

In The Matter of the Resource Management Act 1991

And

In The Matter Plan Change 7 of the Canterbury Land and Water
Regional Plan

BRIEF OF EVIDENCE OF DAN GORDON

Evidence submitted on behalf on the Waimakariri District Council
Submitter ID PC7-3
11 November 2020

INTRODUCTION

1. My name is Dan Gordon and I am the Mayor of the Waimakariri District. Prior to taking on that role in 2019 I was a District Councillor, first elected in 2004. As a Councillor I have represented rural and urban ward communities, and in my role as Mayor I continue to seek the best overall interests of the District. I have, through this Council-related work and over many years as a long term resident in rural and urban parts of Waimakariri, engaged widely across the District with those involved in farming and related aspects of rural life. I regard myself as very connected with and aware of the needs, views and feelings of this sector.
2. I have followed closely the work of the Waimakariri Water Zone Committee since its inception and in particular the huge amount of work that that Committee undertook in preparing the Waimakariri Zone Implementation Programme Addendum (ZIPA). I am aware in broad terms of the extensive investigations and modelling of the potential future flows and concentrations of nitrates in relation to both surface and groundwater quality, and the implications for this derived from differing past and present land uses, and farm management practices as they affect nitrates runoff and infiltration.
3. I know that the consequential implications of differing nitrate concentration limit regimes into the future over time for land use, farm viability and impact on the rural sector has been significantly investigated and weighed in the Zone Committee's deliberations and recommendations proposed in the ZIPA. These balancing deliberations were the basis upon which the regulatory (as expressed in Plan Change 7), and the non-regulatory elements of the ZIPA as recommended by the Committee came to the Council for its adoption. The ZIPA was adopted by the Waimakariri District Council in December 2018 and subsequently the Councils' submission on PC7 expresses broad support for it, given its alignment with the ZIPA in September 2019.
4. I was, and like almost all in our community that I have heard from, am still a supporter of both these instruments as signalling the need for change over time to deliver improved water quality outcomes. But as much as I am concerned about that aim I am also concerned about the pace and nature of that change, being cognisant of its impacts on community, and it is on this aspect that I will focus my remarks.

IMPACTS OF THE PROPOSED CHANGE/NITRATE LIMITS ON COMMUNITY

5. When I spoke at the Council meeting as a Councillor in 2018 and moved the motion to adopt the ZIPA, I expressed gratitude for clauses being included that provided recognition of support for hardship and/or mental health, and the need to work collaboratively. I did so because the Chairperson of the Zone Committee in his report indicated that moving towards reducing nitrates to groundwater will have a significant economic impact on the District, and that there

was a risk that some dairy farmers will not be able to meet the targets set by changes to the Regional Land and Water Plan, and will go out of business. I reflected on visiting a number of farms demonstrating best practice and observing the industry leading the response, but noted it does come at a significant investment cost to farmers.

6. As indicated earlier I want to acknowledge the collaborative work of the Waimakariri Water Zone Committee and the excellent work that was achieved in the development of the ZIPA demonstrated by 80 community meetings that involved farmers and the community. The discussions with the community were challenging but set achievable targets. Environment Canterbury have done an excellent job in assisting the development of the Plan. I am not going to say that everyone is universally happy with what was developed in the end, and my basis of supporting this was because it was a process that collaborated with all parties, consulted widely and reached a consensus that the majority could work with to meet the objectives sought. It also had provisions to recognise hardship, as mentioned previously.
7. I supported the ZIPA process and the regulatory response to it given the intensive analysis, diverse Zone Committee viewpoints, and wide-ranging community participation embodied in it; as reflected in the multiple, varied objectives set out above. I note also the Zone Committee considered a range of possible nitrate plan limits from 1.0 mg/L to 6.9 mg/L nitrate-N for most rivers and streams, with lower limits in the Ashley River/Rakahuri and Waimakariri River. The effects of different limits on stream health and associated Ngāi Tūāhuriri values were considered. Economic and social impacts were also considered, particularly when the Zone Committee looked at how quickly limits could be achieved.
8. As much as I know that responding to the NPS-FM as gazetted in August 2020, subsequent to the final ZIPA and PC7 as notified, is a matter for the Hearing Panel to address, I suggest the matters referenced above from the ZIPA remain pertinent considerations for your deliberations on the pace at which PC7 should respond to this higher order document.
9. WDC, when it adopted the ZIPA, supported the nitrate plan limits as a reflection of the various factors as above to be taken into account in setting an appropriate limit and timeframe for that through a series of 15 per cent farm plan cuts spread over the next 60 years.
10. I am aware that the NPS-FM 2020 has set a nitrate-nitrogen bottom line for rivers of 2.4 mg/l (median value), to be achieved within a generation. Although this limit is not directly for groundwater, (indeed there is no National Bottom Line for groundwater), it is closely linked with spring water feeding a number of waterways in the Waimakariri District.
11. I am also aware of a viewpoint suggesting the goal should be to limit any nitrates in the aquifer to below 1 mg/l and that dairy farmers ought to be directed to achieve a 40 per cent reduction within 10 years.

12. A limit of 2.4 mg/l (median value) 'within a generation', if applied to groundwater, would likely have much more significant community implications than even those contemplated by the Zone Committee and the community that participated in the ZIPA process, let alone what might be termed the catastrophic consequences of that contemplated in para 11 above.
13. I do not have an expert view in relation to setting nitrate limits and timeframes for achievement and how the aspiration for reductions, which few would disagree with, should be finally resolved. But I am concerned about the integrity of the process if a significantly different outcome to that contemplated to date should be arrived at.
14. More importantly I, and I know many in the District community I represent, are deeply concerned at the prospective pace of that change and I urge the Commissioners to be fully cognisant in your deliberations of the potential extent and nature of community implications of any decision, especially on timing made too literally in relation to the aspiration set through the NPS-FM 2020. I do not believe achieving the NPS-FM 2020 nitrate limits 'within a generation' is desirable nor ultimately practical as the economic and social costs could be too great. I would also like to note that the NPS hasn't been through a Select Committee process and there has been no consultation with affected parties.
15. The work of the ZIPA that has led to PC7 is the process I respectfully ask you to carefully consider. From some farmers I meet I am worried that in adopting a stricter or quicker stance that the NPS foreshadows will lead to undue stress and, for some, their mental wellbeing is fragile. Further, if stricter standards are taken this may lead to farmers revolting and ignoring. This is particularly pertinent now owing to the sharp economic downturn owing to Covid, not to mention other Government moves that appear to be threatening the agricultural sector. Ultimately what we need is a regime that is achievable, that has broad industry buy in and there are reasonable timeframes set for change to happen. Most farmers I meet are in fact working to achieve change. There is no argument that we do need to improve water quality. The question is about being given time so that this can be reasonably achieved and not create undue hardship.
16. Thank you for your time and listening to my points.

DAN GORDON
Mayor, Waimakariri District Council

Dated 11 November 2020