Submission on Action for Healthy Waterways

We thank the Ministry for the Environment for the opportunity to submit on the Governments Action for Healthy Waterways discussion document and associated proposed regulations. This submission is made on behalf of all landowners located in the Mangamingi Valley (Eastern Hill Country, Taranaki) by the Mangamingi Community Trust.

Background

The Mangamingi Valley is a no-exit valley approximately 30 kms long, with predominantly steep to mid/low lying sheep and beef hill country farming properties along the first half. The second half enters into an area of regenerating native vegetation which borders the Wanganui Conservation Estate.

The Valley has approximately 23 farming families located along its length, as well as several smaller lifestyle blocks (maybe 4 in total). It has a strong sense of community spirit, with landowners making considerable efforts in conservation and environmental gains.

General comments

We support in principle the Government’s intention to stop further degradation of our unique and stunning freshwater resources, but believe that the proposals suggested are not pragmatic, realistic or achievable on a cost basis. Nor do they appear to be based on sound scientific knowledge and facts.

They also provide very little incentive for people to change and have been proposed with little to no awareness or appreciation of the significant amount of work already done by farmers throughout the country (and our valley) to improve and nurture the unique and amazing environment we have in this country.
We therefore strongly oppose the proposed frameworks, rules, and standards which will lock in current levels of discharge into our waterways and lock-in existing land uses. This approach effectively rewards high intensity, high discharging systems, while penalising low intensity, low input, and low discharge systems that work within the physical environment of the farm.

We, as a farming community, strongly believe in supporting, improving and nurturing the environment within which we live and work. Taranaki in particular has addressed the very issues that you raise over the last 20 – 25 years in a pragmatic, practical and incentivised manner which has been proven to achieve those very outcomes that you as a Government endorse.

Taranaki’s waterways are therefore so much better than they were 30 years ago. The proof is in the scientific research and monitoring undertaken over this time. Unfortunately, however the Governments proposals appear to take little to no consideration of these amazing achievements and any progress made to-date.

Most importantly, we here in Taranaki (and within the Mangamingi Valley) do not experience the same freshwater quality issues such as places like Canterbury. It is therefore appropriate that we as a region are not bundled up with the same type of restrictions that you as a Government have proposed. Clear thought and scientific reasoning need to be established around where the greatest polluters are, what is causing these levels of pollution and what needs to be done to reduce these water quality issues in a practical, incentivised way that encourages land owners and interested parties alike to do the right thing.

We do not believe that the government’s proposals appear to take these regional variances into consideration and this is very concerning. Any proposed regime therefore needs to recognise individual regional needs and variations, not try and set one single rule system for the whole country.

Furthermore, constraining low intensity farm systems like those in our valley, will limit our capability to achieve the goals you want to achieve and make it extremely difficult to meet the additional costs of compliance. This would significantly disadvantage responsible farmers and proactive custodians of the land who have already sought out and achieved environmental innovations and outcomes.

This blanket approach to “holding the line” will also place low input systems under significant financial strain, with many farmers being unable to afford the costs of mitigating the specific issues relating to their farming systems. This could therefore:
- make farming businesses unviable with a significant loss of rural jobs
- threaten many rural communities that are tight-knit and particularly vulnerable – especially when young families leave
- change the whole make-up and dynamics of our agriculture sector (a sector which we are all very proud of).

We do however support a fair approach where each farmer is expected to do their bit in proportion to their impacts, in an effective and workable manner. We therefore request that the Government re-think its approach to restrictions on land-use change and to the grandparenting provisions in the freshwater module and hill country cropping. In particular, we request that there is recognition of low N leaching farms and some flexibility provided for them.

Implementation concerns

While we accept that sheep and beef farms need to address their contribution to water quality issues, the mitigations that a farmer undertakes should be in direct proportion to their contribution to the issues, rather than a broad-brush approach taken across all farms within a catchment.

We are deeply concerned about the potential impacts of these proposals on our Valley, especially in light of the modelling undertaken by LGNZ which highlighted the fact that 68% of sheep and beef farms could be unviable under these proposals. We believe it is incorrect to state that these proposals will not impact
sheep and beef farmers, with a belief that our farms will bear a disproportionate share of the cost (despite being low input, low intensity, and low discharge systems). We also believe that the Government has not taken into consideration regional variances in effects, especially considering Taranaki is a wet climate with significantly larger proportion of wetland areas and streams/rivers than other regions.

**Farm plans**

We do support farmers having tailored land and environment plans implemented for their farm, with the majority of Taranaki’s sheep and beef farms already having farm plans in place (with assistance from the Taranaki Regional Council). But we also strongly believe these plans should not be a regulatory tool, rather they should be an incentivised tool for us to work within to manage our farm inputs/outputs in a systematic, realistic and cost-effective manner.

Having a compulsory freshwater module in compulsory farm plans, will create expensive overheads for farmers which will detract from practical and long-term sustainable environmental activities. Grandparenting emissions to historic levels, is inefficient and likely to be ineffective at addressing specific freshwater issues that relate to each specific farm.

Our Valley experiences significant storm events (due to the high rainfall levels occurring in Taranaki), which have resultant sedimentation deposited into waterbodies. Mitigation measures to reduce the severity of sedimentation runoff from farmland during such events has therefore been a strong focus of many farmers in this Valley, in conjunction with erosion control programmes endorsed by the regional council.

The cost of compliance or the level of on-farm action should also be proportional to the environmental impact of the farm on freshwater health, with the freshwater module farm plan approach completely failing to take this into account. As an alternative, we request that the Government provide additional support for industry-led farm assurance schemes, land and environment plans and/or activities to support catchment-based initiatives.

The suggested timeframe for obtaining a farm plan is also considered to be unrealistic, along with timeframes for auditing. The cost of establishing such a plan and ongoing auditing every 2 or 3 years is significant.

**Excluding stock from waterways**

We do support the focus on freshwater bodies that are permanently flowing and greater than 1m wide on low sloping land that is of a 5 degree slope or under, and the use of a stocking intensity threshold as a proxy for nitrate leaching when applying these requirements to land above 5 degrees slope. However, we strongly oppose the 5m setback suggestion as this is totally unrealistic and takes absolutely no recognition of the kilometres of amazing riparian margin work undertaken throughout the Taranaki region and elsewhere, all of which is usually at or around the 3m setback mark.

There is also no clear and scientific reasoning that 5m is any better than 3m. This 5m setback would result in significant loss of production land in our Valley, along with significant costs being imposed through the required movement of existing fences to comply. We believe this is extreme and not based on any apparent clear scientific benefit.

We also oppose requirements to fence extensively farmed animals out of waterbodies on hill country properties where fencing is prohibitively expensive due to the terrain, length of fencing required, and significant maintenance costs due to extreme weather conditions (which are very real events here in Taranaki). For the majority of our steep hill country (especially with high rainfall levels like our own), the greater risk to freshwater health is from the overland flow of contaminants into a waterbody, not livestock directly being in the waterbody due to the lower stocking rates. In these situations, fences
would do nothing to stop overland flows, with the identification and management of erosion prone areas being a more efficient and effective way to manage the risk, rather than blanket fencing and blanket riparian setback distances.

**Intensive winter grazing**

We do support the establishment of winter grazing standards based on Industry Good Management Practice Principles. However, we oppose the inequitable treatment of low slope areas versus slope land where a consent is only required for winter grazing on land which is greater than 10 or 15 degrees. Environmental risks associated with winter grazing on forage crops relate to the intensity of the operation, the soils it occurs on, the way the activity is being undertaken and the proximity to a receiving freshwater body. Slope alone is too simplistic. Such regulation should also be regionally based, with clear guidance/evidence provided for sedimentation and runoff effects tailored to each individual region.

We also strongly oppose grandparenting standards such as “no greater than 2013/14 to 2018/19 years” through consent, as the additional and significant costs required to get resource consent will lock in existing land uses and not allow for the flexibility required in farming systems to meet the other additional costs from these policies.

**Other comments**

The government has stated “those that are doing the right thing won’t be affected”. We believe these proposals will do the opposite. The residents of our Valley also believe that farmers are now being penalised for already doing good work.

The Valley also has significant concerns relating to the threat of small farming communities being lost through land use change (i.e. conversion to forestry) and the consequential population movement to larger urban areas. This is already being experienced within New Zealand as a result of the “one billion trees” programme and is a threat that we should no longer ignore. This has a significant flow-on effect to our rural towns and urban areas too.

Any more conversion of farming land within this Valley to forestry plantations would have considerable detrimental effect on the community at large. The Valley has already experienced a decrease in farming families living within the area due to farms buying neighbouring properties in order to remain economically viable. All of which changes the dynamics of a reasonable small rural community.

Furthermore, a lot of the land that the Government currently deems appropriate for forestry is difficult to access, with landowners consequently being hesitant to convert productive land into a land use which could change dramatically over the next 30 years in terms of profitability and viability. The risks are significant.

Another concern we as a community hold is that individuals no longer see farming and the agriculture sector as a viable professional option, something which should concern the country as a whole.

**Conclusion**

We trust that you will listen to what farmers and others have to say about this issue. Please respect our views and understand that we are knowledgeable and experienced in these matters in our own right. What we have to say is important.

A one-size-fits-all approach is not the right answer.
Mangamingi Community Trust

Farming families forming this Trust include the following:
Tim and Sue Hardwick-Smith
Kohunui

Duncan Menzies and family
Rannoch Partners

Sarah Collier
Collier Farming Partnership

H and D Munro Partnership
Holmwood Station

Symes Partnership
Gleniti

Personal details removed