**Have your say: feedback on the Northland Regional Council Draft Freshwater Plan Change**

***Please delete this box before submitting:***

Northland Regional Council (NRC) is updating its regional plan to give effect to the National Policy Statement for Freshwater Management 2020 (NPS-FM). NRC are proposing potential new rules that will have a big impact on sheep and beef farmers, including more stringent rules for stock exclusion from waterways, wetlands, and highly erodible land.

To learn more about what the council is proposing you can read the consultation material provided by them on their webpage [www.wai-it-matters.nz](http://www.wai-it-matters.nz), or the [quick summary on B+LNZ’s website](https://beeflambnz.com/advocacy/regional-policy%20work/northland-regional-plan).

To assist you in having your say B+LNZ have created a template below for you to complete. The template provides guidance on the questions NRC wants answers to. This is a good opportunity for you to provide examples of how the rules will impact your farm as this will show the Council how unworkable some of their proposed policies are for the sheep and beef sector.

[See B+LNZ’s submission here](https://beeflambnz.com/sites/default/files/2024-03/NRC-BLNZ-Submission-March-2024.pdf).

***How to complete the following template and upload your submission:***

1. Complete the blank submission template on the following pages. Note you can edit the template however you wish to suit your answers. We have suggested questions to answer but you can choose the questions that best suit you.
2. Delete this first page of instructions.
3. Save your submission as a PDF
* If using Microsoft Word, you can do this through clicking ‘Save as’, and selecting ‘Save as PDF’ under entering your file name.
1. Submit by emailing your document to: freshwater@nrc.govt.nz

NOTE: The closing date is Sunday 31 March 2024. However, NRC have noted they are happy to accept submissions post this due date.

If you have any questions or require further assistance, please feel free to contact Lucy Evans, B+LNZ Environment Policy Analyst: lucy.evans@beeflambnz.com

**Feedback on the Northland Regional Council Draft Freshwater Plan Change**

**Contact information:**

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| **First name:** |  |
| **Last name:** |  |
| **Organisation (if giving feedback on behalf):** |  |
| **Mailing address:** |  |
| **Email:** |  |
| **Phone:**  |  |
| **Is the submission you have provided below confidential? Yes / No** |  |
| **Are you happy for your submission to be published online? Yes / No**  |  |
| **If you are happy to, provide NRC with a background of your farm. For example farm size, stock numbers, and location.**  |  |

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| **Stock exclusion – from waterways:** |
| NRC is proposing rules for excluding stock from waterways that go beyond national legislation. They are looking at a setback of 3, 5, or 10 metres for all permanent and intermittently flowing rivers, streams, and lakes regardless of slope. They are also recommending that these setback areas would be riparian planted. Learn more here: [Northland Regional Council Consultation document: Stock Exclusion](https://www.wai-it-matters.nz/media/5v0lz3j0/draft-freshwater-plan-change-have-your-say-on-stock-exclusion.pdf#calendar) **B+LNZ’s position (**[**read more in our submission**](https://beeflambnz.com/sites/default/files/2024-03/NRC-BLNZ-Submission-March-2024.pdf)**):** *B+LNZ is concerned that NRC is going far beyond national legislation and is applying a one-size-fit all approach that makes little sense in terms of managing risk on individual pieces of land. Stock exclusion requirements should be flexible for farmers to adapt and innovate to meet the multiple demands on their business. Blanket provisions that do not account for issues in fencing areas of high slope do not meet this requirement.* *B+LNZ does not agree that sheep should be included in stock exclusion regulatory requirements. Sheep do not have a natural tendency to stand in or disturb stream margins or beds. Therefore, the additional cost of a multiwire fence is a costly exercise to bring little environmental gain. A farmer would be better to invest in something like stock reticulation infrastructure to ensure sheep have access to drinking water outside of rivers, streams, and lakes. These decisions are best made by the farmer through a Farm Environment Plan rather than blanket provisions.*  |
| **Suggested questions to answer:****How far away from waterways should stock be kept? 3, 5, 10 or 30 metres?**Answer here…**Should an averaging approach be used to set setback distances?**Answer here…**What should the rules be for excluding stock from wetlands?**Answer here…**Should stock exclusion be extended to apply to other animals e.g. sheep?**Answer here…**What timeframes are feasible for any new stock exclusion rules?**Answer here…**What resources will be required to complete stock exclusion of waterways on your farm (labour, time, costs)?** Answer here…**Will the requirements of excluding stock from waterways prevent you from completing other environmental work on farm?**Answer here…**Have you already excluded stock from waterways?**Answer here… |
| **Any additional feedback:**Answer here… |

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| **Stock exclusion – highly erodible land:**  |
| NRC is proposing rules to exclude stock from highly erodible land. NRC have identified that erodible land with a slope of 25 degrees or more accounts for a significant amount of sediment within waterways. To mitigate this the NRC is proposing to exclude stock: * on land with a slope of between 25 and 35 degrees by 2040, and
* on land with a slope greater than 35 degrees by 2035.

Learn more here: [Northland Regional Council Consultation document: Stock Exclusion](https://www.wai-it-matters.nz/media/5v0lz3j0/draft-freshwater-plan-change-have-your-say-on-stock-exclusion.pdf#calendar)**B+LNZ position (**[**read more in our submission**](https://beeflambnz.com/sites/default/files/2024-03/NRC-BLNZ-Submission-March-2024.pdf)**):** *B+LNZ does not support the blanket retirement of land. B+LNZ supports farmers being able to identify areas of concern on their farm and mitigating concerns through practices that suit their farm system.* *Excluding stock and/or planting pine plantations is not the only answer to preventing erosion. Other techniques include grazing management, silvopasture techniques, and managing stock in adverse weather events. These can all be identified and actioned within a Farm Environment Plan.* *B+LNZ is also concerned about the unintended consequences of retiring land from sheep and beef farming. This includes issues associated with converting land to pine plantations, the spread of exotic weeds and pests, increased fire risk from ungrazed pasture, and the loss of rural communities. Farmers should not be required to retire large areas of land while still needing to manage the costs of this retired land.*  |
| **Suggested questions to answer:****Should stock exclusion rules apply to highly erodible land (land steeper than 25 degrees)?**Answer here…**Do you think highly erodible land should be retired?**Answer here…**Looking at the following map how is your farm impacted? And how much of your farm would need to be retired?** [**Click here for map.**](https://experience.arcgis.com/experience/da684289f0e246d7b2a0888c302c8b7e)Answer here…**How badly will retiring highly erodible land impact your farm system?**Answer here…**What resources will be required to complete stock exclusion of highly erodible land on your farm (labour, time, costs)?** Answer here…**Do you currently have strategies in place to manage erosion? E.g. tree planting or stock placement during adverse weather events.** Answer here… |
| **Any additional feedback:**Answer here… |

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| **Water allocation** |
| NRC is proposing changes to water allocation. They are proposing that 20 percent of unallocated water is to be used for environmental enhancement, marae and papakainga, or developing Māori land.Learn more here: [Northland Regional Council Consultation document: Targeted Water Allocation Policy](https://www.wai-it-matters.nz/media/u5hdrscp/the-draft-freshwater-plan-change-targeted-water-allocation-policy.pdf)**B+LNZ position (**[**read more in our submission**](https://beeflambnz.com/sites/default/files/2024-03/NRC-BLNZ-Submission-March-2024.pdf)**):** *NRC must allow for a reasonable allocation of stock drinking water as required under the RMA. Stock drinking water must be readily available year-round and allow for periods of drought and low water flows.* *With the changes proposed for stock exclusion many sheep and beef farmers will be required to invest in stock reticulation systems which in turn may require more investment in, and consenting of, water storage and allocation, which the Council needs to be aware of.* *NRC needs to ensure it understands how various policies being proposed work together, to avoid unintended consequences. Additionally, water quantity policies must allow for building resilience to climate events and allow for reliable water sources into the future.* |
| **Suggested questions to answer:****Do you think a targeted allocation policy would improve cultural, social, economic and environmental outcomes for wai?** Answer here…**Is a policy in the Plan Change an appropriate way to achieve these outcomes?** Answer here…**What do you think about requiring a contribution to a fund? What are your thoughts about how the fund could be used?** Answer here…**How else do you think we can recognise the significant relationship tangata whenua have with wai?** Answer here…**Do you have any existing challenges with your current water supply?**Answer here…**How is water important to your farm system? And do you have concerns around the reliability of future water usage?**Answer here… |
| **Any additional feedback:**Answer here… |

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| **General feedback** |
| **Is there any information you have not provided that you would like to? This may include highlighting that freshwater health and environmental work is an on-farm commitment, but Northland Regional Council is going too far and jeopardising the future of the sheep and beef industry.** Answer here… |