Submission to Fresh Water action plan.

This submission is on behalf of the Gisborne & Wairoa Deer Farmers Association.

As part of the NZDFA we have been pro-active on environmental outcomes. Substantial improvements have already been made by our members, with plans for more in place. DINZ has an Environment Stewardship Plan, which includes water protection. This is an update on the NZ Deer Farmers Landcare Manual 2012, both of which have been widely circulated to the deer industry and used as a guide for deer farmers to develop their own plans. DINZ and NZDFA have been actively encouraging members to complete Farm Environment Plans. In the Gisborne and Wairoa districts a large proportion of deer farmers have completed Farm Environment Plans, with support from the Gisborne District council. These Farm Environment Plans have a fresh water component included.

Nationwide the commitment of deer farmers to positive environmental outcomes is evident by the number of deer farmers represented in farm environment awards.

Gisborne District Council has a fresh water plan in place, which deals with fresh water as specifically relevant to our district. Any restrictions applicable to those regions/districts that do not have plans in place should not be applied where there is a plan in place.

Gisborne and Wairoa districts are different from other regions, in terms of current pollution levels and scale of farming enterprises. Land use in the bulk of the region is divided between conservation estate, plantation forestry and extensive livestock operations. The proportion of the district under intensive land use is small. The biggest factor of risk to fresh water in rural areas in this district is erosion, causing high sediment loading in water ways. With steep hills and soft soils there is a high natural risk of erosion, this needs to be accounted for if limits are set. In the past strategic planting of trees has been successful in reducing erosion. This has been encouraged by local government and occasionally supported by national government. Individual land owners have put in a lot of time and effort to control erosion, and over a long period.

As farmers of livestock we need fresh water. It is not in our interests to have polluted water and we are prepared to put resources into ensuring we can get access to clean fresh water and not causing detriment to others.

For the setting of stocking rate limit on a property basis 14 SU/ha would seem a good level for Gisborne District, if it were measured on actual stock carried at winter stocking rate (30th June base figures, stock units as defined in Lincoln University Farm Technical manual). To define stocking rate on a land use capability basis would be unfair on farmers whose actual stocking rate is below the LUC rate. The calculation for LUC stocking rate was developed for crown lease rating purposes. Most crown leasehold properties are South Island high country. I am not sure that the same methodology would apply equally across the whole country.

I foresee difficulties in setting stocking rate limits on a paddock basis. Paddock boundaries change at times, soil maps in the Gisborne District are not accurate. The water way mapping needs improvement to accuracy. At different times of year high stocking rate is required to encourage pasture quality and growth as well as for weed control. This can be at low risk of run off or damage to water ways. In extensive farming systems where the overall risk to water is low, we need to have more flexibility than it
would suggest the 18 SU/ha limit on a paddock basis allows. I would like to see these areas displayed on a map before forming a definite opinion of this limit.

I support using 5% slope limit across a land parcel to define where streams should be fenced. For this refer to MPI Technical paper no.2017/09 on the effectiveness of fencing streams to reduce e-coli. The results of the studies referenced in this report suggest that fencing streams is only effective in low slope areas and that other unspecified factors may also influence the effectiveness.

The definition of a water way is not easy to understand in the Gisborne district where most water ways are sourced from rainfall and are therefore highly variable in flow. Perhaps an alternative definition could be adopted based on catchment area and rainfall for those water ways not sourced from ground water.

I support the inclusion of an exemption to fence land subject to frequent flooding.

In the discussion document there are no case studies for fencing costs on deer farms. The cost of fencing for deer farmers is greater than for cattle and other livestock. Deer fencing of water ways would have a greater effect of restricting access to streams by other users. There is a substantial cost in weed control of fenced riparian margins, or risk of increased noxious weed invasion which will spread from these areas.

Other concerns regarding fencing of water ways if applied to land greater than 5% slope; Fencing in the Gisborne and Wairoa district often involves earthworks, which can lead to increased erosion. Fencing of streams may mean some fences are not well sited, which could at times increase erosion risk.