I am making this submission to offer not only a dairy farmers perspective, but the perspective of the rural community on the Government’s Essential Freshwater Package and the Action for Healthy Waterways discussion document.

Healthy waterways are important to all New Zealanders, including dairy farmers. We too want to have healthy waterways, successful businesses and thriving rural communities. Dairy farmers share the same aspirations to protect and enjoy our streams, rivers, lakes and wetlands.

Significant work has been completed through the Sustainable Dairying: Water Accord. Farmers have already invested huge amounts of time and effort, resulting in stock being excluded from waterways on 97.5% of dairy farms and more than 99.7% of regular stock crossing points on dairy farms now have bridges and culverts. Over $1 billion has been spent over the last 5 years to achieve this.

Through changes to on farm practices, effluent disposal and riparian planting, many waterways are showing long term improvement. More importantly these improvements are being made in a way that has a long-term sustainable view (environmentally and financially) that will achieve targeted environmental standards. This will be to the betterment of farmers, local communities and the environment. Good work has been done; however further work is required. Land, Air, Water Aotearoa (LAWA) 2008-2017 national water quality data shows about two-thirds of monitored sites are stable or improving in terms of water quality. Three times as many sites are improving in pastoral areas in terms of total phosphorus than are declining.

I support the intent of the Essential Freshwater Package and the Action for Healthy Waterways discussion document. As an industry and country, it is imperative that we stop the degradation of New Zealand’s waterways and further improve water quality.

I disagree with two fundamental areas of the Essential Freshwater Package and the Action for Healthy Waterways discussion document.

We cannot have an approach of ‘one size fits all’ to remediate water quality issues. We require regulations that take into account key drivers of water quality that are specific to each catchment – sediment, nitrogen, phosphorus, E. coli and contaminants. The way in which each of these characteristics are improved is very different and requires its unique approach. I am not saying that all the work is done, however through an approach of targeting hotspots of regional councils that still haven’t got suitable regulations in place is a much fairer and achievable result, than the one proposed.

The proposed ecosystem health nitrogen (DIN) and phosphorus (DRP) attributes lack quantifiable rational in regards to scientific, social and economic implications. Under the proposal some Canterbury farmers would be expected to reduce nitrogen levels by 50 - 80 percent to achieve the targeted 1mg/l. An obscene target when a stream in the Department of Conservation estate, with no farmland upstream measures 3mg/l. A report from Local Government NZ (LGNZ) shows up to a third of the Waikato Waipa catchment currently in sheep, cattle, deer and horses would be replaced by pines. Modelled cost estimates are $100 million, or an 11 percent loss of total profits derived from this land use change. LGNZ modelling shows sheep and beef farming is expected to fall by 68 percent, while dairy would be reduced by 13 percent. Meanwhile forestry would increase 160 percent.

The cost to rural communities under this proposed change will not be measured with a monetary value. The proposed changes take the profitability out of farming, which means less money for
environmental investment. With productive potential being significantly reduced on some farming enterprises, less staff will be employed. The effect of this is less people is rural communities with less money. Small rural towns will suffocate. Land that requires deintensification to forestry will follow the trend of being sold to overseas owners.

I concur with DairyNZ’s view’s on the Government’s Essential Freshwater Package and the Action for Healthy Waterways discussion document.

- I support strategies and actions towards achieving swimmable waterways, and the Government’s work to protect drinking water for our communities.

- I support proposals to limit further intensification in overallocated catchments in the interim.

- In principle, I support the requirement for mandatory Farm Environment Plans, stock exclusion from waterways and a move to best practice for winter grazing.

- I support the ‘averaging’ width set-back approach to stock exclusion and that current fencing remains in place where fencing is already excluding stock from entering waterways. Minimum buffer widths need to be practical and deliver outcomes.

- I do not support requirements to move existing fences by 2025 as there is limited progress to be achieved by re-fencing the same length of stream. I would also like to see waterways less than 1 metre wide, wetlands, and other critical source areas that I fence as part of my Farm Environment Plan count towards the ‘average’ set-back distance applied to my farm.

- I believe more work needs to be done to improve the definition and rules for ‘pugging’ and requirements to re-sow within 1-month, in the winter grazing proposals. I support permitted activity rules for managing stock holding areas, rather than the need for a consent.
- I support policies that protect ecosystem health. However, I do not support the proposed ecosystem health nitrogen (DIN) and phosphorus (DRP) attributes. The science used to come up with these numbers is too simplistic and fails to account for current scientific understanding of the complexity of stream health.

- I support measuring ecosystem responses (namely, periphyton and macroinvertebrates) and taking an adaptive management approach where community-set outcomes are not met.

- Because sediment is an important driver of stream health, I support this as an attribute together with an adaptive management approach for reducing both deposited and suspended sediment. However, the proposed approach to suspended sediment is overly complex and has resulted in national bottom-lines that are well below any peer-reviewed effects-based levels of turbidity. This is of concern to me.
I would like to see additional work undertaken to ensure that all the policies are practical, will work for farmers, and that adequate resourcing has been considered. For example, that we have enough capability and resources around the country to support farmers in implementing the Government’s proposed Farm Environment Plans, and that potential monitoring and/or compliance requirements are not too onerous for farmers, and build off the work already being undertaken by the sector.

We should make the most of having Farm Environment Plans in place – our sector has already committed to all dairy farmers having FEPs by 2025. Some elements of the Essential Freshwater proposals would be better addressed through FEPs, rather than requiring a consent. For example, stock holding areas and the maintenance and management of wetlands should be Permitted Activities and managed through FEPs.

I’d also like to express my disappointment with the way this consultation has been carried out. The initial six-week timeframe is too short for such a significant policy proposal. Spring is a busy and stressful time for farmers, and this – alongside the Zero Carbon Bill, *Mycoplasma bovis* and the pricing of agricultural emissions – has added to that weight.

Thank you for considering my submission. I ask that you work with farmers, not against us, to continue our commitment to improved water quality outcomes for all New Zealanders.

Kind regards,

Equity Partnership Manager
Townshend Group