

Feedback to MEP Hearings Panel from the Marlborough Environment Centre – October 9 2018

In regard to your question on stock units:-

We understand that there are three ways to identify higher intensity livestock likely to cause adverse environmental effects.

- definition of intensive livestock (MDC approach). If this approach is to be retained the definition of intensively farmed livestock needs strengthening to include all cattle)
- Define lowland land areas based on slope using LUC units (MEC favoured approach). This is relatively straightforward and captures a broad range of situations, based on analysis for the draft regulation (See our [reference](#) Ministry for the Environment, *Appendix 5, Draft Regulatory Impact Statement; Stock Exclusion, 2017*).
- use of stock units - MEC briefly discussed the stock unit approach and provided two references to Hawkes bay and Waikato regional council sites, however this is not our favoured approach.

Regarding Commissioner Crosby's question as to where MEC point 1 in paragraph 16 would fit into our proposed plan structure, on further reflection we agree that 1 2 and 3 would sit together with 3 acting as a catch all on land a greater than 15% average slope.

We are not legal or planning experts, however we think that these three provisions together would capture the vast bulk of adverse effects to waterbodies from livestock. At the end of the day we are interested in achieving positive outcomes for the environment and look to the panel, having heard a range of submissions on the issue of livestock exclusion to waterbodies, to capture our intentions in your recommendations.