Your submission to Action for healthy waterways – consultation

Reference no: 175

Submitter Type: NGO

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

Notes
Short time frame for considered response. Respect the intent. Good that it is across all industries. Good that urban contribution to water quality are taken into consideration. BUT needs to include all land use eg horticultural, arable and vineyards.

Clause
Impacts and implementation - please refer to questions 4-6 on page 19 of the discussion document

Notes
with required set backs some farms will have no land left, e.g. have drains along race so do I have to fence both. How are they going to audit it? What will it actually look like in practice? Unintended consequence - will have no access to waterway and drains. Property access maybe compromised. who pays for the planting and maintenance, increased pests. Chemicals into water in maintenance. Impact comparably more on smaller farms as a % - will have to de-stock, earn less money, Where is the science to support the 5 m set back?

Clause
Water commission and other comments - please refer to questions 7-8 on page 19 of the discussion document

Notes
National is okay to set standard but need regional implementation. BUT concern is who would be on it and how would they be chosen. NEEDS industry representation - farmer elected. What powers would this body have?

Clause
Drinking Water National Environmental Standards - please refer to questions 43-45 on page 56 of the discussion document

Notes
no specific water comments

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

Notes
Agree with it in principle but will vary with each individual farm and baseline (eg developed land producing well vs having purchased underdeveloped land to improve it). Agree with consenting pathway. What is the unit of measurement? Many farmers have runoff blocks - is this included or block by block. ALSO what about decreased income - SOCIO ECONOMIC EFFECTS NEED TO BE QUANTIFIED.

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

Notes
We agree with farm plans, and have them. Getting better at using them. IF mandatory who would be the governing body - individual results should not go to central government. Results should be anonymised. FEP standard needs to be same, but relevant, across ALL industries including hort etc. FEP should be industry driven and audited regionally. Funding catchment initiatives that will have impacts greater than any individual property should have central government funding.

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

Notes
Lack of science to make any effective decisions - it is not one size fit all. Need to be part of Farm environment plans. Regional differences in soil type and climate need to be researched. There documented evidence of progress on land users managing their N loss and if this within regional requirements that should be it.
Clause
Excluding stock from waterways - please refer to questions 65-68 on pages 80 and 81 of the discussion document

Notes
Support exclusion of cattle. But definition of a water way and drainage canals and how they fit in? Drains should not be included in any required set back but covered in FEP's. Ephemeral water ways should be included in FEP's as to be managed. Concerns about how the 5m set back was got to? If the 5m becomes mandatory will it enable us to meet criteria for carbon trading. Any impacts need to be outcome focussed not activity focussed - eg drain along race - don't need 5m but need to manage to keep contaminants out of water. If have planted 5m margins and silt builds up how do you do management? Set back needs to be appropriate to what is needed to be controlled. Need to be able to manage and harvest material if needed in riparian margins. Drainage networks were put in for a purpose - this needs to be still be able to occur. Where does cleaning drains, or spraying drains fit in?

Clause
Controlling intensive winter grazing - please refer to questions 69-70 on page 81 of the discussion document

Notes
For this catchment there is no intensive winter grazing and cropping but there is sacrifice paddocks do. Run off needs to be controlled - what about the whoopsy factor for overnight rain? Industry control not central government. Cover in FEP. Needs to be practical as some farms have lots of drainage - outcome focussed and manage run off. A barn on every farm is not the solution. Pugging depth is ridiculous - where is it measured from? who and how? This is not practical at all. How it is defined? Intentional? Gateways?

Clause
Feedlots and stock holding areas - please refer to questions 71-75 on page 81 of the discussion document

Notes
what is the definition of a feed lot? Needs industry input and research for practical solutions. Management should be covered in FEP's.

Clause
Other comments on the proposed National Environmental Standards for Freshwater - please refer to questions 76-78 on page 81 of the discussion document

Notes
Regional government capacity will be an issue to meet timelines. NEED economic and social impact report including impact on rural communities and towns. Capacity shortage about completion of FEP's and progress monitoring.

You have elected to withhold your personal details from publication.