

Proposed Waikato Regional Plan Change 1 –
Waikato and Waipā River Catchments Hearing

**Summary Statement Lindsay Fung on behalf of the
Waikato and Waipa Branches of the New Zealand
Deer Farmers' Association**

15 February 2019

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Introduction

1. My name is Lindsay Fung.
2. I am the Environmental Stewardship Manager for Deer Industry New Zealand (DINZ), a levy-funded industry-good organisation representing New Zealand deer farmers and venison processors

Scope of Summary Statement

3. This summary statement will cover:
 - The Waikato and Waipa Branches of the New Zealand Deer Farmers' Association (NZDFA-Waikato & Waipa) support for principles raised by Beef + Lamb New Zealand (B + LNZ) and Farmers 4 Positive Change (F4PC) – namely:
 - i. The use of Farm Environment Plans (FEPs) as the primary tool for farmers to identify and implement mitigation measures to reduce contaminant losses to water bodies.
 - ii. Coordinated sub-catchment activity that is more directly related to immediate water quality issues.
 - Deer industry initiatives in environmental stewardship and the opportunity for collaboration with Waikato Regional Council (with reference to regional plan implementation activities in Canterbury and Southland).
4. NZDFA-Waikato & Waipa will provide further evidence and farm case studies in later hearing sessions (block 2 or 3) which will also include reference to nitrogen “allocation” approaches (nitrogen reference point, land use capability) and how these might impact on the environmental issues of concern for the case study farms.

Farm Environment Plans

5. At the time of the submission the deer industry was developing an environmental management code of practice, designed to be compatible with a farm environment plan and aligned with the Beef + Lamb New Zealand (B+LNZ) Land and Environment Plan toolkit. The code of practice was developed with input from Waikato Regional Council and was officially launched in May 2018. ***Industry leaders (DINZ and NZDFA) have called for all farmers to have a farm environment plan that uses the code by 2020.***
6. NZDFA-Waikato & Waipa therefore fully support the adoption of Farm Environment Plans (FEPs) that identify high risk areas/activities on-farm and appropriate mitigation measures (good farming practices) to reduce the risk (of contaminants reaching water bodies).

7. However the content and the format of the FEP are crucial to achieving good environmental outcomes and in this respect NZDFA-Waikato & Waipa shares concerns with B+LNZ and F4PC regarding the FEP template that is proposed under PC1. The general concern is that the approach favours “input” control rather than an outcomes focus and that the PC1 requirements for nitrogen reference points and stock exclusion rules will limit many deer farms’ good farming practice options such that sub-optimal outcomes may result.
8. B+LNZ has already developed generic templates for sheep, beef and deer farm systems and these have also been modified to reflect specific regional council needs (i.e. Hawkes Bay, Canterbury, Gisborne, Waikato, Southland – in preparation). However more importantly the effectiveness of these templates is more about the process by which farmers assess the risks and prioritise actions than by any formulaic approach to filling in the sections of the FEP. The resulting FEP is therefore highly specific (if not unique) to each farm and if done correctly, is a living plan that is owned and understood by the farmer.
9. Implicit in the use of FEPs is specifying good farming practices. The Deer Industry Environmental Management Code of Practice (2018) provides examples of the industry’s view on good (deer) farming practices. Elsewhere in the country (Canterbury and Southland) DINZ and local branches of the NZDFA are working with regional councils and farm environment plan auditors to familiarise them with the code of practice, deer farming systems and deer behaviour with a view to better understanding of the issues and how best to manage these issues. In many cases these might run counter to blanket “input-based” rules (such as stock exclusion). We will show some examples of this for the case study farms in the block 2 hearing session.

Coordinated sub-catchment activity

10. NZDFA-Waikato & Waipa re-iterate support for the sub-catchment, community level, collaborative approach outlined by F4PC. This approach is increasingly being seen around the country both to tackle local areas where there are major environmental concerns or simply widespread community desire to better manage the environment.
11. There are parallel comparisons in other settings – deer industry Advance Parties (farmers coalesce around an issue and commit to individual actions), Tb pest control groups, wilding conifer control groups. Environment Canterbury also allows for Nutrient User Groups to form within catchments and essentially allows user group members to combine their nitrogen loss allowances.
12. It is noted that in the s42A report there is concern that sub-catchment groups will not align with whole of river targets or the PC1 Vision and Strategy. NZDFA- Waikato & Waipa disagree since the approach relies on partnership between the council and community group members. Council and community leaders should be able to inform groups of the current state of the Waikato and Waipa catchments as well as the localised state of the sub-catchment. Without this link between local action and the “end game” the exercise would have a limited life span and the FEP approach could be undermined (in the absence of any

commercial driver). Linking in with the catchment state and target would allow members to “think globally, act locally”.

Deer industry initiatives

13. In addition to the Code of Practice, the deer industry has produced additional environmental information through i) the industry – government partnership programme “Passion to Profit” (P2P) in the form fact sheets and, ii) fifteen videos developed by Landcare Trust on sustainable deer farming practices. A more detailed list of industry focus on environmental stewardship is provided in the foreword of the code of practice (hard copies provided).
14. The industry continues to support B+LNZ environment planning workshops and is also providing resources (funding, facilitators and consultants) for deer farmers to establish environment “practice change” groups across the country following the successful P2P Advance Party model that facilitates farmer-to-farmer support and critical review. There are now 10 such Deer Industry Environment Groups around the country since their launch in October 2018.
15. NZDFA- Waikato & Waipa would welcome opportunities to collaborate with the council to enable deer farmers to demonstrate good environmental stewardship as opposed to minimal compliance with regional plan requirements.
16. DINZ is assisting deer farmers across the country to demonstrate environmental stewardship and develop FEPs. However with limited funding it will need to prioritise efforts to where it is likely to achieve greatest support from regulators and therefore greatest impact.
17. NZDFA local branches are also working with supportive councils to implement plans – independent auditors for Environment Canterbury are provided with training visits to deer farms to view environmental issues and deer farming practices. In February this year auditors will undertake a mock audit of a deer farm and results will be discussed with local deer farmers. Similarly, Environment Southland is assisting NZDFA-Southland to run a FEP workshop for Aparima catchment deer farmers and partners closely with the industry’s Southland Environment Advance Party.
18. As small, voluntary-funded organisations NZDFA-Waikato & Waipa have limited resources but do have a long and extensive ‘corporate knowledge’ and awareness of deer farming within the region and will look to assist the council where it can in these matters. PC1 rules and policies and to a lesser extent the broader objectives can either stimulate or discourage any assistance and collaboration.
19. NZDFA- Waikato & Waipa thank the commissioners for hearing our concerns.