

New Zealand Thoroughbred Breeders' Association (Inc)

Patron: Her Majesty The Queen



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Waikato Regional Council
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Submission on: **Variation 1 To Proposed Regional Plan Change 1 Waikato and Waipa River Catchments**

Submission by: New Zealand Thoroughbred Breeders' Association

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New Zealand Thoroughbred Breeders Association wishes to be heard in support of this submission.

New Zealand Thoroughbred Breeders Association could not gain an advantage in trade competition through this submission.

New Zealand Thoroughbred Breeders Association members are directly affected by an effect of the subject matter of the submission that:

- (a) Adversely effects the environment, and
- (b) Does not relate to the trade competition or the effects of trade competition

New Zealand Thoroughbred Breeders Association (Nztba) welcomes this opportunity to submit on the Variation 1 to Proposed Regional Plan Change 1 Waikato and Waipa River Catchments Waikato Regional Policy Statement. We acknowledge any submissions made by individual members of Nztba.

Background

The New Zealand Thoroughbred Breeders' Association (Inc) is an incorporated society established in 1948, with the aim of providing a collective voice for thoroughbred stallion and broodmare owners big and small throughout New Zealand.

We represent approximately 2000 members across eight regional branches throughout New Zealand. The aim of our organisation is to encourage, promote, advance generally and ensure co-operative efforts in all matters pertaining to the production and improvement of the thoroughbred and the best interests of thoroughbred breeders.

New Zealand thoroughbred breeders pride themselves on raising athletic horses that are sought after throughout the world and therefore our natural environment and pasture base is crucial to the way we raise our horses.

The New Zealand Thoroughbred Industry on the whole contributes more than \$1,098.9 million¹ to the New Zealand economy, on economic terms it is comparable in size to the New Zealand Wine and the New Zealand Seafood Industry.

The racing industry in the Waikato region generates \$429.5 million which represents 39% of the national total in value added contribution to the GDP. There are approximately 1,008 thoroughbred horse breeders based in the Waikato, and 34% of thoroughbred broodmares in New Zealand are based in the Waikato region.

The Waikato region employs nearly around 930 staff within the breeding industry, but the thoroughbred industry as a whole supports around 3,837 full time jobs within the Waikato. This does not account for all the associated industries that the breeding industry contributes to economically.

The National Karaka Yearling sales in 2018 contributed a combined aggregate of \$77,017,750 of which the majority of these horses were raised in the Waikato region.

General Comments

NZTBA missed the opportunity to make a submission on the Waikato Regional Council Proposed Plan Change 1 – Waikato and Waipa River Catchments (PC1) but makes the following comments.

NZTBA supports the overarching objective of PC1 to restore the water quality of the Waikato and Waipa River catchments while maintaining the social, economic and cultural wellbeing of people and their communities is maintained.

NZTBA however has concerns that the equine businesses and wider equine community, in particular the Thoroughbred Breeders, in the Waikato and Waipa catchments could be significantly impacted by the provisions of PC1. We believe that the provisions of PC1 does not reflect an understanding of equine property management to the extent that while constraining the business it provides little environmental benefit.

¹ *Size and Scope Report*, New Zealand Racing Board, February 2018

Horses are produced as athletes, not as production animals like dairy, beef, sheep and deer. As a result, equine management is significantly different to the rest of the pastoral sector, including nutritional requirements, energy expenditure, pasture management, and housing. For example, equine properties almost never apply nitrogenous fertilisers as rapidly growing pastures can cause behavioural and bone density issues in young stock.

Of greatest concern to NZTBA is the use of Overseer to achieve a Nitrogen Reference Point on equine properties. Of concern is;

- That Overseer has been developed using rumen animals, primarily the dairy cow. Horses are hind gut fermenters and it is our understanding that the Overseer model has incorporated horses on a stock unit basis using the assumptions developed for other stock classes.
- Overseer assumptions do not reflect different grazing patterns, feed utilisation or the housing (stabling) of horses.

Relief Sought

That equine businesses and the farming of horses is withdrawn from PC1 until such time the provisions fairly and equitably reflect the equine sector including the environmental benefits achieved.

Variation 1

1. Provision

Rules: 3.11.5.2(5); 3.11.5.3(5); 3.11.5.4(1); 3.11.5.4(2); 3.11.5.4; 3.11.5.5; Schedule A(1); Schedule B(e);

Reasons for Submission

Amending the dates is appropriate to ensure that actions are required by the proposed dates occur after Plan Change 1 is beyond challenge and will incorporate any amendments that occur during the First Schedule process.

Further if the First Schedule process is significantly delayed that Waikato Regional Council review these proposed dates and amend if required.

Relief Sought

That the proposed amendment to the dates in Variation 1 are adopted. Further that these dates are reviewed if the First Schedule process is delayed so that the actions required by the proposed dates do not occur until PC1 is beyond challenge.