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To: [Plan Hearings](#)
Cc: Hans@hansvanderwal.co.nz; [Alan Hawkins](#); pam.mark@xtra.co.nz; gmreed@scorch.co.nz; ngakuroa@xtra.co.nz; [Mike Freeman](#)
Subject: PC7 EIC - As One Inc (submitter number 387) [DC-Documents.FID2837222]
Date: Friday, 17 July 2020 4:38:23 pm
Attachments: [image003.png](#)
[15072020_20069_CLWRP_PC7_Waimak_evidence_Mike_Freeman_FINAL.pdf](#)
[Evidence of Mark Nalder for As One Inc \(11769417 1\).PDF](#)
[Evidence of Julie Mehrtens for As One Inc \(11769253 1\).PDF](#)
[Evidence of Alan Hawkins for As One Inc \(11769411 1\).PDF](#)
[Gavin Reed PC7 evidence \(11769244 1\).PDF](#)

Good afternoon,

Please find **attached** the following evidence. This evidence is filed on behalf of As One Incorporated (submitter number 387), and also on behalf of individual submitters, where a second submission number is provided:

- Dr Michael Freeman (expert evidence);
- Mark Nalder (submitter number 272);
- Julie Mehrtens;
- Alan Hawkins (submitter number 413).; and
- Gavin Reed (submitter number 374).

I have copied Hans van der Wal into this email, who is also counsel for As One Inc.

We note that additional information was loaded onto the Plan Change 7 hearings website yesterday. Our witnesses have not had the opportunity to review that information, or comment on it in this evidence. We reserve the right to file further evidence in response to those matters, if required.

Kind regards,
Jamie.

Jamie Robinson
Associate

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BEFORE THE HEARING PANEL OF THE CANTERBURY REGIONAL COUNCIL

In the matter of the Resource Management Act 1991

And

In the matter Plan Change 7 to the Canterbury Land and Water Regional Plan

Statement of evidence from Alan Francis Hawkins

Statement of Evidence from Alan Hawkins (submitter No.413) and on behalf of As One Inc (submitter number 387)

Dated 17 July 2020

Introduction and experience

- 1) My full name is Alan Francis Hawkins. I am a farm adviser at Hawkins Consulting LTD. I have owned and operated this business since 2001.
- 2) I hold the qualification of Bachelor of Agricultural Science from Massey University 1984-1987. I hold the Advanced Sustainable Nutrient Management Certificate from Massey University.
- 3) From 1989 to 1992 I was a Project Officer working for the Western Australian Department of Agriculture developing farm plans and an overall catchment plan for Wallatin creek. A year ago we returned to the area as my daughter was working there after a gap of 25 years. The farmers are still my friends and much of the work we did endures.
- 4) Between 1992 and 1996 I was a Regional Economist based in Carnarvon and covering entire rangelands of the state and the horticultural regions of Carnarvon and Kununurra.
- 5) From 1996 to 2001 I worked as a Farm Adviser with Agriculture NZ. The role was Rangiora based, and primarily I was a dairy consultant, dealing with all aspects of farming including feed planning, financial planning and resource consents related to farming.
- 6) 2001 to present. I established my own business, and am now a self-employed farm adviser. I'm primarily working with dairy farmers, and assist with all aspects of farming, with the

issues of nutrient management understandably becoming a focus over the last decade as the regional plan framework has changed. I have a wider involvement with other farm types including high country properties. In recent years a greater proportion of my work is dealing with Farm Environment Plans, Nutrient Budgets and the associated consents.

- 7) I have read and agree to comply with the Code of Conduct for expert witnesses contained in the Environment Court Practise Note 2014.
- 8) I submitted on proposed plan change seven (PC7) of the Canterbury Land and Water Regional Plan (CLWRP) (number 413) in my own name, and also have been working closely with the As One Inc group (submission number 387). Many of the members of the As One group are my clients, who I have been working with for many years. .

My key concerns with PC7 as proposed are:

- 9) The 6 reduction steps as proposed in table 8-9 for properties in Nutrient Priority Area (**NPA**) zone E will be impossible to meet and remain as a viable business. Farmers will be broke well before the final 'step' that Table 8-9 requires. Dairy milking platforms will be non-viable. Immediately there are three apparent impacts on properties:
 - a. The value will fall.
 - b. Secondly there is the impact on profitability.
 - c. Lastly is the impact on bank security.
- 10) I have assisted clients with due diligence when they are looking to purchase a farming property. There is no way I could support a farmer looking to purchase in the NPA, as the long-term ability to farm that property is non-existent under the current proposal. On that basis, all the farms within the NPA become virtually impossible to sell as a dairy farm, and I question what will happen to those properties, and their owners, under this proposal.
- 11) I have read the evidence of Dr Mike Freeman, prepared for As One Inc. His evidence addresses the disconnect between the surface water body to be improved (e.g. the Cust main drain), and the area of land where reductions are being implemented. Less than half of the Cust surface catchment has been included in NPA Zone E. I am familiar with the Canterbury GIS Maps, and have attempted to reconcile the NPA with the identified surface water catchments, with no success. I then requested information from ECan staff to better understand this issue, and I am yet to receive a response that clarifies it. On that basis, I have significant concerns about the science supporting the NPA, and consider this should be removed from the proposal.
- 12) When preparing this evidence, I have used my knowledge of the district to understand the scale of proposed reductions. I estimate that there are approximately 4900 milking cows that are both in Zone E and the Cust surface catchment. There are an additional 4500 milking cows that are in the Cust surface catchment but not in Zone E. Those 4500 cows are

on properties that require no reductions beyond GMP. The proposal pits neighbour against neighbour, with no scientific reason justifying the line. This picking of winners and losers is not appropriate, unless robust information can support the differentiation.

- 13) The reductions are primarily to be made by dairy milking platforms and other consented activities. There is approximately 1500 ha of dairy milking platform that is in both zone E and in the Cust surface catchment. That is 8.5% of the Cust Surface catchment of 17,856 ha. That small area is responsible for achieving a large proportion of the required water quality improvement. I accept that many dairy farms have got an important role to play in reducing N loss, and improving water quality. However, it feels that a small proportion of land holders been given much of the responsibility for change.
- 14) My concerns with the NPA, and the impact the proposed reductions will have on water quality, are outlined above. I consider that the alternatives proposed by the As One group are significantly more appropriate, both in managing nutrient losses in a fair way to improve water quality, and in ensuring our rural community continues to thrive.
- 15) Under PC5 farmers are required to be farming at GMP from 1 July 2020 – i.e. right now. However it is my understanding that the portal is broken, and it is almost impossible to get an accurate number for GMP. These reductions are all based on the GMP number, and so it is critical that we understand what that looks like.
- 16) I am here because this plan change is of massive significance to our community. Farming is a long-term business. Decisions are made looking forward many years, not just one or two at a time.
- 17) I ask that you consider how this plan change will impact families and communities within the NPA. I seek that the alternative approach proposed by As One is taken, so that my clients can continue to farm within the NPA in a way that is environmentally responsible and financially sustainable.

Alan Hawkins
17 July 2020