

**BEFORE THE CANTERBURY REGIONAL  
COUNCIL**

UNDER The Environment  
Canterbury (Temporary  
Commissioners and  
Improved Water  
Management) Act 2010

AND

IN THE MATTER Submissions and  
Further Submissions on  
Proposed Plan Change  
5 to the Canterbury  
Land and Water  
Regional Plan

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Evidence of **James Kenneth William Hoban** on Behalf of **JG & LM Murchison**  
(Submitter No 67179) and **JKW Hoban & Ors** (Submitter No 67198)

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Dated: 22<sup>nd</sup> July 2016

## INTRODUCTION

- 1.1 My name is James Kenneth William Hoban
- 1.2 I hold the following qualifications: Bachelor of Commerce majoring in Management – University of Canterbury; Graduate Diploma in Applied Science – Lincoln University; and member of NZ Institute of Primary Industry Management. I am one of the founding members of the North Canterbury Landcare Group and am Chairman of the Beef+Lamb NZ Northern South Island Farmer Council.
- 1.3 I have been a self-employed Farm Environment Consultant since June 2014. Prior to this I worked for Environment Canterbury as a Senior Land Management Adviser. I spent 6.5 years working for Environment Canterbury. I specialise in Farm Environment Plans (FEPs) and group facilitation. I have facilitated all of Beef+Lamb NZ's FEP workshops in Canterbury over two years and also carry out contracted work as North Canterbury Policy Agent for the Ministry of Primary Industries and as a facilitator for Deer Industry NZ. I have previously completed contract work for Landcare New Zealand and spent five years as judging coordinator for the Balance Farm Environment Awards in Canterbury.
- 1.4 As well as my consultancy work I also farm in partnership with my parents and wife. We farm and reside at a property known as Parham Hill. My Great Grandfather James Hoban came to the farm in 1909. The property is a 227 hectare sheep and beef farm with some irrigation.
- 1.5 Our farm is located within the area covered by the Hurunui-Waiiau River Regional Plan. However we have submitted on Plan Change 5 because we are hoping that if a practical and sensible planning regime can be developed in Plan Change 5, that Environment Canterbury will apply it to the Hurunui-Waiiau catchments in due course.
- 1.6 I am familiar with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note (2011) and I have complied with it in preparing this evidence. The opinions expressed in my evidence are my own except where I have stated I have relied on the evidence other parties. I have not omitted any facts or material known to me which may influence the opinions I have expressed in this evidence.

## 2. **SCOPE OF EVIDENCE**

2.1 My evidence supports submissions made by JKW Hoban and Others, and JG & LMW Murchison on the following matters:

- (i) Farm environment plans (or variations of these)

2.2 This statement of evidence is supported by Beef + Lamb NZ.

## 3. **FARM ENVIRONMENT PLANS:**

3.1 Canterbury farmers have made excellent progress in completing and implementing farm environment plans (FEPs). To date I have facilitated 25 Farm Environment Plan workshops, contracted to Beef+Lamb New Zealand. Over 330 individuals have attended these workshops. The industry response to support plan completion and use in the past three years has grown. Beef+Lamb NZ has been a key organisation in helping farmers complete plans.

3.2 The Farm Environment Plan developed by Beef +Lamb New Zealand is delivered through a workshop approach which sees groups of farmers complete individual plans at the same time with professional advice.

3.3 This involves a step by step process. Initially, farmers identify their property's features and land types on a map. They do this by creating Land Management Units (LMUs). These are areas of similar natural characteristics and management – for example, an LMU might be steep hill country which is not cultivatable, or flat paddocks of a similar soil type, or large gullies with native scrub cover. Most farmers have between 5 and 10 different LMUs but each LMU might be on several areas of the farm. These areas are all colour coded then assessed individually for environmental strengths and weaknesses/risks. Their current use is described.

3.4 The next step farmers complete is to record an inventory of their current management practices that help achieve the FEP objectives of Schedule 7 of the Land and Water Regional Plan. Finally the farmer identifies new actions they will undertake in the future and record these with an explanation, timeframe and acknowledgement of responsibility. In identifying these they consider the LMU risks identified earlier and how these might possibly be mitigated as well as gaps in their current practices.

- 3.5 In addition to FEP completion, Environment Canterbury staff attend workshops and outline local planning issues and answer questions. These conversations have been productive and useful for both farmer attendees and Environment Canterbury.
- 3.6 Attendees are often a family team (husband and wife, parents and children, siblings etc) and farm staff are often involved with owners. Watching this FEP process unfold for more than one person from the business is always rewarding.
- 3.7 The feedback from these workshops has been that the Beef+Lamb FEP has been good to work with and of benefit to the farm business, rather than being a compliance exercise. The B+LNZ FEP resource is based on business tools that were in existence before FEPs were required by Environment Canterbury. That resource has been developed and modified over a long period of time with the specific purpose of providing a whole farm approach to environmental management that is of significant benefit to the farm business while aiming to ensure that farmers identify, prioritise and manage environmental risk over time.
- 3.8 In my opinion completing FEPs solely to meet a regulatory requirement encourages a 'bare minimum' approach. Making the FEP a meaningful tool that can be used in a voluntary capacity, encouraged by education and supported by industry, is a more rewarding experience for farmers and increases the commitment to meaningful improvements. Having watched large numbers of farmers start to come to terms with the Environment Canterbury's FEP requirements, it is concerning to see changes to Schedule 7 already and the emergence of Schedule 7A.
- 3.9 I support farmers undertaking a more formal process of farm environment planning . However I question the logic in making FEPs a legal requirement for permitted activity status. In respect to the outcomes that the plan seeks in my opinion these farmers should meet permitted activity status because they are deemed to pose a lower environmental risk, not because they have ticked a farm planning box.
- 3.10 The requirements of schedule 7A have been marketed as simpler than an FEP but realistically the completed plans will look the same as they do under the existing rules. The new farm management plan is renamed but still very similar to an existing FEP.

- 3.11 The emergence of Schedule 7A has already created confusion and anxiety among those farmers who have been proactive in completing FEPs. The common, valid concern being that those who have been proactive might now have to redo their good work while those who have not engaged yet will only do the job once – after the shifting goalposts have finally settled. This constant change discourages and delays farmer engagement.
- 3.12 Schedule 7A requires the inclusion of a legal description of the property. This information is already available to Environment Canterbury with only a street address needed to find it on their GIS system. It is usually long, takes time for the farmer to find and adds no value to the farm plan. It is a requirement under the existing Schedule 7 and even there its usefulness is questionable. Making it a requirement in Schedule 7A as well seems like unnecessary detail.
- 3.13 The industry has shown it is capable of providing excellent FEP support for sheep and beef farmers. I would suggest that requiring low risk properties to complete FEPs through regulation, an approach which creates an unconstructive environment of fear and mistrust, is counterproductive. A more productive approach would be to leave the industry groups to work with permitted activity status farmers, knowing that they only achieve this status by being relatively low risk in the first place. The industry is well qualified to create meaningful engagement with these farmers through education and is already showing it will direct resources in this way.
- 3.14 Environment Canterbury staff have been included in many industry efforts to encourage FEP adoption – where this has been as a voluntary farmer initiative, the conversation and work has been much more productive than where this has involved statutory pressure. I have seen these different scenarios with workshops and individual clients right across Canterbury – some facing Sensitive Lake Zone resource consent requirements while others in Light Blue Water Quality zones attend workshops in an entirely voluntary capacity. Those farmers that engage in the farm planning process because they see value in it result in far better commitment, attitude and engagement. It is critical in my view that the plan does not undermine the value of this.

#### **4. SCHEDULE 7:**

- 4.1 Most of my evidence focuses on the farm planning requirements for permitted activity status farmers. I would like to make some brief comments on the new Schedule 7 though, which outlines the FEP requirements for farmers in a consented regime.

- 4.2 Objective 6 is new. I understand that this comes from an ECan perception that leaking water troughs are a major environmental risk FEPs could address. The reality is that stock water efficiency on a sheep and beef farm is a minor issue which does not need detailed farm environmental planning. I can understand the importance of water use efficiency in a dairy situation where large quantities of wash-down water are used.
- 4.3 It is also not clear why public access routes are now required to be marked on maps in an FEP. This is not relevant to the environmental issues that an FEP is trying to address. Requiring this information to be recorded will only feed anxiety about information sharing between farmers and auditors or potentially Environment Canterbury.

## **5. CONCLUSIONS:**

- 5.1 Requiring farmers who meet permitted activity status to complete FEPs seriously risks undermining the value and commitment of farmers to this process.
- 5.2 While the intention of making non-consented FEPs less cumbersome than those plans prepared by farmers who require consent is admirable, the draft plan requirement is still unnecessarily tough on low risk farmers and the changes have created uncertainty and anxiety.
- 5.3 These farms are low risk and do not need to be forced to partake in an extra compliance exercise which will negatively impact on farmer engagement.
- 5.4 If the industry is left to work with these farmers, they will. Environment Canterbury Staff will also have improved engagement opportunities and the results and working environment and longer term commitment and behavior change from farmers will be improved.

James Kenneth William Hoban