

Freshwater Consultation 2016
Randall & Allison Aspinall - Mt Aspiring Station

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Submission on the Ministry for the Environment. 2016. *Next steps for fresh water: Consultation document.* Wellington: Ministry for the Environment.

Background on Submitter

We farm Mt Aspiring station which is a 2,300 hectare high country property near Wanaka running 10,000 stock units consisting of 1,100 head of cattle and 5,000 sheep. Our property is in a high rainfall belt with annual rainfall ranging from 2,000 - 3,500 mm per annum across the farm. As a result we have a large number and distance of significant creeks and waterways running through the property. During the setting of Plan Change 6A (Otago Water Plan) our main stream the Matukituki River was described as having pristine water.

We are also a gateway into the Mt Aspiring National Park with a public road then public walking easements running directly through the middle of the property for approx 21 km. It is estimated that visitor numbers (climbers, trampers, walkers & tourists) are greater than 100,000 people annually.

Our background / experience in environmental and water issues are:

- The property won the Otago section of the Ballance Farm Environment Awards under the management of my parents - John & Sue Aspinall
- Randall has an Agricultural Science degree and worked as a farm advisor for 10 years
- We were heavily involved in Plan Change 6A through the mediation process.
- We are one of 3 properties included in a Beef & Lamb project developing Land Environment Plans in the Lakes environment
- We have a significant project (\$ 400,000 - \$ 500,000) running on the property with the ORC & AgResearch looking at the validation of Overseer in our environment.
- Involved in a Beef & Lamb led regional environment forum
- Involved in water testing on our own property and with the Lakes Landcare Group

Overall Approach

Firstly we would like to congratulate the Government on your approach to setting minimum acceptable standards and a requirement to "maintain or improve" while still allowing individual regions to determine their own more specific standards & targets.

We feel this is a very pragmatic approach and how policy setting should occur through different layers of government.

Freshwater Units

We agree with a move towards maintaining or improving water quality within Freshwater Units. Surely our aim has to be to maintain or improve water quality in the vast majority of streams across New Zealand and this is the best approach for it.

Trying to apply this standard on a regional basis is impractical to measure / manage and allows too much room for infighting between different interest groups and tradeoffs that end up benefiting individual entities / interest groups at a cost to the wider community.

Freshwater Improvement Fund

We thoroughly applaud the establishment of this fund and the potential benefits it could deliver. At a meeting yesterday with the ORC councillors, Beef & Lamb plus a group of Otago farmers we were discussing how much change & improvement there has already been in our regions at a local or catchment level.

This was across Otago & Southland where one Council has applied an effects based and largely hands off approach while the other is still in the process of developing their plan. We discussed how despite this lack of direct Council action there has been over half a dozen Catchment groups established by locals, there are at least 4 significant environmental improvement projects running within the sheep, beef & deer industries, Beef & Lamb have had good turnouts at their LEP workshops and general sentiment has improved.

We think this is a great example of what can be achieved when communities are encouraged to act for themselves rather than regulated / driven from the top down by Councils. The Freshwater Improvement Fund could be a great tool to encourage and support these community / catchment groups to carry out their work and deliver results.

Our only observation is that the minimum contribution of \$ 250,000 requires a very large project size and is probably beyond most individuals or catchment / community groups. While we are aware it will incur additional cost we would like to see that minimum contribution reduced so it can encourage and support smaller community led initiatives.

Stock Exclusion from Waterways

We understand the reasons behind a consistent national standards for stock exclusion and are happy with the standards and timeframes being suggested. We also acknowledge and fully support that all properties have some waterways / wetlands that need to be fenced and there are areas where blanket fencing is appropriate.

Our major reservation with the current discussion document is a lack of detail or clarity around the application of a slope based land classification and at what level that should be applied. In the **Land & Water Forums Recommendations** they have said that the level of classification for slope (at an intrafarm, catchment or district level) should be part of the public consultation process however it does not appear in the discussion document.

This means that on our property which has approx 20 km of the Matukituki river and 5 - 10 km of creeks (which could be captured as waterways) we are up for between 0 and 60 km of fencing (and reticulated stock water) depending on how the slope classification is applied. This obviously makes it very difficult to submit for or against the current discussion paper.

Slope has been chosen as a measure which is relatively simple or definitive for a national standard. However more detail is required on its application and there are other factors which need to be considered. This is best defined by the **Land & Water Forums: Recommendation 38 & Point 217** which says there needs to be exceptions in situations where large costs & significant impracticalities for stock exclusion exist relative to the environmental benefits to be gained. This is the case for many areas which could be captured as lowland hills however have low stock numbers relative to area grazed and quantity of water flowing leading to no or minimal effect on water quality.

Our situation is an example of this where at an intrafarm level the main river and some tributaries could be considered as lowland / rolling hills. This would then trigger a requirement for stock exclusion of this despite the negatives which are:

- large financial cost of establishing up to 60 km of effective fencing across difficult (rocky / undulating) and constantly shifting terrain
- the ongoing maintenance requirement (time & money) for fencing where 100 - 300 mm rainfall events are common leading to flooding, significant natural stream bank erosion, creeks swapping beds regularly, landslides off nearby hill slopes, snow etc
- loss of grazing area where the "best line" for a fence will cut off significant beef cow grazing on river flats & terraces
- removal of cattle will lead to grass getting long & rank in riparian areas. Sheep will then avoid these areas which will allow the growth of ragwort and other invasive weeds in areas where their seed can then spread downstream
- the visual effects of non-natural fencing & vegetation lines on the landscape (a major issue in the Queenstown Lakes Area). Currently most boundaries are unfenced leading to a gradual progression from grazed to non-grazed areas.
- increased stock pressure on small waterways. In areas where reticulated water is impractical or not cost effective stock will simply move from the main stems to smaller tributaries for their stock water and put more pressure on these.
- Potential for land intensification - if one side of a block has to be fenced there will be a temptation to also fence the other (probably easier as further from the river) side leading to further subdivision, increased stocking rates and greater through ground effects on nutrient loss

In our situation our river flats have low cattle numbers relative to area and water flow. We have taken water samples which show that these stock having access to the river has an unmeasurable effect on E Coli, Ammoniacal N, Total N & DRP in the river as it leaves our property. To us it would appear that the lack of environmental benefit from fencing relative to the significant negatives does not warrant stock exclusion. Despite this we still have the potential for significant areas of our farm to be captured as lowland hill and require fencing.

We aware that writing standards to capture the areas that require fencing while avoiding unintended consequences is very difficult however our suggestions are:

- **Take some more time to consider the most appropriate measures for defining what waterways require stock exclusion (on a positive vs negative basis) before progressing the standards.**
- **As a minimum there needs to be a clear & cost-effective pathway for waterways to be exempted from the requirements if it can be shown that the costs / negative impacts outweigh or do not justify the environmental benefits of stock exclusion**

We would like to make the point that while we feel large areas of our property do not require stock exclusion we acknowledge there are areas that do require it. These tend to be slower flowing streams with silty (erodeable) banks in paddock country that is farmed more intensively. We have already fenced some of these streams off and plan to continue with this program as we feel this will produce environmental and amenity benefits.

As a further comment we strongly support the **Land & Water Forums Point 219b** which is a suggestion to make stock water schemes tax deductible. This is a great way to send a message and encourage stock water schemes which will benefit the environment.

We thank you for taking the time to read our submission and hope that we have been able to give an insight to our thoughts and the character of our property. It is difficult to explain the practicalities of fencing / stock exclusion etc in our environment so if any ministers or ministry staff wish to visit our property at any time we would be happy to show you around.

Thank You
Randall & Allison