In regard to the New Zealand Greenhouse Gas Inventory of April 2019, we presume that Equine farming is being considered in the “other” percentage rather than alongside dairy, beef, sheep and deer.

The New Zealand Thoroughbred Breeders Association is concerned that the equine sector has not been included around the table in conversations on greenhouse gas emissions to date, and as a result equine farming is likely to get caught with significant administrative costs to account for the few sheep and cattle on properties with little to no benefit in the reduction in the GHG targets.

We ask that consideration is given to equine farming as an agricultural industry as horses are hind-gut-fermenters rather than ruminant animals, therefore as a land user we are a low methane and nitrous oxide contributor to greenhouse gas emissions.

Background
The New Zealand Thoroughbred Breeders Association (Inc) is an incorporated society established in 1948, with the aim of providing a collective voice for thoroughbred stallion and broodmare owners big and small throughout New Zealand. We represent approximately 1500 members across eight regional branches throughout New Zealand. The aim of our organisation is to encourage, promote, advance generally and ensure co-operative efforts in all matters pertaining to the production and improvement of the thoroughbred and the best interests of thoroughbred breeders.
New Zealand thoroughbred breeders pride themselves on raising athletic horses that are sought after throughout the world and therefore our natural environment and pasture base is crucial to the way we raise our horses.

The New Zealand Thoroughbred Industry on a whole contributes more than $1,098.91 million to the New Zealand economy, on economic terms it is comparable in size to the New Zealand Wine and the New Zealand Seafood Industry.

There are 3,705 thoroughbred horse breeders in New Zealand and the thoroughbred breeding industry employs nearly around 3,335 full time staff within the breeding industry, but the thoroughbred industry as a whole supports around 3,837 full time jobs within the Waikato alone. This does not account for all the associated industries that the breeding industry contributes to economically.

The National Karaka Yearling sales in 2019 contributed a combined aggregate of $79,396,750 of which the majority of these horses were raised in the Waikato region.

**General Comments**

NZTBA would like to have the opportunity on behalf of the equine sector as an agricultural industry to have input into the proposed action plan on on-farm price emissions.

NZTBA supports sustainable agriculture in New Zealand. Horses are produced as athletes not as production animals like dairy, beef, sheep and deer. As a result, equine management is significantly different to the rest of the pastoral sector, including nutritional requirements and expenditure, pasture management, and housing.

For example, equine properties only ever apply nitrogenous fertilisers in very low amounts as rapidly growing pastures can cause behavioral issues and bone density issues in young stock. Equine farmers have always planted trees in a bid to provide shelter, shade and to protect waterways, and here we differ from other pastoral farmers. As well we do not have high stocking numbers per acre as this is counter-productive to the way horses are grazed. We believe we should be treated accordingly when it comes to on-farm price emissions, and that equine farming should be classed in a low release category.

Yours Sincerely

Justine Sclater
CEO

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1 *Size and Scope Report, New Zealand Racing Board, February 2018*