Essential Freshwater Package
Ministry for the Environment
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FROM: Pynewood Farm Ltd

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Submission on the Essential Freshwater Package

Background:

This submission is from the shareholders of Pynewood Farm Ltd which is an Equity Partnership set up in 2012 for the purpose of Dairy Cattle Farming. We are made up of five shareholders, Pauline Stewart, Wayne Little, Deborah Little, Noel Erickson and Viki Erickson. Of our shareholders, Pauline Stewart and her late husbands’ family previously owned the farm for many decades, and now Wayne and Deborah Little live and work on Pynewood Farm. We are passionate about our farm and the environment we live in. We are located in the district of Aparima, Western Southland, a beautiful and special part of New Zealand. The community in which we live and contribute to, mainly relies on farming and related industries for its for its economic and social wellbeing. As farmers, food producers and New Zealanders we value water quality very highly we therefore take a serious and committed approach to maintaining and improving the quality of the water in our area.

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Our Submission:

General Responses to the Proposals:

Consultation Process and Detail

Pynewood Farm Ltd shareholders and directors are extremely concerned at the lack of consultation we have received given the major importance of this policy to all it will affect. The information we received at our local meetings was patchy and short on detail and just downright disappointing given the significant changes discussed. We are in the most busy and stressful time of our year many of us working seven days a week. The time frame given for us to respond accurately on such a complex matter could be seen as unfair in the extreme.

We are also disappointed in the lack of robust science behind the plan considering its importance to all New Zealanders not just the farming sector. With such significant changes proposed we are appalled at the total lack of economic analysis.

Also not having a select committee process and proper economic analysis makes us question the legality of this process and how it complies with the RMA. Do you intend to ignore the RMA?

Your one size fits all approach to the varied water quality issues in the new proposal is simply unrealistic at best. One size does not fit all.

Existing Regulations

In Southland many hours of work, money and expertise has gone into the Southland Land and Water Plan. Pynewood Farm supports this work and does not want it thrown out for a one size fits all plan which is not targeted at a regional level therefore would be doomed to fail and not be specific to our regional issues.

The majority of Farms in Southland are well on their way to meeting the new regional regulations/rules. Pynewood farm focuses on these regulations at a governance and management level. We are constantly monitoring our performance and being monitored by our regional authority. We are very aware and engaged in improving our impact on the environment.
Keeping water quality, a region by region issue is key to the success of the water quality improvement we all desire. We can not stress enough the message “One size does not fit all”.

Responses to Specific Points

Stock Exclusion from Waterways – Pynewood Farm has invested a lot of time and money fencing stock out of waterways the new proposal would have us refence at 5-meter width for no scientifically proven benefit. These large exclusion zones would harbour unwanted weeds here in Southland such as gorse and broom. The cost of the land that we can no longer use to produce food is significant. We have approximately 2.5kms of waterway so the lost land with the 5 meter exclusion zone would cost us 2.5 ha of land valued at $38000.00p/ha which equals $95000.00. This does not take into account the cost of refencing or the annual cost of lost pasture or riparian planting.

Reduce Nitrogen Loss– Pynewood farm uses management practices ie when and where N is applied and in what form ie sustain to minimise any N loss. Pynewood Farm agrees with using a farm plan with a nutrient budget but does not want to see input based rules (eg a nitrogen cap) We support targeting the top percentile of N leachers not penalising farmers who are already managing their N loss.

Farm Environmental Plans– Pynewood farm supports having mandatory freshwater environmental plans. We want these plans monitored and overseen at an Industry level instead of nationally regulated. We currently have a FEP which is in the process of being updated to meet new requirements. At a governance and management level we address this on a day to day basis. We support MFE funding industry to train suitably qualified people to ensure we meet our 2025 targets. Targets need to be practical and achievable. We strongly disagree with the limit of 1ml of N per litre. This is an unrealistic and unattainable target.

Standards for Intensive Winter Grazing – Once again this is proof that a “one size does not fit all” approach does not work. Southland faces a different set of challenges with intensive winter grazing than many other parts of New Zealand. The Southland Land and Water Plan has covered standards appropriate to our regional conditions. We therefore support industry standards in line with the Southland land and water plan. We do not support the 10-20cm pugging rule as it is totally impractical on crops in Southland. Pynewood farm follows all processes set out by the Southland Land and Water plan when winter grazing. We take all steps possible to reduce damage to our soil.
Unintended Consequences

**Economic** - The current proposed changes are likely to have a massive impact on the bottom line of all farmers this in turn will have an impact on our rural communities their businesses, contactors, schools, clubs, voluntary organisations and even sports groups. Farmers as a group employ many people, for example Pynewood Farm has a Contract Milker who employs two three fulltime people it is likely that he would be forced to let one of these people go. That may be the case on many farms in Southland. Say 300 farmers were forced to reduce labour by 1 person this would equate to 300 job losses valued at 60000.00 on average per person which equals $1800000.00 Has the MFE considered this? Where would 300 people find jobs in southland?

**Mental Health** - Farmers are hard working people many working long hours and at times of the year specifically the spring, working seven days a week. We have had many things to deal with over the last few years including the arrival of Mycoplasma bovis, the zero-carbon bill, and the pricing of agricultural emissions and we now face a rushed through Essential Freshwater Package with some questionable science/or lack of science behind it. Rural suicide is real. I personally have been overwhelmed by the amount of particularly Men in the rural community struggling everyday with mental health.

**Food Shortages** - The Essential Freshwater Package has the potential with some of its unrealistic and even unachievable limits to drive people away from farming and the land. To date Farming has been a lead exporter in New Zealand earning the country billions.

**Foreign Ownership of NZ Land** - Should farming become unprofitable and over regulated farms may fall into the hands of foreign investors with no passion for our environment, land or communities.

Thank you for considering our submission. This is our story about our farm and our people and community. We ask you to work with farmers and rural communities not against us to achieve a positive outcome for freshwater quality.