To: Ministry for the Environment


Submission by: New Zealand Thoroughbred Breeders’ Association

Date: 30th October 2019

Contacts: 

CEO
New Zealand Thoroughbred Breeders Association (Inc)
Cambridge 3450

www.nzthoroughbred.co.nz

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

Healthy waterways are important to all New Zealanders and the NZTBA shares the same aspirations 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 NZ Thoroughbred Breeding industry or more broadly the equine sector.

The NZTBA has previously made a submission to the Waikato Regional Council Healthy Rivers Plan Change 1 on behalf of the Equine sector and have undertaken comprehensive research to substantiate our claims that Equine farming is different from other farming methods. See Block 2 submitter evidence -
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, large and small throughout New Zealand.

We represent approximately 1400 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 the whole contributes more than $1,098.9 million\(^1\) to the New Zealand economy, in economic terms it is comparable in size to the New Zealand Wine and the New Zealand Seafood Industry.

The racing industry in the Waikato region generates $429.5 million which represents 39% of the national total in value added contribution to the GDP. There are approximately 1,008 thoroughbred horse breeders based in the Waikato, and the majority of thoroughbred broodmares in New Zealand are based in the Waikato region.

The Waikato region alone employs over 930 staff within the breeding industry, but the thoroughbred industry as a whole supports around 3,837 full time jobs within the Waikato. 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 is generally supportive of the Action for Healthy Waterways document’s intent to improve water quality: however, we as an industry have concerns about some of the proposals as they are not applicable to our industry.

\(^1\) Size and Scope Report, New Zealand Racing Board, February 2018
The NZTBA is undertaking to develop and provide Good Management Practices to all their members to ensure they are compliant. However, the Essential Freshwater document mentioned above has the potential to have a significant impact on the equine and in particular the thoroughbred breeding and 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 feedlot 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 thoroughbred breeding and 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 are 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, for this reason most horse properties feature extensive tree planting and good fencing.

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

- Overseer assumptions do not reflect different grazing patterns, feed utilisation or the housing (stabling) of horses.

**In Conclusion**

The NZTBA accepts the need for good environmental practice with in the industry and to 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. We ask that the Equine sector has some grass roots representation in the future processes to ensure there is a clear understanding of our requirements.

Yours sincerely

CEO