

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions on the Proposed
Southland Water and Land Plan

BY **FEDERATED FARMERS OF NEW ZEALAND
INCORPORATED**

(SOUTHLAND PROVINCIAL DISTRICT)

Submitter

TO **ENVIRONMENT SOUTHLAND**

Local authority

**BRIEF OF EVIDENCE OF BERNADETTE ELLEN HUNT ON BEHALF OF FEDERATED
FARMERS OF NEW ZEALAND INCORPORATED (SOUTHLAND PROVINCIAL
DISTRICT)**

Dated: 25 September 2017

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1. I'd like to briefly delve a wee bit deeper into Farm Environmental Management Plans and Appendix N.
2. As highlighted by Darryl previously, Federated Farmers supports the concept of Farm Environmental Management Plans as a way to facilitate and encourage the implementation of good management practices which will improve water quality.
3. Federated Farmers does not however support Farm Environmental Compliance Management Plans – which, despite their name, is what we believe that these plans really are with Appendix N the way it stands.
4. I'd like to use the Health and Safety regulation, and resulting on farm plans/policies to highlight the difference. This (*professionally produced folder*) is a Health and Safety Plan focussed on compliance. This (*Hunt Agriculture plan*) is a Health and Safety Plan focussed on keeping people safe on our farm. Plans like the first one, cost anywhere from \$1000 - \$4000 to purchase, involve minimal input from the farmers, and often sit on a shelf unused, with little relevance or impact on farming practice. The second was entirely produced by myself with input from my husband and the staff on farm, using WorkSafe provided materials to assist when required. It remains a living breathing document which heavily influences farm practice. Both meet compliance requirements, only the second meets the intent of the regulation.
5. Federated Farmers believes that it is necessary to pare Appendix N right back to the essential elements which will focus farmers on improving water quality outcomes on their own farms. Anything in Appendix N which is not focussed on that purpose should not be a requirement.
6. The vast majority of farmers are motivated and committed to improving their farming practice to improve environmental outcomes. Given the opportunity, they will produce a Farm Environmental Management Plan which provides a road map to make continual improvement on their own farms. However if they're required to produce a Farm Environmental Compliance Management Plan instead, the good-will and the opportunity will be lost – just as it is by these costly Health & Safety missives.
7. Further, if farmers are to go to the effort of producing a Plan which identifies actions they will take to mitigate the negative effects of their normal farming practice, why should they also be required to obtain a resource consent to undertake the same practice. A Farm Environmental Management Plan should allow the resource consent process to be waived for normal farming activities such as winter grazing

and cultivation, provided it outlines appropriate good management practices which will mitigate the potential negative environmental effects.

8. To use the Health & Safety example again, the only compulsory elements are an emergency plan, a hazards register and an accident register. Other items, such as policy regarding children on farm or contractors on farm, are added if relevant to the specific operation.
9. Items such as detailed mapping of subsurface drainage, heritage sites, Overseer nutrient budget, riparian planting information, should be optional components of the plan to be included only if they are specifically selected as key focus areas to mitigate areas of concern on an individual farm.
10. For example on our farm: we are a mixed farming operation (including dairy support but not dairying) on a lignite-marine terrace physiographic zone and are very targeted in our use of fertilisers – informed heavily by soil testing, and with great care taken in application. Our biggest area of risk is sediment run-off. We already use minimum tillage practices for our cultivation whenever possible, and would love to purchase a direct drill and extend this practice. We have a plan in place to work towards that – but the timeframe will depend on how soon we can afford it.
11. Activities which remove us from our core business, such as modelling our nitrogen outputs using Overseer, will suck up significant time that could be used far more profitably, therefore delaying our ability to purchase that drill. On top of that, an accurate Overseer model is impossible for our farming operation so would be a pointless exercise, producing an inaccurate model, to measure nitrogen outputs which aren't an issue on our farm, and therefore giving us inaccurate information that we didn't need in the first place! If we did determine that monitoring our N impact was a high priority, purchasing equipment that would allow us to test the actual water quality leaving our farm may be a better option than Overseer modelling.
12. If you regulate that we must produce an Overseer budget (because we have a dairy support component in our operation), you force us into an Environmental Compliance regime instead of an Environmental Management regime ... a box ticking exercise which will reduce the improvements we could make to water quality outcomes.
13. Overseer nutrient budgets are just one example of a compulsory element of Appendix N. For some farmers this will be a worthwhile tool, so let them make that choice. For those of us who will not be able to make use of this, don't force us into it.

Let each farmer focus their efforts on the low-hanging fruit and biggest wins to maximise the benefits we can deliver rather than forcing us to tick the compliance boxes.

Appendix N: Part B – Farm Environmental Management Plan Content

14. So with that said, here is our overview for a revised Appendix N - Part B, bearing in mind that Appendix N should have a minimal list of compulsory requirements, plus suggestions for other optional inclusions.

15. Property details: address, owners, list of resource consents

16. Map of farm: Optional – to be included if useful as a planning tool for the farmer;
Could include:

- Boundaries and waterways
- Physiographic zones
- Soil types
- Planned cultivation areas
- Steep areas
- Fenced waterways
- Planted areas
- Critical source areas

17. Good management practices section for each relevant aspect of the farm operation for the next 12 months, for example:

- dairy farmers – Overseer budget, waterway fencing;
- beef farms – waterway exclusion if relevant for the farm;
- cultivation – mitigation of sediment run-off if adjacent to a CSA or waterway;
- winter grazing – sediment run-off, grazing management;
- nutrient management plan

- Inclusion of pre-determined compulsory elements for a specific farm practice (eg winter grazing) – these should allow any resource consent requirement to be waived for that farm practice.

18. Optional section for future plans, such as planting, fencing, infrastructure etc.

Thank you for your time and consideration.