Submission on:

1. Action for Healthy Waterways: A Discussion Document on National Direction for Our Essential Freshwater;

2. Draft National Policy Statement for Freshwater Management;

3. Proposed National Environmental Standards for Freshwater; and

4. Draft Stock Exclusion Section 360 Regulations.

To: Freshwater Submissions, Ministry for the Environment

From: Miranda Hunter, Roslin Consultancy Limited

Date: 30th October 2019

Contact: Miranda Hunter
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Personal details removed
Background

I am an Agribusiness Consultant with over 30 years experience in farm systems. For the last 7 years I have specialised in working with farmers on integrating farm systems and environmental good practices. I work one-on-one with farmers (and often their wider Rural Professional Team) on a daily basis. I also undertake project work for Government and Industry organisations.

I hold the following qualifications:

- Bachelor of Agricultural Science
- Certificates in intermediate and advanced sustainable nutrient management
- Certified Nutrient Management Adviser

I support the following aspects of the National Direction for our Freshwater:

1. Water quality and biodiversity issues are important
2. A pathway to be change needs to be developed (or refined in some cases)
3. National environmental standards give Councils direction
4. Farm plans can have an important role (as long as they are principles based that allow innovation are not unnecessarily prescriptive)

I have concerns about the following aspects of the National Direction for our Freshwater:

1. **Process and Information**
   The submission process has been too short to allow in-depth analysis of such complex and far reaching proposals. The proposals have provided insufficient information to allow a sufficient level of consideration (lack of impact studies - especially economic and social)

   There is also a lack of opportunity to appear before a Select Committee to be able to clearly articulate concerns. Many of us are not experienced in submission processes and this process of engagement has disadvantaged us to provide the level of feedback necessary.

2. **Attributes requiring limits**
   There is no scientific basis for the new dissolved inorganic nitrogen (DIN) bottom lines. There is a lack of transparency of how the new bottom lines relate to implementation on the ground (what do farmers need to do differently to achieve these attributes).

3. **Schedule 1 Catchments**
   Interim limits could send farmers in the wrong direction, farmers may be required to invest in short term mitigation to find that is not the correct pathway for long term
limits (in some cases long term limits may require farm system redesign rather than mitigation)

4. **Setbacks**  
There is a lack of science behind proposed setbacks

5. **Intensive Winter Grazing**  
Some of the proposal will be difficult to assess and implement on farm (eg pugging rules). The proposal is overly prescriptive and does not focus on an effects based regime.

6. **Feed Pads / Stock Holdings**  
The proposal states that "the base of a feed lot must be sealed to a minimum permeability standard of 10-9 metres per second". This is the same standard that is required for an effluent pond. The hydraulic loadings are not the same between and effluent pond and a feed pad, an effluent pond has a higher hydraulic loading.

   This permeability standard is an excessive specification for feedlots and stock holding areas. The consequences of this will be:
   - Current facilities that have been built to a current good practice standard could require testing and potentially retrofitting to meet a permeability standard that is excessive (this could generate a cost of in excess of $100,000 for some of my clients, and provide no additional environmental benefit)
   - New facilities will incur extra cost to be built at the higher permeability specification than necessary

Both the above factors create a disincentive for farmers to invest and use these facilities which in many cases will provide a positive environmental mitigation

7. **Implementation**  
   To build resilient and sustainable farm businesses there needs to be consideration of change in a whole farm system context with all changes bundled together, including areas such as greenhouse gas emissions and animal welfare, this package is in isolation of other requirements.

   The capacity and capability at Council and Rural Professional level to support implementation of the proposals is severely lacking.
I would like to suggest the following solutions going forward:

1. Ensure that the farmers and sectors are involved in the development of proposals, and that where change is proposed that it is
   a. Science based
   b. Economic and social analysis is completed and considered

2. Ensure that proposals are considered in a whole farm system context and changes required are bundled together. Cost of consenting and compliance should be carefully considered (as much as possible they should be able to completed by a farmer – this also promotes their ownership of changes required)

3. A robust peer review of the attributes (especially DIN) is completed and alternative options are considered

4. Acknowledge the progress that has been made and maintain the current pathway in the interim

5. Focus on increasing the momentum to limit setting so farmers know what they are aiming for:

   either;
   a. Good management practice, or
   b. Mitigating current farm system, or
   c. Redesigning design farm system

   If farmers have certainty on what they are aiming for and time to transition, the majority of farmers are likely adapt (as technology / options become available).

6. Prior to limit setting focus on farm plans and good management practice, this will provide positive environmental improvement and position farmers to respond to limit setting (in terms of information and skills). This will also develop capacity and capability in farmers and the Rural Professionals that support farmers

   Ensure that there is clarity on minimum standards so where some farmers are letting the side down there is clarity to enable compliance

7. NZ farmers are innovators and need to ensure that the proposals are principle focussed. Farmers are generally very good at on ground implementation of the principles once they understand clearly what the issues are.