

Intensive Winter Grazing–CONSULTATION

Personal Information

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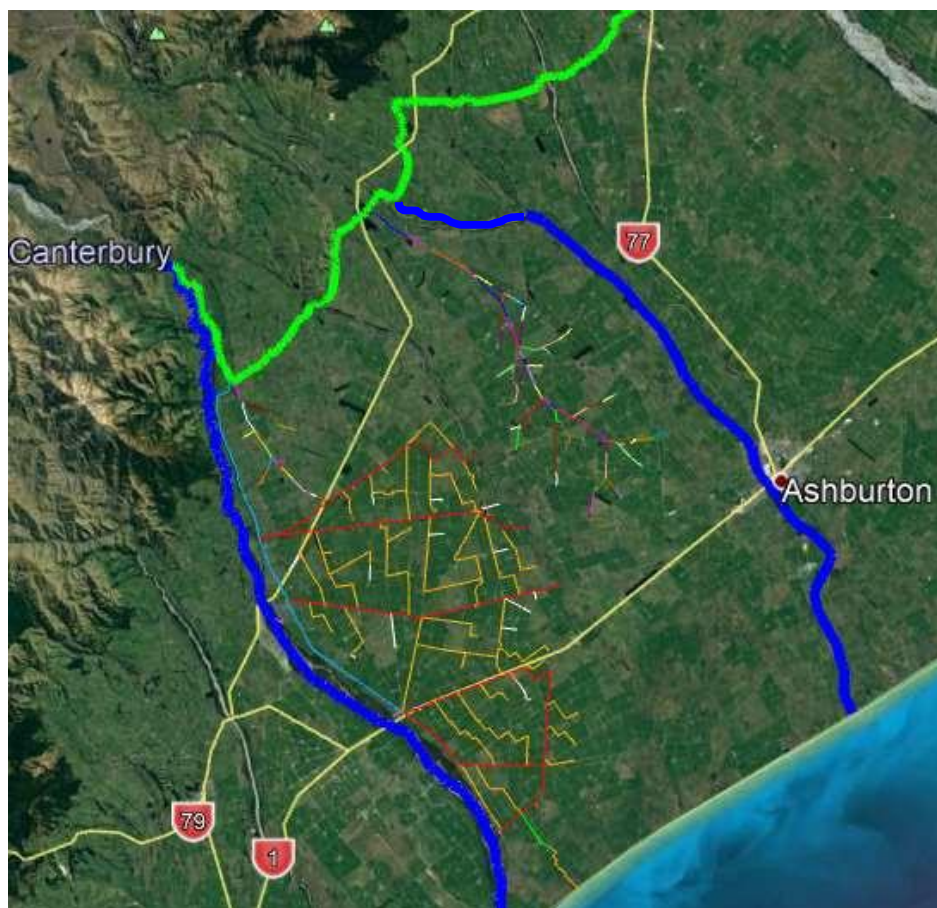
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Who Are We?

MHV Water Limited (MHV) manages one of New Zealand's largest irrigation schemes, delivering water to 206 farmer shareholders for the purpose of irrigation and environmental flows. Alpine water is extracted from the Rangitata Diversion Race (green line) which is fed by both the Rangitata and Ashburton Rivers and distributed to our shareholders via approx. 320km of open race and 100km of piped infrastructure, covering an irrigated area of approx. 51,000 ha lying between the Rangitata and Ashburton Rivers (blue lines below) (Figure 1).

Figure 1: MHV Water Command Area



Our shareholders are a mix of dairy, dairy support, arable and sheep and beef operators. We have been delivering water, through previous entities, in the region for over 75 years and in 2014 we also began managing the environmental compliance for our farmers by holding their nutrient discharge consents at a catchment level. Over this period, we have invested in extensive education programmes, worked collaboratively with community stakeholders, including regional and district councils to define Good Management Practice and beyond and have designed and implemented a comprehensive Farm Environment Plan software system and have a robust Audit programme.

Our Farm Environment Plans are based on Schedule 7 of the Canterbury Land and Water Regional Plan and meet many of the expectations of Certified Freshwater Farm Plans. Given our proactive stance on environmental issues, experience, and specific geographic context, we would like to provide feedback on some aspects of the proposed intensive winter grazing provisions which affects our scheme and shareholders.

Specific Points to Note

MHV Water have supported our shareholder farmers with implementing audited farm plans since 2015. We have had a high level of engagement with our shareholder farmers and seen significant improvements in the management of intensive winter grazing practices as a direct result of our Audited Self-Management (ASM) programme.

We want to reiterate the importance of the following key points to promote the success of the Intensive Winter Grazing provisions of the National Environmental Standards for Freshwater 2020:

1. Support recommendations of the Southland Working Group
2. Minimise duplication through recognition of existing farm planning programmes

General Feedback

Context for the proposed changes to the intensive winter grazing regulations

1. *Do you agree with our framing of the issue? If not, why not?*

Yes, we agree with the framing of the issues outlined in the discussion document. We have been concerned about potential duplication of requirements by consenting winter grazing activities currently managed through implementation of audited Farm Environment Plans.

2. *What other information should we consider?*

We support the current recommendations for a permitted activity pathway where effects of intensive winter grazing are managed through a Certified Freshwater Farm Plan (FW-FP). However, it may be several years before the catchment context is developed and able to be integrated into a farm plan, which may preclude many farmers from this pathway in May 2022 and therefore still require resource consent.

Our Farm Environment Plans are based on Schedule 7 of the Canterbury Land and Water Regional Plan and require farmers to manage soils, nutrients, and critical source areas to minimise losses of contaminants into freshwater. We have seen these requirements have promoted the following type of on-farm actions to minimise the effects of winter grazing:

- (a) Development of annual winter grazing management plans, including appropriate paddock selection, risk identification, optimal grazing patterns, and extreme weather plans
- (b) Greater awareness and communication of environmental requirements in grazing contracts
- (c) Reduced periods of fallow, and promotion of cover crops
- (d) Implementation of catch crops to absorb nutrients following grazing

Our farmers need to continue to implement the above to comply with our own nutrient discharge consents, therefore the need to obtain a resource consent to winter graze and/or prepare a Certified Freshwater Farm Plan is only a financial and time cost, which is likely to result in conflicting actions and duplicating process without any further improvements to water quality.

We recommend the permitted activity pathway is expanded to refer to “Certified Freshwater Farm Plans or equivalent”

3. *Are there any other implementation issues with the current default conditions that have not been discussed above?*

No further recommendations on the proposed amendments.

Amendments to the default conditions

4. *Do you think these proposed changes are the right way to manage intensive winter grazing? If not, why not?*

Yes, we agree the proposed approach is appropriate for the management of intensive winter grazing. We were concerned about the prescriptive nature of the original winter grazing requirements, as many of the requirements would not address water quality issues in our catchment.

For instance, approximately 95% of properties within our command area are not located near a waterway. Controls on pugging may improve soil structure and reduce sediment run-off into surface water, however this mechanism to mobilise contaminants is not applicable to many of our shareholders. Our issues relate to losses of nitrogen leached into groundwater, which may be improved by pugging as the compacted, anaerobic land promotes denitrification and reduces nitrogen lost as nitrate into groundwater.

Furthermore, we have some arable properties who graze trading lambs on an annual crop during winter. Many of these properties currently require resource consent, however the low intensity grazing, flat land and lack of surface water presents a low risk to the environment from this activity. Having a permitted activity pathway available for these properties will be very beneficial, particularly if they are able to utilise existing audited farm plans instead of FW-FPs as the lower risk can be adequately addressed.

5. *Do you think these proposed changes would improve the workability of the permitted activity standards? If not, why not? (Please be specific about which provisions you are commenting on when you are responding.)*

Yes, we agree the proposed amendments will improve the workability of the permitted activity standards. Our only additional recommendation is to permit *equivalent* audited farm plans in the Permitted Activity Pathway 2, instead of just FW-FPs.

6. *Do you think these proposed changes would manage adverse environmental effects of intensive winter grazing effectively? If not, why not?*

Yes, workable provisions will better engage farmers who are implementing these guidelines. Our experience has shown that farmers want to do what is right and are more than willing to take actions necessary to improve water quality, provided the imposition to do so achieves the outcomes. Some of the original permitted activity requirements would impose significant inconveniences on the farming community without improving the environmental outcomes.

Implementation timeframes

7. Do you have any comments on implementation timeframes and whether a further deferral would be necessary?

Provided existing farms plans enable farmers to enter Permitted Activity Pathway 2, then we are comfortable with the proposed timeframes.

Summary

We support the proposed amendments as recommended by the Southland Working Group. We believe these changes will greatly increase the workability of the Intensive Winter Grazing provisions compared to the existing regulations.

Our only additional recommendation is to accept existing audited farm plans for entry into the Permitted Activity Pathway 2, where they achieve the same outcomes as expected by Certified Freshwater Farm Plans. Acceptance of existing farm planning programmes will significantly reduce duplication in process, conflicting requirements between existing programmes and new resource consents, while still achieving the outcomes sought by these regulations.

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