Proposals as a whole - please refer to questions 1-3 on page 19 of the discussion document

Notes
Generally, the group feels that the proposals they are able to comment on - section 5.8 and section 8, will address water quality and bring about improvements. The magnitude of the improvement is poorly quantifiable in the view of this group for the following reasons; limited baseline data in various catchments for comparison; concern that this means the outcomes may not be in line with modeled predictions; concern that the science to provide the ability to predict real outcomes in a whole ecosystem is limited to specific situations and has yet to be proven. The group acknowledges that this last perspective may in part be due to exposure to the science completed to date. The group feels that the goal of bringing freshwater resources and ecosystems to a healthy state within a generation is laudable but there remains too many grey areas around the definition and how this will be measured to be meaningful. The specific goals for each catchment need to be defined clearly and be measurable for the overarching aspiration to have any meaning. A large proportion of the dairy farmers comprising this group, believe that they are moving in line with the broad proposals outlined already and have been doing so for a number of years. There is a feeling that water quality in some of the catchments is better than previous and also that efforts in some areas is frustrated by catchments further upstream of the areas they farm in.

Proposals as a whole - please refer to questions 4-6 on page 19 of the discussion document

Notes
As a veterinary business, the primary concern for us is to be aware of the issues facing our clients and to help them through where possible. We will remain engaged with understanding the implications of the proposals and providing a voice for our farm clients to engage with the process as it is rolled out. A technical summary of the relevant science and gaps in the science would be useful to help understanding and foster a belief in the local community that the government understands the reality of the proposals. Also further modelling of costs and implications for local farms as case studies would assist with the community knowing what is coming. 6. Specifically regarding set-backs and the consequences of this - drains that have been developed to allow flat land to be farmed need to be classified clearly under the new proposals. A lot of these are well over 1m wide with 600mm of water in them year round. How are these to be managed? Riparian planting along the edge of these drains will preclude cleaning. How is this to be managed? Where set-backs occur along waterways, noxious weeds such as blackberry, gorse etc may become a predominant part of the flora. Is this desirable?

Nitrogen, phosphorus, and sediment attributes - please refer to questions 20-21 and 30-35 on pages 52 and 53 of the discussion document

Notes
Question 30: The group does not support introducing new bottom lines for nitrogen and phosphorus based on the following concerns: the group does not feel they have enough background provided in the discussion document to fully understand the implication of lowering the bottom-lines; the group would like assurance that new bottom lines reflect what is naturally present in representative waterways; the group questions the validity of a nationally applicable bottom line without further research and suggests that bottom lines may vary catchment by catchment depending on soil, climatic and topographical features of those catchments; concerns were expressed about the applicability of a national bottom line to the top of the Waikato river compared to the mouth of the Waikato river for example; before committing to new bottom lines, the group needs more certainty around the impact that would have on land use and farm economics; the group is supportive of further research to reduce uncertainties in these areas to determine appropriate bottom lines. Question 31. The group is not sure what it would do differently if the new bottom lines were implemented because it has been provided with very little capacity to determine what actions would make a difference.

Restricting further intensification - please refer to questions 51-53 on page 80 of the discussion document

Notes
The group feels that clarification of the definitions of dairy support needs to be progressed. For example the use of a run-off block to winter a seasonal dairy herd is substantially different from the use of a run-off to graze youngstock and drystock in a year round system. Also clarification of the proposed restrictions on forage cropping as they apply to summer cropping versus winter cropping.
need to be provided. Summer crop grazing during lactation or during dry periods is substantially different from high intensity winter crop grazing. Question 51. While the group supports the broad interim controls on intensification it does so with the following caveats; that switching from "forestry to agriculture" or from "sheep and beef to dairy" be strictly controlled; but that further sustainable development of existing farms be allowed. Examples discussed were of "purchasing a poor performing dairy farm and lifting production" or of "purchasing a run-off which lifted stocking rate on the home farm" may be seen as intensification but this should not be precluded if it is done sustainably. The group does not support the concept of "grandparenting" of farm systems. Question 53. Underdeveloped land exists often inside farms as well as outside of farms. The group feels that undeveloped land within existing farms should be able to be developed productively; wetlands should be protected;

**Clause**

Farm plans - please refer to questions 54-57 on page 80 of the discussion document

**Notes**

Question 54. The group supports mandatory farm plans. The main reasons for this are to reduce risk to the industry from rogue/non-compliant farmers; demonstrate to the public a broad industry desire to be responsible for and improve our environment; to help farmers correctly prioritize improvements; to give farmers direction in what is an increasingly uncomfortable social environment. Question 55. The group supports the proposed minimum content requirements for the freshwater module of farm plans and comments that a number of industry led initiatives by companies such as Synlait and Fonterra already cover the requirements. Question 56. The group supports a priority to have all farmers engaged with a farm plan by 2025. While the group also supports a plan to have tangible change by 2035 it questions whether this is to slow a timeframe. However, it also recognizes the cost of change needs to be balanced with risk of public perception. Question 57. Because of the highly interlinked nature of the costs and benefits associated with farming activity to the whole of NZ, the group supports costs for planning and auditing being shared by the broader community. Financing options for on-the-ground investments need to be favourable and stepped otherwise they won't be able to be done in a financial constrained environment.

**Clause**

Immediate action to reduce nitrogen loss - please refer to questions 58-64 on page 80 of the discussion document

**Notes**

Question 58. While the group appreciates the simplicity of Option 2, it supports option 3 as the most suitable to account for the variability in soils, climate, topography and farm systems. Option 3 will effectively be in place once farm plans are rolled out. Question 59. Changes to the farming system would depend on the results of the plan assessment and development. Likely changes would include reductions in N use on some farms, increases in carbohydrate based supplementation, lowering stocking rate which on the farms represented in this group would result in lowered milk production and income. The group acknowledges that some farms outside of the group could see production and income benefit from lowered stocking rates but believes these are far fewer than 10 years previously.

**Clause**

Excluding stock from waterways - please refer to questions 65-68 on pages 80 and 81 of the discussion document

**Notes**

Question 65. Yes, the group supports the exclusion of stock from waterways as proposed in the discussion document and in the draft of section 360. Question 66. As stated previously, the group believes there is need for clarification of the status of drains developed under the drainage board schemes and how these are to be handled. Question 67. The group supports the measurement of setbacks from the top of the bank but feels strongly that on-farm and paddock specific factors should be accounted for when determining the size of the set-backs. The cost of set-backs is not unsubstantial. One of the farmers present running a 1,000ha unit with 600ha potentially affected by new setback proposals estimated the loss of $600,000 worth of land to increase the set-backs by 2m. Paddock specific factors such as pugging potential, slope and soil type will affect the surface sedimentary load and therefore the width of the set-back required. These should be more fully understood to inform specific rather than blanket set-back recommendations. Set-backs need to allow access to drains managed under the regional drainage boards for cleaning. Question 68. The group cannot think of circumstances in the ordinary run of activity where stock should be exempt from the exclusion regulations on dairy farms.

**You have elected to withhold your personal details from publication.**