

**IN THE MATTER** of the Resource Management Act 1991  
**AND**  
**IN THE MATTER** of the hearing of submissions on Proposed  
Plan Change 5 (Nutrient Management and  
Waitaki Sub-region) to the Canterbury Land  
and Water Regional Plan

**BY** **WAITAKI IRRIGATORS COLLECTIVE  
LIMITED**

**AND** **MORVEN, GLENAVY, IKAWAI IRRIGATION  
COMPANY LIMITED**

**AND** **BRUCE MURPHY**

Submitters

**TO** **CANTERBURY REGIONAL COUNCIL**

Local authority

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**STATEMENT OF EVIDENCE OF BRUCE MURPHY**

Dated: 22 JULY 2016

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## **INTRODUCTION**

1. My name is Bruce Murphy. I am a dairy farmer living at Glenavy on the North Bank of the Lower Waitaki River. I currently a member of the Lower Waitaki south coastal Canterbury Water Management Zone Committee ("the Zone Committee"). I am an active member of my local community, including being Chairman of the Glenavy Swimming Pool Trust and a member of the Glenavy School Board of Trustees.
2. I am also a member of the Nitrogen Allocation Reference Group ("NARG") established in relation to the sub-regional limits-setting process undertaken for the South Canterbury Coastal Streams area (Plan Change 3 to the Land and Water Regional Plan).
3. Along with my parents, our family owns farms in several parts of South Canterbury, all subject to different planning processes and rules. I therefore have a very good understanding of the processes associated with the setting of limits relating to water quality and the implications of such to farming operations.
4. With my parents, we farm in the Glenavy, Waimate, Otaio and Maungati Districts. Our farms in the Glenavy District are predominantly border-dyke irrigated with wide laser-levelled borders and many shelterbelts planted along the borders. Irrigation water is supplied from the Morven, Glenavy, Ikawai Irrigation Scheme ("MGI").
5. The main part of our Glenavy farm is in the Whitneys Creek Zone under Plan Change 5, with the balance in the Greater Waikakahi Zone. MGI does not hold a consent to discharge nutrients, and therefore, the scheme has no nitrogen loss limit. However, every shareholder has an audited Farm Environment Plan ("FEP") and the scheme has implemented an Environmental Management Strategy ("EMS"). This has all been done voluntarily and the scheme has an excellent environmental track record.
6. My evidence will provide my view of the community collaborative processes which occurred prior to the release of Plan Change 5.

## **COLLABORATIVE PROCESS UNDERTAKEN**

7. The reasoning behind the development of the Canterbury Water Management Strategy and its focus on local and catchment scales was that those who understood the realities of each catchment or zone could participate in and contribute to the development of rules that would be applicable to that area.

8. There was a large amount of community consultation undertaken in the lead-up to our sub-regional planning process. From this, Council planning staff were given a clear directive by the Zone Committee of our community's hopes and aspirations.
9. These hopes and aspirations formed the basis of the ZIP Addendum produced in July 2015 by our Zone Committee. Unfortunately, it is my view that the planning process that followed does not give effect to the Zone Committee and the community's views.
10. It was my understanding that farmers within irrigation schemes, such as MGI, that required farmers to have an FEP, and used audited self-management as part of this process, would not be required to obtain further consents under Plan Change 5.
11. The style of environmental management adopted by MGI breeds on farm innovation by cross-pollination of experience to improve farming practices and environmental outcomes.
12. Audited self-management addresses farming practices across a range of areas including nutrient management, effluent management, irrigation, soils, and riparian zones. It supports the continued improvement of every farming system and type over time to achieve or exceed GMP, being the practices agreed on by the industry bodies in the MGM project. This is much broader and encompasses more than nitrate losses modelled in OVERSEER.
13. The Plan Change 5 rule framework does not acknowledge any individual or scheme that is already "doing things right" and in my view, this is a fatal flaw with the plan. It certainly does not reflect the Zone Committee's nor the wider community's expectations of the Plan.
14. The proposed framework will lead to overwhelming compliance and enforcement burdens on both the farming community and the Regional Council itself. As I have seen in Plan Change 3, and now with the Plan Change 5 process, any discussions around a number or narrative representing nitrogen loss is terribly destructive to the conversation.
15. It immediately divides the community into the "haves" and "have nots", meaning that the conversation is confined to inside the farm gate. I was of the opinion that the output from the Farm Portal would be a narrative, not a number. Then, in-stream water quality testing and science would be used to shape the future environmental footprint of our area.

16. The proposed "streamlined" consenting process will still be cumbersome and it simply is not required for farmers who are members of a self-audited irrigation scheme.
17. Plan Change 5 essentially requires all farms operating at some level of intensity, regardless of what the current state of water quality is, to obtain a resource consent to farm. It was not the wish of our community to force onto farmers a huge compliance regime that is time-consuming and expensive.

### **CONCLUSION**

18. In summary, it is my view that the Zone Committee and wider community support the use of FEP's and audited self-management. These are the tools through which GMP will be given effect to, and it is these practices that maintain and improve our environmental footprint. This should set the direction of the Plan - not the burden of a heavily involved, and totally unnecessary, consenting process.

**Bruce Murphy**

22 July 2016