

Feedback from the Drystock Sector

CSG 23

Farmer Engagement Meetings July 2014

“...Practical Application of Regulations

- No one size fits all approach - Diverse and complex nature of dry stock farm systems
- Issues vary through sub catchments, we need to address local issues in a coordinated approach....”

Feedback CSG11

“...Our farming systems are diverse and that is why industry has been exploring and now implementing whole farm system planning to acknowledge these complexities.

Discussions around this study have actually been instrumental in identifying a key value and use for our sector that being the complexity and diversity of dry stock farming systems.

You might ask how this relates to the health and wellbeing of the river, well to put it plainly to get in the green environmentally we've got to stay out of the red financially.

In other words to for us be able to afford to implement environmental initiatives on farm (like you saw at Bill Garlands Property), we need to retain the control of the complexities within our farming systems as we shift our farms towards more sustainable outcomes.

Recommendation

- *CSG recognises and adopts an additional policy selection criteria that recognises the complexity and diversity of farming systems.....*

Drystock Sector Feedback CSG13

.....“The second part of the workshop involved farmers evaluating options for stock exclusion including the options discussed at CSG those being:

- Full cattle exclusion
- Dairy Cattle Exclusion
- Stocking rate threshold
- Specified through a farm plan.

After much discussion “Specified through a farm plan” was the most popular option.

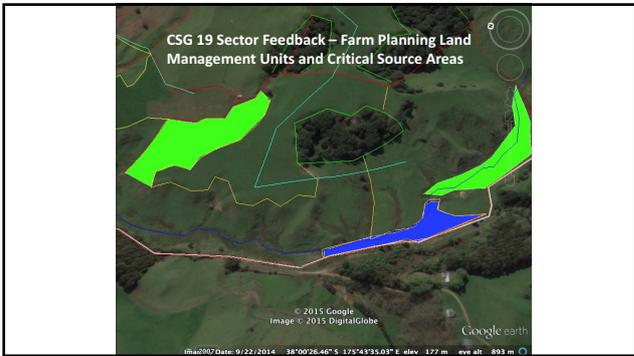
In easier country the general consensus was that full cattle exclusion was a good idea. However there was a very strong indication from the workshop that in some situations stock exclusion is just impractical. Mainly in steeper country where farming certain stock classes under certain management practices is still well and good.

I thought the concerns around these complexities were well summed up by one farmer who said that “... my farm stretches up a steep valley with a water way running through the bottom, in a recent weather event I lost 20 flood gates, it took two months to repair that damage, imagine the damage that would have occurred if I had fence lines running down either side”

Farmer Engagement meetings July 2015

“...Cattle Exclusion

- General agreement that intensive parts of the farm should be the focus for cattle exclusion
- General agreement that stock exclusion should be subject to a farm plan
- Needs to be based on risk
- Need to define what a waterway is
- Hill country is complicated...”



LAWF Fourth Report

Stock Exclusion....

206. Table 1 (below) sets out the Forum's preliminary recommendations on achievable timeframes for excluding stock from waterways. More detailed consultation with affected parties should be undertaken on these dates (along with all the proposals on stock exclusion and riparian management). The intent of the table is that the most intensive farming that has the biggest impact on fresh water would be captured earlier, as it takes place on the plains. Farming systems become more extensive as you move up into lowland hills and the impracticality and costs of exclusion increase: so more time is allowed. **A national stock exclusion regulation would be impractical in hill country areas so they are excluded from the table. Instead, councils will set stock exclusion rules in critical source areas or areas of ecological significance based on a risk-assessment undertaken in the catchment.**

LAWF Fourth Report

Stock Exclusion...

207. **Terrain is an important consideration for the design of a stock exclusion regulation.** Plains and rolling hills typically have U-shaped gullies, while hill country has V-shaped gullies. It is much easier to exclude stock and do riparian management in U-shaped, rather than V-shaped gullies.

208. Table 1 uses a terrain classification similar to land classification systems used by the New Zealand Land Resource Inventory (NZLR) plains/alluvial (slopes of 0-3 degrees)

- lowland hills (rolling hills/down lands) (slopes of 4-15 degrees)
- hill country (slope) **Land Use Capability (LUC) tables in order to specify stock exclusion requirements. The classifications are:**
- es of 16-28 degrees)
- steep hill country (slopes greater than 28 degrees).

Rule 1: stock exclusion

Under consideration

From 2025, access of dairy cattle, beef cattle, horses, domestic farmed deer or domestic farmed pigs onto bed of lake, wetland or perennial waterways **prohibited activity**

Rule #1: Livestock Exclusion – Prohibited Activity

Feedback

- Consensus that in many cases stock exclusion from waterways is imperative but in some cases it is not workable
- Need the definition of perennial waterways to be better defined and specifically identified by WRC
- Need to take into consideration the complexities of the hill country, including the cost-benefit in extensive farming low risk systems
- Risk of flooding damage and complete loss of investment and possibility of increasing negative environmental impact

Rule #1: Livestock Exclusion – Prohibited Activity

Solutions

- Where practical fencing of perennial waterways is a must
- Refer to LAWF guidelines
- Needs to be tied back to the farm plan with identification of critical source areas and apply GMP
- Either permitted activity through Industry Scheme or controlled consent if a high-risk farm or farm is within a high-risk catchment.
- Could be tied to class of land through LUC or as LAWF have described through plains, low land hills, hill country, and steep hill country

Rule 2: (interim) land use change

Under consideration

Major change of land use **non-complying activity**

- requires resource consent
- doesn't require resource consent

	woody vegetation	livestock grazing	dairy grazing	dairy production	arable cropping	commercial veg. cropping
woody vegetation	■	■	■	■	■	■
livestock grazing	■	■	■	■	■	■
dairy grazing	■	■	■	■	■	■
dairy production	■	■	■	■	■	■
arable cropping	■	■	■	■	■	■
commercial veg. cropping	■	■	■	■	■	■

Rule #2: Interim Land Use Change – Non-complying activity

Feedback

- Will severely limit land use flexibility which is a key aspect of a resilient sheep and beef sector
- This rule is not effects based as per the RMA
- Disincentives de-intensification and planting of trees – not doing what is right today for fear of losing existing use rights
- Does not encourage better land use management
- Does not recognise complexities within farms
- More of a political statement than a practical tool
- Need to ensure the interim nature of this rule

Rule #2: Interim Land Use Change – Non-complying activity

Solutions

- A threshold based on effects, so bring it back to a N discharge level that represents a risk for the increase of that contaminant
- If further thresholds are needed then lower thresholds would involve less scrutiny or lower level of consent.
- Need to be linked to land use suitability

Rule #2: Threshold alternative

Using N as a proxy (arbitrary figures used in the example below)....

- Threshold 1:
Activities up to 15 kg N/ha/year = Permitted activity
- Threshold 2:
Activities up to 30 kg N/ha/year = Controlled activity
- Threshold 3:
Activities up to 45 kg N/ha/year = Discretionary activity

Rule #2: Rolling Average Alternative

Using N as a proxy (arbitrary figures used in the example below)....

- Major land use change \geq 35 percent of 5 year (rolling) previous land use of enterprise type that has been typically part of the farm business
- and
- exceeds 35% of baseline N loss modelled by Overseer (highest number of previous 5 year rolling average)

Rule 3: low intensity

Under consideration

- Any land \leq 4.1 ha (excluding commercial vegetable cropping)
- Grazing land: \leq 8 stock units/ha
- Non-grazing land: \leq 75kg N applied /ha/yr
permitted activity

Rule #3: Low Intensity – Permitted Activity

Feedback

- This process is an assessment of risk so need to start with high risk and not low risk
- Stock units are not necessarily a good proxy for risk, i.e. you may have bad operators with low stocking rate.
- Stocking rates are input not effects based but can be used if need be to fill the gap until further information is gathered
- Complexities involved with lease and land use arrangements for cropping of small blocks

Rule #3: Low Intensity – Permitted Activity

Solutions

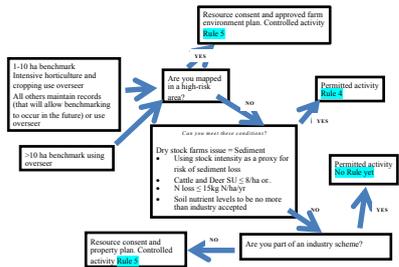
- We should be concentrating on the high risk at the start of the flow diagram/decision tree
- Remove rule 3 feedback loop
- If stock units are used as a proxy it should be based on cattle and deer stock units as they are the class of stock that are the predominant risk in terms of the four contaminants
- If stock units are used as a proxy then wintered stock units is most appropriate for the sheep and beef sector

Working with Proxies

Prefer effects based if need be could explore....

- Industry accepted soil nutrient levels
- Stock unit/ha or Kg's Liveweight /ha
- N loss rates to help define intensity

Decision Tree Alternative



Rule 4

Under consideration

In low risk areas, permitted activity if:

- LUC 1-5
- No grazed winter forage crops
- No perennial waterways OR
- 5m cultivation setback and 3m grazing setback from perennial waterways

All 4 contaminants

and

- good management practice
- for benchmark shows below 75th percentile (on per sector basis, with drystock sector to benchmark first)

N only

Rule #4: Low risk areas - Low risk farm – Permitted Activity

Feedback

- Prescribed setbacks not appropriate or science based
- Unintended consequences like drainage to avoid setbacks, weeds and pest management for set backs that are not well planned.
- Land use class 6 and 7 land can be farmed in a low risk manner

Rule #4: Low risk areas - Low risk farm – Permitted Activity

Solutions

- Depends on what we are trying to achieve here – i.e. how many farms do we want to let through this drafting gate?
- Best to focus first on those that are high risk – the high risk farms and the farms in the high risk catchments acknowledging the difficulties and cost to implement immediately across the whole catchment

Rule 5

Under consideration

- In high risk areas, **controlled activity** as long as property plan is produced with actions to mitigate all 4 contaminants.
- resource consent will be granted
- high risk = high risk of not achieving the water quality target; there's a big gap between current water quality and desired water quality to be achieved in 80 years

Rule #5: High-risk areas – Controlled Activity

Feedback

- Need to define high risk
- Cannot penalise a low risk farm in a high risk catchment
- If based on heat maps can look at all four contaminants but need to prioritise appropriate contaminant

Rule #5: High-risk areas – Controlled Activity

Solutions

- Look at ways of streamlining the consent process through options such as:
- WRC utilising industry progress through the LEP template to reduce costs of consents
- Sub-catchment or group consents administered by one agent that ensures work done on farms in that catchment is consistent with the consent.
- A group of farmers working simultaneously within a catchment undertaking similar actions will achieve quicker the desired environmental outcomes.
- To incentivise by way of cost reductions is to aggregate the process together.
- All farmers do the LEP and receive similar supportive information and direction
- This work coordinated by one agency. An agency being registered advisor or council environmental officer or other.

Risk farms within Drystock

Identifying the Risk in Drystock Farms – Sediment loss

High risk farms could be identified using groves where either N loss, or stocking rate and stock type, primarily cattle and deer, (wintered 1st July) exceeds an arbitrary threshold for a specified land class and high rainfall. This identifier is highlighting that cattle and deer in high numbers are likely to exacerbate sediment loss rates particularly in wetter winter months

Land Class 6 – 7 (Note farm to have ≥ 65 percent of Class 6 – 7)

- Cattle and / or Deer 8 stock units per ha
- ≥ 15 kg of N/ha/yr as measured through overseer

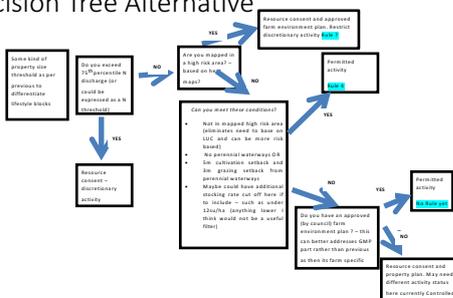
Land Class 3 – 4 (Note farm to have ≥ 65 percent of Class 3 – 4)

- Cattle and / or Deer 12 stock units per ha
- ≥ 25 kg of N/ha/yr as measured through overseer

Land Class 3 – 4 and 6-7 (Note no predominant land class)

- Cattle and / or Deer 10 stock units per ha
- ≥ 20 kg of N/ha/yr as measured through overseer

Decision Tree Alternative



No rule yet

Under consideration

- **Permitted activity** if certified industry scheme with property plan
- Farmers can choose to join an accredited programme and therefore work with the industry on actions to mitigate all 4 contaminants

Rule #: Industry Scheme

- All farmers will (ultimately) need to prepare a farm plan with a nutrient budget and undertake GMP
- B+LNZ to provide all dry stock farmers the opportunity without cost to attend workshop / seminars how to prepare a LEP
- The LEP to be submitted to regional council
- The regional council will target groups of farmers i.e. those individual farmers at risk with high contaminant loss rates and those farmers within at risk sub catchments
- Auditing to be done through a third party
- WRC to then audit the auditors
- B and L NZ - the first 10 years the focus should be on working as hard as possible to achieve that – one mechanism is providing a regulatory encouragement for farmers to undertake farm planning through a council approved farm plan template (which would be the LEP or SMP) in preference to a full industry certified scheme – which may or may not achieve the vision and strategy or sub catchment goals