



## Essential Freshwater Visit to West Coast: 23 – 24 October 2019

Date Submitted:	11 November 2019	Tracking #: 2019-B-06205	
Security Level	In Confidence	MfE Priority:	Non-Urgent

	Action sought:	Response by:
To Hon David Parker, Minister for the Environment	Note this briefing for information	29 November 2019
To Hon Damien O'Connor, Minister of Agriculture, MP West Coast-Tasman	Note this briefing for information	29 November 2019

Actions for Ministers' Office Staff	Return the signed report to MfE.
Number of appendices and attachments	Nil
Note any feedback on the quality of the report	

### Ministry for the Environment contacts

Position	Name	Cell phone	1 <sup>st</sup> contact
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Responsible Manager	Jo Burton		
Director	Martin Workman	022 517 3268	✓

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## Essential Freshwater Visit to West Coast: 23 – 24 October 2019

### Key messages

1. After the Essential Freshwater consultation roadshow, the West Coast Regional Council (WCRC) invited Ministry for the Environment (MfE) officials to visit the West Coast.
2. On 23 - 24 October, MfE representatives visited the West Coast to understand how Action for Healthy Waterways (the proposals) would affect the various activities on the West Coast.
3. MfE representatives undertook this visit on 23 and 24 October 2019, and discussed the proposals with local stakeholders, including WCRC staff, dairy farmers, sphagnum moss growers, and a related biotech company.
4. *Noting regional differences:*

WCRC pointed out the particular challenges it faces with the Essential Freshwater package and the unique regional situation of the West Coast in terms of geography and climate, population, economic opportunities and challenges.
5. *Stock exclusion:*

Farmers considered that fencing for intermittent waterways and permanent flows less than one metre wide would be impractical and in many cases would render farms impossible to operate. They contend that identification and management of small waterways should remain flexible and be covered by individual farm environment plans. This is consistent with the approach proposed in Essential Freshwater.
6. *Farm Environment Plans:*

Farmers support the adoption of voluntary farm environment plans that are developed by the farmer in conjunction with expert advice. Some farmers on the West Coast already have their own voluntary farm environment plans, eg, Lake Brunner farmers have gone through two iterations of voluntary farm plans and now have high plan-adoption rates. Farmers felt that plans are particularly useful in helping them schedule projects (such as bridges, culverts, fences, and stock lane upgrades) according to the environmental benefit and their on-farm costs.
7. *Catchment based approach:*

Farmers report that a project in Lake Brunner has succeeded in educating other farmers about the downstream effects of their activities. They believe that a peer-to-peer approach to environmental management will serve their area better than a set of rules or an off-the-shelf plan.
8. *Sphagnum moss industry:*

Sphagnum moss is a niche industry (\$8 million), with four main producers on private land on the West Coast. WCRC and moss harvesters are concerned that the Essential Freshwater package and its objectives around wetland protection would prevent what is seen as a sustainable moss harvesting industry.
9. *Wetlands:*

Farmers feel frustrated as they pay rates on their land which they cannot develop in a region where there are comparatively many wetlands. They feel like they are paying the price for the benefit of others.
10. Information gathered on this trip will be incorporated into future advice on the Essential Freshwater package.

## Recommendations

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11. We recommend that you:

- a. **Note** that officials undertook a visit to the West Coast on 23 and 24 October 2019, to understand how Action for Healthy Waterways would affect the various activities on the West Coast.
- b. **Note** that information gathered on this trip will be incorporated into future advice on the Essential Freshwater package.

## Signature

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Martin Workman  
**Director: Water**

Date

Hon David Parker  
**Minister for the Environment**

Date

Hon Damien O'Connor  
**Minister of Agriculture**

Date

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### Details on key messages

#### *Regional Differences*

12. WCRC wanted to demonstrate that regional variances should be recognised when setting policy and its implementation.
13. The West Coast is unique in many ways, including geography and climate, population, large proportion land in the conservation estate, and the economy.
14. WCRC has many challenges, including few council staff, a low ratepayer base, and a large land area to manage. The West Coast also includes large catchment areas that are under minimal resource pressure.
15. Almost all farms on the West Coast are dairy farms that supply Westland Milk Products. Most farmers stock jersey cows and operate on lower stocking rates than farms in other regions.

#### *Stock Exclusion*

16. The farmers considered that fencing for rivers less than one metre wide that permanently flow, as well as intermittent waterways would be impractical and in many cases render farms impossible to operate.
17. Permanent fencing is often impractical because of the frequent flooding of rivers and streams. Officials explained how the proposed regulation was designed, including the proposed use of exemptions, and its applications to rivers.
18. Farmers were unconvinced that scientific evidence supports a five metre setback for streams compared to a one metre setback.
19. They felt that Lake Brunner is a good example of where water quality improvements have occurred after stock exclusion without buffers, because stock exclusion minimises sediment loss (phosphorous runoff being the major issue in this catchment). See Photo A, below.



Photo A: A spring-fed stream on a local farm, with an average 1 metre setback.

20. The farmers visited believed that site-by-site identification and management of small waterways should remain flexible and be covered by individual farm environment plans. This is in line with the proposed regulations.
21. Farmers wanted flexibility in rules around use and frequency of stock crossings.

22. Not all streams on every farm can be fenced or bridged. Bridging costs are high relative to the amount and intensity of land use. For example, on a farm visited, one stream with critical access to the wider farm was bridged at a cost of \$80,000. Another stream on the same farm could not be bridged because it was highly mobile and had a high bed load (see Photo B, below). In this case, the stream was managed by constructing a ford. This approach complies with current provisions in the WCRC Land and Water Plan.



Photo B: A different stream on the same farm as Photo A. This stream is forded by stock.

#### *Farm environment plans*

23. Farmers support the adoption of voluntary farm environment plans that are developed by experts alongside the farmers themselves.
24. Some farmers on the West Coast already have their own voluntary farm environment plans, eg, Lake Brunner farmers have gone through two iterations of voluntary farm plans and now have high plan-adoption rates. Farmers felt that plans are particularly useful in helping them schedule projects (such as bridges, culverts, fences, and stock lane upgrades) according to the environmental benefit and their on-farm costs.
25. The plans are for a three year period with key projects documented with time frames. Farmers needed assistance to work up and price developments for projects as they did not have time to conduct the research themselves. These enabled each farmer to prioritise projects according to cost and time. They estimated that farmers collectively spent \$2 - 3 million because they had a plan.
26. The regional council does not monitor the compliance of these voluntary farm plans.

#### *Catchment based approach*

27. The Lake Brunner project has succeeded in educating all the farmers in the area about the downstream effects of farming. Farmers now consult with and develop plans with other farmers.
28. Farmers and WCRC consider that some catchments may need exempting from the stock exclusion regulation, eg, those with low stocking rates.
29. They would prefer this approach over farm-by-farm exemptions, citing that this would reduce bureaucracy and enable quick and easy responses to complaints about stock in streams in exempt catchments.

### *Sphagnum moss farming*

30. Sphagnum moss is a niche industry (\$8 million), with four main producers on private land on the West Coast.
31. Sphagnum is mainly used in the horticultural industry; however, due to its antimicrobial properties, it is also used for water purification in swimming pools, spa pools, and air conditioning plants.
32. Water purification is an area of potential growth for this industry.
33. s 9(2)(a) and s 9(2)(a) subsequently met with MPI and MfE officials on 25 October in Wellington to discuss the science behind and commercial application of sphagnum-derived products and growth of this market.
34. Sphagnum is generally harvested on a 5-year rotation of each piece of land. Once harvested the area is settled down with a machine and moss grows back slowly among the reeds. The Sphagnum fields tend to occur in previously forested areas and in some cases, areas that were previously farmed. If the moss is not regularly harvested scrub regenerates and dries the wetland out. Many sphagnum fields have reverted to forests and the moss no longer grows.
35. Farmers and WCRC see this as a sustainable industry that maintains the wetlands and prevents them from drying out. There is concern that the Essential Freshwater package and its objectives around wetland protection would prevent sustainable moss harvesting that they felt was not adversely affecting the wetland. Growers are concerned that removal of vegetation at time of harvesting might be seen as triggering removal of significant vegetation.
36. The proposals are intended to protect wetlands, and their significant indigenous species. In principle, this should mean that the sustainable harvest of sphagnum moss should be able to continue where it is undertaken without damaging the wetland or threatened or endangered vegetation or fauna species.
37. MfE is working with DOC on the wetland policy and information gathered during the visit will be useful in helping officials clarify this issue.



Photo C: Sphagnum moss harvest and drying

### *Wetlands*

38. According to the WCRC, the West Coast has a comparatively large proportion of natural wetlands, with approximately 23% of the original extent remaining. The proposals seek to avoid loss and degradation of all natural wetlands.
39. Farmers know wetlands are important. However, some farms on the West Coast include a large proportion of wetlands on their property.
40. One farmer expressed frustration that he pays rates for land that he cannot develop. He stated that if the wetland is valued nationally, he shouldn't have to bear the cost of its upkeep. He wants either a government body to buy the wetland, or for the local council to apply rates relief. DOC refused to buy the wetland due to its large area and because it was already protected by the local plan. WCRC has been looking for options to acquire the wetland through third parties as they do not have the funds to purchase the wetland and do not apply rates relief in these situations.
41. Officials will analyse how many wetlands are on private land and incorporate this into future advice.

### **Outcomes**

42. The trip provided an opportunity for officials to have in depth discussions about the practical implications of the Essential Freshwater package, including any unintended consequences. Officials clarified a number of issues/interpretations about the package and advised on the submission process.
23. Information gathered will be incorporated into future advice on the freshwater package.

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## Attendees

43. Attendees of the trip included:

- Anne Haira – Deputy Secretary Partnerships and Customers (MfE)
- Essential Freshwater policy subject matter experts Helli Ward (wetlands), Kirsten Forsyth (stock exclusion), Michael Oates (West Coast relationship manager)
- Simon Pontin (MPI)
- Mike Meehan – WCRC CEO
- WCRC science and planning staff
- Westland Milk Products staff
- Farmers - Katie Milne (Federated Farmers President and Lake Brunner dairy farmer), and Renee Rooney (Chair of Development West Coast and Lake Brunner dairy farmer)

44. s 9(2)(a)



## Programme for the trip

45. On 23 October, MfE officials visited:

- Westland Milk Products factory to discuss the West Coast's unique geographical challenges, and the logistics of dairy farming on the Coast
- Renee Rooney's farm to discuss effects of setbacks for waterways and stock exclusion, tiling farm management plans to document good management practices
- Katie Milne's farm to discuss the Lake Brunner project and what is required to comply with new catchment rules
- Landcorp farm to view humping and hollowing
- Arahura Sphagnum moss to view managing and harvesting sphagnum moss operations in natural wetlands.

46. On 24 October, MfE officials visited:

- Chris Hickford, Partnerships Manager for the Department of Conservation
- A 1500 ha farm in Ross which comprises ~75% wetland
- Lake Mahinapua to discuss outstanding water bodies
- Hokitika Gorge to see recent tourist infrastructure upgrades.