To: Ministry for the Environment

By email: consultation.freshwater@mfe.govt.nz

Submission on: Action for healthy waterways – A discussion document on national direction for our essential freshwater

Date: 31 October 2019

From: Federated Farmers West Coast

Address for service: Federated Farmers of New Zealand
Essential Freshwater

The West Coast Province of Federated Farmers welcomes the opportunity to submit on the Ministry for the Environment’s (‘MfE’) ‘Action for healthy waterways – A discussion document on national direction for our essential freshwater’ and related documents.

As you may be aware, Federated Farmers consists of 24 autonomous provinces, supported by a national body Federated Farmers of New Zealand. This is the submission of West Coast Federated Farmers, the provincial body representing local farmers. We are relying on Federated Farmers’ national submission to represent our views on most points; this submission outlines some of the West Coast’s unique regional characteristics and how they relate to the Essential Freshwater package. The submission should be seen as complimentary to the national submission.

Local Context

The West Coast region has a land area of 2,300,000 ha with the Department of Conservation managing 84% of this land. There is approximately 40,650 km of streams and rivers in the region, of which 81% is in Department of Conservation managed lands.

In a national context, one quarter of New Zealand’s protected land, and 10% of the total amount of rivers, is located on the West Coast. Compared to other regions, the West Coast is rich in its level of remaining biodiversity. The extent of indigenous vegetation provides other benefits and positive effects including, for example, well-vegetated upper catchments that reduce flooding, erosion and sedimentation downstream.

The unique geological and climatic conditions have resulted in a landscape unlike any other in New Zealand. The West Coast is extremely reliant on its natural and physical resources, this reliance on the natural resources requires that the environment remain in a healthy functioning state to provide for this.

We support any move aimed at ensuring that waterways are kept in a healthy state. Healthy, clean water is an essential component of farming good practice as well as being highly desirable from the environmental and production perspectives.

The West Coast has high rainfall and water is generally abundant in most areas. State of Environment reporting has shown that most of the water is pristine, and that the freshwater quality is improving in the areas where improvements are needed, but we acknowledge there is no reason to let water quality slip. There are relatively few significant water use pressures on water bodies on the West Coast.

Traditionally mining has been the primary employer in the region. Agriculture is also a significant contributor, particularly through the dairy industry. In addition to direct farm income from milk production, the added value by the processing of the product is a significant contributor to regional employment and income. Many engineering and other support businesses exist because the mining and agricultural activity and related value-added activities, creates the demand for their products and services.

In 2017, agriculture production on the West Coast directly contributed $325.6 Million to Gross Domestic Product, or 19.98% regionally. This figure is for agriculture production only, it excludes processing and agricultural related services eg veterinarians.

1 Source: Statistics New Zealand Regional GDP and MBIE Modelled Territorial Authority Gross Domestic Product
According to the Statistics NZ Business Demography Statistics Table Builder function on the Statistics New Zealand website, there are 1855 people employed in agriculture and 520 in the food processing (meat and dairy) sector in the West Coast region.

These numbers do not include the self-employed owners of the businesses. The numbers also exclude those employed in rural support services, it only counts those employed on-farm and in food processing. Accordingly, the true figures will be much higher.

There has been insufficient assessment of the economic impacts of the proposed freshwater reforms at national, regional and local levels. This assessment is particularly relevant for economies like the West Coast region, which is heavily reliant on agriculture, processing and related services.

The current Government has a strong focus on wellbeing and communities yet, by not undertaking robust economic analysis, the proposals in this consultation threaten the very core of West Coast life.

The importance of the primary production and food processing sectors to employment in the region is ignored, as are the broader impacts that any restrictions on farm productivity may have on employment and regions.

The economic and social impacts of the proposed regulations will be different within each region, therefore any regulations must be set at the regional level to reflect these differences as well as other local values and trade-offs.

We hope the recent trip to the West Coast by a delegation of staff from MfE highlighted that a national "one size fits all" approach is inappropriate and, why some of the highly prescriptive rules proposed in the draft NPS and NES are impractical for West Coast catchment conditions.

Provision to apply exemptions for areas e.g. at a catchment level and a farm level, where there are no resource pressures, or where resource pressures have already been effectively addressed must be allowed for.

There must also be a degree of flexibility; for example the impracticality of permanent fencing along certain stretches of river that frequently flood. Stock exclusion can be achieved with the use of temporary break-feed fencing, which avoids the expense of fencing (and re-fencing or repairs after every flood) and enables efficient and effective weed and pest control along the river margin.

Due to the very high rainfall in the region, waterlogging and nutrient availability remain major constraints to sustainable production and growth of the pastoral industry. Humping and hollowing and flipping are two land development practices extensively used on the West Coast to improve soil drainage and overcome these major constraints.

- Flipping is the turning over of the soil horizons, usually to a depth of 1-2 metres in order to improve the drainage characteristics of land without altering its natural contour.
- Humping and hollowing means an activity that results in excavation of parallel undulating mounds and hollows in order to improve land drainage for grazing farm stock.

Humping and hollowing and flipping are permitted activities subject to tight conditions regarding size, slope, location outside of riparian margins, and any associated discharge of sediment.

If these conditions cannot be met, a resource consent is required from the West Coast Regional Council, who has a specific Humping & Hollowing and Flipping Consent form.
readily available, as would be reasonably expected with such a widely undertaken on-farm practice.

By ensuring there is an ability to apply regional variances to policy implementation will result in a mutual willingness of everybody involved to find solutions that will actually work. However, some baseline rules are likely to be needed to ensure those few outliers, that every sector has, who have proved reluctant or unwilling to do the right thing are brought into line.

We also ask that a holistic consideration of all government policy (current, under consultation and about to be released) be undertaken to avoid unintended consequences. There is a plethora of changes forthcoming and as nothing operates in isolation, the overall impact(s) appear not to have been considered.

**Conclusion**

We recommend that the process be put on hold pending the acquisition of substantiated data, particularly regional economic analysis regarding the impact of the proposed rules contained in the NPS, NES and Stock Exclusion Regulations.

We recommend that a more flexible method be adopted. A “one size fits all” national approach is too rigid and ignores the regional nuances that must be considered when adopting new regulations.

We recommend that a holistic consideration of all government policy is undertaken to ensure the social wellbeing of our communities is maintained or improved.