Dear Sir/Madam

SUBMISSION BY SYNLAIT MILK LIMITED ON THE:

- **DRAFT NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT**;
- **PROPOSED NATIONAL ENVIRONMENTAL STANDARDS FOR FRESHWATER**; AND
- **DRAFT STOCK EXCLUSION REGULATIONS**

**Synlait Milk Ltd**

1. Synlait Milk Ltd (Synlait) is a New Zealand dairy processing and export company with supply farms, processing plant and other facilities located across the country. It produces a range of nutritional milk products to domestic and international markets.

2. Synlait has processing facilities in Canterbury and Waikato; a blending and packaging facility in Auckland; and a research and development centre at Massey University in Palmerston North.

3. Synlait has developed an integrated supply chain from farm through to processing, and this allows it to provide a consistently high standard of product. Synlait has 257 supply farms (201 in Canterbury and 56 in Waikato) and runs a certified best-practice dairy farming programme, Lead With Pride™ which supports its suppliers in achieving farming excellence.

**Support for the Purpose of the Action for Healthy Waterways Proposal**

4. Synlait supports a national framework for freshwater management. In particular, it supports the objectives to stop further degradation of water quality, with material improvements in five years, and bringing waterways, water sources and ecosystems to a healthy state within a generation.

5. Synlait is aware that it works within an industry where freshwater management is of critical importance. It believes that the Lead With Pride™ programme puts its suppliers at the forefront of industry best practice. Synlait also works mostly within regions where Regional Councils are, or are in the process of, implementing water quality and quantity elements under the current National Policy Statement for Freshwater.

6. Synlait has its own environmental aspirations and its Sustainability Strategy includes the following targets:
Off Farm:
- 20% reduction in water use per kg of milk solids by 2028; and
- 20% improvement in the quality of wastewater.

On Farm:
- 20% reduction in water use per kg of milk solids by 2028; and
- 45% reduction in nitrogen loss to waterways per kg of milk solids by 2028.

Submission Content

7. Synlait’s submission table is attached as Appendix 1. In summary, the key points are:

- Consider nitrogen already ‘in-system’ and how that will be allowed for when assessing trends and determining improvements;

- Support the policy direction of Te Mana o Te Wai;

- Reconsider the proposed DIN and DRP limits, and whether there are higher nutrient limits, or other measures to monitor ecosystem health, which can also achieve healthy waterways (i.e. 3.8g/m3 nitrate toxicity proposed by DairyNZ);

- Proceed with the development of National Environmental Standards for Drinking Water and Wastewater, and national guidance on stormwater management;

- Support the principle of interim measures to control further intensification until Regional Councils have implemented the NPS-FM and Freshwater NES;

- Support mandatory Farm Plans (FW-FPs) with a certified template. Synlait has a similar scheme in place as it works well. Refer to Appendix 2 for details of how FEPs have positively changed the environmental outcomes of our suppliers;

- Ensure those properties with no FW-FP are the initial focus. Farms with existing Farm Plans be assessed later, to allow for less congestion and demand for auditors;

- Support the focus on high risk catchments for immediate action on nutrient loss. Use FW-FPs to reduce nitrogen loss from catchments identified in Schedule 1. Ensure there is sufficient auditing and means for addressing non-compliance;

- Support the 1m minimum stock exclusion setback. However delete the 5m average stock exclusion setback, and rely on the assessment of appropriate setbacks through FW-FPs based on slope, soils and land use;

- Support the control of winter grazing, including the 15 degree slope, and 50ha or 10% of farm, permitted activity thresholds. Delete the pugging permitted activity standard and rely on existing Dairy NZ guidance;

- Stockholding areas and sacrifice paddocks to be managed through clearly defined criteria in FW-FPs; and

- Amend the listed definitions.
Conclusion

8. Please do not hesitate to contact Penny Gallagher, Environmental Policy and Planning Manager (address for service below) should you wish to clarify any matter.

9. Thank you again for this opportunity to provide a submission and we look forward to the further development of the National Freshwater Management Framework.

Dated 31 October 2019

Personal details removed

Director – Sustainability and Brand
Authorised to sign for Synlait Milk Limited

ADDRESS FOR SERVICE:
Synlait Milk Limited
Attention: Personal details removed