

SUBMISSION ON

Managing Intensive Winter Grazing

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To: Ministry for Environment

Name of Submitter: Horticulture New Zealand

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OVERVIEW

Submission structure

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Our submission

Horticulture New Zealand (HortNZ) thanks Ministry for Environment for the opportunity to submit on the 'Managing intensive winter grazing' discussion document and welcomes any opportunity to continue to work the Ministry and to discuss our submission.

If there is an opportunity, HortNZ wishes to be heard in support of our submission. The details of HortNZ's submission and decisions we are seeking are set out in our submission below.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of 6000 commercial fruit and vegetable growers in New Zealand, who grow around 100 different crop types and employ over 60,000 workers.

There is approximately 120,000 hectares of horticultural land in New Zealand - approximately 80,000 ha of this is fruit and vegetables. The remaining 40,000 ha is primarily made up of wine grapes and hops, which HortNZ does not represent.

It is not just the economic benefits associated with horticultural production that are important. The rural economy supports rural communities and rural production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

HortNZ's purpose is to create an enduring environment where growers thrive. This is done through enabling, promoting and advocating for growers in New Zealand.



HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.

Submission

Intensive Winter Grazing Definition

In the discussion document, the activity that is targeted in the regulation is described as follows:

“Intensive winter grazing is a farming practice where livestock (cattle, sheep, deer) are confined over winter to outdoor feeding areas planted with annual forage crops (eg, swedes, kale and fodder beet).”

But in the NES regulation, winter grazing is defined as:

“intensive winter grazing means grazing livestock on an annual forage crop at any time in the period that begins on 1 May and ends with the close of 30 September of the same year.”

In our view the definition in the NES Freshwater has the potential to capture grazing within arable and vegetable crop rotations, that is not intensive and is a practice that supports soil health. It also has the potential to capture grazing of fallen fruit and canopy litter.

We seek refinement of the definition, so it excludes grazing on horticultural residue or fallen fruit and arable crops.

The definition we have proposed (refer to Part 3 below) focuses on managing adverse effects of intensive winter grazing, without having have potentially perverse outcomes for soil health, and food waste management.

The Importance of Crop Rotation for Soil Health

Soil health is recognised in draft government policy, including the Draft National Policy Statement for Highly Productive Land and the Exposure Draft of the Natural and Built Environment Bill. We are concerned that a misapplication of the winter grazing rules, could disincentivize crop rotation.

Crop rotation is essential for crop performance, soil health and structure, and managing pest and disease. Growing the same crop in the same location results in poor crop performance because soil nutrients are depleted over time. Legumes fix nitrogen to be used by following crops in the rotation. Self-emitted metabolites suppress the growth of some crops if they are not grown with other crops.

Crops with deep roots open channels deeper in the subsoil. A pasture phase improves soil structure by adding organic matter to the soil. Rotating crops breaks pest and disease cycles by removing host material and reducing pest populations. Certain sorghum and brassica species act as soil bio-fumigants.

Some vegetable and arable crop rotations include animals in winter. However, these practices are not intensive grazing and do not include high stocking rates or heavy stock. Grazing animals is not the primary activity, but complementary. Care is taken managing animals in these rotations, because maintaining soil health and soil structure is paramount for horticultural land uses.

Reducing Food Waste

The government is developing policy to reduce food waste, as part of the development of the national waste strategy. We are concerned that a misapplication of the winter grazing rules, could disincentivize food loss management.

One way that food loss is managed within the horticultural sector, is to divert food that is unsuitable for human consumption to feed animals; this practice reduces waste to landfill and is an efficient use of natural resources.

Light grazing of in situ of vegetable crop residue and fallen fruit and canopy litter is an efficient and sustainable practice. These practices are not intensive grazing and do not include high stocking rates or heavy stock. Grazing animals is not the primary activity, but complementary. Care is taken managing animals in these rotations and orchards, because maintaining soil health and soil structure is paramount for horticultural land uses.

Submission on Provisions

Without limiting the generality of the above, HortNZ seeks the following decisions on the NES, as set out below, or alternative amendments to address the substance of the concerns raised in this submission and any consequential amendments required to address the concerns raised in this submission.

Additions are indicated by bolded underline, and deletions by strikethrough text.

Provision	Support/oppose	Reason	Decision sought
Definition <i>annual forage crop means a crop, other than pasture, that is grazed in the place where it is grown</i>	Support in part.	The intention is to capture forage crops such as kale and beet, planted to provide forage feed for animals over winter. The regulations should not include light grazing of arable seed crops or vegetable crop residue, that may occur within arable and crop rotations as part of sustainable rotational cropping that is essential to support soil health. The definition as it stands may also unintentionally capture light grazing of fallen fruit and canopy litter.	annual forage crop means a crop, other than pasture, <u>arable or horticultural crops</u> , that is grazed in the place where it is grown