

**IN THE MATTER** of the Resource Management Act 1991  
**AND**  
**IN THE MATTER** of the hearing of submissions on Proposed  
Plan Change 3 to the Waitaki Catchment  
Water Allocation Regional Plan

**BY** **MARK KINGSBURY**

**AND** **WAITAKI IRRIGATORS COLLECTIVE  
LIMITED**

Submitters

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

Local authority

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**STATEMENT OF EVIDENCE OF MARK KINGSBURY**

Dated: 5 July 2016

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## **INTRODUCTION**

1. My name is Mark Kingsbury. I have lived in the Waitaki Valley with my wife and family for more than 20 years. I am a Director of the Lower Waitaki Irrigation Company Limited, and a community representative on the Lower Waitaki-South Coastal Canterbury Water Management Zone Committee ("**the Zone Committee**").
2. I am presenting this evidence in my personal capacity as a farmer.

## **SCOPE OF EVIDENCE**

3. My evidence will provide information about my farming operation and the implications of the proposed Plan Change.

## **MY FARMING OPERATION**

4. We farm a 340 hectare dairy support/bull beef finishing block at Otekaieke. One hundred and twenty hectares of this is irrigated using water from the Kurow-Duntroon Irrigation Company Limited ("**KDIC**").
5. Under the operative Land and Water Regional Plan, my farm is located in a 'green' nutrient allocation zone, meaning that good water quality outcomes are currently being met.
6. The KDIC has a consent to take water for irrigation from Lake Waitaki. The conditions of this consent require us to operate under a Farm Environment Plan, which includes a nutrient budget and modelled nutrient losses using the OVERSEER programme, and these are audited annually.

## **THE PROPOSED PLAN CHANGE**

7. From having been involved in the process for sub-regional catchment limits and rules, it was my understanding that the proposed Plan change would mean (for my farm in an area with good water quality):
  - (a) provided I had implemented and was operating under the industry-agreed Good Management Practices (GMP), I could continue to farm as I had been, without the need to obtain a resource consent.
  - (b) GMP would not have such a narrow definition, and not determined only by modelled nitrogen leaching rates.
  - (c) there would be a strong link in the Plan between the rules and actual water quality monitoring of our waterways, not on projected OVERSEER outputs.

8. Our farm is two-thirds dryland and in a dry season its capacity to graze livestock is effectively zero. Therefore, we have to intensively manage the irrigated area to feed our animals to remain economically viable. Under the new proposal we would require a consent to continue to do this. Farmers are unable to pass on or recover this compliance cost and certainly don't need the extra stress, cost or time involved in obtaining another consent.
9. There are many factors that affect water quality, so to target farms with more than 50 ha irrigated and more than 20 ha of winter grazing is short sighted. Rather than set an area for winter grazing, I think there needs to be a scale that identifies the risk of intensively grazed crops. This would calculate the environmental impact of leaching and run-off, taking into the account soil type, contour, proximity to water bodies, and any mitigating strategies that the farmer might employ. Good water quality outcomes can still be maintained through farm level limits linked to in-stream or ground water quality objectives.
10. Different sections of society are demanding environmental change faster than farming can change as an industry. I don't think it is fair that the current generation of farmers should be burdened with fixing the perceived environmental damage of past generations. We need to make sure that decisions are based around science and not emotion.

The regional council plans are an experiment. No one knows for certain that actions they put in place will work. An experiment, by definition is a procedure adopted on the chance of it succeeding, or for testing a hypothesis. With this experiment, farmers are the lab rats and it would be a poor scientist who would deliver a lethal dose first up to see who survives.

### **CONCLUSION**

11. Farmers need clear, concise direction and information on how to be compliant and/or improve environmental performance. For any plan to succeed you must have a full 'buy in' from all parties affected by it. I think this plan in its present form would not get full farmer support making it unworkable and unenforceable.
12. As my grandfather used to say 'if it ain't broke, don't fix it'.

**Mark Kingsbury**

Date: 5 July 2016