

Tabled at Hearing 07/05/2013

**Supplementary Statement of:**

Mr Michael Bennett

**In Support of:**

Combined Canterbury Provinces, Federated Farmers of New Zealand (320)

**In the matter of:**

Submission on Proposed Canterbury Land and Water Regional Plan (2012)

Section 42A Report Volume 2

**Introduction**

The following is supplementary to my statement on aspects of the 42A report concerning offal pits, animal and vegetative waste, stockholding areas and animal effluent, and activities in beds of lakes and rivers and wetlands.

**Schedule 7**

The staff report at pages 135 – 138 recommends a number of changes to Schedule 7 which sets out the requirements for a Farm Environmental Plan.

Federated Farmers supports the use of Farm Environmental Plans in preference to other management tools to improve environmental performance. Our reasons include:

- A Farm Environmental Plan is a mechanism to develop practical means to safeguard environmental values on a case by case basis, recognising the inherent variation from one farm to another (soil, topography, climate, receiving environment etc);
- The distinct management needs of each farm are best addressed in the context of a discussion with farmers of environmental risks and future aspirations of use on their property;

The staff recommended changes to Schedule 7 add substantial administrative complexity and cost, with time and effort required out of proportion to the small marginal benefit that will be achieved. Staff recommendations that are of particular concern include:

- Part B (4) requires an assessment of environmental effects and management responses, which is a double-up with other parts of Part B, and is unnecessary;
- Part B (5-e) Requires that *all grazing activities avoid damage to the bed and margins of a water body and avoid the direct input of nutrients, sediment, and microbial pathogens.* It is abundantly clear that it is impossible to meet such stringent criteria and continue to farm the hill and high country environment;
- Part C requires that all Farm Environmental Plans are independently audited, with audits repeated annually;
- Part D (4) requires very detailed information including *monthly stocking rates (numbers, types, and classes) including breakdown by stock class.*
- Part D (6) requires *a description of farm management practices on each block including: (a) ground cover – pasture, crops, fodder crops, non-grazed areas (including forestry), riparian and tree areas. (b) stock management – lambing/calving/fowning dates and percentages, any purchases and sales and associate dates, types and age of stock.*
- Various provisions that are redundant with resource consents for the property or with other parts of Schedule 7 (D-7, B-5 and Rule 5.36, B-2 and D-2,

Federated Farmers opposes all of these recommendations. They appear to be seeking a level of certainty or risk management that has no regard for cost or practicality and is simply inappropriate.

The view of Federated Farmers is that the staff recommendations undermine the utility of Farm Environmental Plans, and thereby reduce their effectiveness in improving environmental performance. It is disappointing that the endorsement of Farm Environmental Plans as a management method, by farmers during Hearing Group 1 has been followed by staff recommendations which make the overall approach much more prescriptive and onerous for little discernible environmental improvement.

To be successful, Farm Environmental Plans must:

- Focus on key issues that impact directly on water quality in any given situation (one size does not fit all).
- Be as simple as possible and not be excessively prescriptive or require unnecessary information.
- Include measures that are physically possible, create a genuine improvement, and are cost-effective – otherwise they will not be implemented.
- Foster trust-based partnerships between farmers and the regulator.