Submission to the Essential Freshwater Discussion Document

Federated Farmers Gisborne/Wairoa Branch

Date: 29 October 2019

Introduction

Farmers in the Gisborne/Wairoa region welcome the work being undertaken by Government and Local Councils to improve our Freshwater. We have been undertaking actions of our own to improve waterways over the last fifty years, including many decades of erosion control measures and more recently, five years investing in the development and implementation of the Tairawhiti Freshwater Plan. We would like to see the journey ahead proceed as a partnership of Kaitiakitanga.

Our regional profile

Tairawhiti is home to over 366,000 ha of pastoral farmland and 166,000 ha of production forests. Of this area less than 1% is Dairy farming, being a total of 4 herds. The remaining areas are predominantly extensive hill country Sheep and Beef farms which on average contain almost 25% of their area in native bush, reverting scrub or small forestry plots.

Our Sheep and Beef farming businesses are low input enterprises using little Nitrogenous fertilisers, almost no irrigation and only moderate inputs of Phosphate, at 18.2 kg/ha (less than 1 cup for every 100 square meters) our farmers apply slightly less than what is required to maintain soil fertility at a constant rate (Agfirst 2019) which greatly reduces our nutrient losses to waterways. Our topography and soft sedimentary soils mean that fencing to exclude stock from waterways is often challenging and sometimes impractical, however at a catchment level two voluntary projects currently exist to meet water quality improvement targets set at a community level, involving Farm Environment Planning, fencing, planting and stock exclusion initiatives over more than 35 farms (Case study provided below).

As a collective we would respectfully ask this Government to engage with us over some concerns we have with the current Freshwater proposals. We believe that our regional farming profile is sufficiently different from those high-risk activities being targeted in the Discussion Document, to warrant a more nuanced approach. Our region does not have a high stocking rate, on average carrying approximately 9 stock units per hectare, and increasingly as time goes by, reticulated stock water is being provided to reduce stock reliance on natural sources and to exclude stock from areas where this is possible.

Points to consider

Setbacks and stock exclusion

We agree that the fencing of low slope land under 5 degrees is practical and where stocking densities are high this represents an opportunity to limit the effects of high grazing intensities on nutrient and sediment runoff. We appreciate that steeper slopes have been excluded, however we would also suggest that where stocking intensities fall below a minimum threshold (of perhaps 12 or 14 stock units per hectare or ‘low-risk’ environments) over a Land Management Unit (LMU) that investment in measures other than fencing (such as stock reticulation or the addition of shelter trees away from waterways) may provide better outcomes in freshwater quality, and should therefore form part of a suite of tools considered as part of a Farm Plan.
We also would note that due to our local predominance of sporadic heavy rain, we welcome the provision of exemptions for land where a fence line cannot be maintained due to flooding.

Our regional Plan

Overall it is clear that improving waterways is a goal shared between our communities and this Government, we would however ask that our successes be allowed to prevail, and our learnings be incorporated into the implementation of practical guardianship of our waterways.

Our Tairawhiti Freshwater Management Plan has been a notable success of collaboration, and currently gives effect to the NPS-FWM at a local level. This document has been completed for over two years and has been crafted to reflect our local ecology, geography and climate while supporting our industries and society to improve the environment we wish to share going forward.

Our resources at a local level are limited by a rate paying population of only 23,000 people, and as such the capacity of Local Council to reinvest significantly into a new Freshwater Plan will require resources to be diverted away from critical projects focused on reducing our stormwater discharges and significant infrastructure challenges. We understand the importance of our freshwater resources, however the profile of our region, our industries and the values of our community are still well catered for in our current plan.

We would ask for the ability to retain it, to adapt it as needed and to be alleviated of the obligations to enforce rules and monitor nutrients which relate to ‘high risk’ activities, to which this region has little exposure. This will enable us to focus our resources on those challenges which materially effect our water quality, these being sediment, wastewater, stormwater and in some specific catchments, E.Coli.

Intensification moratorium

Our current regional plans also require consent for the clearance of native vegetation, however the proposed interim limits on intensification (as they relate to woody vegetation or dairy support) provide a further opportunity to reflect on the extensive nature of Gisborne hill country farming.

It is usual under Tairawhiti’s low intensity farming systems (paddock sizes over 100ha remain common) to find that reverted vegetation control is part of a normal farming cycle which often occurs over many years. Because of its favorable climate and often difficult topography, species such as blackberry, gorse, manuka and kanuka frequently encroach on farmland and are often only addressed when funds or time become available. Limiting the extent to which ‘woody vegetation’ can be removed without a resource consent will have a significant impact on the normal operations of Gisborne hill country farms, for whom the risks of negatively impacting water quality are very low.

Similarly, dairy support is present in the region as a stocking option, although rarely if ever does it incorporate the style of wintering system typically seen in dairying regions of the country. Dairy support in the Tairawhiti context is indistinguishable from the low intensity beef grazing systems employed to breed and finish beef cattle. The distinction of dairy support as being ‘more intensive’ than beef farming and therefore requiring a resource consent, will also limit the capacity for this region to provide drought relief to other regions in the event they require off farm grazing due to season conditions. Once again, while it is appreciated that this is not the intention of the rules, their effect will be to potentially curtail normal farming activities which are low-risk and operate as a safety net providing for seasonal flexibility.

Farm Plans

We appreciate that low intensity farming systems are not intended to be impacted by the proposed Freshwater Reforms, however as a region for whom many of the above rules will still apply, we
sincerely ask that more consideration be given to providing clearer links between the rules and the challenges they seek to address.

An example is in the requirement for all Farm Plans to be certified by a suitably qualified person. Currently our region has no one certified as a Certified Nutrient Management Advisor and few obvious candidates for potential certification. Our region currently requires a Council Certified Farm Plan when the farming activities of a property are deemed ‘high risk’ (arable cropping and intensive winter grazing). The expansion of this focus to capture those operating low-risk farming enterprises is likely to further divert resources away from those requiring the most urgent attention and potentially limit the extent to which Council can commit resources to comply with and give effect to the NES and NPS.

Pugging rules

The pugging depth limitations are also worth discussing here. Generally, a 20cm pugging depth could easily be exceeded if heavy rain fell overnight or when a farmer was away from home, particularly on heavy soils during winter. The provision for buffer zones and setbacks when an appropriate stocking intensity has been exceeded (ie during intensive winter grazing) should act to prevent sediment and nutrients entering waterways, and the depth of pugging is unlikely to have a material impact on this outcome.

A more appropriate method of measuring the acceptability of pugging damage would be to provide visual soil assessment tools which enable rapid identification of when a paddock has met a ‘shift’ threshold, while also acknowledging that in some seasons, pugging damage is impossible to avoid, however much a farmer might try, and if welfare is the primary driver behind the inclusion of a pugging depth limit, then these considerations are better addressed under the Animal Welfare Act.

The value of collaboration

Lastly, we would like to comment on the value of collaboration and co-operation. As a large area geographically remote in terms of our road access, the policy makers of Tairawhiti have long acknowledged that the most cost-effective way to bring about change is to enable communities by supporting, facilitating and encouraging steps in the right direction. Regulatory compliance, enforcement and monitoring are by far the costliest means of bringing about a desired result, and they are gains easily lost over changing election cycles and funding models. Changes driven by communities for themselves remain embedded for decades as they flourish under the care of willing hands.

To those in MfE tasked with assimilating these submissions, thank you for taking the time to read this submission, and for considering its contents. We sincerely hope to be able to inform the shape of the final legislation and to help provide a framework which can be embraced by our communities and applied for the benefit of us all.

Many Thanks and Regards

Sincerely

Gisborne/Wairoa Federated Farmers
Case Study: 1

Wharekopae Catchment Project

Measures identified locally by Gisborne District Council to address E.Coli challenges in popular swimming holes have resulted in strong community support for a Catchment Project with the aim of reducing E.Coli in the Wharekopae River at the Rere Falls and Rockslide.

This project included research which identified a possible solution to the challenge of addressing water quality in a comparatively short timeframe and without requiring broadscale investment in fencing or retirement of land. The research suggested that fencing off a five kilometer stretch of river upstream of the popular swimming sites would be sufficient to ensure that pathogens were rendered non toxic by the time they had been exposed to the water and UV for this distance, thereby enabling a community to focus on an achievable target (fencing 5km upriver of the popular sites), which would have a material impact.

Case Study: 2

Motu Catchment Project

The Motu Catchment Project is a collective of 13 farms who have come together to identify ways to improve water quality in the Motu River. The project has facilitated the drafting of erosion control plans, the fencing of riparian margins and planting over 26,000 native plants to enhance biodiversity and reduce streambank erosion.

The project has been well supported by the community, by council and MPI with the number of farms electing to join the project up by 50% in year two.

Some of the good work undertaken and goodwill developed as part of this project may be threatened if the voluntary efforts of farmers are impacted by new rules which require fence lines only recently erected, to be moved within 15 years. As many of these fences are conventional with one electric wire, they are not under stock pressure and therefore have a life that far exceeds 15 years. It would perhaps make more sense to let fences remain for their useful life in their original locations, to be set back further when they are replaced. The limited resources available for fencing could then be used to provide setbacks on waterways where they are not currently present.

This would also recognise the positive efforts of proactive farmers and send a message that farmers trying to do the right thing will not be penalized for it.