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24 April 2017

To Whom It May Concern:

Clean Water Consultation 2017

Please find below our submission on the proposals under the Clean Water 2017 Consultation.

Overall we support the target of 90% swimmable rivers by 2040. We grew up swimming in rivers in Tasman and Nelson and continue to do so on the West Coast, where we frequently swim with our children in New River which borders our dairy farm just south of Greymouth. We would like to see future generations of New Zealanders continue to enjoy our rivers.

However, we have some concerns around the stock exclusion policies proposed, and what these will mean for farmers, particularly in the West Coast context. The points below all relate to the proposed stock exclusion proposals in relation to the West Coast only:

- Based on the information in the consultation document, the West Coast already has 99% swimmable water. This already vastly exceeds the 2040 targets. While we accept that we should not be complacent about what we have, and work to ensure we keep it, we are concerned about the implication of the current proposals on farmers in an area where water quality is already good.
- Nationally dairy farmers should by in large already be achieving excluding stock from waterways over 1 metre wide due to the requirements under the Sustainable Dairy Water Accord. West Coast dairy farmers have not been bound by the Accord, due to Westland Milk Products signing only as a friend. Westland Milk Products requires stock exclusion from such waterways under their Farm Excellence programme and dairy farmers are working towards achieving these standards. For many dairy farmers on the West Coast, the last several seasons of low dairy pay-out has meant that fencing of waterways has had to be deferred as businesses have entered survival mode. We expect that many dairy farms on the West Coast will not be able to meet the 01 July 2017 timeframe for excluding dairy cattle from waterways over 1m wide and suggest this timeframe is pushed back by 12 months for West Coast dairy farmers. It must be noted that dairy farmers on the West Coast are making significant progress towards stock exclusion, and for some farms there are substantial lengths of waterways to fence (upwards of 30km per farm in some cases).
- We agree that stock exclusion should also be required on other farm types for the larger (over 1 metre wide) waterways and note that the timeframe for this gives longer for these

farmers to comply. However, it should be noted again that some farmers will have significant lengths of waterway to fence.

- We are concerned by the proposed requirement for fencing stock out of all permanently flowing waterways regardless of size for land on the 'plains' which will apply to much of the West Coast farmland. For the West Coast, this could mean significant cost for many farmers. Based on the information showing the West Coast already has good water quality, we question the justification of this expense for farmers when it may have little further gain. We suggest that the proposal is reviewed in relation to stock exclusion from waterways under 1m wide on the West Coast.
- We would like to see further clarification on what is meant by 'permanently flowing' and 'drains'. On the West Coast, much farmland has been humped and hollowed. This has the effect of creating 'hills and valleys' within a paddock, with the hollows effectively becoming drains which flow in our reasonably frequent high rainfall events. Generally, these hollows would be excluded from stock exclusion as they are not permanently flowing. In some cases, they may contain 'standing water'. In other words, they are permanently wet at the bottom with reeds and grasses growing. This effectively filters the water at times of low/negligible flow (it could be argued that this is not technically flowing water). If these hollows are considered permanently flowing water this would mean hundreds of kilometres of impractical fencing (from both a financial and paddock management (grazing etc.) perspective), or getting a digger in to clean out the hollows (which would mean it would be clear of rushes etc. and would not retain water permanently and therefore would not require stock exclusion. Having hollows cleaned of rushes etc. may actually provide less environmental benefit than leaving the vegetation in-situ as nutrient filters).

We are supportive of initiatives to maintain and improve water quality. However, it is important that any regulations imposed regarding stock exclusion are reasonable in relation to the actual positive impact they will have on water quality, as well as considering the 'clean, green' image that New Zealand portrays. In addition, the impacts of non-agricultural based activity on water quality must also be addressed.

Regards,

Heather and Kelvin McKay