To: Ministry for the Environment

Submission on: Government’s Essential Freshwater Package and the Action for Healthy Waterways discussion document

Submission by: New Zealand Trainers’ Association

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The New Zealand Trainers’ Association (NZTA) is making this submission to offer an Equine perspective on the Government’s Essential Freshwater Package and the Action for Healthy Waterways discussion document.

The NZTA accepts the need for good environmental practice in the industry and address any issues that it may have. To this end we are working in collaboration with the wider equine sector and industry groups to ensure good Environmental Management Practices are followed and that any regulation is fair, equitable and able to reflect equine management.

Healthy waterways are important to all New Zealanders. The NZTA shares the same aspirations as New Zealanders to protect and enjoy our streams, rivers, lakes and wetlands: however we have some concerns that there is a lack of understanding of equine property management and our requirements.

The key concern that we have is that these national policies and potential regulations are to be developed with advice from several appointed advisory groups that represent or have knowledge of community and sector interests. However, it is our understanding that there is no person on these advisory groups or within either Ministry with any knowledge or understanding of the thoroughbred/racing sector specifically or more broadly the equine sector. We would therefore recommend there be some form of Equine representation in the
future process’s to make sure there is a clear understanding of our sectors requirements.

BACKGROUND

NZ Trainers’ Association and membership
The NZ Trainers’ Association was formed and incorporated in 1975 to represent the needs of thoroughbred racehorse trainers. All racehorse trainers must be licensed to train horses by the code governing body, NZ Thoroughbred Racing. There are currently 819 licensed trainers who can be broken into three categories of licence types:

278 A Licence - professional horse trainers who derive their livelihood from racing. The majority are based close or on racecourses in the rural regions of New Zealand. Horses are kept in a stable and yard environment. There are no paddocks grazed as such. Most of them collect the manure twice a day, store it on a concrete pad until it is removed by a waste management company. None are close to streams or waterways – wastewater is drained through the local racing club’s drainage system.

286 B Licence - they can train up to a maximum of 6 racehorses. Whilst they are able to train a horse wholly owned by members of the public, they often retain a share in horses. Racehorse training is not their prime source of income and they will usually have alternative employment or possibly farming interests. Many will train from their own properties and have their own stable and yard complexes. They will generally travel their horses to a local racecourse for fitness/education.

255 C Licence - these are owner-trainers who must retain at least a 50% ownership share in any horses they train. They mainly train from their own properties which are not exclusively for horses and are much smaller scale. Training horses is not regarded as a source of income. Their average age is 59.5 and many haven’t had a horse start in a race for some years.

Geographically, trainers are from the following areas:
Waikato north – 373
Central Districts/ lower North Island - 257
Southern Island – 188

A report analysing membership in more detail is available from the following link: https://nztrainers.co.nz/news/analysis-of-membership/

The thoroughbred horse in training
The majority of racehorses in training have come from NZ Thoroughbred stud farms. Therefore, the submission provided by the NZ Thoroughbred Breeders’ Association should be read in conjunction with this submission.
Horses progress from a breeder’s property, often via the Annual Yearling Sales and are then “broken in” as early two year olds and have some education. They may then spell at an agistment property prior to joining a racing stable. At all stages through this process, the value of the horse is in keeping it healthy and free from injury as ultimately it will need to be able to perform competitively to continue in the role as a racehorse. Many do not succeed and are often rehomed to alternative equestrian activities. Those who do can often race until they are 5 or 6 years old. They are not in constant training, but have regular breaks throughout the season.

The life of a racehorse in training is very routine. They are fed prepared feeds and do not graze as such. They are likely to be stabled overnight and put out in small day yards after being worked in the early morning at the local track. They do not gallop every morning, but their fitness is built up to a level so they peak on raceday. It is a very labour-intensive routine as horses have both their stables and yards cleaned out daily.

For those horses trained at private properties, they follow a similar routine. Some may travel to a racecourse for their fast work and perhaps have their fitness work on the property where they are kept. They may be out in paddocks as opposed to yards. Again their safety is paramount, so safe containment is essential and their paddocks are well fenced and they do not have access to waterways.

**GENERAL COMMENTS**

The NZ Trainers’ Association support the proposal to stop further degradation of NZ’s freshwater resources. It is hoped that by focussing on those industries that affect the waterways will ensure they are in a healthy state for the next generation. As an industry we do have concerns about some of the proposals as they are not applicable to our industry.

We seek clarification of whether a horse is defined as a livestock unit. Horses are athletes and as such are not bred for production but performance. Their value is in their ability to be physically sound and able to run fast.

Irrespective of whether a horse is deemed as livestock, the Trainers’ Association will be keeping members advised of good environmental practices to ensure they are compliant with the proposed standards. Clarification will be needed as to how a horse-training establishment will be treated under the proposed legislation.

We currently actively promote waste minimisation and recycling and will continue to do so:

- Most of a racehorse in training’s diet consists of hard feed – usually supplied in bags. Our major sponsor, Dunstan feeds actively promotes recycling of feed bags or the utilisation of reusable kegs. This message is
promoted to our membership – see the following link:

- We have recently become aware of a company producing fenceposts made from recycled plastic. The product is beneficial to the waterways as it replaces the need for tantalised pine posts, which can leach into the soil. We are also actively promoting this to our membership -
  https://www.futurepost.co.nz/

CONCERNS
The Essential Freshwater document proposals could have the potential to significantly impact the equine and in particular racing sector. The key areas are;

- It is proposed that a National Environmental Standard be introduced to regulate the environmental impacts of feedlots. The advice that has been provided to us is that any definition of a feed lot will be based on the intensity of stock and non-reliance on soils to provide feed. Such a definition will capture nearly every racing stable in New Zealand, both thoroughbred and harness. And there is no reason to expect that horses will be excluded from such a definition.

- It is proposed to develop the process of nutrient allocation using the model Overseer or alternatively control inputs. We have been able to show that Overseer is inappropriate for use by our industry as horses are not a ruminant animal; there is also a low understanding of nutrient cycling and environmental impacts from horses. The proposed alternative of measuring inputs is also problematic for the equine sector due to the relatively high use of supplementary feed and lack of assessment or resulting nutrient losses from the equine system. We are currently working on getting a better understanding of nutrient cycling on equine properties but are concerned that national policy is likely to be developed with the absence of such information.

- It is proposed to amend the National Policy Statement on Freshwater Management, to require the use of Good Management Practices, set limits and greater controls in at risk catchments. All these areas could impact significantly on the racing industry depending on the specific detail developed.

- 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, energy expenditure, pasture management, and housing.
For example, equine properties almost never apply nitrogenous fertilisers as rapidly growing pastures can cause behavioural and bone density issues in young stock.

- Horses are generally excluded from accessing waterways or any hazard as they raised in a manner to prevent any hazard from causing them injury that could affect their athletic career and potential value. There is a large emphasis on safety and containment.

- Horse are a non-ruminant animal - they are hind gut fermenters therefore they have different requirements and it is our understanding that the Overseer model has incorporated horses on a stock unit basis using the assumptions developed for other stock classes.

- Overseer assumptions do not reflect different grazing patterns, feed utilisation or the stabling of horses which is how most trainers operate.

**IN CONCLUSION**

The NZTA accepts the need for good environmental practice in the industry and address any issues that it may have. To this end we are working with the wider equine sector and relevant regional councils around nutrient management and to develop industry Good Environmental Management Practices as well as ensuring any regulation is fair, equitable and is able to reflect equine management.

What we are seeking from Government, is to assist us to ensure that there is appropriate input and representation as Government develops these policies to ensure due consideration of impacts on the racing sector and any regulatory controls are fair and equitable.

We ask that Equine has some representation in the future process’s to make sure there is a clear understanding of our sectors requirements.