

IN THE MATTER The Resource Management Act 1991.
OF

AND

IN THE MATTER The hearing of submissions on Variation 2 of
OF the proposed Canterbury Land and Water
 Plan

STATEMENT OF EVIDENCE OF LUCY_JANE ELIZABETH JOHNSON

Dated: 1 July 2014

1. INTRODUCTION

- 1.1. My name is Lucy Johnson. I am the currently employed as the General Manager Environment for Purata Farming. I am authorised to speak on behalf of this company. I have been employed with the company for six years, originally as part of the Synlait Group.
- 1.2. I hold the qualifications of a Bachelor of Environmental Science from Lincoln University and am a Kellogg's Rural Leaders scholar.
- 1.3. Prior to my employment at Synlait/Purata I was employed for five years at the Canterbury Regional Council, where I held a number of roles within the consents and compliance sections.
- 1.4. In my current role I help ensure the correct consent authorisations are in place and compliance with these is achieved. I actively work in the policy and planning space by advocating and developing solutions to land and water policy. I also facilitate a growing education and awareness of dairy farming, environmental stewardship within our business, supplier base and wider community.

PURATA

- 1.5. Purata owns and operates 13 dairy farming businesses in the Canterbury region, one of which is on the coast in the Ashburton district.
- 1.6. Purata have a land holding of 4,390 hectares making it one of the biggest dairy farming operations in New Zealand.
- 1.7. Purata aim to produce 5.9M/kg of Milk Solids this year with a turnover estimated to be \$33M for the current financial year. This is on the back of an asset base valued at \$220M.
- 1.8. Purata believe that currently there is \$13.8B invested into dairy farm business within the Canterbury region.
- 1.9. Purata's farming interests in the catchment relates to a 343ha pastoral dairy unit on the coast at Waterton. On-farm there is a protected Mudfish habitat which the business developed when the farm conversion process was undertaken in 2007.

2. POINTS OF SUBMISSION

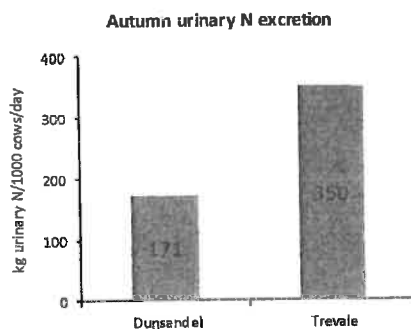
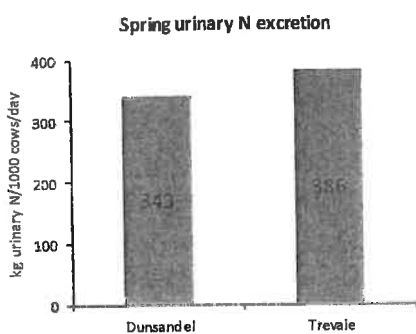
- 2.1. Purata is largely supportive of the direction taken by the Ashburton Zone Committee in formulating the changes associated with Variation 2 (“the Proposed Plan”) but note that a more clarity is needed around the reduction thresholds.
- 2.2. Purata’s strategy has a focus on actively participating in the policy and planning forums for the region to help ensure practical and sound policy outcomes in rural areas and within farming businesses are achieved.
- 2.3. Purata generally supports the evidence to be presented to Council by DairyNZ on behalf of their levy payers and points raised in submission of other Primary Industry Representatives.
- 2.4. Purata have a strong direction of implementing Synlait Milk’s Lead with Pride™ (LWP) programme within our 2020 Strategy. Purata welcomes the opportunity of sharing with the Council the very real challenges and difficulties in implementing these plans across the business.
- 2.5. Purata is also involved in implementing a lean manufacturing and continuous improvement programme across the farm business, referred to as InSynC. This is believed to be the first continual improvement programme for any agribusiness adoption in the Southern Hemisphere.

3. SCOPE OF EVIDENCE

- 3.1 Waitai’s current baseline under Overseer 6.2.0 equates to 24.6 Kilograms/Nitrogen/per year. The range over the four year period of 21-29 kilograms.
- 3.2 The proposed rule framework being proposed will require consent under 13.5.17 post 2017.
- 3.3 What is not clear under the matters of discretion for Rule 13.5.17 (4) is if all landowners need to meet or exceed Table 13 (h) reductions.

- 3.4 Purata seek clarity around the planning provisions to state that reductions to the losses need to be made up to the point of meeting the permitted activity thresholds or those granted under Rule 13.5.14.
- 3.5 To further explain this is a landowner may need a consent under 13.5.17 and reduce their losses in line with the stepped thresholds which may take them under the permitted activity limit. For example if you lost 22kg do you need to still make a 45% reduction and achieve less than 15kg/N?
- 3.6 Purata are mindful of the complexities within the catchment and the variability from high to low plains. There is always some management challenges with working over such a geographic area.
- 3.7 Purata have worked hard to undertake a number of self-modelling exercises to see what reductions can be made within the Overseer model.
- 3.8 While science and technology will hopefully provide some mechanisms for load reduction some of Purata's work shows the need for the model to reflect some of these factors, urinary N concentration is a good example.

Urinary N excretion, predicted using the CNCPS, among different farming systems and seasons



Diet, kg DM/d	Dunsandel	Trevale
Pasture	17	19
Pasture silage	0	0
Maize silage	1	0
Wheat grain	1	0
Potatoes	1	0
Total	20	19

Diet, kg DM/d	Dunsandel	Trevale
Pasture	8.5	13
Pasture silage	0	5
Maize silage	8	0
Wheat grain	1	0
Potatoes	1	0
Total	18.5	18

Source: Dr R Higgs, Purata Farming

- 3.9 Purata's modelling under 6.2.0 already factors provisions for standing cows off, where over the next 12 months a contained feedpad will be constructed. However there will be little gains on our paper losses through Overseer from investing a budgeted \$900,000 on this infrastructure.
- 3.10 Purata would therefore ask for a policy and matter of discretion be added allowing a landowner to apply for an extension to meeting the reductions set out in table 13 (h). Purata's main driver behind this is a 15% reduction is required by 2020, 3-years after the MGM adoption in 2017.
- 3.11 Further Purata would support a similar approach to the terminology adopted in Variation 1 where rather than set percentage reductions are required, a mid-point range are proposed. Thereby offering slightly more flexibility and certainty on any given year for the landowner to achieve.
- 3.12 Purata are supportive of development within the wider zone. This is important for the vibrancy of our community and supporting townships. However such development has to occur in a manner that does not hamstring existing users.
- 3.13 Purata therefore have some reservations around rule 13.5.14 and its application.
- 3.14 Purata would like the plan to clarify how the 30,000 hectares is available and how much is currently 'locked up' in a current consent. There is currently no easy way for a land owner or consent applicant to track compliance with the 30,000 hectare threshold. If Ecan can develop a database for this, similar to the groundwater zone allocation limits that would be useful.
- 3.15 Purata wish to encourage consistency in the planning framework across the region, where possible. It would be preferable to consider amending rule 13.5.30 to authorise the use of any method in Schedule 10 for water allocation. This aligns to provisions in the pLWRP.
- 3.16 Purata wish to express their concern over a total prohibition of water transfer and would rather allow some flexibility in rule 13.5.34, whereby the rule status moves to non-complying. Non Complying is still a high threshold for an activity to meet and there may be instances where a transfer should be facilitated, such as animal welfare, food safety and human health circumstances.

- 3.17 Purata ask for caution around targeted augmentation as a final land owner at the coast we have and acknowledge will continue to experience some challenges with the soils and overland flow from time-time.
- 3.18 Purata understand the reasoning behind augmentation but request very managed trails and controls are put in place before widening the scope of this work. Simply we ask for some robust modelled verse reality impacts are presented to the community and in a forum for understanding such results. A community liaison group or working party, similar to the Drains Working Group could be a good mechanism for involving the community in this process.
- 3.19 Purata do not want such work to unduly limit their ability to farm at this location and meet the criteria set out under LWP or their FEP.

4. CONCLUSION

- 4.1 The rule changes proposed under Variation 2 will potentially have significant impacts on the farming and wider community.
- 4.2 With time new technologies should allow landowners to meet the reductions but clarity is needed as to what levels need to be met.
- 4.3 Purata ask for some mechanisms in the plan where a longer phase in time and consent process can be entered into if the reductions cannot be met.
- 4.4 Purata believe some aspects of the plan are narrowly focused and for the life of the plan should be authorised rather than totally prohibited.