



5 February 2024

OIAD-906

9(2)a

Tēnā koe 9(2)a

Thank you for your email of 18 December 2023 requesting the following information from the Ministry for the Environment (the Ministry) under the Official Information Act 1982 (the Act):

*This question relates to the requirement to report synthetic nitrogen fertiliser use under clause 36 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (the NES-F). I also refer to our previous request on this topic (OIAD-745).*

*We understand that MfE has arranged to receive weekly data from Councils' combined database which contains farm reporting data from each region.*

*Could you please let me know:*

- 1) How many people/contiguous landholdings have submitted reports under clause 36 of the NES-F, in each region, for the reporting period that ended on 30 June 2023?*
- 2) Does MfE have an estimated number of dairy farms in each region?*
- 3) If so, how was MfE able to obtain this number of dairy farms? For example, perhaps this has been estimated from the number of dairy effluent consents granted in each region?*
- 4) Can MfE use these figures to provide a percentage of farms or a percentage of contiguous landholdings, which have reported under clause 36, in each region?*
- 5) What is the total percentage of farms which reported across New Zealand?*
- 6) Did problems arise when comparing the number of reports received under clause 36, with the number of dairy farms? For example, was it difficult to estimate how many people hadn't reported, when comparing contiguous landholdings with dairy farms, as farms can include more than one contiguous landholding?*
- 7) In addition, your response to our previous request mentioned that MfE is progressing a review of nitrogen management settings. Could you please let us know if there is still a plan to review the nitrogen cap in clause 33 of the NES-F? If so, what are the timeframes for, and scope of, the review? Or is this yet to be decided?*

As of 18 December 2023, 5,983 dairy farms (comprising 6,232 contiguous landholdings) had filed reports on their synthetic nitrogen use in the year that ended 30 June 2023.

The Ministry relies on the Statistics NZ estimate of dairy farms in each region as of mid-2022. This data can be accessed on the Statistics NZ website at: <http://tinyurl.com/bdzxjczx>.

The farm count estimates were published by Statistics NZ as part of the Agricultural Production Statistics for 2022. They are based on the 2022 agricultural census. Like all survey and self-report data, the numbers come with some caveats.

We use the Statistics NZ estimates as a denominator from which to calculate the percentage of farms that have filed reports. Using the Statistics NZ estimates, the total percentage of dairy farms reporting for the year to June 2023 was 61% as of 18 December 2023.

Problems arise when comparing the number of reports received against the Statistics NZ estimates in relation to data coverage and data validity. Because neither Statistics NZ nor the councils have data on contiguous landholdings, we have no denominator against which to calculate the percentage of contiguous landholdings for which reports have been received.

However, as mentioned above, we can calculate the percentage of farms reporting using the Statistics NZ estimate of dairy farms as the denominator. What we cannot be sure of is whether this denominator is accurate in all regions or nationally.

We understand that at least two regional councils, using their consents data, have a higher count of dairy farms in their regions than is estimated by Statistics NZ. This would make the actual reporting rates for those regions lower than the rates that we have calculated for them using the Statistics NZ data.

We do not know if such discrepancies are limited to these two regions or occur more widely. This is because there is no consistency in the methods used by councils to count dairy farms. This lack of consistency highlights the importance of having a standardised methodology for counting farms. For now, we will continue to use the Statistics NZ farm data because it is the only dataset based on a consistent methodology across the country.

The commitment to review nitrogen management settings was made under a previous government. We are yet to receive direction from Ministers about these matters.

You have the right to seek an investigation and review by the Office of the Ombudsman of my decision to withhold information relating to this request, in accordance with section 28(3) of the Act. The relevant details can be found on their website at: [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz).

Please note that due to the public interest in our work the Ministry for the Environment publishes responses to requests for official information on our [OIA responses page](#) shortly after the response has been sent. If you have any queries about this, please feel free to contact our Ministerial Services team: [ministerials@mfe.govt.nz](mailto:ministerials@mfe.govt.nz).

Yours sincerely

*Electronically approved by Gina McGrath*

**Gina McGrath**  
Acting General Manager, System Enablement  
Ministry for the Environment | Manatū Mō Te Taiao