

SUBMISSION on the proposed Natural Resources Plan for the Wellington Region

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Communication from GWRC: *NZDFA-Wairarapa prefers hardmail*

Trade competition: NZDFA-Wairarapa could not gain an advantage in trade competition through the submission

Hearing: NZDFA-Wairarapa wishes to be heard and would consider jointly appearing with other submitters

Support: NZDFA-Wairarapa supports submissions from Wairarapa Federated Farmers and Beef + Lamb New Zealand

Signature:  

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INTRODUCTION

Deer Farming and the New Zealand Deer Farmers' Association – Wairarapa Branch

The Wairarapa Branch of the New Zealand Deer Farmers' Association (NZDFA-Wairarapa) welcomes the opportunity to provide a submission on the proposed Natural Resources Plan for the Wellington Region. NZDFA-Wairarapa represents the national and regional interests of over 50 deer farmers.

The New Zealand Deer Farmers' Association (NZDFA) is a voluntary subscription funded incorporated society representing the regional and national interests of approximately 1400 financial members and an estimated 70 % of farmed deer. NZDFA expresses a political and functional view on behalf of all deer farmers and for industry good. It is governed by a national Executive Committee and has a strong regionally based network of 20 autonomous branches.

The NZDFA has a long association with Greater Wellington Regional Council (GW) in approaching environmental and land care challenges and implementing solutions: in particular the NZDFA in conjunction with Deer Industry New Zealand provided substantial input and information to the GW 2011 publication "*A Guide to Managing Stock Access to Waterways in the Wellington Region*" with much of the information being derived from the "*New Zealand Deer Farmers' Landcare Manual*" (2003 – and has since been updated in 2012).

While deer farming is a relatively new and small primary industry in New Zealand (the first licence to farm deer was issued in 1970), the New Zealand industry is the world's largest exporter of venison and deer velvet and arguably the biggest producer of deer velvet. Deer farming systems are based on the annual production of venison, velvet and deer co-products; as such they share many similarities with sheep and beef systems and can be focused on breeding or finishing, and located in fertile plains or hill and high country areas. It is estimated that about 70 % of deer farms are actually mixed livestock (sheep, beef or dairy grazing) and arable cropping can also be incorporated.

Support for submissions from Wairarapa Federated Farmers and Beef + Lamb New Zealand

NZDFA-Wairarapa supports the substantial submission from Wairarapa Federated Farmers which has informed a number of primary industry groupings of the Proposed Natural Resources Plan for the Wellington Region. In particular NZDFA-Wairarapa re-iterates the following areas that require further analysis or refinement:

- *Primary production:* Food production should be recognised in the values and as such a Section 32 report for primary production report should be commissioned prior to the hearings specifically for primary production values (*i.e.* the sum of the costs/benefits of all the proposed policies/rules for farming)
- *Balancing objectives to maintain or improve water quality:* While there are known 'hotspots' of poor water quality, overall the region's water quality is not at levels that require urgent efforts to improve water quality. Apart from identified localities (hotspots), approaches to improve water quality are best determined through the Whaitua process.

- *Greater transparency of use of data or proposed numerics:* Concerns outlined in the submission by Wairarapa Federated Farmers are listed in its “*Critical Recommendations*” but two examples demonstrate the need for more explicit justification for positions proposed in the Plan.
 - Aquatic ecosystem health and mahinga kai objectives: Numeric values in Table 3.4 diverge markedly from current state without benefit of any supporting explanation or analysis of implications (through the s32 report) and some of the proposed numbers seem to be arbitrary selections, un-informed by accepted national bands.
 - Important trout fishery rivers and spawning waters: Schedule I lists rivers unsupported by any criteria of “importance” and ill-supported by evidence in the supporting papers, while Map 22 is not at sufficient scale to delineate the boundaries.

NZDFA-Wairarapa also supports the submission from Beef + Lamb New Zealand: As deer farming typically involves mixed livestock (drystock) and ranges from intensive finishing to extensive breeding production systems the issues encountered will tend to be the same as those for more traditional sheep and beef farms. The submissions from Beef + Lamb New Zealand and Wairarapa Federated Farmers will reflect these issues.

Support for Greater Wellington Regional Council’s Activities

NZDFA-Wairarapa wishes to acknowledge the historical and current council-led environmental initiatives that have assisted the farming community in the region to continue to produce high quality products for domestic and export markets, while minimizing adverse impacts on the region’s natural resources.

In particular the long-running soil conservation programme is well-regarded amongst Wairarapa farmers, which is supported by the Akura nursery supplying appropriate plant material for soil conservation on-farm and native restoration activities. Greater Wellington’s support of the Ballance Farm Environment Awards in the region also provides opportunities for the farming community to view sustainable land management in a business context and allows farmers to see workable practices in operation.

NZDFA-Wairarapa would support ongoing council initiatives such as these and encourages partnership approaches with primary industry organisations, individual farmers and the council.

Specific rules in the proposed plan pertinent to deer farming

NZDFA-Wairarapa has provided submissions below on specific rules that it deems to be pertinent to deer farming that may not be captured by other submitters.

STOCK EXCLUSION

Specific Provisions that NZDFA-Wairarapa’s submission relates to are:

Definition of Category Two waterbodies, including water races and drains > 1 metre

Schedule I and Map 22: important trout spawning habitat

Rule 97: access to the beds of surface waterbodies by livestock

- Stock exclusion from Category One waterbodies by July 2018
- Stock exclusion from Category Two waterbodies by July 2022

NZDFA-Wairarapa’s submission is: ~~support~~/oppose

NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
<p>Extend the timeframes for stock exclusion, e.g.</p> <ul style="list-style-type: none"> • Category One by 2020 • Category Two by 2025 	<p>As there does not appear to be any stated rationale for the timeframes, and there has been no cost-benefit analysis undertaken it would be more prudent to allow sufficient time for farmers to i) plan and ii) budget for activities that achieve stock exclusion.</p> <p>Fencing will be an important component in stock exclusion and for deer farming costs are at least twice as much as conventional fencing for sheep or cattle / dairy cows. Temporary electric fencing is currently not a viable option. A longer timeframe will allow farmers to prioritise surface waterbodies that require deer fencing and spread costs out so that they are affordable and do-able.</p> <p>It should be noted that a Land and Water Forum stock exclusion “flexigroup” (technical working group) has provided indicative timeframes for stock exclusion by 2025 for deer and beef cattle on plains and by 2030 for deer and beef cattle on lowland hills (rolling hills or downlands).</p>
<p>Sheep or goats are not excluded from Category One</p>	<p>Where stock exclusion results in riparian buffer zones or vegetated set-backs, periodic management of vegetation (weed control, excessive pasture growth) may be required to maintain effectiveness of these areas or indeed enhance in-stream ecological conditions.</p> <p>As sheep or goats will not willingly stand in water, their use in controlling vegetation growth next to waterbodies is cost-effective and practical, while the risk of direct discharge of sediment and excreta is low.</p>
<p>Specify that stock exclusion from spawning sites – inanga or trout – is during the spawning season.</p>	<p>Stock exclusion from Category Two waterbodies on the basis of trout spawning should be time bound and apply during the spawning season as defined on page 164 of the proposed Natural Resources Plan for the Wellington Region</p>

Changes Sought	Comments and Reasons
Specify criteria for “important” trout spawning rivers; delete those that don’t meet the criteria	A more rigorous analysis of evidence against specified criteria should be undertaken prior to re-drafting schedule I and Map 22
Amend the definitions of stock crossing to match hill country practicalities and effects	The current definition is very specific and is unlikely to reflect on-the-ground practicalities, particularly in the extensive hill country in the region. The requirement that entry/exit points are “ <i>directly opposite each other</i> ” will be relatively easy (and logical) in lowland/plains areas with gentle topography, but much less certain in hill country where river bends, banks and other landforms may dictate entry and exit points
Allow for stock drinking points	<p>Excluding stock from waterbodies will require an alternative supply of drinking water for stock, but where this is not possible or not affordable, limited access to waterbodies may be required. Good design can minimise impacts to water quality such as an example provided in “<i>The New Zealand Deer Farmers’ Landcare Manual 2012</i>” on page 18 (follow the link here).</p> <p>NZDFA-Wairarapa also wishes the council to acknowledge that stock exclusion involves a significant cost to the land owner. Over and above any exclusion measure (typically fencing) there will be costs of establishing alternative stock water supplies and maintenance of river banks (such as establishment of riparian plantings and weed/vegetation management).</p>

In addition to the above changes sought, NZDFA-Wairarapa wish to provide additional contextual information regarding deer and deer farming that is hoped will inform Greater Wellington in appropriately implementing rules and methods to maintain or enhance water quality of surface water bodies.

- Deer do not stand in water in large groups: Deer entering waterways tend to be young aged animals (playing rather than seeking water) so this is managed by excluding mobs of young animals from paddocks by waterways. In addition deer do not tend to linger in waterways with gravelled beds, but may look to create wallows next to waterways with muddy beds.
- The major issues identified by farmers and confirmed by research are i) erosion along fence lines created by deer pacing up and down fence lines in response to behavioural stress or disturbance, and ii) wallowing.
- Deer pacing along fence lines when under stress creates channels which then transport sediment, phosphorus and faecal matter to waterways. Exclusion of deer from waterways will not solve this issue, but rather providing adequate feed, reducing stocking rate, removing other livestock (e.g. presence of bulls in neighbouring paddocks) or shifting to different paddocks will reduce stress and as a result eliminate fence pacing.
- Some deer varieties (English and European Reds) do tend to wallow and if wallows are connected to waterways then this effectively creates point sources for faecal matter, nitrogen, phosphorus and sediment. Fencing off waterways or stock exclusion does not prevent this problem. The solutions are to fence off and fill in the wallows; divert wallow drainage away from waterways (e.g. to constructed wetlands); construct alternative wallows away from the waterways; remove stock. Other varieties (Wapiti and Eastern Reds) wallow less frequently and Fallow deer do not wallow at all.

While NZDFA-Wairarapa recognises that deer and cattle can and do seek out water in comparison to sheep, the behaviour is not the same for all species/varieties and the contamination risks and impacts on water quality require different approaches. In addition NZDFA-Wairarapa considers that stocking rate is a significant factor on the impact of livestock farming on water quality. Stock exclusion *per se* would be most effective in production systems where stock are intensively farmed, but not cost-effective in more extensive production systems (particularly in hill country) where there are fewer livestock per hectare and likely to be more waterways.

Deer fencing costs typically range from \$20 – 30 per metre (not including labour and does not include additional costs for establishing and managing any vegetated riparian/buffer zones). This high cost has real and significant potential to make deer farming a marginal activity compared with alternative land uses and any subsequent de-stocking of deer and a change in land use does not guarantee reduced impacts on in-stream water quality.

FERTILISER

Specific Provisions that NZDFA-Wairarapa’s submission relates to are:

Rule R82: Application of fertilizer – permitted activity, provided

Condition a) not into or onto a surface water body or beyond the boundary, including as a result of wind drift

NZDFA-Wairarapa’s submission is: ~~support~~/oppose

NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
<p>Amend condition a) to reflect the practicalities of aerial fertiliser application</p>	<p>It is impossible to miss all intermittent surface waterbodies when using a plane or helicopter. Technology is being developed to allow this but it is not commercially available.</p> <p>Condition a) will cause a health and safety risk to the operation of aerial fertilizer application.</p> <p>Environment Canterbury’s operative Land and Water Plan rule for aerial fertiliser application provides a pragmatic approach:</p> <p>5.66 <i>The discharge of fertiliser from an aircraft onto or into land in circumstances where a contaminant may enter water and into any river is a permitted activity, provided the following conditions are met:</i></p> <ol style="list-style-type: none"> 1. <i>There is no fertiliser discharged when the soil moisture exceeds field capacity and</i> 2. <i>Fertiliser is not discharged directly into or within 10 m of the bed of a permanently flowing river or artificial watercourse that is more than 2 m wide, any lake, or any wetland boundary or any significant indigenous biodiversity site identified in the relevant district plan</i> <p>Similarly Horizons Regional Council’s One Plan Rule 14-5 allows fertiliser application to be a permitted activity as long as there is no <i>direct</i> discharge into a surface water body and that reasonable measures are taken to prevent this.</p>

OFFAL PITS, FARM REFUSE DUMPS

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Rule R89: Farm Refuse Dumps – 15 conditions

Rule R91: Offal Pit – 9 conditions

NZDFA-Wairarapa's submission is: ~~support~~/oppose

NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
Rule 89: Farm Refuse Dumps <ul style="list-style-type: none">- increase size from 50 m³ to 100 m³- heavily prune the fourteen other conditions to focus on clear effects	These are existing activities on farms. NZDFA-Wairarapa is unaware of any monitoring or studies that show that refuse dumps or offal pits significantly contribute to adverse impacts on water or air quality and so multiple conditions are not needed.
Rule 91: Offal Pits <ul style="list-style-type: none">- retain condition a) re only containing dead matter from the property; and condition h) odour is not offensive beyond the boundary- heavily prune the other seven conditions to focus on effects	

SILAGE

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Definition: a fermented high moisture stored fodder

Rule R90: manufacture and storage of silage and compost, including

- Condition d) the walls and floor of a silage storage area shall have an impermeable lining able to withstand corrosion, and there shall be no discharge of leachate to water

NZDFA-Wairarapa's submission is: ~~support~~/oppose

NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
Change the definition to specify this does not include baleage	Self-explanatory
Delete the requirement for impermeable lining; retain the condition that there be no discharge to water	<p>Impermeable lining will impose additional costs that may not contribute to a beneficial environmental outcome – a cost-benefit analysis would be helpful for this requirement. The condition that there is no discharge to water is more appropriate.</p> <p>NZDFA-Wairarapa notes that (good quality) silage made to 30 % dry matter or more does not generally create leachate issues. As the production of good quality silage is a <i>production</i> good management practice this would be a more cost-effective approach to minimising leachate as opposed to impermeable lining requirements.</p>

CULTIVATION & BREAKFEEDING

Specific Provisions that NZDFA-Wairarapa’s submission relates to are:

Rule 94: Cultivation & Rule 95: Break feeding

- Cultivation/break feeding shall not occur within 5 m of a surface waterbody, including open drains and water races

NZDFA-Wairarapa’s submission is: ~~support~~/oppose

NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
Delete the conditions requiring 5 m setbacks	<p>The 5 m distance is arbitrary and does not take into account slope and soil type. Also the setback land could be bare ground which would not prevent any run off entering the water body.</p> <p>The pan-primary industry booklet “Industry-agreed Good Management Practices relating to water quality” provides a range of guidance measures to minimize overland flow of sediment and faecal bacteria into water bodies (page 13). It does not prescribe any one measure as the effectiveness is dependent on the specific situation and indeed a combination of mitigation measures may be more effective than a single blunt rule.</p> <p>Such risk-based approaches are more appropriately covered under the plan Methods relating to Good Management Practice</p>

EARTHWORKS

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Definition of earthworks

Rule R99: earthworks of a contiguous area up to 3000 m² per property per 12 months – permitted

Rule R101: earthworks that doesn't meet permitted conditions - discretionary

NZDFA-Wairarapa's submission is: ~~support~~/oppose

NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
Amend the definition and Rule 99 to allow construction of farm tracks as a permitted activity, as well as maintenance	The requirement for the earthworks to be a single contiguous area of disturbance prevents normal track construction or maintenance, or other minor earthworks such as the establishment of stock handling yards, from being considered as a permitted activity. Deer raceways are an important feature of deer farming that allows the quick, safe and low environmental impact movement of deer between paddock and deer shed. It seems unwarranted to require farm tracks and maintenance to be a discretionary activity (Rule R101).
Change Rule 101 to controlled or restricted discretionary with clear conditions	

VEGETATION CLEARANCE ON EROSION-PRONE LAND

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Definition of erosion-prone: slope that is greater than 20 degrees

Definition of vegetation clearance: clearance of woody vegetation (exotic or native) by mechanical or chemical means including felling, spraying by hand or aerial means, hand clearance and burning

Rule R101: vegetation clearance that doesn't meet permitted conditions – discretionary

NZDFA-Wairarapa's submission is: ~~support~~/oppose

NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
Change definition of erosion prone	<p>A pre-existing slope of 20° seems to be an entirely arbitrary threshold that does not take into account factors such as underlying parent material, soil type, climate and slope aspect. This is surprising since Greater Wellington has a very successful and well-regarded hill country erosion programme with perhaps some of the most qualified experts and practitioners in on-farm assessment of soil erosion in the country.</p> <p>A better definition would be to use the well-recognised Land Use Capability (LUC) system to assess erosion prone-ness, while arguably the best approach would be to adopt the Landcare Research developed model for assessing hill country erosion that was adopted by Horizons Regional Council to determine its areas of highly erodible land. Since the model already has the ability to cover landforms in Greater Wellington this should be a relatively straight-forward process involving established science that underpins a neighbouring regional council's policies. It is also worth noting that this model has thresholds ranging from 24° on weak Tertiary-age mudstone to 45° on hard greywacke.</p>
Change definition of vegetation clearance to exclude hand clearance, hand or aerial spraying and roller crushing	While long-term/permanent removal of vegetation cover on erosion prone land greatly increases the risk of erosion, vegetation clearance that retains plant material <i>in situ</i> and particularly root structures does afford some soil protection while new vegetative cover is establishing.
Change Rule 101 to controlled or restricted discretionary with clear conditions	

CULVERTS & BRIDGES

Specific Provisions that NZDFA-Wairarapa's submission relates to are:

Rule R114: weirs, fords, small bridges – permitted if

- not >20 m² in size / footprint
- catchment not >50 ha west of the Ruamahanga, 200 ha east of the Ruamahanga

Rule R115: culverts – permitted if

- not >20 m length and not >0.3 m -1.2 m diameter

Rule R125: small river crossings, dams, structures in a mana whenua site – restricted discretionary

NZDFA-Wairarapa's submission is: support/oppose

NZDFA-Wairarapa seeks the following changes:

Changes Sought	Comments and Reasons
<p>Rule 114:</p> <ul style="list-style-type: none"> - Change the 50 ha catchment restriction to 200 ha - Increase the size for fords and bridges (20 m² too small) 	<p>Clarify the rationale for the difference in catchment areas depending on which side of the Ruamahanga and provide supporting evidence for the rationale, otherwise these should be consistent.</p> <p>The use of fords and stock crossings for <i>intermittent use</i> particularly in hill country may have short-lived and minimal environmental impact.</p> <p>What is the basis for a footprint of 20 m²?</p>
<p>Rule 115:</p> <ul style="list-style-type: none"> - Delete the condition restricting culvert diameter; retain condition that the culvert be constructed to allow for 20 year flood event. - Provide advice to landowner of appropriate culvert sizes to achieve the above condition 	<p>An upper limit for culvert diameter seems counter intuitive to the purpose of the culvert. Council advice (e.g. land management or flood protection expertise) could provide a better outcome and design.</p>
<p>Rule 125: Undertake proper assessment of restrictions proposed for mana whenua sites within the plan itself.</p>	<p>Do not leave this to a consent process at landowner cost – this creates more uncertainty as to who is appropriate and qualified to undertake an assessment.</p>