

Who's
putting local
issues on
the national
agenda?

**We are.
LGNZ.**
Te Kāhui Kaunihera o Aotearoa.

1 August 2021

Hon David Parker
Minister for the Environment
Private Bag
Wellington 6140

Dear Minister Parker

Regional Council report on Intensive Winter Grazing

I am pleased to provide you with a copy of the first Intensive Winter Grazing (IWG) report on behalf of Regional Councils. This report is the first quarterly report requested in your letter to Environment Southland dated 16 March 2021. Environment Southland has provided an additional update expanding on their efforts to address IWG practice. This will be sent to you separately but is also attached as an appendix to this report for completeness.

The report highlights the seriousness with which Regional Councils have taken this matter and also the significant efforts of those councils and the Primary Industry Sector groups to provide tools and support to improve winter grazing practices and to increase interventions where poor practices are observed.

As requested a further report will be submitted by 1 November 2021 which will demonstrate our ongoing commitment to achieving improved IWG practices across New Zealand.

Yours sincerely



Doug Leeder
Chair, LGNZ Regional Sector
Local Government New Zealand

Cc: Minister O'Connor

Appendix 1 IWG report to Minister Parker 1 August 2021
Appendix 2 Regional council compliance monitoring and enforcement IWG
Appendix 3 Minister Parker Letter to Nicol Horrell 16 March 2021
Appendix 4 Primary sector organisations winter grazing checklist
Appendix 5 Chairman Horrell to Minister Parker - IWG Q1 report 1 August 2021

REGIONAL COUNCIL REPORT ON INTENSIVE WINTER GRAZING

1 AUGUST 2021

Executive Summary

This report sets out the actions taken by Regional Councils and Primary Sector organisations to support improvements to intensive winter grazing on crop (IWG) practices in 2021. Overall it can be seen that there has been strong collaboration across Regional Councils and primary sector organisations to provide education, support and tools for farmers. This has resulted in a significant uptake of IWG planning and good management practice (GMP), increased farmer engagement on IWG, and planning for expanded compliance and monitoring programmes.

This report presents a preliminary view of the activities to 30 June 2021. A complete review of activities will be included in the next quarterly report due 1 November 2021. While it is acknowledged that there is still more to do it is considered that this report presents a positive response to improving IWG practices.

Background

In response to a number of recommendations made by the Southland Intensive Winter Grazing NES Advisory Group (SAG) the Minister for the Environment deferred the implementation date for most of the IWG regulations in the National Environmental Standards for Freshwater (NES-FW) from 1 May 2021 until 1 May 2022. The NES-FW regulations that control further expansion of IWG are now in force.

In a letter to Southland Regional Council and other SAG members dated 16 March 2021 the Minister for the Environment advised the deferment of IWG rules was on the basis that Regional Councils (RCs) and the farming sector, as represented by industry-good organisations, commit to:

- Improve IWG practice during the 2021 year and beyond by rapidly deploying an IWG module that will be a prototype for inclusion in the certified Freshwater Farm Plans (FW-FP) currently under development; and
- Undertake increased monitoring and reporting to ensure there are measurable improvements in IWG practice during the year.

The letter further outlined that the Minister for the Environment expected to see:

1. Farmers putting in place better practices such as providing appropriate buffers that are uncultivated and ungrazed around waterways and critical source areas; and retiring steeper slopes that are unsuitable for IWG;
2. RCs undertaking increased monitoring of IWG practices, and taking compliance action against breaches of the law;
3. More effective monitoring by councils of receiving environments such as rivers and estuaries to show if their health is improving;
4. Council monitoring of the total hectares in IWG, and enforcement of the rule against the area in IWG increasing on any one farm; and
5. Quarterly progress reports to the Minister commencing 1 August 2021.

This report is the first of the quarterly reports and provides an overview of the activities undertaken up to 30 June 2021 to meet the requirements listed above.

This report is a collaborative undertaking between RCs and primary sector organisations. It was recognised by all parties that this collaborative approach provided the best chance of achieving positive change quickly.

Discussion

A summary of the key activities carried out in the three months to 30 June 2021 includes the following actions:

- Collaborative primary sector effort to develop and distribute the IWG checklist to 21,000 properties.
- Development of industry IWG modules and plans that informed, and were informed by, MPI and MfE's IWG module.
- Appointment of an IWG Co-ordinator in collaboration with MPI and MfE to support the collection and sharing of best practice advice, relevant updates and extension events nationally.
- More extension events focussed on good IWG practices.
- Increased promotion of an existing IWG hotline to report poor practice.
- A large increase in IWG plan downloads.
- A proactive dairy farmer survey by Fonterra focussed on IWG planning.
- Aerial and on-ground monitoring by Regional Councils with extended programmes planned between 1 July and 30 September.

Proactive approach to wintering

There has been a proactive approach to wintering in 2021 with education and support offered before and during the winter grazing season. This proactive approach has focussed on identifying and addressing potential issues before winter. Examples of this proactive approach have been demonstrated by Environment Southland, with summer cultivation flights and followups with farmers; MPI, with education and support followups with cases from previous season; industry bodies, working collaboratively with each other and regional councils to provide pre-wintering information and support to farmers.

Regional sector

A short survey on current IWG knowledge and practices was circulated to all RCS in May 2021. The survey sought information relating specifically to IWG on: rural sector engagement, planning, consenting, farm plans, compliance monitoring and development of tools to assist compliance monitoring and reporting. The results, which were received from 16 RCs, showed a range of approaches to IWG depending on the extent of the practice within a region.

Most RCs indicated that additional resourcing for freshwater implementation will be added from 1 July 2021, when 2021-2031 Long Term Plans take effect. These additional resources will respond to expectations to monitor new rules contained in the NES-FW such as IWG. RCs noted that they will be balancing resourcing deployed to plan-making, compliance and enforcement and environmental monitoring as part of the package of work required under the NPS-FW and NES-FW.

At the time of the survey, many RCs were still developing their response to the new regulations, including IWG in the 2021 winter. For example, those RCs where IWG is a more significant activity

such as Southland, Otago, Canterbury and Horizons, are already undertaking compliance monitoring, investing in industry-sector engagement and exploring different technologies to assist with identification and monitoring of IWG in the future. RCs have begun exploring opportunities to utilise technology to achieve improved and more consistent monitoring and reporting on IWG. These projects include the development of an app to support IWG planning and the use of satellite imagery to identify the extent of IWG.

All RCs that responded continue to engage with their rural sector (industry groups, farming consultants, farmers, catchment groups) on IWG requirements, often as part of engagement on the Essential Freshwater changes. The intensity of engagement tends to reflect the extent of primary production in a region.

Increased compliance monitoring and Extension Services

As very few consents have been issued, and there were limited rules in place prior to the NES-FW there is little compliance monitoring or complaint/incident data to meaningfully report as a baseline or comparison for the 2021 year. RCs that have existing rules to manage IWG continue to monitor this activity.

Monitoring activities will occur in 2021 through fly-overs and on-ground checks. These activities have been undertaken in previous years however a number of RCs are now increasing their activities.

The IWG activity reported to 30 June 2021 is attached. Much of the compliance and monitoring activity will occur between 1 July 2021 and 30 September 2021. Updated compliance data will be provided with the next quarterly report.

Many RCs offer extension services in order to promote good practice on-farm. These services are often undertaken in collaboration with primary sector organisations or catchment groups. Extension services can range from public meetings, topic-based or area-specific workshops as well as 1:1 on-farm visits. All RCs were also encouraged to promote and share the key messages and supporting material contained within the IWG module released by MPI in 2021.

Environmental monitoring of receiving environments

Existing water quality monitoring continues and is expected to significantly increase in all regions. RCs anticipate that the increased monitoring of receiving environments will be undertaken as part of the broader suite of freshwater monitoring required under the new NPS-FW. Monitoring currently underway will support the identification of high risk areas for IWG activity and will also inform compliance and monitoring programmes.

Total Area in IWG

At present are a range of methods being used to assess the extent of winter grazing being undertaken. RCs use a range/variety of satellite imagery and mapping tools to identify grazing and assess risk. There is an opportunity for RCs to pool expertise and funding to develop a more standardised approach to enable an assessment of scale, risk categorisation and identify high-risk sites. This will help with compliance monitoring and consenting prioritisation as well as providing consistent data on IWG at a national scale. RCs currently working with Manaaki Whenua to develop this project and hope to have it confirmed during the 2021 IWG year for inclusion in the 1 November report.

The following table provides an estimate from Regional Councils of the number of farms undertaking IWG activity. Through the delivery of the project with Manaaki Whenua we hope to provide a more accurate picture of the scale of the activity on a national scale.

Council	Estimated Farms with IWG?	Comments
Auckland	Unknown	Winter grazing is not thought to be a common practice in Auckland. Auckland Council does dairy farm compliance monitoring but there is no monitoring under the IWG regulations.
Bay of Plenty	>30	Estimated using field staff's corporate knowledge and Nutrient Management Plans to develop a spreadsheet of known areas. More work to do to develop the list.
Environment Canterbury	2,600	Estimated based on information from a machine learning model and GIS tool that uses satellite imagery to identify 'potential wintering crops'. This is 2021 data and has not been ground-truthed. This method is likely to overestimate IWG area.
Gisborne	20	Estimate included in the s32 report for the Proposed Freshwater Plan for Gisborne Region 2015.
Greater Wellington	800	Indicative number given by Beef + Lamb New Zealand (B+LNZ).
Hawkes Bay	700	Up to 700 farms based on aerial imagery.
Horizons	Unknown	
Marlborough	Unknown	Project initiated to identify IWG areas, and there would appear to be more than thought, but to date not a high priority environmental concern. Marlborough only has 46 dairy farms and its main primary production areas are viticulture and aquaculture.
Nelson	0	
Northland	Unknown	Winter grazing is not thought to be a common practice in Northland. A full stock take of winter grazing activities on dairy platforms will be conducted from July 2021 along with the farms' annual inspections.
Otago	Unknown	Expect to receive a baseline of hectares of dairy forage crops from regulation 36 NES-F information provision.
Southland	3,500	Extent to IWG per farm varies considerably.
Taranaki	Unknown	Inspect most farms annually, but do not currently focus on IWG.
Tasman	Unknown	Inspect 143 dairy farms, but do not currently focus on IWG.
Waikato	2,000	Estimate.

Table 1: Regional Council Estimate of the total number of farms with IWG by Region (Source: Regional Sector Survey 2021)

Primary industry sector events and activities

Primary sector organisations have responded to the expectations in the Minister's 16 March letter by increasing the already significant activity being undertaken to promote better IWG practices nationally.

Extension Events

Primary sector organisations have undertaken over 150 events across New Zealand focused on IWG over 2020 and 2021. In 2020, there were 96 B+LNZ and DairyNZ events focussed on IWG. To date in 2021, these organisations have undertaken 63 IWG-related events focussed on implementing good practice.

Often extension events are collaborative and include multiple primary sector organisations (e.g. Federated Farmers, Deer Industry NZ (DINZ), DairyNZ and B+LNZ), RCs and can include collaborative efforts with not-for-profit groups, for example Thriving Southland.

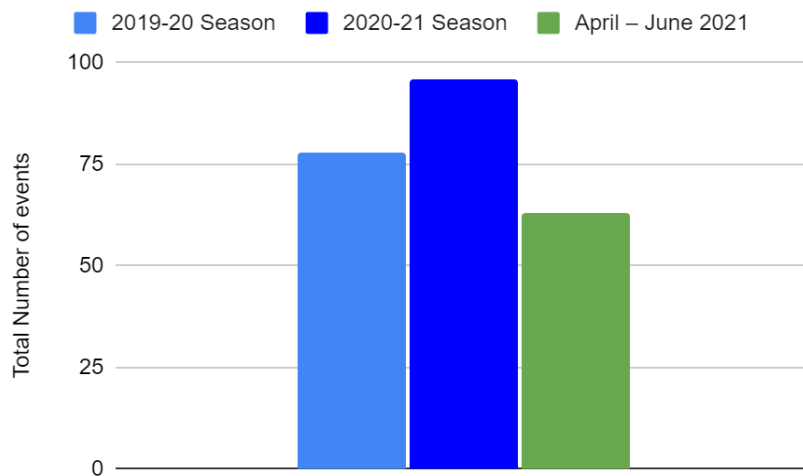


Figure 1: Total number of extension events hosted by DairyNZ and Beef + Lamb New Zealand. (Note the bar in green is only for three months of this season)

There has been a range of extension activities focussed on winter grazing, with much of the effort going into face-to-face field days and discussion groups. Farmers have also been directly contacted through phone calls with primary sector staff or in person on farm to discuss the resources and tools available and answer any specific questions about IWG.

The total number of farmers attending events is measured in the thousands, with 1,771 attending IWG events in 2019, 2,867 attending in 2020 and to June 2021 there have been 1,264 attendees at IWG events with more planned during the winter months.

Improved farming practice

Fonterra Cooperative Group has been active in contacting farmers undertaking IWG in Southland. The firm's sustainability staff have undertaken 103 phone interviews, with questions focussed on IWG planning. The results of which can be summarised as:

- Farms that have an IWG Plan in Place or are in the process of completing one = 62%
- Farms without an IWG Plan = 29%
- Farms that were no longer undertaking IWG on their farm or moving out of dairy = 9%

The results show that two thirds of farmers interviewed have taken action to prepare an IWG plan for winter. An update on these numbers will be included in the next quarterly report.

Fonterra has one of the largest farm environment plan (FEP) programmes in the country, which collects data from all Fonterra suppliers who have an FEP. The FEP programme focusses on the Good farming practice principles as set out in the Action Plan for Water Quality 2018. Principles 14, 'use appropriate paddocks for intensive grazing' and 15, 'manage grazing to minimise nutrient loss from risk areas' relate specifically to mitigating the risk associated with IWG. The below table demonstrates that of the 430 Southland farms with a Fonterra FEP 84% are meeting GFP 20 and 79% are meeting GFP21.

Good Farming Practice Principle	Farms with Fonterra FEP	% Farm Meeting All IWG GFP
14	419	84%
15	419	79%

Table 2 – Percentage of Fonterra FEP’s delivered in Southland that meet Principles 14 and 15 from the Action Plan for Water Quality 2018.

IWG module

Many primary sector groups and RCs have invested in the development of farm plans to support improved farm practices. In April, an IWG module was developed by the Ministry for Primary Industries (MPI) and Ministry for the Environment (MfE) with input from Regional Councils. The module was developed to help kick start IWG planning and provide a set of IWG practice expectations.

B+LNZ and Dairy NZ updated their existing IWG plans to reflect this module, so farmers were able to access consistent information from either MPI, B+LNZ or DairyNZ.

The sector generally supports the national IWG module that has been developed and intends to continue the incorporation of this material within their templates and practice. It is anticipated that further uptake of the new IWG module will be seen in the 2022 season as much of the planning for 2021 had already been completed. Additionally, the inclusion of IWG into Freshwater Farm Plans will also provide greater clarity for all parties on the role of farm planning in achieving good management practice on all farms that undertake IWG.

Both DairyNZ and B+LNZ host many IWG resources, tools and factsheets on their websites. There has been a marked increase in traffic to B+LNZ’s IWG web content in 2021, with over twice as much traffic to this part of the website compared to previous years. DairyNZ’s website traffic has also been high and has been relatively consistent when compared with previous years.

The most noticeable increase in IWG digital activity, however, is in the number of downloads of IWG plans with an almost five-fold increase in IWG plans downloaded in 2021 compared to 2019. This number will continue to rise as 2021 farmers uptake the use of an IWG for planning crops for the 2022 season.

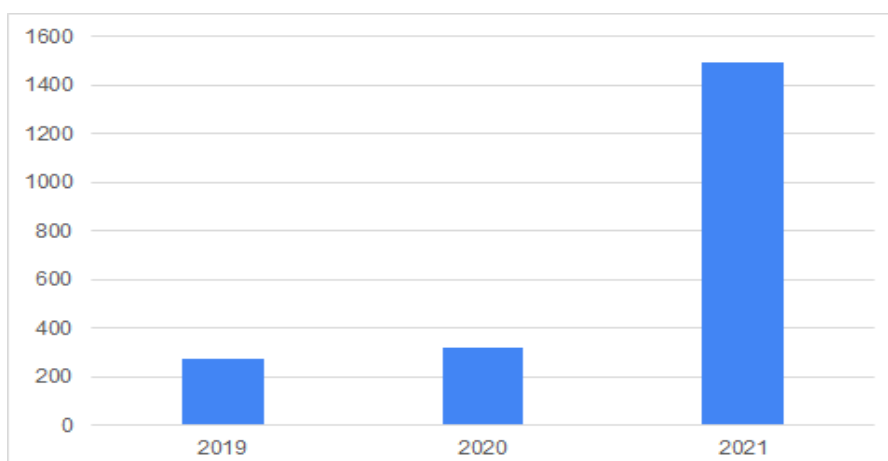


Figure 2 - Combined downloads for intensive winter grazing plans (Beef + Lamb New Zealand: forage cropping templates, forage cropping chapter, paddock plan template and DairyNZ: Winter Grazing Plan, Winter Grazing Checklist).

IWG checklist

Federated Farmers, DINZ, DairyNZ, B+LNZ and the Foundation for Arable Research (FAR), developed a winter grazing checklist to help achieve good management practices. The checklist was designed to help farmers with immediate decision making in early winter 2021 and focussed on an assessment of preparedness which highlighted any potential gaps that needed addressing.

The checklist was delivered to 21,000 rural addresses and was supported by a promotional campaign, which included NZME and MediaWorks promotions, radio interviews and paid advertisements. The campaign was designed to increase the uptake of the checklist and help farmers meet GFP. A copy of the checklist is included.

IWG incidents and enforcement

A hotline (0800 FARMING) was set up prior to winter 2021. This line, which is operated by Federated Farmers and supported by industry and RCs, was provided as an opportunity for the community to report concerning IWG practices for follow up.

From the start of 2021 until 30 June 2021, 14 cases were opened as a result of the hotline, with 12 in Southland, 1 on the West Coast and 1 in Otago.

Of these:

- nine were resolved with seven of those no having no issue found and two requiring minor action resolved on site;
- four remain under investigation; and
- one was unable to be found as not enough information was provided in order to locate the property concerned.

The 0800 line is a collaborative initiative to promote the reporting of poor practice by people who may be hesitant to call a council direct. It enables quick action and targeted interventions with significant cases being referred to Council's for investigation.

Conclusions

RCs and primary sector organisations have responded to the expectations of the Minister to see immediate improvements in IWG practices. While a significant amount of work was already underway, there has been a sustained and collaborative effort from all parties in 2021 to address those poor practices, which may have an adverse effect on the environment. While the data shows that there has been significant engagement in 2021, it is acknowledged that there is further work to do in some areas, including compliance and monitoring activities, the continued uptake of IWG Farm Plans and monitoring and evaluation of receiving environments.

We anticipate in the next quarterly report due in November to include greater details on regional council compliance and monitoring activities and results, an update on the project to identify the scale of IWG nationally and further updates on the extension and support activities being undertaken by primary sector organisations to deploy the IWG module.

As well as input from Regionals Council staff we would like to acknowledge the following groups for their contributions to this report:

- DairyNZ Ltd
- Beef + Lamb New Zealand Ltd
- Federated Farmers of New Zealand Inc.
- Deer Industry New Zealand
- Open Country Dairy Ltd
- Fonterra
- MPI

Appendix 2 – Regional Council compliance monitoring and enforcement

Table 1 - Reactive monitoring based on IWG complaints, incidents and enforcement

	Number of IWG complaints	Incidents linked to IWG	Water quality issues linked to IWG	Enforcement action taken	Comment
Auckland	0	0	0	0	
Bay of Plenty	0	0	0	0	
Environment Canterbury	0	0	0	0	3 complaints in July 2021.
Greater Wellington	0	0	0	0	Not a lot going on here re monitoring of IWG at present. We are working with our Land Management team on helping farmers out with the IWG module and encouraging as many as possible to get started on those.
Hawkes Bay	0	0	0	0	One complaint has been received in early July which was followed up with a site inspection a satisfactory plan was in place, and further advice was given. No formal action taken.
Horizons	0	1	0	0	Officers attended and found no issues.
Marlborough	0	0	0	0	
Nelson	0	0	0	0	
Northland	0	0	0	0	Farms Inspections have started, and a full audit will be completed by December 2021.
Otago	0	2	0	0	2 incidents with IWG observed from the flyovers that were investigated under the regional plan. Ground truthing found that the rules were not in breach.
Environment Southland	16	20	0	1 under investigation	
Tasman	1	0	0	1 formal warning 6 under investigation	
Waikato	0	0	0	0	
West Coast	0	0	0	0	

Table 2 – Proactive IWG compliance monitoring activities

	Number of flyovers	Satellite imagery	IWG site visits or audits	Advice and education	Comment
Auckland	0	0	0	0	IWG is not a prevalent issue in this region. A generic information letter will be sent to dairy farmers to just advise them of the requirements.
Bay of Plenty	0	Region wide	IWG to be checked as part of dairy audits in spring	Letter to all dairy farmers - 650	Aerial photography to be undertaken later in 2021. IWG is relatively small in the BoP with 40-50 properties. We will mostly be dealing with farmers undertaking IWG as part of our other business activities. Rotorua NMPs to be reviewed in 2022, LMO's have commenced discussions with farmers with many indicating they won't continue with IWG next year. Liaison with rural sector organisations (e.g. Fonterra) seeking support, consistent messaging and data where they have it (they said no to the data for individual farms).
Environment Canterbury	0	Whole region	20 direct site visits in 2020. 211 audits of farm environment plans (these may or may not have had IWG component but look at the risks as a whole)	500 – these were in regard to meeting our regional rules not directly about IWG.	1,150 properties have individual land use consents that get audited. A further 1500 properties are audited under the irrigation schemes consents. ECAN had not included a required IWG component into the audit tool until 2021/22. From 2021/22 onward IWG will be assessed as part of the FEP Audit.
Greater Wellington	0	0	0	0	Lots of education and responding to farmers queries going on, working with industry as much as possible with that.
Hawkes Bay	0	Region wide analysis of crops, slope and proximity to waterways 2018 imagery	0	Commencement notifications received from consented feedlots as	P A significant amount of education and training has been completed by the Nonregulatory advisory team including: <ul style="list-style-type: none"> - Pre and during activity sampling by consented feedlots - Nuhaka farm field day (14 farmers) fodder beet crop, pre-grazing plan and buffer zones CSA's - Information Video: Puketitiri farm, on HBRC website

	Number of flyovers	Satellite imagery	IWG site visits or audits	Advice and education	Comment
		and April 2021 imagery		required by the consent	<ul style="list-style-type: none"> - Field day with B&L NZ, Patoka Grazing plans (pregrazing) identifying CSAs buffer zones slope factors. - 4x IWG workshops. <p>This has been a relatively dry year in Hawkes Bay and most IWG issues arise with significant rainfall.</p> <p>A flyover is planned for late July, early August predominantly over Central Hawkes Bay. There are 17 Feedlot resource consents where site visits are scheduled for the July early August period.</p>
Horizons	0	Rangitikei area	0	0	
Marlborough	1 (150,000 ha)	GIS project mapping locations in MDC area being used as a baseline for future monitoring.	31 dairy farms visited with Dairy Monitoring for 2020-21, no IWG on the farms monitored. Land transition programme site visits distributing IWG Module.	Email sent to 46 Dairy Farms within District with relevant information and fact Sheets.	<p>Website updated with NES-FW Regulations and Fact sheets</p> <p>Industry stakeholders sent fact sheets relevant to IWG and other regulations</p> <p>Held meetings with Federated Farmers and stakeholders discussing the new regulations and requirements.</p> <p>Online forms created to supply information to council as per requirements of NES-FW Regulations.</p>
Nelson	0	0	0	0	NCC only has 2 dairy farms in the district and neither of them undertake IWG.
Northland	0	0	0	0	Fonterra indicated less than 10 farms partake in IWG in the Northland region from their data.
Otago	3 (North Otago, Central Otago and West/South Otago)	0	13	Fact sheets and information on website. Letter sent to all dairy farms advising of new rules.	<p>13 follow up inspections were completed in Otago from the cultivation flyover where farmers were provided educational advice.</p> <p>Partnering with the primary industry sector groups to promote good management practices.</p>

	Number of flyovers	Satellite imagery	IWG site visits or audits	Advice and education	Comment
				Video on IWG good management practice online.	Regulatory staff have been providing advice and information and speaking at events when invited. This advice and information included speaking at catchment group sessions, workshops on IWG and field days; meetings with industry groups, stakeholders and other Regional Councils; responding to phone call and email questions and providing as much information on our website as possible. Plan Change 8 includes intensive grazing requirements.
Environment Southland	2 (all Southland area)	0	10 follow ups by Land and Water Services team from cultivation flights. 2 Compliance visits	General advice and education provided	Generally an improvement in IWG practices.
Tasman	2 (70,000ha)	0	1 site visit undertaken and 15 scheduled for varying scales of observed issues/sites of interest.	1 advice letter	One predominantly agricultural catchment yet to be flown. Overall the monitoring is showing farms are for the most part practicing good winter grazing techniques. Pugging is looking like the main issue possibly caused by lack of prevention of stock having access back into grazed areas. No known increase in areas of IWG from the limited historic info we have. Also getting feedback that a number of farmers have stopped IWG for alternative methods even though we don't have the base data. Lot of ground truthing still to be done.
Waikato	0	0	Dairy Inspections have not seen any issues with IWG	0	Conversations with many farmers with regards to IWG and what is best practice. The team are aware of IWG risks and watching out for it when monitoring farms
West Coast	0	0	0	Fact sheet available on Council website	Flyover to be completed in July, with site visits in July/August. Have met with two MPI inspectors that work on the West Coast to collaborate on inspections and sites of interest. Ground inspections will be followed up on after the aerial Flights.



16 March 2021

Nicol Horrell
Chair, Environment Southland

Dear Nicol

Intensive winter grazing module for freshwater farm plans

I really appreciate the time and effort that members of the Southland Intensive Winter Grazing NES Advisory Group (SAG), including from your Council, put into their report of 10 December 2020 (the report). This advised on the implementation of the intensive winter grazing (IWG) regulations in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F).

The Minister of Agriculture and I believe that improvements in IWG practice relating to freshwater will be achieved in the medium term primarily through certified freshwater farm plans (FW-FPs), rather than through default permitted activity conditions in the NES-F that serve as a bottom line (although that may still be necessary for some).

In response to SAG advice, I have decided to defer the start date for parts of the IWG regulations (ie for permitted activities and related resource consents) for a period of one year (from 1 May 2021 until 30 April 2022). This will be country-wide, bearing in mind that SAG members were reflective of views elsewhere, although the most serious IWG issues are in southern areas of the country.

The Minister of Agriculture and I are announcing the deferment today. See the attached embargoed press release. The deferment is in return for regional councils (councils) and the farming sector committing to:

- Improve IWG practice during the year by rapidly deploying an IWG module that will be a prototype for inclusion in the certified FW-FP regime currently under development; and
- Undertake increased monitoring and reporting to ensure there are measurable improvements in IWG practice during the year.

The NES-F regulations that control *further* expansion of IWG will not be deferred and will need to be enforced.

The roll-out of a prototype IWG module (a draft of which was in the report) is an opportunity to show the effectiveness of a FW-FP approach to improving freshwater health outcomes. The deferment will facilitate the prototype being ready for formal incorporation into certified FW-FPs in 2022.

For IWG during the year, my expectations of councils and the farming sector are:

As above, to:

- Improve IWG practice during the year by rapidly deploying an IWG module that will be a prototype for inclusion in the certified FW-FP regime currently under development
- Undertake increased monitoring and reporting to ensure there are measurable improvements in IWG practice during the year.

And further to this:

- Demonstrable and early progress in deploying the IWG module
- Farmers putting in place better practices such as providing appropriate buffers that are uncultivated and ungrazed around waterways and critical source areas, as recommended in the SAG report; and retiring steeper slopes that are unsuitable for IWG
- Councils carrying out more monitoring of IWG practices and taking compliance action against breaches of the law
- More effective monitoring by councils of receiving environments such as rivers and estuaries to show if their health is improving, ie whether significantly less sediment and other contaminants are ending up in them
- Council monitoring of the total hectares in IWG, and enforcement of the rule against the area in IWG increasing on any one farm; and
- Quarterly progress reporting to me on the above points through Environment Southland (and other councils as appropriate), ie on 1 August and 1 November 2021, and 1 February and 1 May 2022.

The Ministry for Primary Industries will also be responding to animal welfare complaints and prosecuting as appropriate where breaches of the law occur.

Once the IWG regulations enter into force from 1 May 2022, farmers will have the option of undertaking IWG through a certified FW-FP as an alternative to complying with the default permitted activity pathway in the regulations, or obtaining a resource consent.

In addition, any changes (if desirable) to rules associated with the default permitted activity pathway will have been progressed by this time.

Thank you again for your important contribution to this work, and I have asked officials to continue working with you, SAG members and others to ensure the successful roll-out of the IWG module.

I look forward to receiving regular updates on progress. Meanwhile, please note that this letter will be made available to other parties with an interest in IWG.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'David Parker', written in a cursive style.

Hon David Parker
Minister for the Environment

Attachment:

Copied to:

Hon Damien O'Connor, Minister of Agriculture

Members of, and observers to, the SAG

ARE YOU SET FOR WINTER?

Use our winter grazing 2021 checklist to check and improve your winter preparations

What you do this winter matters to all farmers

This year, what we do during winter will be scrutinized more than ever so it is important we all do our bit and get it right. It isn't too late to make improvements for this winter. Animal welfare and environmental protection are both extremely important.

Use our easy checklist

The checklist below will help you assess whether you've covered off the key preparations for grazing.

Note: your regional council may have more stringent rules which apply in your area. If you're unsure please check with them.

Wintering Checklist	Green I'm all set to go	Orange This could be improved	Red Not planned, needs more preparation
Stock are excluded from waterways. You have a minimum buffer of 5m (more is required for sloping ground).			
Critical source areas (CSAs) are protected: ideally keep stock off them for the whole winter period. If you have cropped CSAs, fence them off and graze them last during good weather after the rest of the crop has been fed. Leave a good buffer area at the lowest point to filter any sediment run-off.			
Graze paddocks strategically. If adjacent to a waterway, graze towards the waterway. If on a slope graze downwards and in the direction of the water flow, or using a strategic plan suited to your location (such as an extra wide buffer).			
Plan the placement of supplementary feed and portable water troughs away from waterways, critical source areas, and ponding areas.			
Animal welfare requirements are critical: transition carefully, consider shelter, ability to lie down on firm ground, and access to water.			
Measure feed to accurately assess quantity, and plan daily feeding to ensure adequate feed for the whole winter (including extra feed for poor weather).			
Plan and manage mobs to reduce the risk of lambing / calving on crop.			
Develop an adverse weather plan for each winter grazing area to ensure that animal welfare and environmental protection needs will be met in poor weather.			
Make a plan to record evidence (photos, video, your farm diary) showing that good management practices are being implemented; and to use this year's learnings to inform next year's plan.			

Green

You're confident you're ready for the coming season, great work!

Orange

Check your preparations are in order, and complete any further necessary work. Check out the resources below which can help you.

Red

Now's the time to take action and sort out your planning – all farmers will be under scrutiny so you don't want to let the team down. Check out the resources below to help your preparations so you're winter ready.

Resources to help your winter planning and preparations

Beef & Lamb – beeflambnz.com/wintergrazing

Dairy NZ – dairynz.co.nz/wintergrazing. Dairy farmers can also contact their milk company for information.

Deer NZ – visit deernz.org and search for 'wintering feed systems'

MPI – mpi.govt.nz/protecting-freshwater-health

Foundation for Arable Research (FAR) – visit far.org.nz/resources and search for 'winter grazing'

In some regions, your local catchment group may also have information to assist you.

To check if there are any local rules you need to meet, contact your local regional council. If you're planning to expand your grazing or become more intensive you may need to check with your regional council if you need a consent.

Looking to the future

Going forward, all farmers who graze stock over winter will need to have a documented winter grazing plan. This plan can become part of your Farm Environment Plan.

DairyNZ and Beef + Lamb NZ are supporting farmers with wintering resources, information and events – look out for more information on these.

This information is brought to you and supported by:



1 August 2021



Hon. D Parker
Minister for the Environment
Parliament Buildings
Wellington

Our Reference: A678031

Te Taiao Tonga

Dear Minister

In your letter, dated 16 March 2021, you outlined your expectations for improving intensive winter grazing in Southland. This letter is our first report. It provides an update on our activities in line with your requests.

We have continued to build on from a range of regulatory, monitoring and education initiatives, some of which had been underway for several years. As a consequence, we are seeing strong evidence of good decision-making by farmers, in our aerial surveillance work, with the implementation of expected practices, more consistently across the region.

Attached to this letter, and also being sent directly to you, is a report prepared by the regional sector and the primary sector (Appendix One). The focus on intensive winter grazing has led to stronger alignment in how we share information and work together. Matters of data collection, compliance approaches, engagement and implementation are being discussed and shared to provide support and consistency across the New Zealand.

Intensive winter grazing module

Environment Southland contributed to the development of the MPI/MFE wintering module noting that other similar modules have been developed by industry and community groups.

In Southland, a template was developed by Thriving Southland, who work with catchment groups. Over the past three months Environment Southland staff, in partnership with our industry representatives, have attended over 20 field days and other events where the 'Thriving' module was workshopped with farmers. Our land management staff provided technical expertise, and individual follow-up visits where needed, for attendees. The timing of these workshops meant that most of the discussion was on the current winter period and how to best manage existing crops.

We are now working with farmers to prepare for the coming three to four months, on the 'cultivation period' for winter 2022. Ensuring that farmers are equipped and assisted to make good decisions at this stage, including thinking about how a paddock will perform in very wet weather, is absolutely fundamental to lifting performance during the winter period. Staff will again work with industry and community groups to support field days with a focus on increasing uptake of the IWG module. We are intending to allocate staff to areas where we know there to be either large scale winter grazing, or high winter grazing risks (from sediment and *E. coli* loss).

For now
& our future

2020 07L - Chairman Horrell to
Minister Parker - IWG Q1 report

We are developing a framework to record the progress that farmers are making. The link to the data collection and storage work happening as part of the Freshwater Farm Plans development is critical.

Practice improvements and monitoring

For the third successive year we worked with industry groups (Dairy NZ and Beef + Lamb NZ) to undertake 'cultivation flights'. This is an aerial approach to checking locations and potential risks of cultivated crop paddocks prior to stock being grazed. (This is separate to the compliance flights we undertake during winter – see Regulatory overview and follow up on page 3.)

Two flights across the Mataura and Oreti catchments were undertaken to identify firstly, where cultivated paddocks that may pose a risk during the winter, and secondly where regulations were not being met. On-ground follow-up visits were focused on paddocks that were poorly selected i.e. paddocks with waterways and critical source areas, on a flood plain or lacking adequate buffer distances from waterbodies.

The two flights this year yielded four follow-up meetings where we worked with the farmers to prepare winter grazing plans, to identify mitigations and/or change to their intended practices. This approach was well received and we noted the co-benefits of positively working with the community and raising awareness of issues outside of the 'stock on crop' period.

Like other Councils we also use social and conventional media to demonstrate and explain to farmers the on-ground actions that are needed to manage IWG.

As well, we developed and shared a simple video clip to assist farmers with the simplest way to measure slope angles whilst out in the field, using ropes, poles and a clinometer. This information allows in-field measurements to be done relatively easily and supports better decision-making for paddock selection and compliance with NES-F slope rules.

As touched on earlier, monitoring change in on-farm behaviour (and practice) is a key area for improvement so that Councils, industry and farmers can demonstrate progress made, and ongoing improvements.

Environmental improvements and monitoring

We are implementing a range of changes to our environmental monitoring programmes over time, starting with a review of our existing baseline and fine scale monitoring programmes to ensure that we can detect the changes to sediment and *E. coli* losses.

This is being undertaken as part of our science strategy development, and transition to a catchment/freshwater management unit approach to achieving freshwater outcomes in Southland.

We know from Wilcock et al (2013)¹ that "monitoring programmes in New Zealand need to be much longer than 10 years to detect changes caused by farmers actions". The adoption of good

¹ Wilcock RJ, Monaghan RM, Quinn JM, Srinivasan MS, Houlbrooke DJ, Duncan MJ, Wright-Stow AW, Scarsbrook MR (2013) Trends in water quality of five dairy farming streams in response to adoption of best practice and benefits of long term monitoring at the catchment scale. *Marine and Freshwater Research* 64, 401–412.

management practices will be critical to achieving improved IWG outcomes, both in Southland and across the country.

This adoption rate needs to continue to improve. We are very clear about that with our community. We do have a very good understanding of losses from winter grazing activities in Southland, at a field or paddock scale. Science studies on wintering practices at Telford, Five Rivers, Tussock Creek and Woodlands, as well as Otago, form a strong basis for the management practices that we now promote.

Finally, we worked with Manaaki Whenua in 2014 and 2017 to use satellite imagery to determine the extent of winter grazing across the Southland region. The information obtained from this work was used to help inform the regulatory framework in the proposed Southland Water and Land Plan notified in 2016. We are developing a scope of work and plan to complete this work for 2021. From the work completed in 2014, we know there are approximately 3,500 properties that had winter grazing crops over an extent of approximately 68,000 hectares.

Regulatory overview and follow up

We have an active aerial surveillance programme where we undertake three compliance flights during winter, and we follow-up all enquiries/complaints that come in via the Environment Southland pollution hotline.

Anecdotally, we have so far observed evidence of increased butters and properly managed critical source areas this winter. Table 1 below outlines the work undertaken over the past three months, once stock has been moved onto crops or are in a break-feeding situation on pasture.

We actively work with MPI staff on the ground in Southland to connect on animal welfare issues and vice versa on environment issues. This strengthened relationship has gained momentum this year and is a very positive step.

We have received three consent applications for intensive winter grazing, most of which relate to large scale farming operations. Applicants have indicated they are 'getting organised early' and preparing their businesses with the knowledge of the likely changes ahead. We know that when the NES regulations for IWG are implemented (irrespective of any changes) there is likely to be a high number of applications received.

To prepare for this, we have linked our mapping and consenting online systems to build a 'decision support tool' – the front facing map brings together a number of spatial datasets to allow farmers to understand the risks of choosing different paddocks. The consenting tool helps farmers determine whether or not a resource consent is needed for their IWG activity and then provides an interactive form to apply for the consent. This initiative will help provide farmers with relevant information and lead to efficiencies from a consenting perspective.

Table 1: Summary of Compliance activities (2019-2021)

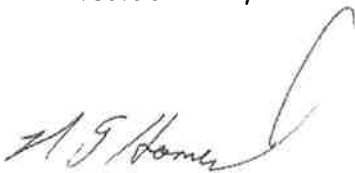
	Wintering flight issues to follow up	Environment Southland Pollution Hotline	IWG prosecutions (court outcome finalised)
2021 (to date)	4	19	TBA
2020	19	16	3
2019	95	30	0

Next steps

It has been a relatively wet winter in Southland. We (and our community) know there is still work to do, particularly to lift the performance of some of our farmers who have yet to fully understand the changes required. As we move from the wintering period to the cultivation period, we will be shifting our focus to ensure farmers are prepared for next winter, working with industry and across the regional sector. As outlined above we will maintain our attention on improving IWG, our monitoring, and develop ways to measure environmental change.

We welcome your feedback to this letter, and extend an invitation for you to visit Southland in person to discuss the detail of this report and view firsthand the activities underway.

Yours sincerely



**Nicol Horrell
Chairman**

Encl