Submission: Action for Healthy Waterways Discussion Document

From: Dairy Goat Co-operative (N.Z) Ltd
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Dairy Goat Co-operative is a New Zealand farmer owned Co-operative established in 1984. It specializes in the development, manufacture and international marketing of its own-brand goat milk nutritional powders for infants and children. It owns and operates its entire core manufacturing processes, enabling tightly controlled production of high-quality milk formula for infants and children.

Hamilton based, Dairy Goat Co-operative is an export focused business that sources goat milk from its shareholder suppliers in Northland, Waikato and Taranaki. The proposals put forward in the Action for Healthy Waterways discussion document have the potential to materially impact Dairy Goat Co-operative’s suppliers and therefore the Co-operative as a whole.

Dairy Goat Co-operative is committed to the enduring health and wellbeing of current and future generations of children. Dairy Goat Co-operative markets and distributes its products in over twenty-five countries. It is an international leader in researching the functional benefits of Goat milk for paediatric nutrition, and has published clinical research trials internationally.

Submission Points

Dairy Goat Co-operative is generally supportive of the objective of the discussion document, to improve freshwater quality outcomes across New Zealand. Dairy Goat Co-operative submits that achieving this should occur in a manner that recognises and supports good behaviours past, current, and future, and maintains and improves the well-being of the New Zealand community as a whole. It should also occur in a timeframe and manner that recognises practical constraints on the ability for land owners to be supported through a transition process, and the ability of central and regional government to put in place systems to monitor and manage policies and regulation.

Dairy Goat Co-operative submits that land use decisions should be assessed using a risk-based approach which recognises the level of risk posed by differing land use practises. This will
encourage focus on addressing the highest risk land use practises which have the greatest impact on the environment. Such an approach will also enable prioritisation of work for the limited number of professionals available to support these activities.

Dairy Goat Co-operative notes that the proposed approach within the discussion document is focused on common farming systems, such as cattle-based dairying, and would seem to have not considered the risks (or lack of) posed by other farming systems and the impacts of the proposed policies and regulations on these systems. This is evident in two key areas:

- Discussion of dairying within the document having a “cattle” focus, with no recognition of other species currently farmed for dairying within New Zealand, and
- The use and definition of the term “feed-lot”, with little consideration for how this captures other farm systems, specifically housed goat farming.

Dairy Goat Co-operative is concerned that the proposals have been developed and taken out for public comment in advance of any analysis of the impacts of the implementation of the proposals on rural communities. These impacts have the potential to impact the extent, speed of implementation/transition period, and level of support required to achieve improved freshwater quality objectives. This will be especially important if the freshwater quality objectives are to be achieved while maintaining socially and economically healthy rural and provincial communities.

Dairy Goat Co-operative believes considerable work needs to be undertaken to determine what activity needs to be implemented, by both central and regional government, to support any transition in farming approach and in the delivery of the services that farming enterprises are likely to need to access (e.g. environmental farm advisory services, farm planning services). The proposed approach runs a significant risk of being undeliverable in the absence of such support and there are issues of capacity and capability that Dairy Goat Co-operative believes are unlikely to be addressed in suitable timeframes should an uncoordinated “market” approach be taken.

**Dairy definition**

Issue:

The documents variously provide definitions of “dairy cattle” and “dairy farming/support” and in all instances these refer to cattle based dairying. Within the body of the documents the term “dairy” or “dairying” is used – this does not seem to have been defined. Controls on “dairy” farming would be significant if the approach contained within the discussion document were to be implemented. However, it would seem the focus of all such concerns relates to the potential environmental impacts of cattle based dairy farming.

Examples of the use of the term “dairy” or “dairying” within the discussion document include:

**Section 1.1**

“From June 2020, changes such as new irrigation or conversion to dairying will only happen where there is clear evidence it will not increase pollution.”
Section 8.2

"Intensification occurs when inputs such as irrigation, fertiliser and stock increase per hectare of land, or if a farm converts to a higher intensity land use (such as from sheep and beef farming to dairy farming)."

“We propose to apply restrictions to the following activities:

• increases in the area of land in irrigated pastoral, arable or horticultural production above 10 hectares
• changes in land use above 10 hectares from:
  - arable, deer, sheep or beef to dairy-support
  - arable, deer, dairy-support, sheep, or beef to dairy”

The use of the terms dairy and dairying without reference to cattle is common throughout the discussion document.

Dairy Goat Co-operative notes that dairying in New Zealand now encompasses four dairy animal species; cattle, sheep, goat and deer.

Deer dairy is a very small scale venture, and the impacts of deer on freshwater quality will be managed via the stock exclusion provisions relating to deer generally.

Sheep and goats are both growing sectors. Goats are known not to spend time in waterways, and are light in weight so having minimal impacts on soil structure. A dairy goat farming system will typically see the goats housed, with a cut and carry feeding regime. As such, the risks to the environment, including water quality, from dairy goat farming is negligible to nil as the animals will not have access to waterways, and any potential contaminants will be captured, contained and managed to prevent environmental impacts.

Proposed solution:

Dairy Goat Co-operative submits that given the key freshwater quality concerns, in relation to the impacts of dairying, do not relate to goat dairy systems, that either:

- The term "dairy" be explicitly defined as relating to the farming of cattle only and any proposed controls on dairying, or land use change to dairying, be confined to cattle based dairy farming, or
- Dairy goat farming systems be explicitly excluded from the definition of dairy and dairying within these document.

Dairy Goat Co-operative suggests that the discussion document and any associated resulting regulations and policies be reviewed to ensure that the appropriate definitions are used consistently throughout.

Stock exclusion
Issue:

The discussion document and draft regulation lack consistency, and therefore clarity, as to the animal types that must be excluded from waterways. In some parts of the documents (e.g. Draft Stock Exclusion Section 360 Regulations) a reference is made to cattle, deer and pigs requiring exclusion however within the discussion document itself the terms “livestock” and “stock” are also used. These terms encompass more than the species noted above and do not seem to have been defined.

Dairy Goat Co-operative is concerned the lack of consistency between the discussion document and the proposed regulations could see an expansion of the species required to be excluded from waterways following this consultation.

Goats are recognised as being a species that has no affinity for entering waterways, they do not have a tendency to wallow, nor do they have the weight to cause pugging or bank damage. Their impact on freshwater quality through access to waterways will be negligible.

Dairy goat farming primarily uses a housed farming system. Within this system the goats will be prevented from accessing any waterways, without the need for riparian fencing to occur.

If a risk based approach is taken to addressing freshwater quality issues, the costs of requiring riparian stock exclusion for dairy goat farming systems clearly out weighs any benefits that may accrue.

Proposed solution:

Dairy Goat Co-operative submits that no change should be made to the proposed regulations requiring riparian exclusion only for those species currently noted, being cattle, deer and pigs. 

Alternately housed dairy goat farming systems should be explicitly exempted from the requirement for riparian stock exclusion, recognising both the negligible impact of goats on waterways and the controls in place through the housed farming system used. Dairy Goat Co-operative notes that housed pigs are currently exempted in one instance within the proposed regulations.

**Feedlot**

Issue:

The current definition of a feedlot within the discussion document is:

"..... areas where stock are confined in pasture-free areas and provided with feed, for more than 80 days in a six-month period. This includes both covered and uncovered areas."

This definition is very broad and, given the comment within the discussion document that “there are about five feedlots within New Zealand”, would seem to cover many more situations than
the documents drafters envisaged. The definition currently captures housed dairy goat farming systems.

Housed dairy goat farming provides a contained system that allows any potential risks to water quality to be addressed through the capture, containment, and management of potential contaminants. Such housed systems should not be confused with a “feedlot” situation.

Furthermore, the use of this term in the context of housed dairy goat farming has the potential to cause confusion in the minds of the public and Dairy Goat Co-operative’s customers. The image of large scale feedlots, such as those used for beef production in the Americas and Australia, is low in the public mind with concerns about environmental impacts as well as in relation to animal health and welfare outcomes.

Proposed solution:

Dairy Goat Co-operative submits that the definition of feedlot be reviewed to ensure it only captures the situations envisaged by the drafters - which Dairy Goat Co-operative believes are those situations where livestock are held under the conditions noted (in the definition) on soil or uncontained de-vegetated pasture, with an absence of any infrastructure to prevent, or capture and manage, run-off of effluent or contaminated water. If the drafters are unable to define the term in a way that does not capture housed dairy goat farming systems, then such farming systems should be explicitly excluded from the definition.

**Intensification**

**Issue:**

The discussion document proposes an approach that would see a stocking rate intensification being used as a proxy for increased risks to freshwater quality. Resultant policies have implications for land use change, requiring actions (e.g. consents, requirement to demonstrate no increase in risks to freshwater quality) that add cost.

Intensification in the absence of appropriate changes in management systems may well lead to increased environmental impacts. Intensification with appropriate infrastructure and management changes can provide a much improved environmental outcome. Housed dairy goat farming systems provide such an alternate land use due to the use of systems of infrastructure and management that allow the capture and control of potential environmental contaminants. Land use change to housed dairy goat farming should be supported as New Zealand attempts to maintain the viability of rural communities while reducing environmental impacts. Adding costs to such land use change sends the wrong signals to land managers.

Proposed solution:

Dairy Goat Co-operative submits that land use change to low/negligible risk farming systems, such as housed dairy goat farming systems, should be supported. As such movement to this farming system should be a permitted activity, conditional on meeting appropriate regional and district council rules.
Implementation Constraints

Issue:

The policies and actions proposed within the discussion document are in themselves nothing new. They take activity that is already occurring in some regions of New Zealand and look to apply them nationally. In taking this approach there also needs to be recognition of those factors that may be preventing these regional approaches from being successful. Key amongst these is a lack of suitably trained and experienced resource to support change in land-owner practice, and to deliver and audit farm plans.

Capacity and capability to provide meaningful support is constrained in many (if not all) regions. The ability to increase capacity is there – it will take time to develop however. Dairy Goat Co-operative has concerns over the ability to deliver the support needed for a transition of land use practises, and meet what will likely become regulatory requirements for farm plans, in the timeframes required to achieve the improvement in freshwater outcomes the discussion document proposes. It is evident that this is a serious issue within the Waikato in relation to the Healthy Rivers Plan Change, and it is our understanding that similar issues already occur in Canterbury.

Any nationally applied policies will place additional pressure on Regional Councils to develop systems to allow policy and regulatory implementation to occur. Dairy Goat Co-operative suggests that there is a need to provide appropriate tools (farm plan systems, information systems etc) and support at a national level to reduce inefficient "re-invention of the wheel" by Regional Councils and reduce inconsistency across regions.

Yours Sincerely,

Personal details removed