Submission on the Government’s Action for Healthier Waterways discussion document

To: Ministry for the Environment

Submission by: New Zealand Thoroughbred Racing

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PURPOSE

The purpose of this submission is to respond to the document: *Ministry of the Environment. 2019
Action for healthy waterways – A discussion document on national direction for our essential freshwater.*

In particular, it seeks to confirm New Zealand Thoroughbred Racing’s full support for the objectives set out in the document. It also seeks to bring government’s attention to distinction between equine activity, namely, horseracing, and other forms of livestock farming.

BACKGROUND

New Zealand Thoroughbred Racing (NZTR) is the governing body for Thoroughbred horseracing in New Zealand. Thoroughbred horseracing generates more than $1 billion in value-added contribution to the New Zealand economy. The economic output generated by the New Zealand Thoroughbred industry is directly responsible for sustaining 9,621 full-time equivalent jobs across the nation. The industry is also supported by 4,763 people who volunteer their time and resources for the love of the sport. In addition to the persons employed directly by the industry, an additional 3,707 persons participate in the breeding of racehorses and another 15,951 participate through their ownership, or part-ownership, of racehorses.

Thoroughbred racing in New Zealand has had a long and celebrated history, dating back to 1842, when the first recorded race took place on Petone Beach near Wellington. The rich cultural, heritage and social significance of the sport has been recorded ever since then. The racecourses located all around New Zealand are an important part of the fabric of many local communities. Horseracing has developed extensive practices that support charitable organisations and the local communities.

Central to the Thoroughbred racing industry is the horse. Thoroughbred horses are highly specialised equines, bred for their agility and speed. The breeding of Thoroughbred horses is highly regulated from the time of their conception through to the end of their racing careers. Every Thoroughbred birth is recorded in the New Zealand Stud Book which, in turn, forms part of a network of Thoroughbred registers across the world. In New Zealand approximately 5,000 mares and 188 stallions produce just over 3,300 foals each year. Of these, approximately 1,730 are exported. The foals that have remained from previous foal crops make up the population of 4,744 horses which participate in races.

ALIGNMENT WITH OTHER SUBMISSIONS

This submission is aligned with the submissions made by:

- New Zealand Thoroughbred Breeders’ Association. (NZTBA)
- New Zealand Trainers’ Association. (NZTA)
GENERAL COMMENTS

NZTR recognises and accepts that the quality of freshwater has deteriorated over recent decades as stated in the Action for healthy waterways and, consequently, there is a need to reduce the amount of nitrogen, phosphorous sediment and pathogens from entering the waterways. As such, the racing industry is committed to take any action within its area of responsibility to stop the further degradation of New Zealand’s waterways and to restore them to a healthy state.

NZTR is working together with other equine organisations, including the NZTBA and the NZTA, to strengthen the racing industry’s obligations to protect and restore the quality of all waterways to ensure the quality of urban and rural wetlands and streams.

NZTR supports the intent behind the proposals as set out in the “Action for healthy waterways – a discussion document on national direction for our essential freshwater.” In principle, NZTR supports the proposals to:

- Set and clarify policy direction,
- Raise the bar on ecosystem health,
- Support the delivery of safe drinking water,
- Improve ecosystem health by better managing stormwater and wastewater, and
- Improve ecosystem health by improving farm practices where needed.

The success of the proposed actions will depend on a number of factors such as strong regulatory processes and also appropriate and achievable standards. NZTR has a strong interest in the appropriate application of the achievable standards as it is concerned that there is danger that various sectors of the horseracing industry may be inadvertently or bluntly included in regulatory processes which are applicable to other animals and farming systems, and which may result in being counterproductive rather than productive.

A separate submission has been made by the New Zealand Trainers’ Association in which it expresses concern regarding a number of proposed actions. These included the possibility that a horse may be defined as “livestock” which in the view of the racing industry would be inaccurate. It also expressed concern that training establishments may be inadvertently caught in the definition of a “feedlot”, or “other stock holding” facility that have relevance to sheep, dairy or cattle production. It is submitted that the purpose and activities which take place on a training facility are very different to recognised feedlots and that the intention of the definition was never to include racehorse training facilities in the controls placed on feedlots. The intention of the action plan not to define training establishments as feedlots is demonstrated in section 8.7 on page 79 of the document which states “There are about five feedlots currently operating in New Zealand”. As there are several very large and hundreds of small Thoroughbred training establishments around the country, it is clear that they are not intended to be considered as “feedlots.”

NZTA has also submitted that the proposed Overseer model of nutrient allocation is not appropriate for horses. Given the physiology of the digestive system of a horse and the specific nutrient requirements, NZTR supports the submissions of NZTA.

There are 42 Thoroughbred racecourses in New Zealand. The racecourses hold a total number of 315 racemeetings each year. During a racemeeting between 60 and 140 horses may come onto the racecourse property for the purpose of racing. The horses arrive on the racecourse on the morning of the racemeeting and will leave the course by the afternoon. It is submitted that racemeetings on
a racecourse do not meet the definition of a “feedlot” nor a “stock holding area” and therefore are exempt from the restrictions proposed by the National Environmental Standards for Freshwater.

Notwithstanding the above submissions, NZTR acknowledges that the accumulation of horses in a limited area does create environmental stresses which must be managed responsibly. Urine and manure should be managed responsibly so that the threat of waterway contamination is minimised.

Racehorses should be, and are, managed so that they have minimum impact on the quality of freshwater. Precautions should be taken to prevent urine and manure contamination of the waterways. Waterways on facilities which have racehorses must be fenced to prevent horses from accessing the water. Paddocks must also be managed to prevent the loss of pasture which may result in waterways being contaminated by sediment.

**CONCLUSION**

NZTR shares the concern that the quality of freshwater has deteriorated, and that responsible action needs to be taken to restore it to its former health.

NZTR submits though, that the management practices required for horses are different from other livestock. To achieve the best freshwater management practice, horses must not be inadvertently grouped together with production livestock but rather standards should be developed which are relevant and specific to horses.

The proposed standards should take into account the difference in the digestive anatomy of the horse as well as the feeding methods compared to other livestock. The standards should also reflect the daily activity profile of racehorses as equine athletes. NZTR would be happy to make itself available to work with Government to ensure that the most effective freshwater management practices can be achieved.