

8 August 2023

Ministry for the Environment

via email to: severeweather@mfe.govt.nz

Submission on proposals for Orders in Council for enforcement/prosecution, resource consent renewal and national direction statutory timeframes

1. Thank you for the opportunity to provide feedback on the three Order in Council ('OIC') proposals for 'Tranche 5' relating to the Resource Management Act ('RMA').
2. The Hawke's Bay Regional Council ('HBRC') supports in principle each of the three key proposals but consider it is vital that we have the opportunity to view and provide meaningful feedback on the draft Orders to confirm they are clear and workable in practice.

PROPOSAL 1 – Extending statutory timeframes for Hawke's Bay Regional Council to take enforcement/prosecution action from 12 months to 24 months

3. We welcome and **support in principle** this Proposal. During an online hui with MFE officials, comments were made that identified further clarification was required on several matters, including:
 - a) scope of the Order in terms of activities that the extended period would or would not apply to; and
 - b) when the Order would be 'triggered.'
4. In Hawke's Bay, we anticipate that this Order would need to be broader than only being applicable to forestry activities and activities that contributed to mobilisation of unprecedented volumes of debris during 2023's severe weather events. That may not be the same case in Tairāwhiti but that is for Gisborne District Council itself to submit on.
5. The proposal identifies that resources of HBRC (and Gisborne District Council) have been stretched in the aftermath of Cyclone Gabrielle's devastating impacts on many parts of our region. We do not question the need for the Order. We only ask that the Order (when drafted) is clear and unambiguous to work in practice. We look forward to the opportunity to provide further feedback on the draft Order in the near future.

PROPOSAL 2- Deeming a small number of water take consents issued by Hawke's Bay Regional Council to be deemed permitted activities until replacement applications are determined while meeting same standards as previously consented water take activities

6. We also welcome and **strongly support the intent** of Proposal 2. We do have some concerns about its workability in practice. We outline those concerns below, but we reiterate our expert staff welcome further discussions on ways that these concerns could be overcome, including the alternative approach outlined in this submission.
7. We understand Proposal 2 is provided to assist HBRC in administering replacement consent applications that did not meet a timeframe to obtain s124 rights under the RMA due to the significant disruptions caused by Cyclone Gabrielle impacting our region in February 2023. As proposed, those expiring consents for activities

where replacement applications were lodged less than three months prior to their expiry date (but not after their expiry date) would be deemed permitted activities until 31 May 2024. Those deemed permitted activities would need to operate under the same conditions as the previously consented conditions.

8. According to HBRC's records, there are 32 applications in this state. Key facts about those 32 applications are:
 - a) the applications are for water permits to take water from the Heretaunga Plains aquifer
 - b) the existing consents expired on 30 May 2023, but
 - c) their respective replacement applications were each lodged prior to the expiry date
 - d) the date for lodging and receiving RMA s124 status (allowing them to continue to be exercised while their replacement consents are being processed) was 28 February 2023
 - e) HBRC does not currently have any discretion or legal grounds to waive lateness in relation to those 32 applications not meeting the 28 February 2023 timeframe
 - f) Cyclone Gabrielle battered the Hawke's Bay region during 13-14 February 2023 with devastating impacts for many permit holders, from minor inundation, power outages, significant damages to farm infrastructure, roading, businesses and homes
 - g) these applications are covered by policies and rules in the TANK Plan Change (PC9). Some of those policies and rules in PC9 propose significant reductions in water allocation.
9. We welcome and support the intent of this proposal, but the proposal could be improved further if our key concerns are accommodated. Our key concerns are:
 - a) the deemed permitted activities would 'lapse' after 31 May 2024, unless the Order is amended further with another timeframe. A twelve-month deemed permitted activity duration is unlikely to be sufficient and
 - b) a deemed permitted activity would not 'flex' like s124 rights do given uncertainties of further legal challenges against decisions on resource consent applications.
10. Many of the matters covered in PC9 are contentious. There are sixteen appeals currently before the Environment Court on proposed PC9. Court-assisted mediation is currently being timetabled. Reductions in water allocation are amongst those contentious issues. We anticipate it will take some time for water allocated-related matters to be settled (either by mediated agreement or with a Court hearing and decision).
11. HBRC has been holding the applications for replacement water permits while PC9 has progressed. This has relied on consent holders having RMA s124 rights so that they can continue to exercise their water permits in the interim. HBRC is now moving to process the consents in line with Independent Hearing Commissioners' decisions on PC9 as it now stands. However, we cannot guarantee that any decision on these resource consents will not be appealed themselves. It is very possible that those applicants who have appealed the groundwater allocation details in PC9 may be dissatisfied with the decision on their water permits. Equally, other submitters may also choose to appeal decisions on the resource consents. If that proves to be the case, then water permit applicants will be reliant on:
 - a) their deemed permitted activity status under this Order in Council proposal until 31 May 2024; or
 - b) their s124 status until the resource consenting decisions are beyond any legal challenge. Under the current RMA system, that could still be a number of years until legal challenges are resolved.
12. Water permit applications that are subject to s124 rights are not limited by time. They are able to continue to be exercised until the process is concluded. Then their new resource consent (if granted) will take the place of the expired resource consent. This would not be the case with deemed permitted activities as per this Order proposal. The Proposal is that that Order would deem permitted activities for a twelve-month

period – to 31 May 2024. If the Order is passed in early September, then already one quarter of that time will have elapsed before this Order takes effect.

An alternative approach to the problem

13. One possible alternative to using the deemed permitted activity approach is to provide an extension of the period that is available under s124 to allow applications to be lodged and have s124 continuation rights. Currently a consent authority (HBRC in this case) has discretion under the RMA to allow s124 rights to apply if an application is lodged between six and three months of existing consent expiry. There is no similar discretionary power for a consent authority to allow s124 rights for an application lodged less than three months of consent expiry date. But an Order in Council could be made that grants such discretion to HBRC for this particular purpose.
14. We think there is strong merit (and simplicity) in this approach given that Proposal 2 for an Order:
 - a) relates to 32 applications for water permits to take water from the Heretaunga aquifer
 - b) all 32 applications were filed before the expiry date of their existing consents
 - c) an Order can apply retrospectively, or from a particular time/event specified by the Order
 - d) and the RMA does not currently empower HBRC with discretion to waive lateness of those 32 replacement applications which happened to occur during a time of great devastation and disruption from impacts of Cyclone Gabrielle.
15. We submit that Proposal 2 should be amended to replace the deemed permitted activity approach with a more straightforward approach that modifies s124(2)(d)(ii) to read “(ii) ends on the day before the expiry of the existing consent” (or words to similar effect) being 30 May 2023.
16. Or alternatively, if the Order’s proposal proceeds with the deemed permitted activity approach, then:
 - a) the duration be extended beyond twelve months, or
 - b) preferably, the expiry of deemed permitted activity privileges be left unspecified as a calendar date, but instead expressed as a consenting decision conclusion (i.e. when the respective consent is processed to a point beyond legal challenge).

PROPOSAL 3A – Freshwater Planning Instruments

17. We **support in principle** Proposal 3A, being a three-year timeframe extension for HBRC to publicly notify new freshwater planning instruments to implement the NPS-FM.
18. Prior to the Cyclone, HBRC had commenced work on the ‘Kotahi Plan’ which would be a combined review of the regional policy statement, regional coastal plan and other regional plan provisions. This review was being driven by the need to update some aging plan provisions across existing planning documents, plus to give effect to national direction in the growing number of national environmental standards and national policy statements, particularly the NPS-FM. The RMA currently requires plans that give effect to the NPS-FM to be notified no later than 31 December 2024. The proposal for an Order would extend that by up to three years.
19. As MFE officials are probably aware, HBRC had commenced the Kotahi Plan several years ago and this was informed by an extensive programmes of environmental science work and community engagement. The Cyclone significantly interrupted and disrupted those programmes. Our environment is not as it was before Cyclone Gabrielle. The state of many of our region’s waterways have been significantly altered by the Cyclone - to what extent is currently unknown. Our science teams are undertaking significant work to understand the effects on water quality from the Cyclone that will then set a new baseline for our community to have conversations on visions, values and Te Mana o te Wai.

20. HBRC's 'business as usual' work programme has been adjusted as a consequence of the effects of Cyclone Gabrielle. The Kotahi Plan preparation process has been temporarily paused while the Council and community focus on recovery from the recent severe weather.
21. One key feature of HBRC's current work is preparation of its Environmental Resilience Plan (second edition) to enable HBRC to deliver the Environmental Pou for the Regional Recovery Plan (which is overseen by the Hawke's Bay Regional Recovery Agency).
22. As part of HBRC's recovery planning work, HBRC has been working with Post [Treaty] Settlement Governance Entities (PSGEs) and Taiwhenua entities to develop a pathway for mana whenua engagement. This pathway involves different options to provide resources and funding to help support the development of their own Recovery locality plans that we hope will include the provision of information required under the NPS-FM such as fresh water visions, values and Te Mana o te Wai statements. This was always intended as a significant piece of work for the Kotahi Plan and will still be required for the development of a freshwater planning instrument. The conversations we hope to have will look to support mana whenua in both the recovery and transition through to the delivery of a plan under the NPS-FM. There is still much to be done in this space but already, these conversations have commenced with some PSGEs to the extent that their own priorities, availability and capacity allows while they also have a focus on Recovery efforts.
23. Over the past few months, HBRC's Policy and Planning leads have been working closely with various MfE officials to understand the options available for transitioning from a 'BAU' planning programme to one that reflects impacts to HBRC's work programmes and communities from Cyclone Gabrielle. This has included looking at opportunities for a regional spatial planning approach that may be provided through the proposed Spatial Planning and Natural and Built Environment legislation that Government has proposed to replace the RMA. We continue to work through those options.
24. The proposal of an Order to provide a three-year extension for notification of freshwater planning instruments is welcomed while we work through reconfigured work programme options and align our efforts working with Treaty partners. In that way, the Order would provide some immediate relaxation of a demanding legislative timeframe so we can rebuild a work programme that, at least:
 - a) is staged and prioritised in a way that delivers on our Recovery efforts;
 - b) aligns with various other new and emerging Recovery-related initiatives across the region;
 - c) does not demand over-commitments from mana whenua and communities who are already stretched and stressed dealing with Cyclone Gabrielle's impacts; and
 - d) also addresses some of the more significant issues facing our region right now.
25. The significant issues being focused on currently include:
 - a) freshwater quality management – including development of:
 - i. understanding the impact of the cyclone on freshwater quality
 - ii. any necessary transitional arrangements for managing land use impacts on water quality and
 - iii. management options that support rural recovery as part of longer term NPS-FM freshwater planning
 - b) regional policy direction for sustainable land use; appropriate land use of 'Category 3' areas; natural hazards; climate resilience; water security etc.
 - c) biodiversity – impacts of the cyclone on existing priority areas as well as opportunities for enhancing biodiversity as part of cyclone recovery and
 - d) afforestation – understanding the impact of forested land on mitigating cyclone impacts and whether new policy direction or regulation is required, noting that included in the 49 recommendations of the

Ministerial Inquiry Panel into Land Use, is a recommendation for improved national direction on forestry management, including on forestry slash.

26. We note that the engagement material for the Proposed Orders refers to the “*plan would be tailored to each catchment to respond to the findings of the Ministerial Inquiry into Land Use*” in Tairāwhiti and Wairoa districts. Presumably the “plan” referenced here is intended to be the freshwater planning instrument implementing the NPS-FM. We do intend for the Kotahi Plan to tackle issues covered by the Ministerial Inquiry, to the extent that RMA plans can do so.
27. The engagement material also refers to the Minister or Ministry for the Environment supporting HBRC by setting out a set of expectations for what “*should be achieved prior to full NPS-FM implementation.*” We look forward to opportunities to proactively discuss what those expectations might be **before** those are set in legislation or some other format. We also look forward to other forms of support the Ministry may offer HBRC for its ongoing implementation of the NPS-FM (and the suite of other national direction).

PROPOSAL 3B – Extended timeframes for compliance with Stock Exclusion Regulations in Hawke’s Bay

28. We **support the intent of this Proposal**, but consider it does not quite go far enough to really support rural communities’ recovery from the extensive devastating impacts of Cyclone Gabrielle in our region.
29. The Resource Management Stock Exclusion Regulations 2020 (‘SER’) require the exclusion of stock from water bodies and wetlands by 30 June 2023 in some cases and 30 June 2025 in other situations. Proposal 3B is for an Order providing a two-year extension of compliance with the 2023 deadline out to 30 June 2025. Based on what we currently know about the impacts being felt by many Hawke’s Bay farmers, this two-year extension does little to relieve the pressure that is on farmers across the region as they work hard to get their farming systems, businesses and livelihoods back on their feet.
30. Under the SER, the 2023 deadline is for the exclusion of dairy cattle and pigs as well as cattle and deer that are intensively grazing¹ on any terrain from lakes and wide rivers. It also applies to the exclusion of stock from wetlands that are identified in regional plans or district plans. The 2025 deadline is for the exclusion of dairy support cattle as well as beef and deer on low slope land from lakes and wide rivers. It also applies to the exclusion of stock from other wetland that support threatened species or that are larger than 0.05ha on low slope land.
31. Cyclone Gabrielle caused rivers to breach their banks and, in some cases, to change course. Fences adjacent to rivers and streams have been damaged, destroyed and/or even buried. Rivers or streams may now occupy space where fences previously stood. Decisions need to be made about realigning rivers and streams before some fencing decisions can be made. Where water flooded across farms, fences further away from rivers and streams have been littered with debris, if not destroyed or buried with silt. Orchards and vineyards with posts and wires supporting apples and vines have been buried in silt. Water storage dams and stock water reticulation systems have been damaged or lost. There has been track damage, slips and loss of crossings across many farms.
32. It is estimated that it will take several years for all these areas to be cleared and redeveloped, particularly with recurring intense winter rainfall events further mobilising debris on hillsides and sediment on banks of waterways. In the case of horticulture and vineyards redevelopment may be a staged process and involve cropping and stock grazing on land before it is converted back to an orchard or vineyard. The scale of the work will mean it will take a long time to complete all fencing and orchard and vineyard support work. Similar

¹ Intensively grazing means

- (a) break feeding; or
- (b) grazing on annual forage crops; or
- (c) grazing on pasture that has been irrigated with water in the previous 12 months.

materials and skills are required for these works. There are likely to be delays due to limitations on materials and skilled labour across the region.

33. In the aftermath of Cyclone Gabrielle, HBRC commissioned a survey of damage that covered 530 beef and lamb properties (450 landowners). The results are being analysed to develop and report a more complete representation of the damage to beef and lamb farms across the region. This survey represents approximately one in seven of farms within Hawke's Bay. There are an estimated 3,656 farms over 20 hectares in size and a further 1408 horticultural properties in the region.
34. From the survey returns, we know that:
 - e) over two million metres of conventional wire fencing was damaged (average of 5.5km per affected property)
 - f) a further 1.5 million metres of electric fencing was damaged (average of 4.2km per affected property)
 - g) there was over 500 hectares of riparian planting lost (average of 2.5ha per affected property and
 - h) the estimated cost of replacing the riparian planting and fences recorded in this survey feedback is \$48 million.
35. Also refer to Appendix 1 for further information from the survey.
36. Hawke's Bay farmers in the Tukituki River catchment have been required by rules in the regional plan to exclude stock from waterways since 2020 or to obtain resource consent if they could not comply with that timeframe. We have recorded that 93% of total stream length in the Tukituki catchment is stock excluded by either fences or by other farm management practices. Over 1,000 kilometres of riparian fencing was in place prior to Cyclone Gabrielle. We have not quantified the full extent of riparian fencing lost or damaged but from the HBRC cyclone impact survey, we know that in the Central Hawke's Bay District Council area²:
 - a) at least 61 hectares of riparian planting was lost and
 - b) 1,450 km of fencing (not just riparian fencing) was lost or damaged.
37. Feedback from HBRC's Land Management team members working in this area is that each farm has around \$200,000 of damage and it will take several years to get back on a level footing. There will be a need to stage and prioritise repairs and recovery, including fencing (or other forms of stock exclusion from waterways).
38. It will take time to replace, repair and adjust activities so that they are functioning as well as they were or better than prior to the cyclone. HBRC is working with affected farmers, growers and landowners in developing resilience objectives and anticipate that these will be incorporated into freshwater farm plans in future when that regime is rolled out in Hawke's Bay in future years. Those Farm Plans will serve to programme works and actions to bring farms into viable and sustainable production and in compliance with NPS-FM, NES-F, SER and regional plans.
39. The Freshwater Farm Plan system roll out for Hawke's Bay is now set for 2025. Freshwater Farm Plans with an action plan are to be prepared and submitted for accreditation within 18 months of the (yet to be) specified Hawke's Bay rollout date.
40. HBRC intend to continue working with farmers through the challenging recovery period to develop strategies for farmers' sustainable and resilient future and to promote and assist in actions needed to move into compliance with rules and regulations. We would prefer to have discretion for a time to encourage good practice decisions before rules and regulations become absolute. We see merit in the timeline for both the 2023 and 2025 stock exclusion regulations being extended in Hawke's Bay to have full effect from 1 July 2027. This would align with the Freshwater Farm Planning system roll-out in our region. If stock exclusion is not in

² The upper and middle sections of the Tukituki River catchment are within the Central Hawke's Bay District and the lower reaches of the catchment are within Hastings District.

place on a farm when a Freshwater Farm Plan is prepared and accredited, then stock exclusion work should be one of the first actions set out in the Action Plan.

41. For the reasons set out above, HBRC request that an Order is made so the Stock Exclusion Regulations are amended so that both the 2023 and 2025 dates are extended to apply and from 1 July 2027 in Hawke's Bay.

Concluding comments

42. Hawke's Bay Regional Council again, thanks the Ministry for the opportunity to provide feedback on these proposals. Please contact Gavin Ide in the first instance (refer address for service below) if you have any questions or require clarification regarding this submission. Gavin can make arrangements if necessary for MFE officials to meet and discuss the above comments further with relevant experienced HBRC staff.
43. We look forward to the opportunity to view the draft Orders and request that as much time as possible be given for that.

Yours sincerely



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Amongst our survey respondents, over 2 million metres of conventional wire fencing has been damaged and 500,000 metres of tracks

1

FENCING – 92% of landowners

- Impacts to conventional (wire) fencing total 2,028,422m with an average per landowner of 5,497m
- Electric fencing losses amount to 1,569,267m with an average per landowner of 4,229m
- When looking at wire and electric fencing combined, the damage/loss was strongly skewed towards predominantly sheep farm operations:
 - Sheep 3,116,328m (11,977m avg)
 - Beef 327,353m (1,502 avg)
 - Lifestyle 49,621m (378 avg)

Locations: High levels of impact across all regions but most prevalent in Southern and Northern areas

Distribution of impact: In total there were 19 landowners who incurred more than 10km of combined fencing damage

2

TRACK DAMAGE – 75% of landowners

Across all survey respondents impacted, 502,038m of tracks have been damaged/lost at an average per landowner of 1,668m

Total track damage was largely linked to Sheep or Beef operations

- Sheep 299,852m (2,499m avg)
- Beef 137,030m (1,458m avg)
- Lifestyle 17,213m (538m avg)
- Dairy 16,600m (1,660m avg)

Locations: Track damage incurred by over 80% of those in Southern and Northern Areas

Distribution of impact: 30 properties overall have incurred 5km or more of track damage

3

WATER SUPPLY / IRRIGATION - 71% of landowners

In total, survey respondents incurred the following damage to their water supply / irrigation systems:

- 1,082 dams damaged/lost
- 1,555,561m of water reticulation damaged/lost
- 6,950m of wastewater damaged/lost

Those that are predominantly farming sheep lost 762 dams, 71,785m of water reticulation and 2,430m of waste water.

Locations: Highest occurrence of impact was felt in the Central region

Pumps and Sheds: As well as the impacts listed above, 145 properties reported losing or suffering significant damage to pumps and/or pump sheds.

Most respondents who have suffered slips have had this account for 10% or less of their total land size

4

SLIPS - 68% of landowners

For those who suffered slips on their land, this damage was largely limited to 10% or less of their total land (76% of those impacted)

When we converted ballpark % impacts to total land area we calculate that in total approximately 10,705ha was lost to slips at an average of 39ha per impacted property.

Sheep operations had a total of 6,559ha impacted (58ha average) while beef had a total of 3,480ha impacted (39ha average).

Locations: 85% of those in the Northern region incurred slipping

Distribution of impact: In total, 30 properties have lost 100ha or more to slips.

5

CULVERTS - 64% of landowners

When looking at the properties who suffered Culvert damage, the total estimated replacement value of these culverts is \$3,175,806 at an average of \$14,745 per impacted property.

The majority of this replacement cost/damage was relatively equally shared between Sheep operations (\$1,558,750) and Beef operations (\$1,370,555)

Locations: Most prevalent across Southern and Northern areas

Distribution of impact: For a small number of properties (5) the estimated replacement value for damaged culverts amounted to \$100,000 or more.

6

PLANTING - 53% of landowners

When looking at total planting losses for those impacted, the greatest loss (ha) was for erosion control and Forestry.

- Forestry 608ha (avg: 3ha)
- Erosion 700ha (avg: 3ha)
- Riparian 514ha (avg: 2.5ha)
- Natives 483ha (avg: 2.4ha)

NOTE: Of the 3 properties that identified their predominant land use as 'Forestry', only two were impacted for a total loss of 3ha of forestry planting.

Locations: 60% of those in the Southern region incurred planting losses

Summary of Top Impacts by Location

	TOTAL			Northern			Central			Southern		
	% impacted	Total	Average	% impacted	Total	Average	% impacted	Total	Average	% impacted	Total	Average
Fencing damage	92%	Conventional (wire) 2,028,422m Electric 1,569,267m	5,497m 4,229m	96%	59,310m 14,250m	2,471m 648m	89%	515,851m 147,985xm	2,055m 592m	99%	1,446,441m 1,404,880m	16,255m 15,785m
Track damage	75%	502,038m	1,668m	81%	63,160m	3,158m	71%	318,461m	1,592m	84%	99,267m	1,306m
Water supply/irrigation system damage	71%	1.082 dams 1,555,561m of water reticulation 6,950m of wastewater	4 dams 552m of water reticulation 26m of wastewater	69%	141 dams 5,700m of water reticulation 0m of wastewater	8 dams 335m of water reticulation 0m of wastewater	73%	739 dams 126,191m of water reticulation 4,950m of wastewater	4 dams 625m of water reticulation 25m of wastewater	64%	97 dams 22,670m of water reticulation 2000m of wastewater	2 dams 390m of water reticulation 37m of wastewater
Slips	68%	10,705ha	39ha	85%	1,280ha	58ha	64%	6,460ha	35ha	71%	2,771ha	43ha
Culvert damage	64%	\$3,715,806	\$14,745	73%	\$378,800	\$21,044	59%	\$2,785,356	\$17,408	76%	\$488,650	\$7,082
Planting losses	53%	Forestry 608ha Erosion 700ha Riparian 514ha Natives 483ha	Forestry 3ha Erosion 3ha Riparian 2.5ha Natives 2.4ha	27%	Forestry 14ha Erosion 16ha Riparian 17ha Natives 57ha	Forestry 2ha Erosion 2ha Riparian 2ha Natives 10ha	52%	Forestry 499ha Erosion 457ha Riparian 427ha Natives 375ha	Forestry 3ha Erosion 3ha Riparian 3ha Natives 3ha	60%	Forestry 86ha Erosion 223ha Riparian 61ha Natives 45ha	Forestry 2ha Erosion 4ha Riparian 1ha Natives 1ha
Silt damage	47%	3341ha	18ha	54%	356ha	27ha	50%	2,334ha	17ha	37%	636ha	19ha

Footnote: Northern location is the Wairoa District Council area
 Central location is the Hastings District Council area
 Southern location is the Central Hawke’s Bay District Council area.

Remainder of Impacts by Location

	TOTAL			Northern			Central			Southern		
	% impacted	Total	Average	% impacted	Total	Average	% impacted	Total	Average	% impacted	Total	Average
Sheds/barns/yards damage	41%	\$13,644,370	\$84,748	31%	\$86,500	\$10,813	48%	\$13,007,670	\$99,295	23%	\$300,200	\$15,010
Sustained flooding damage	36%	1582ha	12ha	35%	120ha	13ha	39%	823ha	8ha	27%	634ha	26ha
Machinery/Vehicle/Equipment damage	36%	\$11,419,209	\$78,753	27%	\$200,000	\$28,571	42%	\$10,809,500	\$90,079	19%	\$289,709	\$17,042
Stock losses	25%	6,388 Sheep 258 Cattle	66 Sheep 3 Cattle	35%	419 Sheep 45 Cattle	47 Sheep 6 Cattle	21%	3,095 Sheep 198 Cattle	54 Sheep 3 Cattle	33%	2,844 Sheep 14 Cattle	95 Sheep 1 Cattle
Bridge damage	24%	\$5,897,300	\$62,077	42%	\$236,000	\$23,600	20%	\$2,425,700	\$44,920	32%	\$3,223,600	\$111,159
Wood waste / debris damage	23%	758ha	9ha	15%	92ha	23ha	27%	600ha	8ha	12%	51ha	5ha
Issues with access to/from property	23%	-	-	62%	-	-	23%	-	-	13%	-	-
Supplementary feed impacts	21%	4,363 bales of baillage 8,429 bales of hay	53 bales of baillage 99 bales of hay	19%	705 bales of baillage 736 bales of hay	141 bales of baillage 147 bales of hay	21%	2,016 bales of baillage 5,503 bales of hay	35 bales of baillage 93 bales of hay	22%	1,642 bales of baillage 2,190 bales of hay	86 bales of baillage 110 bales of hay
Gravel damage	19%	458ha	6ha	12%	127ha	42ha	18%	148ha	3ha	24%	183ha	8ha
Forage crop losses	18%	958ha	14ha	15%	36ha	9ha	16%	374ha	9ha	25%	548ha	24ha