

## Hearing Statement – Matt Harcombe - B+LNZ

1. My name is Matt Harcombe. I am the Environment Programme Manager for B+LNZ. I am responsible for the oversight, coordination and integration of B+LNZ's environmental activities.
2. In addition to Mr Morrison, I have with me today, Corina Jordan, Turi McFarlane, Andrew Burt, Carly Sluys and Julia Beijeman.
3. To B+LNZ, success in this plan is when a farmer very clearly knows supports and connects with 'what the plan is trying to achieve and completely understands their role in achieving it. Success is when a farmer has real ownership of the plans outcomes and they buy into that outcome because it's the right thing to do, not because they have to. Success is when they are managing natural resources in a way that supports strong thriving communities in Southland. Success is when communities are working together to meet their collective needs and wants for the use of freshwater.
4. In the view of B+LNZ, despite our collective best intentions, our increasingly complicated regulatory approach to manage freshwater is divorcing farmers more and more from the why, not bringing them closer to it.
5. The recommendations made through our submission and throughout our evidence are predicated on linking farmers to the 'why' and ensuring that the plan provides certainty, clarity and outcomes. That, trust and empowerment to achieve real change are its principles, not thresholds, resource consents and audit trails.
6. You will hear first from Mr Andrew Burt and then Ms Carly Sluys. They have provided you with evidence to illustrate how the sheep and beef sector is the dominant farm land use in Southland, covering nearly 60 percent of Southland's land area. Just under nine percent of Southlanders are employed within the drystock sector. With all those people in jobs across Southland, more than \$380 million in wages is paid out by the sheep and beef sector each year.
7. In a nutshell, and despite a dramatic drop in sheep numbers, the sheep and beef sector is inextricably linked to the region's viability and economic success. The Southland Water and Land Plan must find the most efficient and effective way of engaging the sector in a collective vision for freshwater in Southland without undermining that importance to Southland, its people, its landscapes and its economy.

8. In our evidence, we have recommended changes to the proposed Plan that we think provide a more economically efficient way of protecting our land and water resources, and are more likely to engage farmers with the 'why'. These include our recommendations around the winter grazing threshold, stock exclusion, tile drains and farm management plans.
9. In respect to winter grazing our proposed alternatives aim to continue to encourage farmers and council to consider winter grazing as part of their whole farm system. Using a farm plan to identify suitable winter grazing sites, to think about ways to mitigate N and P loss through management actions, and to allow farmers the flexibility to make decisions that best suit their unique set of circumstances but to restrict councils' deeper examination of that activity, through resource consent, to a limited number of farmers.
10. The notified plan outlined an area threshold, while we acknowledge the proposed changes in the section 42a report, our submission suggested Council adopt an alternative threshold of 10 percent of a farm's effective area. Our evidence shows that in addition to retaining a minimum area, a 10 percent threshold, will better reflect the winter grazing profile of Southland and will more efficiently enable council to achieve the plans objectives. It is B+LNZ view that this will enable council to more accurately examine and support working with specialist operators.
11. With respect to stock exclusion, you only have to start with an overlay map of the network of Southland's waterways to understand the colossal challenge that farmers have in the region to enable them to exclude all cattle from water, all of the time. That does not however mean that this should not be a target to achieve where there are demonstrable effects of that activity on water. Our submission focusses on changes to the plan that we believe better allow farmers to make prioritised decisions, over time and acknowledges that environmental improvements that require significant investment in infrastructure on sheep and beef farms, are funded out of capital, not debt, and take time to achieve.
12. There are just under one and half thousand sheep and beef farming enterprises in Southland. Each of these unique enterprises represents at least one family, and each family member is intimately linked to the surrounding community. Many of these families are the second, third or fourth plus generation, and have strong ties to the land and the natural

resources that underpin their businesses. Each one of those farms has their own unique enterprise and their own set of challenges in the way they interact with the regions natural resources.

13. No two farms in Southland are the same, and the region's people are just as diverse as the land they farm. No two farm management decisions are based on the same information, or made for the same reasons. This diversity means that blanket rules, or duplicated resource consent conditions are unlikely to be the most efficient way of achieving the desired outcomes of the Plan. Blanket rules also help breakdown that farmer connection to the 'why'. They can lead to a 'I do it because I have to' mentality or "how do I shape my farm system to get around this consent."
14. Again both Mr Burt and Ms Sluys will share evidence that illustrates that Southland's sheep and beef farmers are exactly this. Diverse and in the way they manage and resilient to the ups and downs of markets because of flexibility in their farm systems. Its critical to their future that the plan is able to recognise this diversity and flexibility.
15. People are central to the success of this plan and any piece of legislation. We want people to be empowered by the Southland Water and Land Plan. We want farmers to take an ownership of issues, and we want to foster a farmer driven expectation to do better – always, not just now, not focus on how they can work their system around the requirement to get a resource consent but to focus on actions that make a difference. We know there is already a fundamental shift across Southland in farmers getting together, who are willing and able to do so. 18 separate catchment groups are testament to that.
16. Our evidence outlines how we cannot expect to achieve this farmer driven ownership through blanket or overly complicated rules. B+LNZ believes that the best on-ground outcomes are achieved through the development and adoption of farmer owned and driven Farm Environment Plans. We acknowledge that the plan provides for the development of these, and in some cases through a permitted activity rule, but the use of farm plans in regulation has to be treated with caution and the relative success of this approach relies heavily on information to empower the conversation with farmers, farmers really engaging in the process of farm planning and the identification and management of risk and a commitment to implementing those actions.

17. Mr. McFarlane's evidence outlines proposed changes to Appendix N that we believe will enhance the development and use of Farm Environment Plans in the region. His evidence includes proposed amendments that B+LNZ believe will add value to the process for farmers, which is critically important if the plan is to be successful in empowering the adoption of FEPs to add value, to connect to the challenges, not to be something that has to be completed and filed in the bottom draw.
18. Both Mr. MacFarlane and Ms. Sluys will provide you with evidence that demonstrates phosphorous, sediment and E. coli are the contaminants most commonly associated with sheep and beef farming.
19. Just as we believe in our farmers owning the environmental issues associated with their farming practices, we too believe in being very transparent about the issues most commonly associated with our sector through this hearing process. We ask that, as you consider all the information put in front of you, you remember we are here with integrity looking for ways we can collectively do better as a sector and most importantly support farmers to constantly improve the way they manage natural resources. We are not here to try and shift the blame or conversation away from sheep and beef farmers, we are here to work towards the adoption of a plan that creates a culture of trust and a collective vision for how we want to manage water in Southland.
20. Mr. McFarlane describes how critical source area management is the most efficient way to mitigate possible water degradation associated with this type of contaminant loss. Critical source areas lend themselves to be managed effectively through Farm Environment Plans. This is because through the farm planning process, farmers will:
  - a. Locate the critical source areas on their property;
  - b. Make that connection with the 'why'; and
  - c. Work out which mitigations are the most appropriate to their unique set of circumstances.
21. The Physiographic Zone approach is predicated on this same concept of making appropriate land use decisions underpinned by sound resource management principles. It has as an approach, immense opportunity to empower even stronger connections between land use and water. B+LNZ supports the information and science underpinning the development of the physiographic zones. Our submission sought the exclusion of the maps from the plan as it is using regional scale information differentiated by policies and rules that are then applied at a farm scale. B+LNZ considers that the plan must not use regional scale

maps to then apply rules that impact on farm scale flexibility in management. We acknowledge some of the recommendations made throughout the s42A report have gone some way to address B+LNZ's concerns. However, farmers overwhelmingly expressed concern throughout our consultation with them that they did not want to see their farming futures determined by lines on a map in a plan being applied at the wrong scale.

22. Through our work to help farmers prepare for the hearing, we challenged them to find win-win solutions for their farms and their communities values and objectives for freshwater management. We discussed that while passing blame might be easier, in fact we will all loose if we don't own our issues and develop our own unique ways to address these.
23. Its outstanding to see so many farmers have taken the time to share their unique farming story and management approach with you. We urge you to listen intently to what they have to say. After all, any enduring changes and their resulting success are largely in their hands. Connecting with people and getting them to do stuff as a result, is the single most important reason this plan exists. Ms Jordan has set out a number of recommendations in her evidence that aim to improve the plans ability to achieve that in the most efficient and effective way possible.
24. If we miss our opportunity to make that connection through this plan, we risk undermining the significant momentum and trust of a generation of farmers who are willing to adapt and crack on with on-farm actions that will make a difference to the future management of freshwater in Southland. Success for you, as decision makers, will be to develop a plan that farmers in Southland view not as compliance but an integral part of what they do.