



2 April 2024

Hon Andrew Hoggard
Associate Minister of the Environment
PARLIAMENT BUILDINGS

BY EMAIL: andrew.hoggard@parliament.govt.nz

Dear Minister

FRESHWATER FARM PLANS – CLARIFICATION OF POSITION

On 5 March 2024 Beef + Lamb New Zealand (B+LNZ) wrote to you and shared its thoughts on the role of farm plans in farm management practice, including regulating contaminant losses from farms. The letter was in response to B+LNZ's understanding that Government is considering the future of freshwater farm plans under part 9A Resource Management Act 1991 and Resource Management (Freshwater Farm Plans) Regulations 2023.

In our letter we shared our views on the principles we consider should guide and govern how farm planning is used, if at all, in regulation. To recap, B+LNZ sees that:

1. Farm plans are a useful tool and can play a powerful part in managing contaminant losses from farms.
2. However, for a farm plan framework to succeed there needs to be a risk-based approach to any regulatory requirements to prepare and execute farm plans.
3. Farmers have limited resources, which should be focused where they can make the most difference. Requiring all farms to prepare farm plans and have them certified and audited does not represent a thoughtful approach to the use of those resources. It runs the risk of turning a powerful tool into a box to tick.
4. Instead, there should be a careful assessment of risk to water based on a farm's physical resources, its catchment-context, and the farming activity.
5. Any regulation addressing farm planning should focus on high-level principles only. Regulation that is too prescriptive (as is in place now) is not as effective as farmer-led plan development that identifies and owns the solutions for problems.
6. It is inefficient and unnecessary to require both farm plans and resource consents to farm. Farm planning, where necessary, can provide the necessary structure for farmers to respond to water quality issues. Secondly, regional councils do not have the skills and expertise to review and meaningfully comment on the contents of a farm plan, so should not be expected to do so.
7. The role of industry assurance schemes should be properly recognised and provided for alongside, or as an alternative to, farm plans.

Since sending the letter of 5 March 2024, B+LNZ has reflected on the need to clarify on point in relation to the position in the Waikato Region in particular.

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In our letter, we advocate for the suspension of the implementation of the Freshwater Farm Plan Regulations in the Waikato (and Southland) while the regulations were reviewed. While B+LNZ stands by this position, it is important to note that our driving principle is that the need for certified and audited farm plans should be based on risk. In the context of the Waikato region, the Waikato and Waipā catchments have been identified as at a particular risk, and we support the use of farm plans, supported by the certification and audit requirements as found in the Regulations, as an appropriate way to manage the risks present within those catchments.

B+LNZ's call for the suspension of mandatory farm plans within the Waikato region is directed at those catchments beyond the PC1 area, where the need for compulsory farm plans for all farms (greater than 20 ha) has not been fully tested.

B+LNZ would be very happy to meet with you to discuss its position further, and we look forward to ongoing participation in processes to assist Government to reshape and refine freshwater policy in New Zealand.

Yours sincerely

A handwritten signature in blue ink, consisting of the letters 'KA' followed by a long horizontal stroke.

Kate Acland
Chair