely affect rural communities: jobs, food quality and prices.</p>	<p>The details for PPC1 contradicts the use value statements made and will particularly affect rural and Maori communities.</p> <p>The land use change policy will not be effective. Mechanisms for compliance can be achieved through different means such as a FEP's.</p>
2.	Why the focus of landowners only?	Explanatory Statement, Page 8	Support, subject to our proposal	<p>Lack of clarity for submitters to how the Regional plan as described in the Plan Change 1 relates to RMA specifically in relation to other consent holders who discharge to water bodies.</p> <p>The policy focus is on landowners and reducing their contamination to waterbodies, with no clarity on whether there will be changes to others (i.e. non landowners) who discharge.</p>	<p>More information (visibility and clarity) to how Plan Change 1 changes relate to broader discharge activities in the catchments and how they are regulated and if there are any changes planned for those non-landowners who discharge.</p> <p>The investment required of landowners to reduce contamination should be relative to discharges by others e.g. if a council sewage scheme has a theoretical NRP 20 fold of that of the dairy farm next door, what level of mitigation investment would each party need to bring to the table?</p>	<p>To deliver on the aspiration of the Vision and strategy of the Waikato/Waipara rivers, all contamination from all source need to be addressed i.e. from cities, towns, commercial enterprise and from land use activities. If land owners are 'doing their bit' then non-landowners should also have an increase in regulatory requirements including a mitigation investment proportional to their contamination quantum.</p>

				part of that FEP		mitigations in the FEP. This will result in less cost and greater landowner engagement
8	Impact of earthworks or other mitigations	Policy 11 Page 33	Support, subject to our proposal	WRC regulatory authority should incorporate policies relating to mitigations activities where there are one off impacts	Impacts such as one off sediment discharge as a result of earthworks required to undertake mitigation measures should be allowed for without triggering non-compliance action from WRC	Farmers should be able to undertake mitigation measures in good faith and use best practice methodology without fear of repercussions or prosecutions
9	Viability of farms and resource requirements for those affected by the Plan change	Method 3-11-4.3 Page 36	Support, subject to our proposal	Delivering on legal requirements borne out of Treaty and freshwater legislation has effectively been passed onto landowners. The plan change should not put landowners in a position where financially they are in the red and trying to work in the 'green'. The focus should be that farms can work in the black and be empowered to work in the green. If the proposed plan change threatens economic viability of farms then a perverse outcome will be that farmers cannot give effect to environmental initiatives.	A fund or other mechanism is established to support and enable landowners to fully fund environmental initiatives as indicated in their FEPs. Improving on water quality should be a fair and equitable process involving all people in the community.	There needs to be an agreed funding system to support landowners, particularly farmers where layout costs for implementing FEP's threaten their livelihood e.g. funds for riparian fencing and planting, construction of wetlands, livestock crossings
10	Overseer as a fit for purpose tool?	Schedule B, Page 47	Support subject to our proposal	Overseer was not a designed to be a regulatory tool for councils. There is uncertainty about whether Overseer would stand up to independent scrutiny from scientists and modellers in relation to its proposed use in Plan Change 1. Inherently models have shortfalls and limitations and these need further exploration. Of particular note, the inability of Overseer to model all types of mitigations that a landowner may want to put in place	Further work is done to ascertain whether Overseer is the appropriate tool. Heavy reliance is placed on the NRP value to drive the mitigations. Greater clarity is also needed to understand the inter-relationship between modelled NRP's, the reality on the ground and the impact and return on investment of mitigation work on NRP values and the regulatory implications	There should be absolute transparency between what the model (Overseer) calculates, the on the ground mitigation investment and the assessments by accredited persons
11	Streamlining efficient use of planning resource for FEPs	Rule 3.11.5.3 Page 41	Support, subject to our proposal	Increased expense of developing a new industry of FEP professionals when expertise already is 'in-house	Use current primary sector professionals such as farm consultants who hold relationship with farmers to be accredited to undertake FEP consultation. Qualifications should be the same for those professionals who establish the NRP or for developing FEP's	Streamlining those involved in the work to reduce costs to the landowners, and to the ratepayers

3	Natural processes and managing expectations of 'clean water'	Objective 1 Page 27	Support, subject to our proposal	Sedimentation is a natural process as indicated in the NIWA article <a href="https://www.niwa.co.nz/our-science/freshwater/tools/kaitiaki_tools/impacts/sediment">https://www.niwa.co.nz/our-science/freshwater/tools/kaitiaki_tools/impacts/sediment</a> . Consideration should be given to what are natural events without influence of public judgement or pressures	Robust data should be captured for the catchment for cyclical and 'one off' events to ensure that mitigations are for on land activities rather than from contaminations through natural events or processes. Thought should also be given to public response to these such as proactive compliance guidelines.	Landowners should not be held to account over natural processes or events which may influence the four measures including sedimentation. Subjective measures such as clarity and colour may instigate unnecessary compliance activities
4	Everybody should have a part to play	Policy 2 Page 30	Support, subject to all dischargers playing their part	Water quality is a community issue and should have a government (central and regional/local), commercial, industrial, urban and rural interface	There should be a sub-catchment approach to the plan with implementation plans specific to that sub-catchment where all point and diffuse dischargers to waterbodies are involved. Mitigation measures should be proportional to their relative impacts i.e. those that contaminate the most in the subcatchment need to invest most heavily in reducing their contamination	To deliver on the aspiration of the Vision and strategy of the Waikato/Waipara rivers, all contamination from all sources need to be addressed where mitigation efforts required should be proportional to their relative impact.
5	Land use changes	Policy 6, Page 32	Oppose	Severe land use change restrictions as described will stifle strong economies and vibrant communities. If contamination through the land use change is neutral as detailed in a FEP, this policy becomes nil and void.  Broad brush strokes of a land use change policy is not a smart approach, but allowing for land use change as markets demand whilst ensuring environmental integrity allows for strong local economies and innovations on land	All land use changes should be permitted activities unless the land use change sits outside of the 75 <sup>th</sup> percentile for NRP. FEP's should be the regulatory tool which enables (or not) the land use change	FEP's are the appropriate mechanism to not allowing an increase in diffuse discharges and are the regulatory means to seeking assurance.  Land use change policy adds an unnecessary layer, with no value add, but incurs cost to landowners and rate payers. In addition it perpetuates the 'grandfathering' or 'allocation' of the NRP, whereas a FEP would contribute to the Vision and Strategy
6	Visibility of an ongoing implementation plan	Policy 7 Page 32	Support, subject to our proposal	Currently a draft implementation plan is in place which does not give certainty to the quantum of investment required of landowners and how this can be planned for	Implementation plans should be final with clear standards and expectations so that budgets can be apportioned appropriately over time and without wasted effort	Transparency of mitigation methods and requirements will ensure they can be planned for with certainty
7	Earthworks for mitigation measures	Policy 11 Page 33	Support, subject to our proposal	There is potential for layers of compliance if there is a requirement for farms to complete a Farm Environmental Plan (FEP), and then require further consents for undertaking mitigation measures as	If mitigation measures are included in the FEP, no additional resource consents should be required i.e. should be all inclusive as part of FEP approval	Avoids duplication and the effect of 'double' compliance. The FEP, when approved by WRC, should also incorporate all approvals relating to the

