

10 October 2018

OTOP Zone Committee
C/o -Barb Gilchrist
Zone Facilitator
Environment Canterbury
PO Box 550
Timaru 7940
By Email: barb.gilchrist@ecan.govt.nz

Dear OTO Zone Committee

B+LNZ feedback on the draft OTO ZIPA

1. Thank you for the opportunity to provide feedback on the draft Zone Implementation Plan Addendum (ZIPA) for the OTO water Zone. We can see that a considerable amount of time and effort has been put into bringing these recommendations together, and Beef + Lamb NZ (B+LNZ) appreciates the chance to provide feedback on these.
2. Agriculture is inextricably linked to the natural environment, and how we farm today affects what we have tomorrow. B+LNZ is seeking policy solutions that connect farm practices with the underlying natural resources, thus enabling land use optimization. Farming within environmental limits, and with the natural rhythms of the land is paramount to delivering on our farmers' vision of success "World leading stewards of the natural environment and sustainable communities."
3. B+LNZ's comments on the draft ZIPA are designed to help the zone committee balance competing needs for natural resources in a fair and equitable manner, supporting thriving rural communities both now and into the future.

4.8 Water Quality and Ecosystem Health

4. The Zone Committee have referred to a winter grazing threshold of 20ha in the high run off risk zone and that areas greater than 20ha should be managed through a resource consent and Farm Environment Plan, which is audited. Winter grazing is one of the activities carried out on sheep and beef farms that can pose a higher environmental risk. As such, B+LNZ supports an approach to more closely monitor and control this type of activity. However, the intervention should match the risk. As written, the draft ZIPA did not detail the specific recommendations around this general, high-level recommendation.
5. In particular, B+LNZ needs to better understand and provide feedback on:
 - a. The recommended 20ha threshold referred to on page 2 of the draft ZIPA; and
 - b. The high run off risk zone
6. It is noted on page 4 of the draft ZIPA, the Zone Committee considers that mitigations could be made now to reduce nitrogen losses, including reduced nitrogen fertiliser

Level 4, Wellington Chambers
154 Featherston Street
Wellington 6011, New Zealand
PO Box 121
Wellington 6140, New Zealand

applications, and supplementary feeds that are low in protein (i.e. nitrogen) like fodder beet should be used instead of high protein feeds (balage, silage). This recommendation is inconsistent with the recommendation that aims to curtail winter grazing. At best it would send mixed and confusing messages to the farmers, at worst it may give rise to practices that the recommendations actually seek to discourage.

7. If a 20ha winter grazing threshold is introduced farmers might need to reduce their winter grazing area (e.g. fodder beet) but will still need to fill the feed wedge for their livestock. Some farmers will be able to import feed. Others may need to make their own supplements, which might be achieved through more nitrogen fertiliser applications to pasture to produce hay, balage, or silage – high protein feed.
8. Page 4 of this preamble further states that 'the Committee have recommended that the stock exclusion rules in OTOP should be strengthened to include drains and canals discharging to surface waterbodies'. Again, the specific recommendations have not been included in this draft ZIPA and B+LNZ would like the opportunity to see and understand these recommendations in order to provide feedback on them.
9. B+LNZ supports the use of farm environment plans (FEPs) as a means for farmers to identify and manage their impact on the environment and to optimise their businesses and practices. B+LNZ also supports the use of FEPs to address sediment, phosphorus, and pathogen losses to water from farming practices. Ultimately B+LNZ would like to see FEPs connected into catchment plans, so that individual farmer actions have a direct line of sight to community-set catchment scale outcomes. There are two priority pieces of work within B+LNZ, aiming to make this reality. It is noted that Management Plans, rather than FEPs, have been recommended for certain land users, in particular land users who do not require resource consent.
10. It is important that the Management Plans offer the same opportunity to farmers to both meaningfully address their environmental impacts and look at ways of optimising and improving their system as what FEPs would. An inadequate Plan could have the effect of undermining work to achieve water quality targets by giving land users a skewed or incomplete guidance on what is required from them. Having sufficiently robust Management Plans will provide certainty to farmers that they are on the right track with regards to contaminant losses through run-off, and reassurance to communities and Environment Canterbury that the appropriate measures are in place to achieve water quality targets.
11. This is relevant in light of the zone-wide recommendation the Zone Committee has made with regards to E.coli, recommendation 4.8.1 II(c) and Temuka FMU recommendation 5.2.1.
12. B+LNZ request that the Zone Committee make a recommendation to Environment Canterbury to that effect.

5.1 ORARI FMU

13. **Recommendation 5 I** of the draft ZIPA states that nitrate losses to water should be reduced by a total of 30-35%. Approximately 15% of this is expected to be achieved through the adoption of Good Management Practice (GMP). The remaining is to be achieved through staged reductions by 2040.
14. The recommendations do not give an indication for the reduction framework, which implies that a blanket reduction of up to 20% beyond the expected results of implementing GMP should be made across the FMU by all land users.
15. A blanket reduction of up to 20% will not be achievable for low nitrogen emitters, which generally includes many sheep and beef systems, who might be losing between 6-25kgN/ha/yr. A 1-5kg reduction from a low nitrogen emitting system would require dramatic changes to the systems that would cripple the business in return for very small environmental gains. It would also have the effect of penalising those systems that in fact have the lowest environmental impact in terms of nitrogen. B+LNZ does not believe that the Zone Committee intended for low nitrogen emitters to carry a disproportionate disadvantage through these recommendations, and believe that this concern can and should be remedied and avoided.
16. B+LNZ request that the Zone Committee clarify to Environment Canterbury that a blanket nitrate reduction of up to 20% beyond expected results of GMP implementation across the FMU is not intended. The reduction framework for nitrate reductions should take into consideration the proportionate contributions to the nitrate losses to water, and how meaningful gains can be made for water quality based on the land use and its environmental impacts particular to that land use. Sheep and beef farmers recognise and are committed to every land user doing their bit to protect water quality. Rules and policy frameworks should recognise that different farming systems have different levers they can pull, and enable farmers to focus on their high payoff activities to protect water quality. For most sheep and beef farmers, a focus on overland flow pathways and critical source areas, rather than nitrogen reduction targets, is a more effective way of protecting water quality. B+LNZ is seeking a policy framework that recognise the differences between farming systems with rules that protect water quality, not rules that require actions when a better environmental outcome could be achieved by focussing resources on undertaking a different action
17. **Recommendation 5 III** of the draft ZIPA encourages 'regional council to continue to support non-statutory measures for nitrogen reductions beyond GMP Loss Rates'. B+LNZ supports this recommendation and believes that council support for non-statutory measures to reduce nitrogen losses to water can add significant value to terrestrial and aquatic environments. B+LNZ notes that there are a number of measures to reduce nitrogen losses to water which are not recognised by Overseer®. As a result, there is little incentive for individual land users to use them despite their value and additional benefits they offer, for example as a habitat for native flora and fauna.

18. B+LNZ request that the Zone Committee recommend to Environment Canterbury that it go further than supporting measures, and incentivise these measures for example through recognition in consent conditions.
19. **Recommendation 5 VI** recommends that land use consents to farm are limited to a term of 10 years to coincide with plan changes. In theory this is a good recommendation, however in practice it is problematic.
20. Resource consents will expire at the time where Environment Canterbury will start the new plan process, however it could take up to another five years for a revised plan to be finalized. This means that resource consents will need to be applied for and granted with conditions that might not be compliant with the rules that are finalised, years down the track. Environment Canterbury may either be left with the option to recall and review a very large number of land use consents to farm at considerable expense, or have a large proportion of land users and their resource consents left potentially non-compliant with the new plan.
21. B+LNZ recommends that the term for the resource consents is raised from 10 years to 15 years to mitigate this risk. A 15-year term would provide more certainty for the consent holders and allow for a smoother transition to a new plan in future.

5.3 OPIHI FMU

22. B+LNZ feedback for recommendation 5.3.4 for the Opihi FMU is identical to that given for the Orari FMU, please refer to paragraphs 13-21 above.

5.4 TIMARU FMU

23. B+LNZ feedback for recommendation 5.4.3 for the Timaru FMU is identical to that given for the Orari FMU, please refer to paragraphs 13-21 above.

5.2 TEMUKA FMU

24. B+LNZ feedback for recommendation 5.2.1 for the Temuka FMU is identical to that given for the Orari FMU in paragraphs 17 and 18 above.

Thank you again for the opportunity to comment. B+LNZ welcomes the opportunity to further discuss any of the points above with the Zone Committee, should you wish for more information.

For any inquiries relating to B+LNZ's feedback, please contact Lauren Phillips, Environment Policy Manager – South Island on 027 279 0117 or lauren.phillips@beeflambnz.com.

Yours sincerely



Lauren Phillips
Environment Policy Manager – South Island

Level 4, Wellington Chambers
154 Featherston Street
Wellington 6011, New Zealand
PO Box 121
Wellington 6140, New Zealand