

THE HEALTHY RIVERS CHALLENGE

– 5,000 FARM PLANS IN EIGHT YEARS

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Abstract

Proposed Plan Change 1 (PC1) – Waikato and Waipā River Catchments Plan Change 1 was developed in partnership with iwi as a co-management project, and alongside the community as a collaborative planning project establishing a 24 member Collaborative Stakeholder Group (CSG). The CSG settled on an 80 year timeframe to achieve the water quality objectives of the Vision and Strategy for the catchments under the co-governance arrangements.

This plan is the first of eight ten-year steps to improve water quality for four contaminants. This first step addresses diffuse discharges of nitrogen, phosphorus, sediment and bacteria and its objective is to achieve ten percent of the required change between current water quality and the long term water quality targets.

The key policies in PC1 are:

- All rural properties over 2ha must register with WRC and provide information on how the land is used.
- Most properties over 20ha must provide a Nitrogen reference point (NRP) detailing the nitrogen leaching from the property in 2014/15 or 2015/16 (whichever is higher).
- Land use change to higher intensity uses is a non –complying activity requiring a consent, and the applicant must show that the new use will have lower contaminant losses than the original use.
- Most farms over 20ha must have an approved FEP within a prioritised timeframe based on sub-catchment condition.

The numbers

The catchment is 1.1m ha 61% in pastoral farming (28% dairy, 33% sheep and beef) >670,000ha farmed, 31% in forest (15% forestry, 16% natives).

- ~14,000 properties in catchment
- ~10,000 must register
- ~ 5,000 farms requiring an FEP & NRP (roughly 50% dairy)
- 8 years to complete
- Requires an average of 300 non-dairy FEPs per year
- ~ 15 to 20 farmers per FEP workshop

- ~ 20 workshops per year
- = 300 to 400 FEPs per year

Farmer engagement is critical to achieve that. We expect that there will be relatively slow uptake at the beginning of each 3 year tranche, followed by a rush to complete as the deadline approaches. That will put pressure on farmers, and on WRC and our systems.

Plan development

PC1 is currently progressing through the RMA Schedule 1 process having been notified on 22 October 2016. Following notification of Proposed Plan Change 1, Pare Hauraki raised concerns with the Waikato Regional Council (WRC) that they had not been consulted with in the manner required by the RMA. Council withdrew part of the proposed plan change area on 3 December 2016 in order for consultation to take place.

The submissions process concluded in late 2018. There were an additional 61 submissions received on the withdrawn area (Variation 1), bringing the total number of submissions to 1084 and raising over 1000 submission points on some topics. In addition, there were 70 further submissions received with many being hundreds of pages in length.

There are five independent commissioners on the Hearings Panel who have provided direction on the hearing of PC1 submissions. Their direction includes the use of information forums, mediation and expert conferencing on a number of topics including:

- Economic and Science Modelling (held 2018)
- Commercial Vegetable Production (February 2019)
- Farm Environment Plans (April – May 2019)
- Sub Catchment Planning (May 2019)

Hearings are set to start in March 2019, with a recommendation submitted to Council September 2019. Council expects to sign off on a decision by the end of April 2020.

Implementation of PC1 – to present

The WRC HRWO implementation team is tasked with implementing PC1, this involves establishing a training and certification process for farm planners, developing a FEP guide, templates, an electronic submission process, monitoring, audit and compliance systems, as well as data management and reporting processes.

WRC has commenced certification of farm nutrient advisors (CFNA) to approve nitrogen reference point (NRP) calculations. Currently the Nutrient Management Advisory Certification Programme covers the technical aspects required and forms the basis of our certification system. In support of this process Council has prepared a NRP development guide and an online CFNA application process.

Engaging farmers in the process is key to ensuring the eventual success of the policies, so significant effort is also going into developing and testing methods to engage farmers at a sub-catchment and community scale. WRC has been supporting the roll-out of Beef + Lamb NZ FEP workshops and continues to develop sub-catchment profiles to help farmers better understand the nature of some of the issues within their catchment. WRC has also developed a template and guide to support farmers who want to make a start on preparing their FEP.

The certification process for farm environment planners (CFEP) is progressing. The CFEP requirements are defined in PC1 and include five years' experience in farm systems management, advance nutrient management training, and experience in soil conservation and sediment management. WRC also anticipates providing some additional workshops on PC1 and other such matters related to the understanding of the regional plan and the RMA.

There is widespread interest in a national FEP certification systems to avoid duplication of effort across the country. That work is under way with New Zealand Institute of Primary Industries Management, although they are not expected to deliver an operating system in the timeframes required to meet the needs of PC1.

The FEP must be approved by a Certified Farm Environment Planner and submitted to WRC with a Controlled Activity Consent application or as part of a Certified Industry Scheme as a Permitted Activity.

Farm Environment Planning Challenges

The WRC HRWO implementation team is uniquely positioned as a submitter on PC1. As the project team has looked to implement PC1, a number of implementation challenges have been identified. These challenges stem from rules, policies and the content of the FEP schedule (Schedule 1) as currently proposed in PC1. Many of the issues identified relate to inflexibility and unclear direction and the associated impact on engagement.

The implementation project team has been exploring (as a submitter) alternative approaches that may address some of the challenges associated with the current proposed plan regarding FEPs. Having looked externally at the implementation of FEPs elsewhere and considered the national good farming practice (GFP) project, we have formed a view that the promotion of GFP within PC1 through the mediation and expert conferencing process as a means of achieving behaviour changes across the Waikato and Waipā catchments. In our view, the GFP approach better addresses the challenges identified in that it is:

- Industry agreed;
- Flexible, better addressing farm management;
- Better communicates progress; and
- Leverages off existing support programmes and industry material.

A key difference between PC1 and the GFP approach is that, while FEPs under the current PC1 tell a farm what they must do, the revised approach tells the farmer what they must achieve. The implementation project team has started to communicate the proposal with other submitters and expects to refine content ahead of caucusing on the matter.

Implementation of PC1 – moving forward

Because the PC1 approach is new it has generated the need for a number of new systems, some of which have already been described above. Other systems under development include:

- Audits for the certification systems.
- A two-way 'portal' or access point at which base information for FEPs can be accessed and FEPs can be submitted.

- A tool for creating and managing FEPs electronically, including external data transfer. This must be capable of simple adjustments over time, but also provide certainty that minimum requirements are not lost.
- On-line consent application process
- New databases to manage the mass spatial information as well as annual Overseer files from ~5,000 farms.

The implementation project team continues to build upon relationships with stakeholder organisations across sectors, sharing lessons learnt in the policy implementation space from the roll-out of comparable plans across the country. Farmer engagement remains a high priority, as is communicating useful and accurate information. PC1 represent a significant change to some sectors, especially for hill country dry stock farmers who have not so far been targeted with environmental regulation. Getting the FEPs prepared and approved on time and then implemented will be heavily reliant on having farmers engaged in the need and the benefits. This is made more difficult while the policies remain open to changes arising from the upcoming hearings.

As a submitter, communicating our preferences for PC1 with stakeholder organisations is important, particularly ahead of expert conferencing and mediation on particular topics. Uncertainty around the use of OVERSEER® in regulation has necessitated reflection on matters such as NRP and compliance. The inherent uncertainty associated with the plan development process has driven the need to remain agile in the roll-out of the project.

Conclusion

Waikato Regional Council's PC1 has adopted Farm Environment Plans as a key policy approach to bring about changes on farms that will result in improvements in water quality in the Waikato and Waipā catchments. It is therefore important that the plan content is implementable, this includes the practical use of FEPs on-farm as a tailored risk based tool for achieving improvements.

The implementation of the policies presents a number of administrative, legal and social challenges and as a consequence has driven a range of innovations over recent years.

In addressing the challenges of the policies, Council staff, industry stakeholders, farm consultants and farmers have all made changes and are preparing to make more over the coming decade. This adaptation and resilience is a characteristic of New Zealand agriculture that offers considerable hope for the future of the industry, our waterways and our international reputation.