



*Essential Freshwater* amendments – December 2021

# Proposed amendments to the low slope map for stock exclusion

Summary of submissions



Ministry for the  
**Environment**  
*Manatū Mō Te Taiao*

Ministry for Primary Industries  
Manatū Ahu Matua



**Te Kāwanatanga o Aotearoa**  
New Zealand Government

## Disclaimer

The information in this publication is, according to the Ministry for the Environment's best efforts, accurate at the time of publication. The Ministry will make every reasonable effort to keep it current and accurate. However, users of this publication are advised that:

- the information does not alter the laws of New Zealand, other official guidelines, or requirements.
- it does not constitute legal advice, and users should take specific advice from qualified professionals before taking any action based on information in this publication.
- the Ministry does not accept any responsibility or liability whatsoever whether in contract, tort, equity, or otherwise for any action taken as a result of reading, or reliance placed on this publication because of having read any part, or all, of the information in this publication or for any error, or inadequacy, deficiency, flaw in, or omission from the information in this publication.
- all references to websites, organisations or people not within the Ministry are for convenience only and should not be taken as endorsement of those websites or information contained in those websites nor of organisations or people referred to.

## Acknowledgements

This summary of submissions is based on an earlier document prepared by PublicVoice on behalf of the Ministry for the Environment.

This document may be cited as: Ministry for the Environment. 2022. *Proposed amendments to the low slope map for stock exclusion: Summary of submissions*. Wellington: Ministry for the Environment.

Published in December 2022 by the  
Ministry for the Environment  
Manatū Mō Te Taiao  
PO Box 10362, Wellington 6143, New Zealand

ISBN: 978-1-991077-03-5  
Publication number: ME 1712

© Crown copyright New Zealand 2022

This document is available on the Ministry for the Environment website: [environment.govt.nz](https://environment.govt.nz).

# Contents

Executive summary	6
The consultation process and submissions	11
Where did submissions come from?	11
Ministry for the Environment's online consultation hub	11
Written submissions received via email or post	11
Data analysis methodology	11
Statistical analysis	11
Thematic analysis	12
Who we heard from	14
Overview of submissions	14
What we heard	17
Context for the proposed changes to the low slope map	17
Assessment criteria	20
Proposed changes — introduction of a new map	22
Initial regulatory impact analysis of the proposed options	27
Options we are not considering	32
Estimated costs and benefits for regulated parties	34
Additional feedback	36
Appendix 1: Consultation questions	37
Appendix 2: Organisations that submitted	39

# Tables

Table 1:	Example of thematic analysis table	13
Table 2:	Type of organisation	14
Table 3:	What region are you in?	15
Table 4:	Submitters interest groups	15
Table 5:	Q1. Do you agree with our framing of the issue? If not, why not? By interest group	17
Table 6:	Q1. Do you agree with our framing of the issue? If not, why not?	18
Table 7:	Q2. What other information should we consider?	19
Table 8:	Q3. Do our objectives and criteria focus on the right things? If not, what would you change and why?	20
Table 9:	Q4. Do you think the changes to the low slope map will more accurately capture low slope land?	22
Table 10:	Q5. Do you agree that the 500-metre altitude threshold should be added? By interest group	23
Table 11:	Q5. Do you agree that the 500-metre altitude threshold should be added?	23
Table 12:	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	24
Table 13:	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?	25
Table 14:	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	26
Table 15:	Q7. If you own land captured by the map, does the proposed low slope map layer reflect what you would expect to be captured?	26
Table 16:	Q8. Do you agree with our preferred approach? If not, why not? By interest group	28
Table 17:	Q8. Do you agree with our preferred approach? If not, why not?	29
Table 18:	Q9. What other information should we consider?	30
Table 19:	Q10. What are the likely impacts and cost implications of the preferred approach (Option 2) compared with the status quo (Option 1)?	31
Table 20:	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	32
Table 21:	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?	33
Table 22:	Q12. Do you agree with our estimation of the costs and benefits? By interest group	34

Table 23:	Q12. Do you agree with our estimation of the costs and benefits?	35
Table 24:	Q13. What other information should we consider?	35
Table 25:	Q14. Any other feedback on the proposals	36

## Figures

Figure 1:	Example of a statistical analysis table.	12
Figure 2:	Are you submitting as an individual or on behalf of an organisation?	14
Figure 3:	Q1. Do you agree with our framing of the issue? If not, why not?	17
Figure 4:	Q5. Do you agree that the 500-metre altitude threshold should be added?	23
Figure 5:	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?	24
Figure 6:	Q7. If you own land captured by the map, does the proposed low slope map layer reflect what you would expect to be captured?	26
Figure 7:	Q8. Do you agree with our preferred approach? If not, why not?	28
Figure 8:	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?	32
Figure 9:	Q12. Do you agree with our estimation of the costs and benefits?	34

# Executive summary

This document summarises the submissions received during the public consultation on [Stock exclusion regulations: Proposed changes to 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)

## Assessment criteria

- 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:

---



### Initial regulatory impact analysis of the proposed options

- 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](#). 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](#).

## 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 1: 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.<sup>1</sup> 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.

---

<sup>1</sup> Braun V, Clarke, V. 2006. *Using thematic analysis in psychology*. *Qualitative Research in Psychology* 3(2): 77–101.

**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 1: Example of thematic analysis table**

Main theme	Sub theme(s)	Frequency
Areas of disagreement	Concerned with/errors in methodology used and areas focused on	34
	Cannot use slope as proxy for stock intensity	12
	Disagree with slope angle/altitude threshold used	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	General agreement with framing of the issue	30
	General agreement with framing of the issue	25
	Agree that current map has inaccuracies	14
General comments	Stock responsibility unclear when controller is not owner	3
	Usefulness of map could extend to other issues	1
	Usefulness of map could extend to other issues	1
	Concern with consultation	1

# Who we heard from

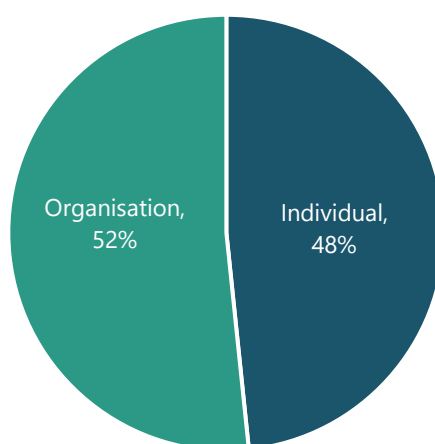
This section provides an overview of the submissions received.

## 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](#).

**Figure 2:** Are you submitting as an individual or on behalf of an organisation?



**Table 2:** 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 3: 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 Taihū-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 4: 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

Interest group	Number of submissions
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 3: Q1. Do you agree with our framing of the issue? If not, why not?



Table 5: 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 6: 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 7: 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:

- The frequency and intensity of stock grazing and access to the waterbody
- The values associated with the waterbody and sensitivity of the receiving environment
- 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 8: 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

Main theme	Sub theme(s)	Frequency
	(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.”

#### 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 9: 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 4: Q5. Do you agree that the 500-metre altitude threshold should be added?**



**Table 10: 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 11: 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 5:** 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 12:** 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 13: 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

#### 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.”

#### 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 6:** 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 14:** 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 15:** 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

Main theme	Sub theme(s)	Frequency
	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

#### Yes, it does capture what I would expect

“The updated mapping approach provides maps which seem more realistic.”

#### 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.”

#### 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.”

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



Table 16: 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 17: 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

#### 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.”

#### 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.”

#### 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 18: 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 19: 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 8: 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 20: 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 21: 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 9: Q12. Do you agree with our estimation of the costs and benefits?



Table 22: 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 23: 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 24: 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 25: 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
- Tairāwhiti 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