



**SUBMISSION**

**7 December 2015**

**TO**

**Gisborne District Council**

**ON**

**Draft Gisborne Regional  
Freshwater Plan**

**BY**

**Beef + Lamb New Zealand Ltd**

# Submission

## 1. Introduction

- 1.1 Beef + Lamb New Zealand Ltd (B+LNZ) welcomes the opportunity to make a submission on Greater Wellington regional Council's Proposed Natural Resources Plan
- 1.2 B+LNZ is an industry-good body funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand. Its mission is to deliver innovative tools and services to support informed decision making and continuous improvement in market access, product positioning and farming systems.
- 1.3 B+LNZ is actively engaged in environmental issues that affect the pastoral production sector.

## 2. General Submission

- 2.1 B+LNZ commends the Gisborne District Council for the approaches taken in the draft Plan and in particular the approach of managing water quality issues through the use of Farm Environment Plans.
- 2.2 B+LNZ supports the use of Farm Environment Plans and in support of this approach has developed a Land and Environment Plan Toolkit that assists farmers to prepare a tailor made plan for their property and farm system.
- 2.3 B+LNZ delivers workshops and other extension activities to assist farmers in the development of their own Land and Environment Plans.

Note: The standard planning format indicating additions or ~~deletions~~ is followed in this submission.

### Section 2: Definitions

#### 2.4 Best Management Practice **Oppose in part**

The definition of 'Best Management Practice' describes the actions that it is reasonable to expect all farmers to undertake, which in line with the Land and Water Forum's recommendations have been termed 'Good Management Practice'.

It is suggested that 'Best Management Practice' describes a greater standard or level of management, necessary where extra effort is required.

As part of the Matrix of Good Management (MGM) Project undertaken by Environment Canterbury, the major primary sector industry-good bodies agreed the 'Good Management Practices' (GMPs) that should be undertaken on all farms. Although part of the MGM Project, the GMPs were crafted to ensure that they were applicable for any farm in any region of New Zealand.

#### Relief sought

That '~~Best~~ Management Practice' be renamed 'Good Management Practice' and that all references in the draft Plan to Best Management Practices or BMP be amended accordingly.

#### 2.5 Breakfeeding **Oppose in part**

The definition includes 'subdividing by movable fences'. It is suggested that while moveable fences may be used, they may not always be used and that other forms of fencing or containment might be used. The critical factor is the intense concentration of livestock on a small area of feed.

### Relief Sought

A system of controlling the feeding of grazing animals by ~~subdividing paddocks with movable fences and~~ concentrating animals on a small area of feed for short periods of time,

## **2.6 Policy 4.1.1 Oppose in part**

This policy seeks to exclude the taking of water for stock drinking purposes where 'the taking or use is for intensively farmed stock...'.  
The definition of intensively farmed animals in the draft plan means that any cattle or deer on irrigated land, contained for break feeding, any dairy cows, no matter what the stocking rate or the or irrigation status thus including organic dairy farms, and pigs if there are more than 9 per hectare, are not to be provided with drinking water as a permitted activity.

The taking of reasonable amounts of water for stock drinking purposes is provided for under Section 14 (3)(b) of the Resource Management Act, and does not differentiate nor allow a difference to be made between extensively or intensively farmed animals.

It is therefore a permitted activity that is not at the discretion of a regional plan to remove.

Regional councils do however need to account for the taking of water for stock drinking purposes as part of catchment accounting requirements.

Relief sought

### Relief sought

Amend policy 4.1.1 by deleting the first part of (b) the taking or use is for intensively farmed stock or irrigation or irrigation..."

## **2.7 Policy 4.1.10 Oppose in part**

The prioritising of clause 'b.' above clause 'c' appears to be in conflict with not just animal health but animal welfare requirements, and the provisions of 14(3)(b) of the RMA.

### Relief sought

Clause (c) is swapped with clause (b).

## **2.8 Rule 4.1.4 Oppose in part**

See para 2.6 above.

### Relief sought

Amend rule 4.1.4 to read:

"The taking and use of surface water... of rates less than 5 litres/second ~~except where this is for intensively farmed stock.~~"

## **2.9 Rule 5.3.2 Oppose in part**

Clause (c) of the Permitted Activity Standard should be amended to align with the proposals put forward to the Minister for the Environment on a timetable for the exclusion of stock from water, by the Land and Water Forum in its Fourth report.

The LAWF report proposes stock exclusion from waterways for beef cattle and deer in plains by 2025, and 2030 for beef cattle and deer on lowland hills (rolling hills and downlands).

### Relief sought

That Permitted Activity Standard clause (c) is amended to align with the Land and Water Forum's Fourth report.

#### **2.10 Rule 5.3.5 Oppose in part**

This rule should be amended to align with the proposals put forward to the Minister for the Environment on a timetable for the exclusion of stock from water, by the Land and Water Forum in its Fourth report.

The LAWF report proposes stock exclusion from waterways for beef cattle and deer in plains by 2025, and 2030 for beef cattle and deer on lowland hills (rolling hills and downlands).

##### Relief sought

That the Permitted Activity Standards (a) and (b) are amended to align with the Land and Water Forum's Fourth report on the subject of stock exclusion.

#### **2.11 Rule 5.4.4 Oppose in part**

Provision should be included that allows material destined for an offal pit to be moved from one property where it may be inappropriate or not possible to locate an offal pit to meet the permitted activity standards, to one located on another property, where both properties are in the same ownership.

##### Relief Sought

Amend Permitted Activity Standard (c) to read: Only of dead animals or animal parts produced on the property or a property in the same ownership to that where the pit is located.

#### **2.12 Rule 5.4.6 Oppose in part**

Permitted Activity Standard (b) is too restrictive where a silage pit is correctly constructed and maintained with non-permeable liner and good management practice of any discharge. Increasing uncertainty associated with climate change will increase the need for stored feed in the future, and larger silage or feed storage, when constructed according to good management practice is no more a risk than smaller storage volumes.

##### Relief Sought

Permitted Activity Standard to read: (b) The volume of any silage pit or stockpile is less than ~~20m<sup>3</sup>~~ 100m<sup>3</sup> when constructed and managed in accordance with industry Good Management Practice.

Permitted Activity Standard to read: (d) The silage pit or stockpile... Coastal Marine area or 20metres for any silage pit or stockpile constructed and managed in accordance with industry Good Management Practice.

Permitted Activity Standard to read: (e) The base of the pity or stockpile shall be no less than 1 metre above the highest level of the water table, or 0.6 metres above the water table where the silage pit of stockpile is constructed and managed in accordance with industry Good Management Practice.

#### **2.13 Policy 6.2.1 Oppose in part**

The reference in this policy to Plant Pests should be amended to read Pest Plants to avoid any mis-interpretation. A plant pest may be construed as a pest of plants, rather than a plant that is a pest.

##### Relief Sought

Plants introduced....the waterbody. Pest plants ~~Plant pests~~ shall not be introduced... Lakes.

**2.14 Policy 6.2.3                      Oppose in part**

There are other pest plants that should also be prohibited from use, in addition to those in a Regional Pest Management Strategy, such as those that are Unwanted Organisms under the Biosecurity Act.

Relief Sought

Insert after Regional Pest Management Plan "or any Unwanted Organism under the Biosecurity Act".

**2.15 Rule 6.2.1                      Oppose in part**

As for Policy 6.2.3, reference should be made to all Unwanted Organisms under the Biosecurity Act.

Relief Sought

Permitted Activity Standard (a) .... Regional Pest Management Plan or any Unwanted Organism under the Biosecurity Act.

**2.16 Rule 6.2.2                      Oppose in part**

Plant pest references should be Pest Plants. See earlier.

Relief Sought

Permitted Activity Standard (a)i. The introduction or planting of any plant or part of any ~~plant~~ pest plant which is included...

Add: iii Any Unwanted Organism under the Biosecurity Act.

**2.17 Rules 6.3.2 and 6.3.3                      Oppose in part**

Relief Sought

Ensure that these rules and Permitted Activity Standards align with the LAWF Fourth Report recommendations relating to stock exclusion provisions and timing.

**2.18 Rule 7.1.3**

Sections 52 and 53 of the Biosecurity Act may also require that exotic vegetation is cleared.

Relief sought

Amend rule accordingly: a. The clearance is required under a Regional Pest Management Plan or section 52 or section 53 of the Biosecurity Act...

**2.19 Rule 7.2.3**

See earlier

Relief sought

Conditions/Standards/Terms: b. The clearance is required under a Regional Pest Management Plan or sections 52 or 53 of the Biosecurity Act.

## 3 Conclusion

B+LNZ thanks Gisborne District Council for the opportunity to comment on the proposed Natural Resources Plan.

B+LNZ would not gain an advantage in trade competition through this submission

B+LNZ wishes to be heard in support of this submission and is happy to discuss the issues raised in this submission, or join with other similar submitters.

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