**Consultation on changes to the intensive winter grazing regulations – B+LNZ’s submission template**

*Beef + Lamb New Zealand (B+LNZ) will be making a submission on behalf of the sheep and beef sector on the Government’s proposals.*

*We have also developed this template to help farmers who want to make their own submissions on the proposals. This template focuses on what we believe are the key areas for comment.*

***To use this template, follow the structure below and add in your own information and views.*** *We’ve provided starters to get your ideas flowing – you could copy and paste some of what we’ve provided but submissions in your own words are always better****.*** *We recommend you think about how the proposed new rules would apply to you, how clear the requirements are and how easy the rules would be to implement.*

*Once completed, you can use the responses to fill in the Ministry for the Environment’s online form at:* [*https://consult.environment.govt.nz/freshwater/intensive-winter-grazing-regulations/consultation/intro/*](https://consult.environment.govt.nz/freshwater/intensive-winter-grazing-regulations/consultation/intro/) *(note this is MfE’s preferred option) – alternatively you can email your submission (as a PDF or Microsoft Word document [2003 or later version]) to* *IWG@mfe.govt.nz*

*Submissions close at 5pm Thursday 7 October 2021.*

**Personal information**

Remember to include your:

* name or organisation
* postal address
* telephone number
* email address.

MfE may publish your name and any or all of your comments on its website unless you tell them you don’t consent to this – if this is the case, you could say something like:

I do not wish for my name or any part of my submission to be made public.

**Introduction – general response to the proposals**

You could set the scene with something like this:

I want to make my views on the intensive winter grazing proposals heard by the Government. Intensive winter grazing is an important part of my farming business and I want to ensure I can do the best possible job using good management practices to manage the potential effects. Overall, I think the changes proposed make the rules more workable on my farm and therefore easier for me to implement and manage my risk of affecting freshwater health.

**Proposals I support**

You could indicate your support for some or all of the following – or there may be other aspects you support:

* removal of the pugging depth standards
* addition of required management of critical source areas
* removal of the requirement to exclude stock from sub-surface drains
* change in slope measurement from the ‘mean’ across a slope to a ‘maximum’ slope
* shift in dates for rules coming into effect, to 1 November 2022 (you could note this means you have time to understand what you need to do and get ready to get it done effectively)
* continued ability for farmers to complete a Certified Freshwater Farm Plan as an alternative to applying for a resource consent.

**Proposals where further information is required**

You might like to note it’s difficult to comment on some aspects of the proposals because further information is needed. Areas you could highlight for further information could include the following, or there may be others:

* what reasonably practical steps I can take to manage the effects of pugging on freshwater health
* what steps I can take to show I am resowing ‘as soon as practical’
* how I can define a critical source area (in addition to sub-surface drains) and best identify these areas
* when and how I can get a Certified Freshwater Farm Plan
* what I will need to include in my Certified Freshwater Farm Plan to ensure my winter grazing activities can continue as a permitted activity
* what situations would determine whether I need to apply for a resource consent or get a Certified Freshwater Farm Plan.

**The proposed slope rule**

The Government is proposing to make a change to the slope rule included in the intensive winter grazing regulations. Instead of setting the limit at an average of 10 degrees as measured across the paddock, the proposed new limit is a maximum of 10 degrees anywhere in the paddock.

You could comment on whether or not you agree with this rule and why that is the case.

If you do not agree with this rule, you could say something like this:

I do not agree with the proposed 10 degree maximum slope threshold for ‘permitted’ activities. This puts hill country farmers at a disadvantage for improving their steeper pastures and will result in significant areas of land being kept out of crop without a strong environmental rationale.

As a better way to manage the risks cropping and grazing on higher slopes pose, I suggest that:

* the slope ‘trigger’ is placed at a higher level such as 15 degrees
* intensive winter grazing can occur on slopes steeper than 10 degrees without a resource consent or Certified Freshwater Farm Plan as long as an Intensive Winter Grazing module is completed
* this module would describe how sufficient buffer strips will be put in place to ensure the protection of freshwater health.

**The proposed use of Certified Freshwater Farm Plans**

The Government is proposing that farmers have the ability to complete a certified freshwater farm plan if they cannot meet the proposed permitted activity conditions.

You could comment on whether or not you agree with this proposal and why.

If you do not agree with this rule, you could say something like this, or provide your own solution:

I do not agree with the use of a Certified Freshwater Farm Plan as the only alternative means for farmers to undertake intensive winter grazing as a permitted activity. It is unclear what content will be required in a Certified Freshwater Farm Plan, when these will become available, and who will be able to complete them. I do not have confidence that the system will be up and running in time for this option to be available for all farmers who have intensive winter grazing as part of their system.

Instead, I propose that a farmer can complete an Intensive Winter Grazing module and have this on hand for review by the regional council as an alternative to having to complete a Certified Freshwater Farm Plan. This module will better allow me the capture the risks that are present within my farming context and apply the best practices and principles to manage these risks effectively.