

6th August 2019

By Email

To whom it may concern

Re: Proposed Regulations for Dam Safety

- 1.1 DairyNZ is the industry good organisation representing New Zealand's dairy farmers. Funded by a levy on milksolids and through government investment, our vision is for New Zealand dairy farming to have the world's most competitive and responsible dairy farming. DairyNZ's work includes research and development to create practical on-farm tools, leading on-farm adoption of farming within limits, promoting careers in dairying, and advocating for farmers with central and regional government.
- 1.2 The Dairy Tomorrow Strategy (The Future of New Zealand Dairying) signals the intent of dairy farming to be a part of New Zealand's future for the long term. DairyNZ supports the development of a resource management framework that achieves the sustainable management of natural and physical resources in an efficient and equitable way, whilst enabling social, cultural and economic wellbeing of people and communities.
- 1.3 We thank the Minister for Business, Innovation and Employment for the opportunity to submit on the Proposed Regulations for Dam/Pond Safety.
- 1.4 We would like to endorse the Irrigation NZ submission on the proposed regulations. Additionally, we wish to highlight a further point that may not have been covered in other submissions. This point relates to the perverse or unintended impacts of the proposed regulations. These unintended impacts relate to environmental goals and to water use reliability and can be illustrated by way of reference to a regional example.
- 1.5 In some regions where ground water availability is limited, farm dairies access the water required from surface water sources. These are increasingly limited and impacted by the water quantity and quality limits required by the National Policy Statement for Freshwater Management. We understand that in Northland, for example, up to 60% of dairy farms rely on surface water sources for their farm dairy cleaning and function. The Northland Regional Plan has recently been subject to a Hearings process, influenced by contributions from a range of stakeholders across the Northland community. Among other outcomes, the NRP now encourages the capture and storage of surface water during high flows to allow farmers to continue operating the dairy shed during low flows. It also favours a move away from discharge of treated effluent to water to discharge of

effluent to land. DairyNZ strongly encourages these practices to maintain farm productivity and meet desired water quality outcomes respectively. Both these activities rely on dams on farm.

- 1.6 The creation of additional regulatory requirements for dams is likely to create a barrier for farmers wishing to move to Good Management Practice in terms of water and effluent management. DairyNZ is concerned that this regulatory barrier could slow or prevent the uptake of Good Management Practices and stymie sustainable management goals set under the plan by the community.
- 1.7 DairyNZ is willing to provide further information should this assist the Minister.
- 1.8 Thank you once again for the opportunity to provide our views.

Yours Sincerely

Charlotte Wright

Senior Policy Advisor
DairyNZ