

Hurunui Waiau River Regional Plan: Plan Change 1 Dryland Farming hearing 22 October 2019.

Presentation by Rural Advocacy Network.

(1) Successful approach to Farm Plans in Hurunui.

Farmers have been addressing water quality & other environmental issues for the past 50 years.

Prior to Regional Councils we had Catchment Boards. Farm plans were an integral part of the Catchment Board system. Many farmers still retain their 40 – 50 year old Catchment Board plans with a sense of pride & good memories. These tailor made farm plans were hugely successful built on a partnership based on trust & respect. As you travel through the farmland of Cheviot view the extensive erosion plantings, native bush areas, QEII Trust covenants, wetlands, agroforestry – all testimony to the success of the Catchment Board system.

The Catchment Board system & advisors were carried across to the newly formed Canterbury Regional Council in 1989 under a new name Resource Care. The huge uptake by farmers of environmental initiatives continued.

In 2011 with the arrival of Commissioners to ECan the Resource Care system was disestablished & a greater focus on regulation in its place. All of the original Catchment Board & Resource Care staff have since left ECan disenfranchised with this new regulatory model that lost all the goodwill & positive momentum built up over 50 + years.

Today's ECan mandated farm plans are not held in the same high regard as in the Catchment Board days. In fact for many farmers they are seen as a pain in the backside, increasingly complex, bogged down in minute detail. A tick box process to cross off the list. Another layer of cost that reduces the amount of budget available for environmental actions on the ground. With the increasing failure of the regulated approach to Farm Plans many are now recognising the need to establish a holistic model for the future that is once again built on trust & respect & empowers landowners to continue the positive behaviour change.

It is our submission that mandatory ECan prescribed Farms Plans are not appropriate or justified & will not be effective for the dryland farming community.

ECan & some submitters would have you believe that if dryland farmers were not regulated then environmental issues would worsen. This is not backed up by what we see today – hundreds of farmers fencing & planting waterways & wetlands, more native bush areas being retired, a significant increase in farmers undertaking erosion control initiatives, farmer led groups – Catchment Groups, Farm Discussion Groups, the Hurunui District Landcare Group & Hurunui Biodiversity Trust. All of these actions delivering water quality benefits. ECan would gain so much more positive environmental outcomes by working positively with these groups rather than forcing objectionable & unjustified requirements onto dryland farmers.

(2) THE SOCIAL COST

One of the 4 cornerstones of Part 2, Section 5 of the RMA is social wellbeing. ECans poor planning systems have come at a huge cost to the social wellbeing of our district. This remains a principal concern of ours & it adversely affects the mental well being of many in our community. Not only are environmentalists pitted against farmers but farmers against farmers – irrigator verses dryland, dairy verses dryland, dryland verses dryland. All of this because of a flawed planning system that continues to be perpetuated with Plan Change 1.

Jeff Wilkinson to speak on this subject. (attached)

Winton outlining some historical context of the HWRRP including that the original purpose wasn't to capture dryland farmers into any regulatory/mandatory requirements. (attached)

Referring to our submission

3. It is critical that you as Hearing Commissioners & decision makers understand the current relationship between ECan & the rural community as this relationship has a huge bearing on the effectiveness of any plan. Highlight how bad the situation with ECan is. Trust of ECan is at an all time low. Many farmers feel under siege from ECan & those captured under consents live in a constant climate of fear.

6. We note the submission by Aotearoa New Zealand Fine Wines Estate LP is compelling evidence that the flaws of the 10% rule are not being properly addressed by Plan Change 1. This reinforces our claim that low emitting irrigators remain unfairly & unjustifiably constrained & penalised by PC1.

10 – 12 Farm Plans. Reinforce at 12 about thresholds.

The requirement to have an ECan prescribed mandatory farm plan in itself does not deliver any freshwater quality benefit. The real power of Farm Plans is whether they are used & how they are used. Combined with good advice they can be a very useful tool to achieving many water quality benefits.

* Explain how many of the dryland farmers are low labour resource systems (often just the farmer) & any mandatory requirements such as Farm Plans & Portal add to an already significant & disproportionate burden being placed on these farmers. Most unfair given the negligible impact these farms have on freshwater.

* reference the extent of regulations already applying to dryland farmers & the range of positive environmental initiatives.

We note concerns articulated in the evidence of Lionel Hume for Federated Farmers clauses 17 & 18 about the information sensitivities with the portal & management plans. Our view is that when a management plan is referenced as a requirement in any regional plan that management plan becomes accessible by the Regional Council. For example someone could complain about mahinga kai, winter grazing, wetlands or any of the many other aspects required to be covered by the management plan. In effect all those aspects listed in the management plan become conditions of a consent. This is an unjustified imposition on activities that have been widely acknowledged as having insignificant effects on water quality.

It appears the reason ECan are seeking mandatory management plans on dryland farmers is for addressing the issue of winter grazing. At clause 168 of the officers report is the following statement - *"It would be unlikely Plan Change 1 could be the most appropriate way of achieving the Objectives of the HWRRP or as giving effect to the Objectives and Policies the NPS-FM if winter grazing is provided for as a permitted activity with no requirement to actively manage the risk of run-off contamination of water."* This is consistent with the reason that ECan councillors gave when visiting our area earlier this year. We acknowledge that winter grazing if done poorly on a large scale can cause adverse effects. The issue of winter grazing was well traversed during Plan Change 5. Acknowledging dryland farmings insignificant effect on water quality & the fact that the effects

of winter grazing vary hugely depending on many factors - soil type, rainfall, the river catchment we & other farming industry groups accepted threshold levels for winter grazing on dryland farms. As outlined in our submission if the concern or the principle concern with dryland farming is winter grazing then the discussion should focus on the appropriate thresholds not simply requiring everyone to have a management plan that covers many other activities not just winter grazing.

17 – 18 Mahinga kai

Making the incorporation of Mahinga kai into farm plans mandatory is one sure way to devalue the concept of mahinga kai. Witness how counterproductive the mapping & regulating SNAs in Hurunui has been. More recently Mataitai customary fishing reserves gazetted in Hurunui & Kaikoura districts have seen an outcry from landowners with legal action imminent. Much of the work i do in my private work is of huge benefit to mahinga kai.

Conclude with quote from “It’s Everybody’s Business: Whole Farm Plans”, AgResearch October 2016 for Horizons Regional Council

Throughout all the interviews (of both hill and dairy farmers) the importance of Field Officers, or knowledge-brokers, was repeatedly highlighted as playing a vital role in relationship building and engagement with farmers. Such relationships, based on trust, are recognised by farmers, as crucial both in introducing plans to farmers and in the implementation of these plans. This suggests a central role for Field Officers working with farmers to realise the longterm potential of Environmental Plans as vehicles to implement policy, and generate regional growth.

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