Submission

Ministry for the Environment
Proposed Policy
Action for Healthy Waterways
29th October 2019

Background

Oceania Dairy Ltd (ODL) is situated in South Canterbury and has 73 suppliers - 54 in the ECAN Region and 19 in the Otago Region. The majority of supplying farms approximately 64 are irrigated (44 from irrigation schemes) and a further 9 are dry land. 99% of these farms already have Farm Environment Plans either through irrigation schemes or due to the farms being situated in the ECAN region.

Oceania Dairy has been a signatory to the Sustainable Dairy Water Accord and has documented the environmental progress of its Suppliers.

Oceania Dairy has one processing plant which consists of a 10 Tonne/hour dryer, UHT plant and Canning and Blending plant.

General Submission

1.1 ODL has contributed to and supports the DairyNZ submission

1.2 ODL is committed to working with ECAN and the Otago Regional Council to ensure improvements in the environment and work towards environmentally and economically sustainable farming practices.

1.3 This submission is focusing on the proposals outlined the “Action for Healthy Waterways” discussion document.

1.4 ODL believes that a detailed economic and social analysis of the impact on people and communities, of the Essential Freshwater proposals needs to be completed.

1.5 ODL recognizes that some catchments have poorer water quality than others.

1.6 ODL believes that the broad brush approach taken by the Essential Freshwater document needs to be reviewed and regional and catchment differences recognized. (As outlined in the Westland Milk Products submission)

1.7 This broad approach also prevents innovation and will impede flexibility in creating solutions for individual catchments or situations.

1.8 While ODL recognizes that there are cumulative effects across catchments, the current set of proposals does not recognize the significant farm practice improvements which have taken place and improvement in freshwater quality already being seen in many catchments.
1.9 The timeframe of significant improvement in water quality, of 5 years, is unrealistic for some catchments, due to lag times in attenuation, whilst other catchments may be able to achieve this in shorter timeframes. These regional and catchment differences need to be recognized.

**Wetlands (Section 5.6)**

2.1 ODL supports no further loss of wetlands and encourages further consideration of incentives for their restoration and re-creation.

**Water Quality (Section 5.8)**

3.1 ODL does not support the bottom line for rivers of an annual median for 1.0 milligram per litre of DIN, as this is unachievable even in many of our un-degraded waterways, and will not necessarily improve ecosystem health.

**Farm Plans (Section 8.3)**

4.1 ODL supports the mandatory requirement for Farm Environment Plans (FEP)

4.2 Implementing and auditing of FEPs, nationally, will take time and expertise. Currently there would not be enough skilled practitioners to implement this proposal in a short timeframe. Rushing FEPs is likely to result in poor quality outcomes and lack of understanding from farmers.

4.3 FEPs are requirements of some regional councils and irrigation schemes already, which are currently audited. ODL does not believe that these farmers should be required to re-do these plans.

**Immediate Action to Reduce Nitrogen (Section 8.4)**

5.1 ODL acknowledges that in some catchments there are high Nitrogen levels and understands the need to focus on nitrogen reduction. However, if land use change is required then extended timeframes need to be considered in light of economic pressures for these farmers.

5.2 If these proposals are adopted, in some catchments retirement of land will be required, and central government will need to look at compensation for these farmers.

**Excluding Stock from Waterways (Section 8.5)**

6.1 ODL supports stock exclusion from permanent waterways

6.2 Farmers have made significant gains in this area and where fences are in place should not be required to move them out to 5 metres but be left at the minimum distance of 1 metre.

6.3 ODL suggests that there will be little gain for a large cost in extending the setback on existing fences.

6.4 Greater slope >15 degrees may require a larger buffer strips of up to 5 metres

6.5 ODL does not support an average 5 metre buffer strip on slope <5 degrees
Controlling Intensive Winter Grazing (Section 8.6)

7.1 Practices outlined in the proposal are considered industry good management practice.

7.2 ODL supports industry and national standards for winter grazing.

7.3 ODL believes FEPS will play a role in achieving Industry good management practice.

Reducing Pollution from stock holding areas (Section 8.8)

8.1 ODL supports sacrifice paddocks provided they are more than 50 metres from a waterway which will not require a resource consent.

Summary

9.1 ODL supports the concept of the National Environmental Standard on some aspects.

9.2 ODL urges the Government to ensure there is robust economic and social analysis completed before these proposals become legislation.

9.3 ODL asks the Government to consider regional differences for some aspects of this proposal and acknowledge the progress already being made by the Primary Sector.

9.4 ODL urges the Government to also consider the variation in timeframes for differing regions or catchments to comply with any new legislation.

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Contact:

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