SUBMISSION TO
THE MINISTRY FOR THE ENVIRONMENT
on

Clean Water 2017

From Deer Industry New Zealand

Deer Industry
New Zealand

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1. Introduction

1.1 Deer Industry New Zealand (DINZ) welcomes the opportunity to make a submission to The Ministry for the Environment (MfE) in response to the consultation document “Clean Water” (MfE publication number: ME 1293).

1.2 New Zealand has the world’s largest modern farmed deer industry. The main products marketed from deer farming (with 95% of these products exported) are venison and deer antler velvet. In the year ending 30 September 2016, deer products were worth $245m in export receipts to New Zealand. It is estimated that 75% of deer farmers also actively farm sheep and/or cattle.

1.3 DINZ is a levy funded industry-good body established by the Deer Industry New Zealand Regulations 2004 under the Primary Products Marketing Act 1953. DINZ’s functions (under regulation 5(1)) include the following:

- to promote and assist the development of the deer industry in New Zealand;
- to monitor, and from time to time report on, the economics and efficiency of all components of the deer industry; and
- to report from time to time to the Minister and to the Minister of Foreign Affairs and Trade on movements of costs and prices or other factors likely to affect the economic stability of the deer industry.

1.4 DINZ’s levy payers are the producers and processors of venison and velvet antler. Venison levies are shared equally each between producers and processor exporters. There are roughly 1,800 deer farmers and 16 processing plants that slaughter deer, of which 12 slaughter only deer.
2. Scope of Submission

2.1 DINZ will confine this submission to the following topics:

- Funding to improve fresh water (page 22)
- Keeping stock out of our waterways (page 25)

2.2 DINZ supports the broad aim to set ambitious but possible targets for swimmable rivers and lakes as well as enabling mechanisms through provision of better water quality information, amending the National Policy Statement for Freshwater Management (NPS-FM), co-funding community activity, and excluding stock from waterways where practical and effective. As with the previous consultation document (Next steps for fresh water: Consultation document, 2016), DINZ is supportive of the Government’s collaborative approach through the Land and Water Forum (LAWF) and other fora that include a diverse selection of stakeholders.

2.3 As deer farming shares many issues and areas of environmental risk with other livestock farming systems, DINZ also supports submissions from industry bodies representing other livestock species farming where these are consistent with deer farming and deer behaviour management. As such DINZ supports submissions from Beef + Lamb New Zealand and Federated Farmers of New Zealand in relation to Amendments to the NPS-FM as follows:

- The status of water valued for economic wellbeing and for food production is considered alongside other significant values (human and ecosystem health).
- The swimmable target being applicable only to where this is a value for the waterbody and the need to recognise that this may also involve water ways that are below 4\(^{th}\) order (the current threshold for the swimmable target). In doing so it also should be acknowledged that supporting community catchment initiatives to maintain or improve water quality is an effective approach and that the provision of localised water quality information is fundamental to enable this.

3. Funding to improve fresh water

3.1 DINZ considers that the eligibility criteria that set a minimum request for funding of $200,000 and limits these funds to unreasonably cover a maximum of 50% of the total project cost, sets a distinctly high threshold that discourages small organisations and community-led projects.

3.2 In our earlier 2016 submission, DINZ stated that “Government activities and funding can greatly assist education and farm management practice change affecting water management and wider environmental stewardship... There are good examples of community-led catchment groups throughout the country that have resulted in agreed actions with the aim of improving environmental outcomes and meeting regional council policy requirements... Funding for more groups in catchments that are seeking to improve degraded water quality would accelerate their formation and allow these groups to secure services from what is a currently small group of facilitators in this specialized and multi-disciplined area” (see paragraphs 5.3 - 5.4 of the DINZ 22 April 2016 submission).
3.3 DINZ considers that the partnership funding model is a very robust approach but the reality of having to provide a minimum of $200,000 from non-Freshwater Improvement Fund sources is unaffordable and in our view unreasonable for a small organisation or individual community catchment groups.

3.4 Future funding rounds for the Freshwater Improvement Fund could be more inclusive by reducing the minimum request for funding level to a more attainable $100,000. It is notable that the examples of government investment provided in the map on page 24 of the consultation document are between $55,000 - $140,000 for Community Environment Fund projects and $39,000 - $181,000 for DOC Community Fund projects.

4. Keeping stock out of our waterways – start date, definitions and riparian buffers

4.1 The proposed starting date of 1 July 2017 for excluding dairy cattle and pigs from water bodies – while not directly impacting on deer farming appears to be overly ambitious.

- DINZ considers that once all consultation has been fully considered and requirements for stock exclusion are finalised, a more reasonable starting date would be six months following a government decision and announcement of the requirements.
- While DINZ originally supported the starting date in the earlier consultation stage (22 April 2016), time frames are now considerably reduced and may not result in effective and positive engagement with landowners, which in turn may have flow on impacts to uptake for beef cattle and deer farmers as they are phased in to meet the requirements.

4.2 Definitions of “lakes”, “natural wetlands” and “permanently flowing” as stated on page 28. We refer back to the Fourth Report of the Land and Water Forum’s Recommendation 37 that provides further clarity for defining a natural wetland.

Recommendation 37: A national stock exclusion regulation should clarify that ‘natural wetlands’ subject to the regulation are ‘wetlands’ as defined by the RMA but not including:

- wet pasture, damp gully heads, or where water temporarily ponds after rain or pasture containing patches of rushes
- effluent ponds
- artificial storage facilities and detention dams
- artificial water courses such as conveyance and drainage canals
- reservoirs for firefighting, domestic or community water supply
- engineered soil conservation structures.

4.3 DINZ welcomes ongoing discussion as to how to pragmatically define the above terms to allow land owners to have certainty in their obligations and an understanding of the effectiveness of these obligations in maintaining or improving water quality.

4.4 DINZ notes that a riparian buffer would in many cases be desirable and beneficial when used in conjunction with stock exclusion but does not agree that this equates to best management practice as a blanket assumption. Any requirement from a regional
council to combine riparian buffers with stock exclusion would be better determined by considering farm-specific management and circumstances with local catchment water quality issues. This allows factors such as ongoing riparian buffer management (which may require stock grazing to control weeds), logistic capabilities and priority of water quality targets (reduced E. coli and sediment from stock exclusion, or in stream temperature control and shading for biodiversity from riparian buffers).

5. Keeping stock out of our waterways – stock crossings

5.1 Proposal (page 28): Stock crossings. Cattle, deer and pigs are able to enter water bodies for the purpose of crossing from one side to the other as long as they are being supervised and are actively driven across the water body in one continuous movement, where this occurs less frequently than once per week. Stock crossings used once or more per week, must be bridged or culverted by 1 July 2019.

5.2 DINZ supports the intention of the proposal but seeks further amendment to distinguish between:

- Prolonged river crossings (particularly if there are large numbers of livestock) that are frequent and over a long period (and therefore would justify being bridged or culverted), and
- Crossings that are of short duration (and where stock move quickly across the water body and do not linger) and occur over short periods in the year.

5.3 As the text is currently worded, the sentence “Stock crossings used once or more per week, must be bridged or culverted by 1 July 2019” could be interpreted as requiring all stock crossing to be bridged or culverted unless the inference is that this is on an ongoing basis.

5.4 DINZ considers this is not the intent of the text which should consider both the frequency (number of crossings per day/week/month) of stock crossing at any particular location as well as the intensity of the crossing (number of animals per crossing event, duration of animals in or near the water).

5.5 DINZ refers back to its submission on “Freshwater Consultation 2016” (22 April 2016), page 5, paragraph 3.13: “a mob of 400 deer crossing the Waimea Stream in Southland (when being moved from one paddock to another) have been timed at three minutes to cross. During that time and for four minutes after crossing, water quality guidelines (Australian and New Zealand Guidelines for Fresh and Marine Water Quality – October 2000) for Escherichia coli and Dissolved Reactive Phosphorus were exceeded, but over the course of a day these increases were negligible.” The conclusion reached in this small on-farm project was that deer quickly crossing have little influence on overall water quality primarily due to the short time spent crossing.

5.6 Other than moving between paddocks, management of farmed deer does not involve numerous stock movements over an extended season such as would occur for dairy cows during the milking season. However there are times when deer movements can be frequent and over shorter time frames. One example would be velvet antler removal that typically occurs over a two month period (October – November) where small groups of stags are moved to a deer shed, antlers are removed and the deer are returned to the paddock. Stock may be moved up to three times a week over this
period. Other occasions for stock movement include Tb testing, sending stock for slaughter and vaccinating or drenching – these are typically annual events.

5.7 An alternative to the current wording that captures the intent is as follows: “Cattle, deer and pigs are able to enter water bodies for the purpose of crossing from one side to the other as long as they are being supervised and are actively driven across the water body in one continuous movement, where this occurs less frequently than once per week on average. Stock crossings used once on average weekly, or more frequently per week, must be bridged or culverted by 1 July 2019.”

5.8 DINZ would encourage more collaborative discussions with other interest groups to determine appropriate criteria for requiring bridging or culverting and that these are in relation to expected risks and magnitude of the risks to water quality.

6. Keeping stock out of our waterways – stock exclusion plan

6.1 Proposal (page 29): Alternative option. Where a land owner is unable to meet the requirements set out above (e.g. due to significant practical constraints), they may apply to the relevant regional council for permission to instead develop a ‘stock exclusion plan’. This must set out where and when stock will be excluded from water bodies on their land, and where complete stock exclusion is not feasible, what alternative mitigations will be undertaken to manage the environmental impacts of stock access to water bodies. This could be standalone or form part of a wider farm environment plan or land environment plan and must be approved in writing by the regional council.

6.2 DINZ supports this proposal as a means of demonstrating when the benefits of excluding stock from waterways can be achieved through more cost effective methods or where there is little benefit to be gained from excluding stock based on current management practices, stocking rates and local climate conditions and water quality state. DINZ has previously submitted that exclusion of deer from waterbodies is currently only possible through the use of permanent fencing which is more costly for deer than for other livestock species.

6.3 We submit that the stock exclusion plan, where this is not already included in a regional council-required “farm environment plan” (or equivalent), should be:

- Relatively easy to develop by the farmer/owner without the need for a farm consultant.
- An administratively simple and non-costly procedure for the relevant regional council to approve in writing.
- Not require disproportionate expense and time to inspect or verify (or take on the role of a quasi-consent).

6.4 In the supporting document to the Clean Water publication, “Appendix 5 Draft RIS Stock Exclusion”, paragraph 112 (page 24) states: “In limited cases, stock exclusion may be impractical and not justified by environmental benefits (for example, where paddocks are intersected by many waterways and stocking density is very low, as on some West Coast farms).” DINZ also notes that the Fourth Report of the Land And Water Forum’s Recommendation 38 also acknowledges these circumstances:
6.5 We observe that the nature of deer farming in hill and high country can fit this description where stock exclusion is impractical and the enormous costs required for exclusion through fencing cannot be justified as there are negligible environmental adverse consequences. Recommendation 38 has clear precedence in deer farming locations, further emphasising that slope class as a proxy for stocking rate will have some limitations. We also note that in land areas outside the farm boundary it is estimated that some 250,000 wild deer also roam freely with no discernible impact on water quality at its headwater sources.

6.6 Further clarification of alternative mitigations could include current farm management practices if the result is that water quality does not show deterioration from current levels. This may be a particular feature for West Coast deer farms that are not intensively stocked and experience high rainfall in catchments with water quality at acceptable levels.

7. Conclusions

7.1 DINZ supports the broad aim to set ambitious but possible targets for swimmable rivers and lakes as well as enabling mechanisms through provision of better water quality information, amending the National Policy Statement for Freshwater Management (NPS-FM), co-funding community activity, and excluding stock from waterways where practical and effective.

7.2 DINZ is supportive of the Government’s collaborative approach through the Land and Water Forum (LAWF) and other fora that include a diverse selection of stakeholders.

7.3 Better access to the Freshwater Improvement Funds for small industries and community catchment groups is requested through lowering the level of required co-funding.

7.4 Excluding stock from waterways where practical and effective is supported although DINZ requests more clarification of definitions, stock crossing and stock exclusion plan criteria. DINZ welcomes ongoing collaboration in developing guidance for stock exclusion issues.