Dairynz Form Submission

I am making this submission to offer a dairy farming perspective on the Government’s Essential Freshwater Package and the Action for Healthy Waterways discussion document.

Healthy waterways are important to all New Zealanders, including dairy farmers. We too want to have healthy waterways, successful businesses and thriving rural communities. Dairy farmers share the same aspirations to protect and enjoy our streams, rivers, lakes and wetlands.

That’s why in July 2013 we launched the Sustainable Dairying: Water Accord, a set of national good management practice benchmarks aimed at lifting environmental performance on dairy farms. In our latest five-year results we have already achieved:

- 100% of stock crossing points have bridges or culverts to exclude dairy cows
- 98% of waterways greater than 1 m wide have dairy cattle excluded
- 100% of farms have been assessed for effluent management practices
- 100% of dairy farm conversions complied with environmental standards in the 2017/18 season.

All of this was done voluntarily and at our own expense. Most importantly, we believe these actions will lead to improved water quality and ecosystem health outcomes.

I am broadly supportive of the Action for Healthy Waterways document’s intent to improve water quality; however, I have significant concerns about some of the proposals and hope the Government will be open to considering alternatives that the primary sector is working on.

- I support strategies and actions towards achieving swimmable waterways, and the Government’s work to protect drinking water for our communities.

- I support proposals to limit further intensification in overallocated catchments in the interim.

- In principle, I support the requirement for mandatory Farm Environment Plans, stock exclusion from waterways and a move to best practice for winter grazing.

- I support the ‘averaging’ width set-back approach to stock exclusion and that current fencing remains in place where fencing is already excluding stock from entering waterways. Minimum buffer widths need to be practical and deliver outcomes.

- I do not support requirements to move existing fences by 2025 as there is limited progress to be achieved by re-fencing the same length of stream. I would also like to see waterways less than 1 metre wide, wetlands, and other critical source areas that I fence as part of my Farm Environment Plan count towards the ‘average’ set-back distance applied to my farm.

- I believe more work needs to be done to improve the definition and rules for ‘pugging’ and requirements to re-sow within 1-month, in the winter grazing proposals. I support permitted
activity rules for managing stock holding areas, rather than the need for a consent.

- I support policies that protect ecosystem health. However, I do not support the proposed ecosystem health nitrogen (DIN) and phosphorus (DRP) attributes. The science used to come up with these numbers is too simplistic and fails to account for current scientific understanding of the complexity of stream health.

- I support measuring ecosystem responses (namely, periphyton and macroinvertebrates) and taking an adaptive management approach where community-set outcomes are not met.

- Because sediment is an important driver of stream health, I support this as an attribute together with an adaptive management approach for reducing both deposited and suspended sediment. However, the proposed approach to suspended sediment is overly complex and has resulted in national bottom-lines that are well below any peer-reviewed effects-based levels of turbidity. This is of concern to me.

- I would like to see additional work undertaken to ensure that all the policies are practical, will work for farmers, and that adequate resourcing has been considered. For example, that we have enough capability and resources around the country to support farmers in implementing the Government’s proposed Farm Environment Plans, and that potential monitoring and/or compliance requirements are not too onerous for farmers, and build off the work already being undertaken by the sector.

- We should make the most of having Farm Environment Plans in place – our sector has already committed to all dairy farmers having FEPs by 2025. Some elements of the Essential Freshwater proposals would be better addressed through FEPs, rather than requiring a consent. For example, stock holding areas and the maintenance and management of wetlands should be Permitted Activities and managed through FEPs.

- I’d also like to express my disappointment with the way this consultation has been carried out. The initial six-week timeframe is too short for such a significant policy proposal. Spring is a busy and stressful time for farmers, and this – alongside the Zero Carbon Bill, Mycoplasma bovis and the pricing of agricultural emissions – has added to that weight.

- Finally, there appears to be a lack of Government economic analysis available for me as I try to calculate and understand what this change might mean for my farm, my family and my community. This is especially concerning as I try to understand how the combination of cumulative policies and additional levies may affect us. This needs to be addressed before these policies are finalised.

Thank you for considering my submission. I ask that you work with farmers, not against us, to continue our commitment to improved water quality outcomes for all New Zealanders.

Kind regards,