To save our rivers and safeguard our drinking water the Government should urgently implement:

1. A sinking cap on synthetic nitrogen fertiliser. Synthetic nitrogen fertiliser, imported feed, irrigation, overstocking and intensive winter grazing damage our waterways. I strongly support ‘input controls’ like the proposed nationwide cap on synthetic fertiliser.

2. Restrictions on intensive farming practices and rules that will halve the herd; Including; a nationwide maximum stocking rate limit, a complete ban on new dairy conversions, an end to intensive winter grazing, and a regulated phase out of the use of imported animal feed.

3. Enforceable limits on pollution: I support the nitrogen loss cap and the strict bottom lines for pollutants like nitrogen, phosphorous, sediment and E.coli.

4. Strong rules, not voluntary measures: While I think it is essential that farms have a plan to cut pollution, voluntary farm plans and other industry-led measures must be additional to strong mandatory rules not instead of them.

Specifically, within the proposed NES I support:

5. A nationwide cap on synthetic nitrogen fertiliser (Option 2 section 8.4).

6. All the proposed controls on intensification in section 8.2 on; new dairy conversions, expansion of irrigated land, changes in land-use to dairy support, dairy, or from forestry to pasture and intensive winter grazing. But I want these to be prohibited activities and apply nationwide.

7. The nitrogen loss cap, (Option 1 section 8.4) in combination with, but not as a replacement for the fertiliser cap.

8. National regulation on intensive winter grazing (option 1 section 8.6).


10. Additional protections for wetlands - these should follow the Science and Technical Advisory Group (STAG) recommendations and apply to wetlands of all sizes and on private land and the forestry industry should not be exempt from these rules.

I want all controls on inputs and intensification in the NES to be stronger than the proposals and to become a permanent set of rules, rather than expire in 2025.

Specifically, I would support:

11. The synthetic fertiliser cap to be set low initially and as a sinking cap from 2020 onwards which ends in the elimination of this product completely by 2025.

12. Making new dairy conversions, intensive winter grazing and new feedlots prohibited activities, instead of discretionary activities.

13. Implementing these additional input controls:

16• A maximum stocking rate limit applied nationally, which is lower in catchments with porous soils.
17• Making the nitrogen-loss cap a nationwide rule, not only in high nitrate affected catchments

I oppose:

18• Option 3, in section 8.4 ‘farm plan based reductions’.
19• Option 2, in section 8.6, for ‘industry set minimum standards for winter grazing’
20• Farm plans being used to “reduce reliance on national regulations”, as suggested on pg 67 of the discussion document.

In the NPS, I support:

21• The inclusion of nitrogen, phosphorus and suspended sediment as new attributes, and I support the bottom lines for these attributes proposed by the STAG.
22• The inclusion of the tables for macroinvertebrates, submerged plants, deposited sediment, dissolved oxygen, and ecosystem metabolism. However these should be attributes requiring limits, rather than ‘action plans’.
23• The elevation of Te mana o te wai and the hierarchy of obligations so that the first priority is the health of the water, the second priority is providing for essential human health needs, such as drinking water, and third is other consumption and use.
24• The elevation of the status of mahinga kai to a compulsory value.
25• Additional provisions for safe fish passage. These should also require the identification and removal of existing barriers to safe fish passage and these requirements should be put into the NES so that they come into effect sooner than 2025.

26• I also support the faster planning process proposed.