A picture containing text, grass, plant

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# Executive summary

This document summarises the submissions received during the public consultation on [Stock exclusion regulations: Proposed changes to low slope map](https://environment.govt.nz/publications/stock-exclusion-regulations-proposed-changes-to-the-low-slope-map/). The consultation period ran from 26 July 2021 to 7 October 2021. A total of 92 submissions were received.

This report focuses on summarising submissions. It does not analyse feedback or make recommendations. Recommendations responding to submissions will be made through agency advice to the Minister for the Environment and the Minister of Agriculture.

**Background to the consultation process**

The Ministry for the Environment and the Ministry for Primary Industries (the Ministries) consulted on changes to proposed stock exclusion regulations. As part of the Resource Management (Stock Exclusion) Regulations 2020 (the regulations), the Ministries introduced a map identifying low slope land across New Zealand. This map designates the requirement to exclude the relevant livestock from wide rivers, lakes and natural wetlands.

**Synopsis of main themes**

This synopsis presents the main themes covered by submissions across all questions asked in the consultation. These themes are presented alphabetically and not by order of prevalence or importance.

**Discretion and exemptions**

Discretion and exemptions was a common theme around addressing any perceived errors in the map. Some submitters felt that where the map is inaccurate, the use of discretion should be permitted. Councils exercising discretion was most commonly suggested, along with certifier and farmer discretion, when managed under freshwater farm plans (FWFPs).

A process for applying for exemptions from the regulations was also a common theme. Most notably, submissions indicated that farming under Department of Conservation (DOC) grazing licenses is already regulated and therefore would undesirably be subject to multiple regulations.

**Inaccuracy of the low slope map**

A common theme among submissions was the perceived inaccuracy of the map. The parameters and methodology used to create the map were given as the reason for the inaccuracies. For example, submissions disagreed with the:

* altitude threshold used
* the use of slope as a proxy for stock intensity
* the averaging of the slope.

A common suggestion was the need to conduct ground-truthing to determine errors and correct them.

**Relationship between stock exclusion regulations and freshwater farm planning**

Some submissions indicated that the regulations and freshwater farm planning are not complementary ways of managing stock exclusion. Having two approaches is regarded as confusing due to increased complexity.

Submissions that proposed using FWFPs to manage stock exclusion prefer this approach as it negates the need to use an inaccurate map that is perceived as not fit for purpose. Additionally, FWFPs allow farm operators and certifiers some discretion and flexibility for managing stock exclusion.

Stock exclusion regulations were preferred over FWFPs because there was a perceived lack of clarity about how FWFPs will affect stock exclusion. FWFPs as a tool to manage stock exclusion were therefore considered not fit for purpose.

**The proposal needs to be more comprehensive**

Suggestions that the proposal needs to be more comprehensive were a common theme across responses. Submissions frequently said that the proposal needs to consider variables other than slope and altitude. Examples include farm practice, soil characteristics, climate and the characteristics of the river or water body. These variables are all considered to play a role in determining the practicality of managing stock exclusion.

**Key findings by consultation questions**

| **What we are consulting on — proposed changes to the low slope map for stock exclusion** |
| --- |
| **Q1. Do you agree with our framing of the issue? If not, why not?**  63% (n=43) agreed with the framing of the issue, while 37% (n=25) disagreed.  The main reason for agreement was:   * that the current map has inaccuracies (n=14).   The most common reasons for disagreement were:   * concern with/errors in the methodology used and areas focused on (n=12) * that the updated map contains errors/is not fit for purpose (n=11) * disagreeable costs/impacts of implementing/monitoring changes (n=10). |
| **Q2. What other information should we consider?**  Suggestions for other information to be considered included:   * broader consideration for implementation/impacts of proposal (n=21) * consideration for variables other than slope (n=17) * the possibility for exemptions (n=12). |

| **Assessment criteria** |
| --- |
| **Q3. Do you think our objectives and criteria focus on the right things? If not, what would you change and why?**  16 submissions agreed with the proposed objectives and criteria, 17 submissions commented on the proposed objectives and criteria, and 25 submissions suggested focusing on other objectives and criteria.  Other objectives and criteria in need of focus included:   * variables other than slope (n=9) * clarity needed around on-farm requirements/actions (n=5) * the impact of regulations on competitiveness and viability (n=5).   Comments on the proposed objectives and criteria included:   * various discussions on the practicality of the proposals (n=16) * the effectiveness of the proposals (n=4) * the extent to which the proposals give effect to Te Mana o te Wai (n=3). |

| **Proposed changes — introduction of a new map** |
| --- |
| **Q4. Do you think the changes to the low slope map will more accurately capture low slope land?**  19 submissions indicated that the proposed changes to the low slope map would more accurately capture low slope land. 19 submissions also said that the changes are an improvement but that the map is still not accurate. 35 submissions believed the map would not capture low slope land more accurately.  The main reason for thinking it would not more accurately capture low slope land was:   * methodological flaws in the creation of the map (n=21). |
| **Q5. Do you agree that the 500-metre altitude threshold should be added?**  57% (n=32) agreed that the 500-metre altitude threshold should be added, while 43% (n=24) disagreed.  The most common reasons for disagreement were:   * a preference for the altitude threshold to be increased (n=15) * general disagreement with the map and the areas captured by the map (n=10). |
| Q6. Do you agree that the regulations and freshwater farm plans are complementary ways to manage the need to exclude stock from waterways? If not, why not?  55% (n=37) agreed that the regulations and freshwater farm plans are complementary ways to manage the need to exclude stock from waterways, while 45% (n=30) disagreed.  The most common reasons for agreement were:   * preferring stock exclusion to be managed through FWFPs (n=7) * the flexible, contextually appropriate, risk-based management solutions that could come from using the two approaches (n=6).   The most common reasons for disagreement were:   * disagreement over the cost/practicality and effectiveness of regulations and FWFPs (n=11) * the two approaches introduce complexity/confusion/uncertainty (n=9). |
| Q7. If you own land captured by the map, does the proposed low slope map layer reflect what you would expect to be captured?  22% (n=13) agreed that the proposed low slope map layer reflected what they would expect to be captured, while 78% (n=46) disagreed.  The most common reasons for disagreement were:   * concerns over land being captured or left out inaccurately (n=29) * concerned with/errors in the methodology used (n=13). |

| **Initial regulatory impact analysis of the proposed options** |
| --- |
| Q8. Do you agree with our preferred approach? If not, why not?  35% (n=22) agreed with the preferred approach, while 65% (n=41) disagreed.  The most common reasons for disagreement were:   * perceived errors in the updated map (n=15) * the implementation of the proposal is impractical/ineffective (n=9). |
| Q9. What other information should we consider?  The most common other information that submitters thought should be considered was:   * variables other than slope (n=10) * a preference for stock exclusion to be managed differently (n=7). |
| Q10. What are the likely impacts and cost implications of the preferred approach (Option 2) compared with the status quo (Option 1)?  The most common impacts identified by submitters were:   * an increase in complexity/impracticality/lack of flexibility (n=7) * impacts on competitiveness/viability (n=7).   The most common cost implications identified by submitters were:   * increased costs for farm operators (n=9) * reduced costs for farm operators (n=6). |

| **Options we are not considering** |
| --- |
| Q11. Do you agree our proposed changes to the low slope map address the need for stock exclusion requirements to have some flexibility? If not, why not?  51% (n=25) agree that proposed changes to the low slope map address the need for stock exclusion requirements to have some flexibility, while 49% (n=24) disagreed.  The most common reason for agreement was:   * to use FWFPs to manage areas of uncertainty (n=5).   The most common reasons for disagreement were:   * discretion and exemptions are required from the council (n=12) * the proposal lacks flexibility for land that is between 0–5 degrees (n=7). |

| **Estimated costs and benefits for regulated parties** |
| --- |
| Q12. Do you agree with our estimation of the costs and benefits?  25% (n=12) agreed with the estimation of the costs and benefits, while 75%(n=36) disagreed.  The most common reasons for disagreement were:   * cost estimations are missing/inaccurate/underestimated (n=31) * significant environmental cost to benefit ratio analysis is required (n=7). |
| Q13. What other information should we consider?  The most common other information that submitters thought should be considered was:   * the need for accurate costing/funding (n=10) * disagreement over the accuracy/use of the map (n=5). |

| **Additional feedback** |
| --- |
| Q14. Any other feedback on the proposals?  The most common other feedback received was:   * an alternative approach to managing stock exclusion (n=7) * more meaningful consultation/support is needed (n=6) * clarity is sought around the regulations/implementation (n=6). |

# The consultation process and submissions

The discussion document was made available on the Ministry for the Environment's website. Submissions were received via Citizen Space (the Ministry for the Environment's online consultation hub), by email, or by post. A total of 92 submissions were received.

## Where did submissions come from?

44 submissions came from individual submitters, while 48 were on behalf of organisations. A list of the organisations that submitted is located in [appendix 2](#_Appendix_2:_Organisations). Of the 92 submissions received, 35 were received via email or post.

## Ministry for the Environment's online consultation hub

The consultation questions were developed by the Ministries and were included in the consultation document. The only mandatory questions in the online survey were those related to the submitters' details and the consent to release the submission. A section was included at the end of the consultation ('Additional information'), which allowed submitters to provide any other feedback they wished and attach supporting documentation.

The questions asked via the Ministry for the Environment's online consultation hub are listed in [appendix 1](#_Appendix_1:_Ministry).

## Written submissions received via email or post

35 written submissions were received via email or post. Some of these submissions indicated which consultation questions they were directly answering. These submissions were processed and analysed by question. Whenever submissions did not follow a set structure, they were analysed as per the consultation questions they aligned with.

## Data analysis methodology

Citizen Space was used to collect the submissions. The consultation questions formed the framework of analysis and reporting for all submissions.

## Statistical analysis

Submitters using the consultation hub could select their preferences for each of the quantitative questions. Written submissions that clearly stated their position in the framework of the quantitative questions have been included in the statistical analysis tables.

The analysis of the responses to closed-ended questions is presented as figures. Figure 1 provides an example of how statistical data is reported for questions where submitters were given a choice of answers.

Figure : Example of a statistical analysis table.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Farm or grower n = 38** | **Māori agribusiness owner/tangata whenua n = 4** | **Central government/local government n = 11** | **Primary sector/agri-support n = 13** | **Environmental group n = 6** | **General public n = 7** | **Other n = 7** | **Total n = 68** |
| Yes | 58% | 25% | 73% | 77% | 67% | 71% | 86% | 63% |
| 22 | 1 | 8 | 10 | 4 | 5 | 6 | 43 |
| No | 42% | 75% | 27% | 23% | 33% | 29% | 14% | 37% |
| 16 | 3 | 3 | 3 | 2 | 2 | 1 | 25 |

## Thematic analysis

PublicVoice undertook the analysis of responses to open-ended interface questions. All submissions received via Citizen Space and in written format underwent thematic analysis, which extracted themes from the text responses. The thematic analysis PublicVoice used is founded on Braun and Clarke’s methodology.[[1]](#footnote-2) A team of research analysts identified, analysed and interpreted patterns of meaning within the open-ended responses.

### Classification of themes

The results from the thematic analysis were organised into top-level themes. The most common themes have been listed below, along with a brief description.

**Concerned with/errors in methodology and areas focused on —** responses that indicated concerns or errors with the methodology used to create the low slope map or the methodology of developing the proposal in general.

**Consider variables other than slope —** where respondents indicated other variables that need to be considered when looking at stock exclusion.

**Impact of stock exclusion regulations on viability —** this top-level theme contains responses indicating that stock exclusion regulations will have a detrimental impact on the viability of farm operations.

**Alternative management of stock exclusion —** when respondents have pointed out other possible means of managing stock (other than the proposed low slope map).

**National regulation/map not fit for regional/farm variations —** when responses have indicated that regulation at a national level cannot be flexible enough to consider regional or farm variations.

**Cost estimates missing/inaccurate/underestimated —** this top-level theme captures comments that indicate that the discussion document has not accurately estimated the cost implications of implementing the required changes.

When comments could fit into more than one theme, they were placed into the themes, which they aligned with more strongly. Tables are included to show the frequency of each response to help illustrate their significance and levels of support. Table 1 provides such an example.

### Further classification

Submissions were then further categorised into sub-themes under each of these top-level categories.

Table : Example of thematic analysis table

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| Areas of disagreement | |  |  | 34 |
|  | Concerned with/errors in methodology used and areas focused on | | | 12 |
|  |  | Cannot use slope as proxy for stock intensity | | 5 |
|  |  | Disagree with slope angle/altitude threshold used | | 4 |
|  | Updated map contains errors/is not fit-for-purpose | | | 11 |
|  |  | (Council) discretion needed where map is inaccurate | | 3 |
|  | Disagreeable costs/impacts of implementing/monitoring changes | | | 10 |
|  | Lack of consultation in formulating options | | | 4 |
|  | National regulation/map not fit for regional/farm variations | | | 5 |
|  | Regulations are not stringent enough | | | 4 |
|  | Opposed to proposed regulation changes | | | 1 |
| Areas of agreement | |  |  | 30 |
|  | General agreement with framing of the issue | | | 25 |
|  | Agree that current map has inaccuracies | | | 14 |
| General comments | |  |  | 3 |
|  | Stock responsibility unclear when controller is not owner | | | 1 |
|  | Usefulness of map could extend to other issues | | | 1 |
|  | Concern with consultation | |  | 1 |

# Who we heard from

This section provides an overview of the submissions received.

## Overview of submissions

### Individuals/organisations

48% (n=44) of submissions came from individual submitters, while 52% (n=48) were on behalf of organisations (Figure 2). Table 2 shows the types of organisations. A list of the organisations which made submissions is located in [appendix 2](#_Appendix_2:_Organisations).

Figure : Are you submitting as an individual or on behalf of an organisation?

Table : Type of organisation

| Organisation type | Number of submissions |
| --- | --- |
| Business | 16 |
| Local government | 10 |
| Other | 8 |
| Industry body | 5 |
| NGO | 4 |
| Iwi/Hapū | 3 |
| Central government | 2 |

### Location of submitters

Table 3 shows the location of submitters.

Table : What region are you in?

| Location | Number of submissions |
| --- | --- |
| Northland | Te Tai Tokerau | 3 |
| Auckland | Tāmaki-makau-rau | 1 |
| Waikato | 7 |
| Bay of Plenty | Te Moana-a-Toi | 2 |
| Gisborne | Te Tai Rāwhiti | 2 |
| Hawke's Bay | Te Matau-a-Māui | 5 |
| Taranaki | 2 |
| Manawatū-Whanganui | 7 |
| Wellington | Te Whanganui-a-Tara | 13 |
| Tasman | Te Tai-o-Aorere | 0 |
| Nelson | Whakatū | 0 |
| Marlborough | Te Tauihu-o-te-waka | 3 |
| West Coast | Te Tai Poutini | 13 |
| Canterbury | Waitaha | 20 |
| Otago | Ōtākou | 6 |
| Southland | Murihiku | 6 |
| Outside of New Zealand | 1 |
| Unknown | 1 |

### Submitter's interest groups

Submissions were classified according to interest groups outlined in Citizen Space. Submitters using Citizen Space could select their interest group(s). Interest groups were allocated to the submissions not received through Citizen Space. The interest group(s) allocated was based on the content of the submission. If no interest group could be ascertained, the submitter was allocated to the category ‘other’. The breakdown of submissions by interest group is detailed in Table 4.

Table : Submitters interest groups

| Interest group | Number of submissions |
| --- | --- |
| Farm or grower | 52 |
| Primary sector/agri-support | 17 |
| Local government | 11 |
| General public | 10 |
| Environmental group | 8 |
| NGO | 7 |
| Tangata whenua | 4 |
| Central government | 3 |
| Catchment group | 3 |
| Maori agribusiness owner | 1 |
| Registered charity | 0 |

# What we heard

## Context for the proposed changes to the low slope map

Following the introduction of the stock exclusion regulations, stakeholders raised several concerns. Officials from the Ministries worked with key stakeholders to investigate the concerns raised about the current map.

### Q1. Do you agree with our framing of the issue? If not, why not?

Submitters were asked if they agreed with the framing of the issue. Figure 3 shows the level of agreement overall. Table 5 shows the level of agreement by interest group.

* 63% (n=43) agreed with the framing of the issue, while 37% (n=25) disagreed.

Figure : Q1. Do you agree with our framing of the issue? If not, why not?

Table : Q1. Do you agree with our framing of the issue? If not, why not? By interest group

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Farm or grower n = 38** | **Māori agribusiness owner/tangata whenua n = 4** | **Central government/local government n = 11** | **Primary sector/agri-support n = 13** | **Environmental group n = 6** | **General public n = 7** | **Other n = 7** | **Total n = 68** |
| Yes | 58% | 25% | 73% | 77% | 67% | 71% | 86% | 63% |
| 22 | 1 | 8 | 10 | 4 | 5 | 6 | 43 |
| No | 42% | 75% | 27% | 23% | 33% | 29% | 14% | 37% |
| 16 | 3 | 3 | 3 | 2 | 2 | 1 | 25 |

Table 6 provides a summary of the key themes identified.

The main reason for agreement was:

* that the current map has inaccuracies (n=14).

The most common reasons for disagreement were:

* concern with/errors in the methodology used and areas focused on (n=12)
* updated map contains errors/is not fit for purpose (n=11)
* disagreeable costs/impacts of implementing/monitoring changes (n=10).

Table : Q1. Do you agree with our framing of the issue? If not, why not?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| Areas of disagreement | |  |  | 34 |
|  | Concerned with/errors in methodology used and areas focused on | | | 12 |
|  |  | Cannot use slope as proxy for stock intensity | | 5 |
|  |  | Disagree with slope angle/altitude threshold used | | 4 |
|  | Updated map contains errors/is not fit-for-purpose | | | 11 |
|  |  | (Council) discretion needed where map is inaccurate | | 3 |
|  | Disagreeable costs/impacts of implementing/monitoring changes | | | 10 |
|  | Lack of consultation in formulating options | | | 4 |
|  | National regulation/map not fit for regional/farm variations | | | 5 |
|  | Regulations are not stringent enough | | | 4 |
|  | Opposed to proposed regulation changes | | | 1 |
| Areas of agreement | |  |  | 30 |
|  | General agreement with framing of the issue | | | 25 |
|  | Agree that current map has inaccuracies | | | 14 |
| General comments | |  |  | 3 |
|  | Stock responsibility unclear when controller is not owner | | | 1 |
|  | Usefulness of map could extend to other issues | | | 1 |
|  | Concern with consultation | |  | 1 |

|  |
| --- |
| **Areas of agreement**  “I agree that land was captured in the map which was not of low slope and that land with a slope of greater than 5 degrees is not going to benefit from being fenced.” |

|  |
| --- |
| **Areas of disagreement**  “The proposed changes move the concerns with low slope maps from one set of locations to other locations. The slope and altitude thresholds continue to be arbitrary.” |

### Q2. What other information should we consider?

Table 7 provides a summary of the key themes identified.

Suggestions for other information to be considered included:

* broader consideration for implementation/impacts of proposal (n=21)
* consideration for variables other than slope (n=17)
* the possibility for exemptions (n=12).

Table : Q2. What other information should we consider?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| Broader consideration for implementation/impacts of proposal | | | | 21 |
|  | Impact of stock exclusion regulations on viability | | | 13 |
| Consider variables other than slope | | |  | 17 |
| Suggested exemptions | |  |  | 12 |
|  | Land already managed by DOC | |  | 12 |
|  | Areas with grazing licenses | |  | 7 |
| Prefer alternative management of stock exclusion | | | | 12 |
| Errors in the updated map need consideration | | |  | 8 |
| National regulation/map not fit for regional/farm variations | | | | 5 |
| Regulations are not stringent/inclusive enough | | |  | 4 |
| Guidance/clarity on implementation of regulations | | |  | 1 |
| Meaningful consideration of public input | | |  | 1 |

|  |
| --- |
| **Suggested exemptions**  “An alternative to providing broader discretion for regional councils and the Freshwater Farm Planning process is to adjust the definition of the ‘low slope’ map boundaries. This could include the exclusion of certain river classes within the bounds of the ‘low slope’ map or the exclusion of certain types of land parcels.” |

|  |
| --- |
| **Consider variables other than slope**  “Each case needs to be taken on its merits, considering a variety of matters, including:  a. The frequency and intensity of stock grazing and access to the waterbody  b. The values associated with the waterbody and sensitivity of the receiving environment  c. The options for stock exclusion, and cost and practicality of using them. Any adverse effects of stock exclusion, including alternative to manage exotic plant pests in riparian margins.” |

## Assessment criteria

The Ministries used the following criteria to evaluate the options presented in the consultation document:

* effective
* practical
* gives effect to Te Mana o te Wai
* takes into account the Treaty of Waitangi (Te Tiriti o Waitangi).

### Q3. Do our objectives and criteria focus on the right things? If not, what would you change and why?

Feedback on the proposed objectives focusing on the right things resulted in 16 submissions agreeing with the objectives and criteria, 17 submissions commenting on the proposed objectives and criteria, and 25 submissions suggesting other objectives and criteria in need of focus. Table 8 provides a summary of the key themes identified.

Other objectives and criteria in need of focus included:

* consider variables other than slope (n=9)
* clarity needed around on-farm requirements/actions (n=5)
* consider the impact of regulations on competitiveness and viability (n=5)

Comments on the proposed objectives and criteria included:

* various discussions on the practicality of the proposals (n=16)
* the effectiveness of the proposals (n=4)
* the extent to which the proposals give effect to Te Mana o te Wai (n=3).

Table : Q3. Do our objectives and criteria focus on the right things? If not, what would you change and why?

| **Main theme** | **Sub theme(s)** | |  | **Frequency** |
| --- | --- | --- | --- | --- |
| Other objectives and criteria in need of focus | | | | 25 |
|  | Consider variables other than slope | | | 9 |
|  | Clarity needed around on-farm requirements/actions | | | 5 |
|  | Impact of regulations on competitiveness/viability | | | 5 |
|  | Focus on accuracy of map | | | 3 |
|  | Focus on the impact of changes to/from other legislation | | | 3 |
|  | Prefer stock exclusion to be managed through FWFPs | | | 3 |
| Comments on proposed objectives and criteria | | | | 17 |
|  | Practical |  |  | 16 |
|  |  | Flexible |  | 9 |
|  |  |  | Stock exclusion regulations/map are restrictive/not flexible | 4 |
|  |  |  | Focus on local decision making/consultation | 2 |
|  |  |  | (Council) discretion and exemptions needed | 2 |
|  |  |  | Opposed to focus on flexibility | 1 |
|  |  | Implementation of proposal is impractical/needs to be practical | | 7 |
|  |  | Wellbeing of farm operators has not been assessed | | 1 |
|  | Effective |  |  | 4 |
|  |  | Measurable outcomes required | | 4 |
|  | Gives effect to Te Mana o te Wai | | | 3 |
|  |  | Proposal does not meet Te Mana o te Wai criteria | | 3 |
|  | Takes into account Treaty of Waitangi (Te Tiriti o Waitangi) | | | 2 |
|  |  | Proposals will not meet Te Tiriti o Waitangi criteria | | 1 |
|  |  | Must include mana whenua input | | 1 |
| Yes, objectives and criteria focus on the right things | | | | 16 |

|  |
| --- |
| **Yes, objectives and criteria focus on the right things**  “We think the objectives and criteria do focus on the right things and provide a good summary of how farmers would like to work with regulators. We do think there is a disconnect between criteria #2 "Practical >> flexible - takes a risk based approach and tailors mitigations to the farm scale" and a reliance purely on the mapping tool developed. While we commend the work done to improve the applicability of the mapping tool it is still a generic nation-wide tool based on 1 or 2 main inputs and that simply does not provide flexibility or allow tailored mitigations in every situation. That can only be done by providing an avenue for more complex situations to be managed through the farm plan process.” |

|  |
| --- |
| **Other objectives and criteria in need of focus**  “When dealing with ecosystem management the criteria that policy must interact well with other relevant systems is vital. Excluding stock will have little impact without fertiliser controls, which will also have little impact if overgrazing and bare ground are allowed. Must be a holistic approach, and policy pieces must integrate to be workable, and more importantly, to achieve the outcome of healthy, thriving ecosystems across Aotearoa.” |

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| --- |
| **Comments on proposed objectives and criteria — practical**  “It's not a one size fits all situation. Farms need to be assessed individually rather than one set of criteria being applied to all. The farming conditions on the West Coast are entirely different to those in Central Otago for example.” |

## Proposed changes — introduction of a new map

**We propose a different mapping approach**

The Ministries consider that a different mapping approach should be taken to identify where beef cattle and deer need to be excluded from waterways.

Officials from the Ministries have developed a preferred option to amend the current map, which proposed to improve the application of the stock exclusion regulations to farming practices across New Zealand.

### Q4. Do you think the changes to the low slope map will more accurately capture low slope land?

19 submissions indicated that the proposed changes to the low slope map would more accurately capture low slope land. 19 submissions also said that the changes are an improvement but that the map is still not accurate. 35 submissions believed the map would not capture low slope land more accurately. Table 9 provides a summary of the key themes identified.

The main reason for believing it does not capture low slope land more accurately was:

* methodological flaws in the creation of the map (n=21).

Table : Q4. Do you think the changes to the low slope map will more accurately capture low slope land?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| No, changes do not accurately capture low slope land | | | | 35 |
|  | Methodological flaws | |  | 21 |
| Yes, changes more accurately capture low slope land | | | | 19 |
| Changes are an improvement, but still not accurate | | |  | 19 |
| General comments | |  |  | 13 |
|  | (Council) discretion and exemptions needed | | | 5 |
|  | Areas identified are impractical/expensive to fence | | | 5 |
|  | Concerns with consultation | |  | 2 |
|  | Environmental benefits questionable | | | 2 |
|  | Smaller/unique areas will be better dealt with through FWFPs | | | 2 |
|  | Guidance/clarity on implementation of regulations needed | | | 1 |

### Q5. Do you agree that the 500-metre altitude threshold should be added?

Submitters were asked if they agreed that the 500-metre altitude threshold should be added. Figure 4 shows the level of agreement overall. Table 10 shows the level of agreement by interest group.

* 57% (n=32) agreed that the 500-metre altitude threshold should be added, while 43% (n=24) disagreed.

Figure : Q5. Do you agree that the 500-metre altitude threshold should be added?

Table : Q5. Do you agree that the 500-metre altitude threshold should be added? By interest group

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Farm or grower n = 30** | **Māori agribusiness owner/tangata whenua n = 2** | **Central government/local government n = 8** | **Primary sector/agri-support n = 12** | **Environmental group n = 6** | **General public n = 6** | **Other n = 7** | **Total n = 56** |
| Yes | 63% | 0% | 63% | 58% | 33% | 33% | 57% | 57% |
| 19 | 0 | 5 | 7 | 2 | 2 | 4 | 32 |
| No | 37% | 100% | 38% | 42% | 67% | 67% | 43% | 43% |
| 11 | 2 | 3 | 5 | 4 | 4 | 3 | 24 |

Table 11 provides a summary of the key themes identified.

The most common reasons for disagreement were:

* a preference for the altitude threshold to be increased (n=15)
* general disagreement with the map and the areas captured by the map (n=10).

Table : Q5. Do you agree that the 500-metre altitude threshold should be added?

| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| --- | --- | --- | --- | --- |
| Disagree with 500m altitude threshold | | |  | 28 |
|  | Increase threshold | |  | 15 |
|  | General disagreement with map and areas captured | | | 10 |
|  | (Council) discretion and exemptions needed | | | 2 |
|  | Decrease threshold | |  | 2 |
| Agree with the 500m altitude threshold | | |  | 17 |
|  | Agree, but stock pressure exists above 500m | | | 4 |
|  | Minimal stock pressure over 500m | |  | 3 |
|  | Agree, but exclude high-country/Chatham Islands | | | 1 |

### Q6. Do you agree that the regulations and freshwater farm plans are complementary ways to manage the need to exclude stock from waterways? If not, why not?

Submitters were asked if they agreed that the regulations and freshwater farm plans are complementary ways to manage the need to exclude stock from waterways. Figure 5 shows the level of agreement overall. Table 12 shows the level of agreement by interest group.

* 55% (n=37) agreed that the regulations and freshwater farm plans are complementary ways to manage the need to exclude stock from waterways, while 45% (n=30) disagreed.

Figure : Q6. Do you agree that the regulations and freshwater farm plans are complementary ways to manage the need to exclude stock from waterways? If not, why not?

Table : Q6. Do you agree that the regulations and freshwater farm plans are complementary ways to manage the need to exclude stock from waterways? If not, why not? By interest group

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Farm or grower n = 34** | **Māori agribusiness owner/tangata whenua n = 2** | **Central government/local government n = 12** | **Primary sector/agri-support n = 13** | **Environmental group n = 6** | **General public n = 7** | **Other n = 10** | **Total n = 67** |
| Yes | 44% | 50% | 83% | 85% | 83% | 57% | 60% | 55% |
| 15 | 1 | 10 | 11 | 5 | 4 | 6 | 37 |
| No | 56% | 50% | 17% | 15% | 17% | 43% | 40% | 45% |
| 19 | 1 | 2 | 2 | 1 | 3 | 4 | 30 |

Table 13 provides a summary of the key themes identified.

The most common reasons for agreement were:

* preferring stock exclusion to be managed through FWFPs (n=7)
* the flexibility, contextually appropriate, risk-based management solutions that could come from using the two approaches (n=6).

The most common reasons for disagreement were:

* disagreement over the cost/practicality and effectiveness of regulations and FWFPs (n=11)
* the two approaches introduce complexity/confusion/uncertainty (n=9).

Table : Q6 Do you agree that the regulations and freshwater farm plans are complementary ways to manage the need to exclude stock from waterways? If not, why not?

| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| --- | --- | --- | --- | --- |
| Disagree with regulations being complementary | | |  | 33 |
|  | Disagree with cost/practicality and effectiveness | | | 11 |
|  | Two approaches introduces complexity/confusion/uncertainty | | | 9 |
|  | Prefer alternative management of stock exclusion | | | 7 |
|  | National regulation/map not fit for regional/farm variations | | | 6 |
|  | Errors in map and thresholds disagreeable | | | 4 |
|  | More consultation required | |  | 3 |
| Agree that both are complementary to manage stock exclusion | | | | 27 |
|  | Prefer stock exclusion to be managed through FWFPs | | | 7 |
|  | Allows for flexible/contextual/risk-based approaches | | | 6 |
| General comments | |  |  | 3 |
|  | Concerns regarding labour shortages for implementing changes | | | 1 |
|  | FWFPs needs to be made publicly available | | | 1 |
|  | More information is needed | |  | 1 |

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| **Disagree with regulations being complementary**  “Determining changes ahead of the Freshwater Farm Plan Regulations are notified creates a reliance on plans having rules to protect waterbodies from stock, both because of the reduction in protection that may eventuate under proposed-to-be changed Stock Exclusion Regulations and the fact that FW-FP have yet to be developed as the Freshwater Farm Plan Regulation is under consultation currently. This is problematic and creates a regulatory gap.” |

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| **Agree that both are complementary to manage stock exclusion**  “Yes they're a good complementary option. In areas that aren't low slope a regional, contextual decision makes sense. The only concern I have is the cost of freshwater farm plans. For farm environmental plans, some regulators charge almost as much as the cost of fencing. If the cost is the same for freshwater plans, that effectively doubles the cost of compliance.” |

### Q7. If you own land captured by the map, does the proposed low slope map layer reflect what you would expect to be captured?

Submitters were asked if the proposed low slope map layer reflects what they would expect to be captured. Figure 6 shows the level of agreement overall. Table 14 shows the level of agreement by interest group.

* 22% (n=13) agreed that the proposed low slope map layer reflected what they would expect to be captured, while 78% (n=46) disagreed.

Figure : Q7. If you own land captured by the map, does the proposed low slope map layer reflect what you would expect to be captured?

Table : Q7. If you own land captured by the map, does the proposed low slope map layer reflect what you would expect to be captured? By interest group

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Farm or grower n = 41** | **Māori agribusiness owner/tangata whenua n = 2** | **Central government/local government n = 6** | **Primary sector/agri-support n = 10** | **Environmental group n = 4** | **General public n = 5** | **Other n = 5** | **Total n = 59** |
| Yes | 17% | 50% | 50% | 10% | 0% | 40% | 20% | 22% |
| 7 | 1 | 3 | 1 | 0 | 2 | 1 | 13 |
| No | 83% | 50% | 50% | 90% | 100% | 60% | 80% | 78% |
| 34 | 1 | 3 | 9 | 4 | 3 | 4 | 46 |

Table 15 provides a summary of the key themes identified.

The most common reasons for disagreement were:

* concerns over land being captured/left out inaccurately (n=29)
* concerns with/errors in the methodology used (n=13).

Table : Q7. If you own land captured by the map, does the proposed low slope map layer reflect what you would expect to be captured?

| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| --- | --- | --- | --- | --- |
| No, it does not capture what I would expect | | |  | 45 |
|  | Land captured/left out inaccurately | |  | 29 |
|  |  | Concerns with practicality/cost associated with captured land | | 7 |
|  |  | Captures areas managed by DOC/low intensity areas | | 4 |
|  | Concerned with/errors in methodology used | | | 13 |
| Yes, it does capture what I would expect | | |  | 10 |
| General comments | |  |  | 9 |
|  | Concern with consultation | |  | 3 |
|  | Flexibility is needed by catchment/farm | | | 2 |
|  | Process to challenge incorrectly identified land needed | | | 2 |
|  | Prefer stock exclusion to be managed through FWFPs | | | 2 |

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| **Yes, it does capture what I would expect**  “The updated mapping approach provides maps which seem more realistic.” |

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| **Yes, it does capture what I would expect**  “Floodplain alongside the river was captured, makes perfect sense. Creek in a steep sided gully was excluded when it had previously been included, also makes sense.” |

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| **No, it does not capture what I would expect**  “We have looked up our farm which is what we would class as rolling to steep and large chunks of it are classified as 0–5 degree, and smaller chunks 5–10. We believe the map is still wrong.” |

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| **No, it does not capture what I would expect**  “While it is an improvement on the previous low slope map which was extremely inaccurate, this should be left to a more localised approach. It doesn’t make sense to cover the top end of a valley when the bottom end of a valley is not covered on the map. Greater definition/reality is required around realistically what a water way is.” |

## Initial regulatory impact analysis of the proposed options

Two options were proposed through the consultation, of which the second was the preferred option of the Ministries:

* Option 1: Status quo — retain the current map
* Option 2: Proposed changes to low slope map adopted

### Q8. Do you agree with our preferred approach? If not, why not?

Submitters were asked if they agreed with our preferred approach. Figure 7 shows the level of agreement overall. Table 16 shows the level of agreement by interest group.

* 35% (n=22) agreed with the preferred approach, while 65% (n=41) disagreed.

Figure : Q8. Do you agree with our preferred approach? If not, why not?

Table : Q8. Do you agree with our preferred approach? If not, why not? By interest group

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Farm or grower n = 34** | **Māori agribusiness owner/tangata whenua n = 2** | **Central government/local government n = 8** | **Primary sector/agri-support n = 14** | **Environmental group n = 4** | **General public n = 7** | **Other n = 10** | **Total n = 63** |
| Yes | 32% | 0% | 50% | 29% | 50% | 57% | 20% | 35% |
| 11 | 0 | 4 | 4 | 2 | 4 | 2 | 22 |
| No | 68% | 100% | 50% | 71% | 50% | 43% | 80% | 65% |
| 23 | 2 | 4 | 10 | 2 | 3 | 8 | 41 |

Table 17 provides a summary of the key themes identified.

The most common reasons for disagreement were:

* perceived errors in the updated map (n=15)
* the implementation of the proposal is impractical/ineffective (n=9).

Table : Q8. Do you agree with our preferred approach? If not, why not?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| Disagree with preferred approach | | |  | 39 |
|  | Errors in updated map | |  | 15 |
|  | Implementation of proposal is impractical/ineffective | | | 9 |
|  | National regulation/map not fit for regional/farm variations | | | 8 |
|  | (Council) discretion needed where map is inaccurate | | | 6 |
|  | Prefer alternative management of stock exclusion | | | 6 |
|  | Lack of concern for the competitiveness/viability of farms | | | 5 |
|  | Consider variables other than slope | | | 4 |
| Support preferred approach | |  |  | 17 |
| General comments | |  |  | 2 |
|  | Clarity required on implementing proposal | | | 2 |

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| **Disagree with preferred approach**  “The proposed low slope map accordingly still has major financial and practical management implications for pastoral leases, but without any compelling evidence of likely material environmental gains.” |

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| **Support preferred approach**  “It's more workable, economically feasible, and seems like it'll provide the best outcomes for freshwater which is the ultimate goal. There is no downside to using the best information available.” |

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| **Support preferred approach**  “There is agreement with the preferred option. The previous map captured large areas of Southland that did not require inclusion, such as high country pastoral use land.” |

### Q9. What other information should we consider?

Table 18 provides a summary of the key themes identified. The most common other information that submitters thought should be considered is:

* variables other than slope (n=10)
* a preference for stock exclusion to be managed differently (n=7).

Table : Q9. What other information should we consider?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| Other information to consider | |  |  | 37 |
|  | Consider variables other than slope | | | 10 |
|  | Prefer alternative management of stock exclusion | | | 7 |
|  | Errors in updated map need consideration | | | 7 |
|  | Practicality/cost of fencing and of excluding livestock | | | 5 |
|  | Analysis of potential social/environmental gains/impacts | | | 6 |
|  | Clarity required on the impact of maps/regulations | | | 5 |
|  | The need for engagement and participation | | | 4 |
|  | (Council) discretion and exemptions needed | | | 4 |

|  |
| --- |
| **Consider variables other than slope**  “Current water quality. Potable/swimmable/natural or farm activity related. Size of catchment and number of farms in the catchment. Recreational use if any. Nature of terrain/soil type/surface covering (gravel is not damageable).The low slope map does not accurately identify areas that have a potential to intensify. The old Catchment board maps did, why are these not used?” |

|  |
| --- |
| **Consider variables other than slope**  “We would recommend, as well as age of data, considering river type such as braided streams and meandering channels, as well as other features including geology and soil type. Our concern is that in some locations the practicalities of fencing may be compromised and lead to costly fencing with subsequent replacement fencing due to infrastructure loss via natural processes.” |

|  |
| --- |
| **Analysis of potential social/environmental gains/impacts**  “The social impact on farming communities” |

### Q10. What are the likely impacts and cost implications of the preferred approach (Option 2) compared with the status quo (Option 1)?

Table 19 provides a summary of the key themes identified.

The most common impacts identified by submitters were:

* an increase in complexity/impracticality/lack of flexibility (n=7)
* impacts on competitiveness/viability (n=7).

The most common cost implications identified by submitters were:

* increased costs for farm operators (n=9)
* reduced costs for farm operators (n=6).

Table : Q10. What are the likely impacts and cost implications of the preferred approach (Option 2) compared with the status quo (Option 1)?

| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| --- | --- | --- | --- | --- |
| Cost implications of the preferred approach | | |  | 17 |
|  | Preferred option will increase costs for farm operators | | | 9 |
|  | Preferred option will reduce costs for farm operators | | | 6 |
|  | Economic cost to environmental benefit ratio acceptable | | | 2 |
|  | Minimal cost difference | |  | 1 |
| General comments | |  |  | 17 |
|  | More research and clarity needed | |  | 7 |
|  | Both options are inaccurate/impractical/costly | | | 6 |
|  | Prefer alternative management of stock exclusion | | | 2 |
|  | Support preferred option with council discretion | | | 2 |
|  | Remove exclusions | |  | 1 |
| Impacts of the preferred approach | | |  | 16 |
|  | Increased complexity/impracticality/lack of flexibility | | | 7 |
|  | Impact of changes on competitiveness/viability | | | 7 |
|  | Increased clarity/flexibility/practicality | | | 4 |

|  |
| --- |
| **Cost implications of the preferred approach**  “With fencing costs at least 40% greater than on mainland New Zealand, a lack of available labour, and low farm incomes, the cost implications for Chatham Islands farmers are significant. Option 2, where land on the Islands is identified on the low slope map, would mean financial hardship for farmers with little additional environmental benefit above what would be achieved by managing stock exclusion through the freshwater farm plan process.” |

## Options we are not considering

The Ministries are not recommending any exemptions from the proposed map for stock exclusion regulations. The proposed changes to the map aim to find an appropriate balance between national consistency and the discretion to more flexibly determine local on-farm solutions through the freshwater farm plan system.

### Q11. Do you agree our proposed changes to the low slope map address the need for stock exclusion requirements to have some flexibility? If not, why not?

Submitters were asked if they agree the proposed changes to the low slope map address the need for stock exclusion requirements to have some flexibility. Figure 8 shows the level of agreement overall. Table 20 shows the level of agreement by interest group.

* 51% (n=25) agree that proposed changes to the low slope map address the need for stock exclusion requirements to have some flexibility, while 49% (n=24) disagreed.

Figure : Q11. Do you agree our proposed changes to the low slope map address the need for stock exclusion requirements to have some flexibility? If not, why not?

Table : Q11. Do you agree our proposed changes to the low slope map address the need for stock exclusion requirements to have some flexibility? If not, why not? By interest group

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Farm or grower n = 29** | **Māori agribusiness owner/tangata whenua n = 1** | **Central government/local government n = 7** | **Primary sector/agri-support n = 8** | **Environmental group n = 4** | **General public n = 5** | **Other n = 5** | **Total n = 49** |
| Yes | 52% | 100% | 57% | 25% | 25% | 80% | 60% | 51% |
| 15 | 1 | 4 | 2 | 1 | 4 | 3 | 25 |
| No | 48% | 0% | 43% | 75% | 75% | 20% | 40% | 49% |
| 14 | 0 | 3 | 6 | 3 | 1 | 2 | 24 |

Table 21 provides a summary of the key themes identified.

The most common reason for agreement was:

* to use FWFPs to manage areas of uncertainty (n=5).

The most common reasons for disagreement were:

* discretion and exemptions are required from the council (n=12)
* the proposal lacks flexibility for land that is between 0–5 degrees (n=7).

Table : Q11. Do you agree our proposed changes to the low slope map address the need for stock exclusion requirements to have some flexibility? If not, why not?

| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| --- | --- | --- | --- | --- |
| No, proposed changes do not allow for flexibility | | |  | 24 |
|  | (Council) discretion and exemptions needed | | | 12 |
|  | No flexibility for slope land that is 0-5 degrees | | | 7 |
|  | Map is inaccurate/not fit for purpose | | | 5 |
|  | Further flexibility is needed from the proposed options | | | 3 |
| General comments | |  |  | 14 |
|  | Prefer alternative management of stock exclusion | | | 6 |
|  | More information/refinement of mapped areas needed | | | 5 |
|  | General opposition to proposal | |  | 3 |
|  | Difficulty of enforcement for council | |  | 1 |
| Yes, proposed changes allow for flexibility | | |  | 12 |
|  | Use FWFPs to manage areas of uncertainty | | | 5 |

|  |
| --- |
| **Yes, proposed changes allow for flexibility**  “Yes. It is viewed that the discretion retained via this approach to stock exclusion requirements balances the national consistency with local on-farm solutions.” |

|  |
| --- |
| **No, proposed changes do not allow for flexibility**  “As outlined through other responses there is limited flexibility with the structure of the current requirements to have any flexibility in the 0–5 degree threshold. We accept that there is flexibility through the FW-FP process for land above 5 degrees and 500m asl. However the details around the FW-FP are still open for consultation and significant work is required to better understand how they will be implemented and structured for sound on-farm and catchment outcomes. We are supportive of a similar approach being taken for all land in relation to ephemeral waterways. Further this will help better establish sensible buffer margins, rather than a one sized fits all approach. There is a potential we sell ourselves short if a more substantial margin is required in some parts of the waterway, due to topography, slope, land use and localised context.” |

## Estimated costs and benefits for regulated parties

The Ministries have drafted the estimated costs and benefits for a range of regulated parties. However, some limitations of the cost and benefit analysis were identified.

### Q12. Do you agree with our estimation of the costs and benefits?

Submitters were asked if they agreed with our estimation of the costs and benefits. Figure 9 shows the level of agreement overall. Table 22 shows the level of agreement by interest group.

* 25% (n=12) agreed with the estimation of the costs and benefits, while 75%(n=36) disagreed.

Figure : Q12. Do you agree with our estimation of the costs and benefits?

Table : Q12. Do you agree with our estimation of the costs and benefits? By interest group

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Farm or grower n = 28** | **Māori agribusiness owner/tangata whenua n = 2** | **Central government/local government n = 6** | **Primary sector/agri-support n = 8** | **Environmental group n = 3** | **General public n = 6** | **Other n = 6** | **Total n = 48** |
| Yes | 21% | 0% | 50% | 13% | 33% | 50% | 17% | 25% |
| 6 | 0 | 3 | 1 | 1 | 3 | 1 | 12 |
| No | 79% | 100% | 50% | 88% | 67% | 50% | 83% | 75% |
| 22 | 2 | 3 | 7 | 2 | 3 | 5 | 36 |

Table 23 provides a summary of the key themes identified.

The most common reasons for disagreement were:

* cost estimations are missing/inaccurate/underestimated (n=31)
* significant environmental cost to benefit ratio analysis is required (n=7).

Table : Q12. Do you agree with our estimation of the costs and benefits?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| Opposed to estimated costs and benefits | | |  | 33 |
|  | Cost estimations missing/inaccurate/underestimated | | | 31 |
|  |  | Cost of fencing and maintenance | | 7 |
|  |  | Costs will impact the viability of farming operations | | 5 |
|  | No significant environmental cost to benefits ratio analysis | | | 7 |
|  | Costs remain the same as previous map | | | 1 |
| Approve estimated costs and benefits | | |  | 5 |

### Q13. What other information should we consider?

Table 24 provides a summary of the key themes identified.

The most common other information that submitters thought should be considered is:

* the need for accurate costing/funding (n=10)
* disagreement over the accuracy/use of the map (n=5).

Table : Q13. What other information should we consider?

| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| --- | --- | --- | --- | --- |
| Other information to consider | |  |  | 26 |
|  | Accurate costing/funding is needed | | | 10 |
|  | Disagree with accuracy/use of map | |  | 5 |
|  | Negative environmental impacts resulting from regulation | | | 3 |
|  | (Council) discretion and exemptions needed | | | 2 |
|  | Timing and alignment of all regulations roll-out | | | 2 |
|  | Working with/understanding farmers' needs | | | 2 |
|  | Guidance documentation required | |  | 2 |
|  | Review analysis of Te Mana o te Wai | |  | 1 |
|  | Impracticality of implementing proposal | | | 1 |
|  | Sufficiency of current legislation | |  | 1 |
|  | The impact of decisions on privately owned land | | | 1 |
|  | A reporting procedure for breaches | |  | 1 |
|  | Independent auditing of fencing | |  | 1 |
|  | The uncertainty and flexibility of FWFPs needs to be considered | | | 1 |

|  |
| --- |
| **Accurate costing/funding is needed**  “Subsidizing fencing for landowners based on a proportionate measure of waterway/wetland within their property and fencing already undertaken.” |

## Additional feedback

### Q 14. Any other feedback on the proposals?

Table 25 provides a summary of the key themes identified.

The most common other feedback received is:

* an alternative approach to managing stock exclusion (n=7)
* more meaningful consultation/support is needed (n=6)
* clarity is sought around the regulations/implementation (n=6).

Table : Q14. Any other feedback on the proposals

| **Main theme** | **Sub theme(s)** |  |  | **Frequency** |
| --- | --- | --- | --- | --- |
| Prefer alternative management of stock exclusion | | |  | 7 |
| More meaningful consultation/support needed | | |  | 6 |
| Clarity sought around regulations/implementation | | | | 6 |
| Map accuracy needs improving | | |  | 5 |
| General support for changes | |  |  | 5 |
| Disagree with removal of depleted grasslands and tall tussock | | | | 2 |
| Ensure environmental outcomes | | |  | 2 |
| (Council) discretion and exemptions needed | | |  | 2 |
| Consider variables other than slope | | |  | 2 |
| Necessity of using independent auditors in assessment | | | | 1 |
| Cost to farmers is considerable | | |  | 1 |

|  |
| --- |
| **Prefer alternative management of stock exclusion**  “This use of a low slope map does not take into account stocking rates, nor stock management, nor does it deal with the practicalities of excluding stock in particular areas – all of which we feel are better dealt with on a farm specific basis through a farm environment plan.” |

|  |
| --- |
| **Clarity sought around regulations/implementation**  “Clarification around fines and who they are aimed at – the operator or the land owner and therefore the interplay between the two. The solution needs to ensure that landowners have agreements and contracts on low slope and winter grazing methods and therefore when that contract is broken, that is where the fine is directed.” |

# Appendix 1: Consultation questions

##### **Your details**

1. What is your name? (Required)

2. What is your email address? (Required)

3. Which region are you in? (Required)

4. Are you submitting as an individual or on behalf of an organisation? (Required)

5. Which group(s) best describes your interest: (pick any) (Required)

6. Name of organisation (Required)

7. Type of organisation (Required)

##### **Section 1: What we are consulting on – proposed changes to the low slope map for stock exclusion**

Q1 Do you agree with our framing of the issue. If not, why not?

Q2 What other information should we consider?

##### **Section 2: Assessment criteria**

Q3 Do our objectives and criteria focus on the right things? If not, what would you change and why?

##### **Section 3: Proposed changes – introduction of a new map**

Q4 Do you think the changes to the low slope map will more accurately capture low slope land?

Q5 Do you agree that the 500-metre altitude threshold should be added?

Q6 Do you agree that the regulations and freshwater farm plans are complementary ways to manage the need to exclude stock from waterways? If not, why not?

Q7 If you own land captured by the map, does the proposed low slope map layer reflect what you would expect to be captured?

##### **Section 4: Initial regulatory impact analysis of the proposed options**

Q9 What other information should we consider?

Q10 What are the likely impacts and cost implications of the preferred approach (Option 2) compared with the status quo (Option 1)?

##### **Section 5: Options we are not considering**

Q11 Do you agree our proposed changes to the low slope map address the need for stock exclusion requirements to have some flexibility? If not, why not?

Q12 Do you agree with our estimation of the costs and benefits?

Q13 What other information should we consider?

##### **Additional information**

Any other feedback on the proposals?

Upload supporting documentation

##### **Consent to release your submission**

Do you consent to your submission being published on this website? (Required)

If yes to the above, clearly state if there are parts of your submission that you do not want published.

# Appendix 2: Organisations that submitted

* 161 Otuiti Trust
* Amuri Irrigation Ltd
* ANZCO Foods
* Ara Poutama, Department of Corrections
* Ballance Agri-Nutrients Limited
* Bay of Plenty Regional Council
* Beef and Lamb NZ
* Breach Oak Farm
* Brockley Farm
* Canterbury Regional Council (Environment Canterbury)
* Chatham Islands Council
* Chilean Needle Grass Action Group
* Deer Industry New Zealand & New Zealand Deer Farmers Association
* Eilean Donan Farm Limited
* Environment River Patrol - Aotearoa
* Environment Southland
* Federated Farmers of New Zealand
* Fish & Game New Zealand
* Forest & Bird
* Greater Wellington Regional Council
* Hawke's Bay Regional Council
* High Country Accord Trust
* Hurunui District Landcare Group
* King Country River Care
* Latham Ag Ltd Consulting
* Mackenzie Guardians Incorporated
* Manaaki Whenua - Landcare Research
* Manaia Properties Limited
* Marlborough District Council
* New Zealand Walking Access Commission Ara Hīkoi Aotearoa
* Newhaven Farms Ltd
* Northland Regional Council
* Pāmu (Landcorp Farming Limited)
* Pomahaka Water Care Group
* Rangitikei Rivers Catchment Collective
* Ravensdown Limited
* Rural Women New Zealand
* Tairawhiti Whenua
* Tanupara Station
* Taranaki Regional Council
* Te Ao Marama Inc.
* Te Runanga o Ngai Tahu
* West Coast Regional Council
* Westland Dairy Company Limited t/a Westland Milk Products
* Wingletang Farms ltd

1. Braun V, Clarke, V. 2006. *Using thematic analysis in psychology*. Qualitative Research in Psychology 3(2):

   77–101. [↑](#footnote-ref-2)