

Notice of person's wish to be party to proceedings

Section 274, Resource Management Act 1991

To The Registrar
Environment Court
Christchurch

DR & JAE Pullar Ltd wish to be a party to the following proceedings:

Federated Farmers of New Zealand (Southland Province) (Appellant) and the **Southland Regional Council** (Respondent) with respect to the **Southland Water and Land Plan**.

We made a submission about the subject matter of the proceedings.

We are not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.

We are interested in matters relating to the following issues.

Rules 20(a)(iii)(3) C and D.

We support the request from the appellant that Rules 20(a)(iii)(3) C and D be deleted.

Rule 20 (a) (iii) (3) (C)

This part of the rule relates to the requirement to use transportable water troughs during intensive winter grazing.

Rule 20 (a) (iii) (3) (D)

This part of the rule relates to the requirement to use portable feeders for supplementary feed during intensive winter grazing of stock on winter feed crops.

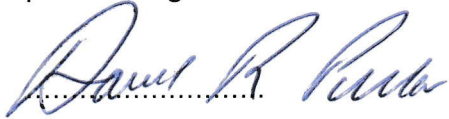
We support the deletion of these rules for the following reasons:

1. These matters were not included in the Proposed Water and Land Plan, and were therefore not subject to the submission process.
2. The Report and Recommendations of the Commissioners in paragraph 193 referred to submissions from Federated Farmers and the Lower Aparima Catchment Group in their discussion regarding the Good Management Practices referred to in the rule. These submissions make no reference to the use of transportable water troughs for sheep or the use of portable feeders for feeding supplementary feed to sheep

as being good management practice for intensive winter grazing of sheep on winter crop. The Lower Aparima Catchment Group submission included a Dairy NZ factsheet of good management practice for wintering dairy stock in Southland. These practices would not have been written with the intention that they can be directly applied to other types of stock. It is not reasonable to do so.

3. The decision notes that the guidance for the wording of these rules was obtained from other submissions without specifying which parties these submissions were from, and from Environment Southland fact sheets and advisory documents from other agencies including Dairy NZ. The Environment Southland facts sheets and the Dairy NZ advisory documents were not a part of the Proposed Water and Land Plan and were not subject to the submission process.
4. If these matters had been included in the proposed plan they would have attracted submissions.
5. The requirements for the provision of drinking water for sheep is an animal welfare issue to be determined on a case by case basis. Some winter crops have a high water content (up to 90%) and provision of water in portable troughs may not be required.
6. The rule does not allow the provision of water through the use of non-portable troughs.
7. The rule states that water troughs will prevent stock accessing a lake, river (excluding ephemeral rivers), artificial watercourse, modified watercourse or natural wetland for drinking water. This is incorrect. Stock access to these areas is managed by the requirements of Rule 20 (a) (iii) (4) which requires exclusion of stock from water bodies during intensive winter grazing.
8. The use of feeders for supplementary feeding of sheep may not be good management practice where there are large numbers of sheep in a mob. The use of feeders concentrates animals in a small area. This means that some animals have access to feed while others do not, and may result in animal welfare issues.
9. The concentration of animals in a small area resulting from use of portable feeders also increases the risk of adverse environmental effects as a result of pugging and soil damage.
10. The use of portable feeders for supplementary feeding of sheep during intensive winter grazing should not be prescribed by the plan.

We agree to participate in mediation or other alternative dispute resolution of the proceedings.

A handwritten signature in blue ink, reading "David R Pullar". The signature is written in a cursive style and is positioned above a horizontal dotted line.

5 June 2018

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