

Proposed Plan Change 5 (Nutrient Management and Waitaki Sub-region) Hearings – New Zealand Deer Farmers Association - Canterbury/West Coast Branch and South Canterbury/North Otago Branch

Friday 26 August 2016

Introduction

1. My name is Edmond Noonan. I am the spokesperson for the combined Canterbury - West Coast and South Canterbury – North Otago branches of the New Zealand Deer Farmers Association (NZDFA). NZDFA is a voluntary membership organization representing the interests of deer farmers. Previously I have had roles as a Canterbury Branch Committee Member and Chairman and I have served on the NZDFA National Executive Committee as a member and as Chairman.
2. I am currently the Operations Manager for Provelco – coordinating deer antler velvet exports. I am a graduate in commerce from Lincoln University in Supply Chain Management and a qualified internal and external auditor
3. I have over 30 years of farming experience in Canterbury, North Auckland and the Waikato covering deer, sheep, cattle and cropping (arable and winter feed) systems and have placed highly in both the NZDFA Farm Awards and Ballance Farm Environmental Awards. I also have lectured on deer farming systems at Lincoln University.
4. I am an Environment Canterbury approved auditor for Farm Environmental Plans (FEPs) and have been involved in the Matrix of Good Management Project Reference Group as well as workshops on auditing requirements for FEPs that helped form the *Canterbury Certified Farm Environment Plan (FEP) Auditor Manual*.
5. I have also been a Ballance Farm Environmental Awards judge as well as both a coordinator and judge for the deer industry Environment Awards.
6. The deer industry was the first pastoral industry to produce a Landcare Manual in 2004 which was then updated in 2012. I was a committee member for both editions.
7. I would like to speak to the written submission from the combined Canterbury - West Coast and South Canterbury – North Otago branches of the NZDFA, dated 11 March 2016, and focus on the aspects of this submission that I feel were not adequately considered in the CLWRP Plan Change 5 Section 42A Report, Report No. R16/23, July 2016 (S42A report).
8. I will be assisted by Dr Lindsay Fung, Environmental Policy Manager for Deer Industry New Zealand (an industry-good levy-funded organization) and Mr David Morgan, Canterbury deer farmer and current Chair of the NZDFA National Executive

Committee.

Schedule 28

9. I refer to our submission which notes that, according to the Section 32 Evaluation Report, the rationale for including OVERSEER modelling proxies for good management practices (GMPs) is to provide *legal certainty*, while an alternative approach preferred by NZDFA that would be a more collaborative and transparent process has “*the effect of reserving to the Council, a discretion to determine how the MGM outputs would be updated in the future, with no ability for members of the public to be heard on the effect of any proposed changes.*”
10. Such outcomes from the changed proxies have the potential for significant ramifications for farming systems: As there are significant uncertainties associated with OVERSEER proxies and the even more complex issues of GMPs proxies; therefore the objective of certainty, will be lost in the complexity of the modelling.
11. Given that Schedule 28 was derived from the Matrix of Good Management (MGM) project and that this was not available for public hearings but rather determined through industry consultation at a technical level with wider stakeholder approval at a project governance level, it seems somewhat disingenuous to subject updates or changes to modelling proxies to a formal plan change process.
12. Further NZDFA had requested that similar approach to the MGM project be adopted for ensuring that future updates are adequately discussed amongst the primary industry stakeholders and approved by wider community stakeholders. However, the S42A report recommends retaining Schedule 28 in conjunction with the Farm Portal although other submitters have requested the removal of Schedule 28 and the removal of the Farm Portal. NZDFA has not requested the removal of the Farm Portal and the S42A report has given no consideration of the NZDFA position which would be a more collaborative and inclusive process rather than involving a plan change.

Schedules 7 and 7A

13. This is a significant component of Plan Change 5 and is crucial to the effectiveness of FEPs that will be required for the majority of drystock farms that do not currently have industry auditing and verification schemes. NZDFA had requested that a more collaborative approach to determining the content and the language of these schedules would better reflect the focus on adoption of GMPs. A potential alternative was provided to illustrate a more practical outcome that would be more relevant to farmers.
14. The S42A report has taken this unendorsed version alongside other submitters' requests and has cobbled together a recommendation for the hearing panel. NZDFA considers this process to be unsatisfactory with regards to positive engagement with industry organisations and their ability to further 'ground truth' details with their farmer membership. Components of the Schedules are not just an academic exercise for regional planning but have a far reaching effect on environmental farm planning.

15. Notwithstanding NZDFA's preferred approach to collaboratively determine the content and wording of the Schedules, two main features remain problematical: Firstly the contrived requirement for farmers to identify Phosphorus Risk Zones within their farm and secondly, the identification of public access routes or access routes to maintain waterways in Schedule 7.

Phosphorus Risk Zones

16. The S42A report recommends a change of wording which in essence still requires the farmer to identify where the 'high level' Phosphorus (run off) Risk Zones are located on the farm. It does not follow that a detailed risk-based analysis of farm practices, land forms, soils and climate which would identify on-farm critical source areas and recorded on a FEP would be assisted by referencing these to the coarser scale Phosphorus Risk Zones.
17. As was stated in our submission, if this was in relation to Phosphorus leaching, the use of such risk zones would be more applicable to identify on-farm areas that might require more consideration for where intensive farming activities could be located. However as Phosphorus leaching is explicitly excluded from the risk zone maps, the exercise remains completely superfluous to improving good environmental outcomes.
18. The S42A report states (paragraph 8.280, page 177): "*...the development of the maps was discussed with a good cross section of industry representatives through the MGM project and their participation on the Governance Group and PC5 Policy Working Group in late 2014 and early 2015.*"
19. NZDFA disputes this claim at least for the deer industry and from consultation with Beef + Lamb New Zealand staff involved in the MGM project and the PC5 Policy Working Group, there is similarly no recollection or record of discussion of the maps.

Identification of public access routes or access routes to maintain waterways

20. Our concern over the requirement to identify public access routes or access routes to maintain waterways in Schedule 7 (but not 7A) was not supported in the S42A report which states on page 147: "*In my view, identification and awareness of public access routes is relevant base information for FEP users, particularly where legitimate access and use of a waterbody for activities such as fishing, customary food gathering and contact recreation may potentially be compromised by farm management decisions and poor water quality.*"
21. NZDFA is unaware of this being a requirement in other regions where equivalent farm plans are required such as Hawkes Bay (Tukituki catchment) and Horizons, or where there are similar proposals (Southland). This seems like an overly prescriptive requirement and one that raises the concern of how much information contained in the FEP will be made available to parties other than Environment Canterbury and the FEP owner.
22. It would be expected that Environment Canterbury would have its own records of access routes to maintain waterways (otherwise it would be unable to fulfil any

maintenance duties to date), while farmers will be aware of public access routes on their own farm – as occurs at present. NZDFA also requests the commissioners to consider if this has any relevance to “unformed legal roads” or paper roads and subsequent health and safety considerations regarding access within a working farm.

Schedule 7, Part

23. NZDFA notes that its concern around the status and accountability of the *Canterbury Certified Farm Environment Plan (FEP) Auditor Manual* is considered out of scope or ‘not incorporated by reference in Plan Change 5’. While this may prevent Environment Canterbury from considering our request, we feel compelled to comment on the S42A report commentary (paragraph 8.202, page 158) that states: “*The NZDFA states that industry input to the Certified Farm Environment Plan Auditor Manual has been minimal and requests CRC re-engage industry to agree standards and methods. It is my understanding that the Manual has been written by Environment Canterbury in collaboration with an Industry Advisory Group comprising representatives from the Primary Industries and Central Government.*”
24. NZDFA contends that the ‘collaboration’ with representatives of primary industries does not imply consensus or agreement. Further we emphasise that there is no ongoing commitment to involve primary industry representatives in reviewing and updating the manual. This situation creates unreasonable uncertainty for stakeholders, disenfranchises them from the process, and undermines the process of continuous improvement, by exclusion.
25. While this may be beyond the scope of Plan Change 5 and the commissioners’ responsibilities, this area, as with Schedules 7 and 7A, require considered and positive engagement with farmers and their representatives if the implementation of Plan Change 5 is to be regarded by farmers as non-threatening.

Concluding remarks

26. NZDFA represents the farming community of a small but significant primary industry that offers choice and diversification for drystock farming. As an industry we have developed awareness of deer behaviours and their potential for environmental impacts and have management practices to mitigate these.
27. Our farming members and our industry-good organization Deer Industry New Zealand have attempted to engage constructively and collaboratively with other land users and regulators and will continue to do so. We hope that our request for re-engagement (with regards to Schedules 7 and 7A) of Environment Canterbury and primary industries is viewed in this light.
28. In our submission we made comment that with limited resources, it is difficult for NZDFA to undertake a thorough analysis of the proposed plan changes as well as consult on a representative position from the Canterbury membership in the minimum time frames. The lack of ongoing engagement with Environment Canterbury policy makers does little to encourage our farmers that real progress on environmental management will be made as opposed to activities that satisfy an administrative

function of CLWRP Plan Change 5.

29. The NZDFA supports the objectives and aims of the CLWRP and believes there are objectives that best can be met by implementing a risk based FEP, based on industry agreed good practices and the specific farm's risk profile associated with the environment and farming system. The FEP can be assessed and validated by utilizing the GMP narratives and evidence-based records. This allows for a quantitative assessment which supports the objectives of the regional plan.
30. Thank you for hearing our concerns.