30 October 2019

To: Minister for the Environment
consultation.freshwater@mfe.govt.nz

Personal Information
Submitter: Taranaki Veterinary Centre Ltd
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Submission on the Action for Healthy Waterways Essential Freshwater proposals.

Background
We are a farmer-owned co-operative veterinary club with clinics in Waverley, Patea, Hawera, Manaia and Stratford. We service 580 dairy farms (190,000 dairy cows) and 170 sheep & beef farms as well as the companion animals in the Central and South Taranaki regions. We employ 72 full time staff, including 30 veterinarians, and 10 casual seasonal staff.

General Response
We are broadly supportive of the Action for Healthy Waterways document’s intent to improve water quality;

- We support strategies and actions towards achieving swimmable waterways, and the Government’s work to protect drinking water for our communities.
We support proposals to limit further intensification in over-allocated catchments in the interim.

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

However, we have significant concerns about some of the proposals and hope the Government will be open to considering alternatives that the primary sector is working on.

Key Concerns and Impacts

Our key concerns on the freshwater proposals are:

1. Lack of scientific evidence and justification for the nutrient levels used to determine freshwater quality (DIN, DRP)
2. Lack of scientific evidence for the use of Overseer as a regulatory tool
3. Lack of scientific evidence for the 5 metre distance of waterway setbacks
4. The potential economic impacts that will affect our business and rural Taranaki
5. The short time frames for consultation on such an important proposal with significant implications

1. Lack of scientific evidence and justification for the nutrient levels used (DIN, DRP) to determine freshwater quality

The use of single national measurements (DIN and DRP) to cover the entire country and its varied topography, climate, soil structure, rainfall and agricultural/horticultural use and intensification belies logic and scientific justification.

This becomes particularly evident when catchments that have been included within Schedule 1 of the NES (especially those in Taranaki) for high DIN levels actually have proof of ecological sound and improving biodiversity through measurements of MCI, chlorophyll-A and all 3 periphytons being in ranges that do not trigger immediate action (good to excellent).

The Government's focus on nutrient limitation as the sole driver of in-stream ecological health is based on highly selective science, poor consideration of efficiency, cost-efficiency,
and effectiveness, and lack of demonstrable outcomes. In a region with widespread and significant exceedances of the proposed DIN and DRP limits, waterway ecological health is good to excellent by the Government’s own measures, and has been improving significantly in degree and scope for the last two decades and more, as the region’s riparian programme covering the whole ring plain and coastal terraces nears completion. Nutrient-based interventions lack justification and credibility.

In summary, at least in respect of Taranaki but probably valid in many other regions, the deficiencies of the NPS nutrient controls are that it focuses on inputs, not outcomes; is poorly targeted (isolating and recognising only two potential drivers of stream health, and ignoring many other physical and hydrological factors that likewise affect stream health); and lacks scientific integrity and demonstrated performance as to effectiveness.

2. Lack of scientific evidence for the use of Overseer as a regulatory tool

The Parliamentary Commissioner for the Environment’s critique of OVERSEER concluded that it is a poorly constructed representation of real processes, with gross uncertainties (>50%), fails to recognise attenuation between farm and waterway, and lacks international credibility. The Government has committed $40 million to ‘improve’ it - thus acknowledging it is not ‘fit for purpose’ - yet simultaneously demands its regulatory use within a likely timeframe of 6-9 months once the NES is put into effect.

From its outset, Overseer, was never designed to be a regulatory tool but rather was intended to support decision making on managing nutrient use and losses at a farm level. The former of these uses, i.e. regulatory and auditable, requires a degree of accuracy and certainty so that not only does the resource user have their activities assessed and justifiable, the regulator can demonstrate exactly where non-compliance has occurred and what might be done to mitigate it “beyond reasonable doubt”. Overseer, as a modelling tool, does not have this capability across the breadth of land types and use in this country.

Of particular issue to Taranaki is that Overseer N loss estimates have been validated against farmlet system N losses and most of these studies occur where annual average rainfall is no greater than 1200mm. The model extrapolates its algorithms to higher rainfall based on first principles and the known interactions between rainfall and soil properties. Many of the catchments in the Taranaki ring plain, which have their source in the Egmont National Park, have an annual rainfall of between 1100mm to 7178mm (at 900m above sea level). As
these rainfall rates are much higher than Overseer has been calibrated for, it remains unproven in the Taranaki region.

Overseer models nutrients lost from the farming system, but not what happens to the nutrients after that, nor what happens in the surrounding and receiving environments.

3. **Lack of scientific evidence for the 5 metre distance of waterway setbacks**

TRC over 25 years has aided farmers to voluntarily fence and riparian plant 10,000's of kilometres of waterways throughout the Taranaki ring plain. This process has been part of carefully and well thought-out plan with farmers developing bespoke fencing and planting plans to match their individual farm requirements and is more comprehensive as it captures all waterways on a property of any size and flow, not just those over 1 m wide.

Over this time frame measurable improvements in waterway ecological health can be clearly associated with the fencing and planting of river sections.

By contrast, the indiscriminate approach set out in the proposed stock exclusion regulations, that every farm must have a compulsory average setback of 5 metres for stock exclusion fencing lacks meaningful specific cost and benefit. Farmers will have to tear out thousands of kilometres of fencing and reposition them for no proven gain in water quality or new benefit.

Arbitrarily excluding waterways greater 1 m wide also lacks justification as it ignores scientifically reality that smaller streams contribute a greater proportion of downstream nutrient levels.

These two factors above combined will only generate frustration and distrust amongst the pro-active Taranaki farming population towards any Government proposals.

4. **The potential economic impacts that will affect our business and rural Taranaki**

Estimates produced by the Taranaki regional Council for farms to meet the proposed guidelines are an average $50,000 per year per farm. On top of this estimated production losses are 3-4 times this figure annually.

This is an extremely large cost to impose on farms already heavily indebted partly due to environmental improvements already made. Extra costs of this magnitude are likely to force
farmers off their land or reduce stock numbers to very low levels, either way their contribution to the local economy will be severely reduced.

Rural communities thrive because of their farmers. Most rural Taranaki towns do not have employment that is not directly related to servicing the dairy industry. With farmers spending less money the retailers and supporting service industries (including milk processing plants) will also be forced to scale down or close altogether leading to more unemployment or an exodus from the community.

As a business whose primary activities are directly related to livestock this is of major concern to us and our future. We employ 72 people living in and contributing multi-millions of dollars in salaries annually to rural Taranaki communities, and a reduction in animals serviced will force a reduction in staff.

Flow on effects could also be a decrease in the standards of animal welfare provided to livestock due to decreased farmer incomes and with fewer veterinarians there will be a probable decrease in animal husbandry as well the education and dissemination of new information. Also with fewer veterinarians, biosecurity risk increase dramatically (as this country has already recently experienced).

It is well known that rural New Zealand already struggles to recruit and retain vets. In 2009 the Government established the rural bonding scheme which has to date been successful in mitigating this. A reduction in livestock numbers and farmer income and profitability will undermine all of this and rural Taranaki (and New Zealand) will once again be suffering from a shortage of skilled livestock veterinarians.

5. The short time frames for consultation on such an important proposal with significant implications

We sympathise with the rural community on the disappointing short time frame of 6 weeks for consultation on a programme that has such significant and far-reaching implications.

We have identified 7 documents totalling over 330 pages associated with the fresh water proposals that need to be read and understood to fully appreciate the implications of the proposals.

With livestock farmers and horticulturalists as the most affected group of people, we are astounded that the Government has given such a short time frame of consultation given that these people must run their own businesses in what is arguably the busiest time of the year for them.
Our Recommendations

- Work collaboratively with landowners, regulators, councils and communities to develop plans to improve fresh water quality that allow for regional differences in topography, climate, soil structure, rainfall and agricultural/horticultural use and intensification.

- Reconsider the use of DIN and DRP as measures of water quality and move to an output-based measurement of true ecological health and biodiversity.

- Where waterway fencing and riparian planting has already occurred, reconsider the 5 metre average setback until there is evidence of benefits of re-positioning fences to this distance. Where regions have proactively fenced and riparian planted waterways, undertake studies and research to determine if riparian planting has a mitigating effect on the set back distance.

- Do not use Overseer as a regulatory tool unless it can conclusively be proven to cover the wide range of variables it will encounter. It may remain as a management tool but has serious limitations in Taranaki where our annual rainfall is higher than what Overseer has been calibrated to.

Regards,

Ben Dickie, Chair

Stephen Hopkinson BVSc  CEO

On behalf of the Board:

Nicola Luxton  John Kelly
Michael Roberts  Tony Landers
Dale Cook  Richard Uhlenberg
Belinda Price