

Gleeson Plan Change 1 Block 3 Farm Plans

Schedule 1 detail – what is required re the farm plan

Agreement that farm plans are an important and necessary tool to assist provide the outcomes sought by Plan Change 1

The farm plan must be ‘owned’ by the farmer as a ‘living document’

- The farm plan cannot be a tick-the-box exercise
 - The farm plan must be more than just a compliance tool
 - The writer is concerned that industry schemes will be more about tick-the-box locking in existing land use as being inherently proper without good comprehensive understanding about the natural resource that is being used and whether existing land use is suitable for that farm and locale
 - Industry schemes should be welcomed however they cannot be locked in (grandparented) with permanency and so must be subject to scrutiny that evolves and accept there could be transitional expectation to move land use such that effects from will need to be significantly reduced in some locales beyond what may be achievable with good management practices
 - The farm plan cannot endorse grandparenting
 - The farm plan must be designed / formatted so it becomes seamless across future plan changes and itself doesn’t become an obstacle to what must be implemented in the future plan changes
 - The farm plan therefore must not be bounded and so be more than what will achieve 10 percent improvement in the state of water quality (the writer believes PC1 will not achieve 10 percent)

The farm plan must have consistency in language and definition, for example best / good management practice, best practical option etcetera. There perhaps needs greater integration and alignment with all overarching documents for example RMA.

- There must be care applied here to ensure inappropriate land use does not get locked in and grandparented because the best practical option ‘test’ means all mitigation may have been exhausted yet there is no expectation that such land use is misplaced and should be changed.
- The writer makes no distinction between best and good management practice being one of the same. There is no halfway house only transition towards...

Best / Good management practice is a package of ideals, it serves multiple outcomes and so as such is about management in a broad sense. By and large it is managing risk... this aligns with RMA expectation to manage, reduce and avoid

Best / Good management practice should not include offset. Any offset needs to be considered separately and its worthiness subject to other tests

○

The farm plan must build on and leverage other plans. This provides much needed guidance and understanding...

There is an onus upon the regional council as part of its responsibility to manage the environment on behalf to provide comprehensive information pertinent to each subcatchment

- Subcatchment plan (with linkage to FMU catchment zone plans)
 - The writer believes there is good information / data available today for each subcatchment to begin making informed conversation / discussion about needed direction and travel which would be augmented if an interim year-2050 state of water quality was embedded, and noting new discussion about NPS Freshwater
 - We do not have to sit back for another 10 years or so to populate the data set with additional information (this continues with grandparenting as the allocation framework)
 - Preparation of the subcatchment plan must involve all stakeholders
 - The subcatchment plan must reference and target the 4 contaminants but not be limited in this brief also noting importance of biodiversity, carbon and versatile soils (new government policy beginning to emerge)
 - Subcatchment allocation of contaminant loss as a property right would be vexed, any allocation should be sheeted back to individual property titles
 - A detailed description of the subcatchment
 - This is a repository of all relevant information
 - It should be transparently accessible to all
 - There should be inclusion of Iwi and Hapu information detailing the co governance arrangements, rohe boundaries and more...
 - Contaminant loss profile and priority
 - Te Mana o te Wai NPS Freshwater
 - What are the contaminants of concern?
 - Relative to bottom lines is the subcatchment over or under allocated?
 - The bottom lines must become embedded as plan rules
 - The bottom lines may be interim highlighting the journey, the direction and pace of travel required
 - In-stream DIN and DRP
 - Macroinvertebrate Community Index
 - Periphyton
 - Sediment
 - Microbial pathogens
 - Topography, geology, soils, hydrology, rainfall, climate, geothermal, solar, wind
 - Use of LiDAR or similar for digital terrain modelling
 - Ensuring S-Maps is up to date and complete
 - Land use in the subcatchment urban, rural, infrastructure corridors etc.
 - Location of point source discharge, resource consent details

- Drainage boards and similar
- Attenuation studies
- Modelling of the subcatchment
 - CLUES, SPARROW, SEDMet

•

There is by necessity a cost to undertake a farm plan

- The cost needs to be lessened wherever feasible

The farm plan follows an acceptable template, so it is similar in design and repeatable for all farms

The farm plan has a basic template and is added to by topic modules relevant to the farm business and the employed farm system

For expediency are we endeavouring to create a farm plan process that is 1 a simplified cut down or 2 for full completeness is designed into topic modules, so the plan is tailored to needs

- The writer favours the later

To expediate there should be encouragement of workshops, the formation of subcatchment / community collectives and sector groupings to get repeatable messaging conveyed in one forum across many land users / farmers

The subcatchment approach combined with subcatchment/ community collectives and sector groupings allows better focus and more targeted placement of resources

The farm plan has multiple purposes, and this must be recognised:

- Farm business
 - Is the farm business:
 - Undertaking high-risk farm activities and / or system } risk-based assessment
 - Located in a high-risk locale } “
- Managing effects and outcomes (reducing externalities from contaminant loss that may cause environmental harm and / or nuisance)

The farm plan needs to be informed, what are the contaminants that are to be managed and what level of constraint applies i.e. what is the trigger or threshold that cannot be exceeded

The farm plan needs to be able to self-examine –

- Is the farm system as applied appropriate, will a fully functional farm system including good management practices be compliant?
- Are all good management practices in use, if not when will they be undertaken?
 - Restoration and precautionary
 - Work program with timeline and SMART goals
- Monitoring, auditing and assessment to ensure progress and compliance

The farm plan needs to be prioritised re risk based and be more informed where risk is high

- High risk farm system
- High risk subcatchment
- Critical source areas

The focus must always be effects based and outcomes required

Avoid one-size-fits-all and overly prescriptiveness

Tailorise and focus upon critical source areas

There needs to be recommended minimum standards and guidance material yet allowance to tailorise to a farm circumstance. Any departure from minimum standards must be articulated and fully explained – what assessment made and how alternative provides a more pragmatic and reasonable outcome yet will deliver same or better

Some mitigation may require gradation of mitigation action depending upon potential of risk

- This would be assessed by proxy for example stocking rate intensity
 - Low / medium / high stocking rate require increasing buffer width

The Good Farming Action Plan for water quality 2018

- The writer considers this document to be weak, it is too open ended and subject to different interpretation. There needs to be more clarity of expectation.

Farm plans are also an information gathering exercise - What is happening by whom and where?

Farm practices that have high risk potential needs oversight and understanding

- Why does this practice occur?
- What advice about best practice and possible mitigation could be provided?

There needs to be encouragement to engage

Some high-risk land use practices need oversight however regulatory oversight should not be burdensome

- Provide 'free' resource consents

There should be no 'trading' of allocation – the market is such exists would be naive, thin and immature