

IN THE MATTER of the Resource Management Act
1991

AND

IN THE MATTER of the Proposed Plan Change 13 (Air
Quality) to the Regional Natural
Resources Plan

AND

IN THE MATTER of submissions and further
submissions by Ravensdown Limited
(Submitter No. 50)

**STATEMENT OF EVIDENCE OF ANNA MARY WILKES
ON BEHALF OF RAVENSDOWN LIMITED**

15 OCTOBER 2018

1. INTRODUCTION

1.1 My full name is Anna Mary Wilkes.

1.2 I am employed by Ravensdown Limited (**Ravensdown**) as an Environmental Policy Specialist. I have worked in this role since February 2017.

1.3 I was previously employed by Golder Associates (NZ) Limited (and its predecessor Kingett Mitchell Limited) for 12 years in various environmental consulting roles covering compliance monitoring, water quality, assessments of effects on the environment, resource consent applications, project management and resource management planning. I was also previously employed by Marlborough District Council as an environmental consultant and summer student.

1.4 I have a Bachelor of Science in Microbiology (1997) and a Master of Science with Honours in Biochemistry (2000) from the University of Canterbury. I also have a Master of Resource and Environmental Planning with Honours (2018) from Massey University.

1.5 I am an Associate Member of the New Zealand Planning Institute and a member of the Resource Management Law Association.

1.6 Evidence for Ravensdown at this hearing is also being provided by Ms Carmen Taylor, a planning consultant with Planz Consultants Limited. I have reviewed Ms Taylor's evidence.

1.7 I am presenting evidence as a representative of Ravensdown, and not as an expert witness.

1.8 In preparing my evidence, I have reviewed the section 42A Report for Proposed Plan Change 13 (Air Quality) (**PPC13**), and associated tracked changes version of PPC13 and the Regional Natural Resources Plan (**RNRP**).

1.9 I note that while this is not an Environment Court hearing and I am not presenting expert evidence, I confirm that I have read the Environment Court's Code of Conduct for Expert Witnesses and agree to comply with it.

Scope of Evidence

- 1.10 The scope of my evidence is to provide contextual background to Ravensdown's interest in PPC13 prior to Ms Taylor addressing specific planning matters in her evidence.
- 1.11 In my evidence I will focus on Ravensdown's general interest in regulatory processes, the construct of the business as a farmer-owned co-operative, and Ravensdown's operations in the Bay of Plenty.

2. RAVENSDOWN'S INTEREST IN REGULATORY PROCESSES

- 2.1 Ravensdown takes an interest in a wide range of resource management matters that relate to rural and industrial activities and participates in planning processes at the national and regional level through preparing submissions on regulatory, policy and plan mechanisms prepared under the Resource Management Act 1991 (RMA).
- 2.2 In participating in policy and regulatory development processes, Ravensdown recognises the need for the environmental impacts of farming to be mitigated and is supportive of an effects-based approach. However, it is important that farmers' ability to operate is protected and they retain the opportunity to innovate and to run farm businesses that are productive, sustainable and profitable.
- 2.3 In addition, Ravensdown has its own manufacturing, quarrying and bulk fertiliser store activities to service its customers. Historically, activities at these sites, which have been established for a long period time, have generally not required resource consents but as planning provisions have evolved, Ravensdown has acknowledged that there is a need for improvements to site management practices in order to satisfy new environmental and planning requirements. Ravensdown supports the need to mitigate the effects of its operations on the environment and is committed to fulfilling its environmental obligations in order for its business activities to continue.
- 2.4 In particular Ravensdown participates in planning processes to ensure policies and regulations incorporated into plans or other planning mechanisms, seek

and find an optimal balance between any necessary amendments to farming activities, as well as its industrial operations, and the use of the products it has developed to assist with sustainability, growth and production in the rural sector, and ultimately the economic and social wellbeing of the rural community and New Zealand.

3. RAVENSDOWN SHAREHOLDERS IN THE BAY OF PLENTY

3.1 Ravensdown has approximately 700 shareholders identified as farming in the Bay of Plenty. Approximately 40% are dairy farmers, 33% comprise horticultural activities, and the remainder comprise sheep, beef, mixed livestock, forestry, cropping and lifestyle blocks.

4. RAVENSDOWN'S BUSINESS

4.1 Ravensdown exists to enable smarter farming for a better New Zealand. As a farmer-owned co-operative, Ravensdown's products, expertise and technology help farmers reduce environmental impacts and optimise value from the land.

4.2 Ravensdown is an integral part of the food creation process, whether the food is grown for livestock or for humans. Ravensdown tests for, advises about, buys, ships, stores, spreads, measures and maps food-creating nutrients and fertiliser for its farmers in an integrated way.

4.3 Ravensdown is a science-focused organisation delivering quality agri-products, technologies and services. Ravensdown provides:

- (a) Practical insights, trusted guidance and lab-based diagnostic data on soil and plant samples.
- (b) Environmental consultancy to assist farmers to mitigate impacts and move beyond compliance.
- (c) Quality agri-products including agrichemicals, seeds and animal health products.
- (d) Manufacturing superphosphate at dedicated plants in Christchurch, Dunedin and Napier.
- (e) Lime quarries producing agricultural lime products.

- (f) Logistics and storage of bulk fertiliser and other products to ensure they are available when needed.
- (g) Global sourcing from top tier suppliers.
- (h) Capability for precision fertiliser application by ground and by air.
- (i) Map-and-measure technology for better on-farm decision making.
- (j) Innovation and research to ensure advice and solutions are based on sound science.

4.4 Ravensdown operates a network of fertiliser bulk stores, quarries and three superphosphate manufacturing plants throughout New Zealand. In the Bay of Plenty Ravensdown has one company operated store at Te Puke, two consignment stores (Te Teko and Broadlands) and a urea silo at Galatea.

4.5 Ravensdown provides the nutrients that nourish New Zealand's soil which, in turn, feed the plants and animals that deliver the products that can command a premium on the world stage. Smarter farming is all about smarter choices for the environment. Sales are important but as a farmer-owned co-operative, it is not Ravensdown's policy to sell farmers more than they need. Precision agriculture is about the right amount of the right inputs in the right place, applied at the right time. Smarter farming is also about always having the right reason – the focus on the environment, community and kaitiaki (stewardship).

4.6 Nutrient losses from fertiliser are uneconomic for a farmer to sustain and these potential losses can be managed using a range of techniques including appropriate advice on product type, application rates and timing. Ravensdown Environmental, a user-pays consultancy, promotes the control of nutrient losses through good management practices, Farm Environment Plans and Nutrient Budgets.

5. COMMENTS ON PROPOSED PLAN CHANGE 13 (AIR QUALITY)

5.1 Ms Taylor, in her evidence, discusses the outstanding matters arising from Ravensdown's submissions and further submissions, in more detail. However, in the context of Ms Taylor's evidence, I have taken this opportunity to identify matters of importance to Ravensdown in relation to PPC13.

- 5.2 Ravensdown recognises the importance of managing fugitive dust emissions from its bulk fertiliser stores to minimise effects on local air quality. Ravensdown considers that PPC13 Rule AQ R22 requirement for resource consents for discharge of particulates from Ravensdown's bulk stores should be confined to situations where the particulate discharge causes effects beyond the property boundary.
- 5.3 Ravensdown worked closely with Ballance Agri-Nutrients Limited (**Ballance**) and the Fertiliser Association of New Zealand (**FANZ**) to provide consistent feedback on the draft National Planning Standards definition for fertiliser (submissions closed 17 August 2018). Given the timing of PPC13 and the proposed gazetting of the National Planning Standards in April 2019 it is appropriate that the PPC13 include a definition of fertiliser that is consistent with the national definition.
- 5.4 Ravensdown's submission on the draft National Planning Standards definition for 'fertiliser', sought to reference the definition in the current Agricultural Compounds and Veterinary Medicines (Exemptions and Prohibited Substances) Regulations 2011. While I note that these regulations are under review, I consider that the current definition is appropriate for PPC13.
- 5.5 Similarly, Ravensdown would prefer that PPC13 definitions for intensive farming were aligned with the pending National Planning Standards definition for 'intensive primary production' and 'primary production'.

6. CONCLUSION

- 6.1 The matters raised in Ravensdown's submissions have largely been addressed through the section 42A Report's recommendations for amendments to the PPC13. Ms Taylor has addressed remaining matters which in our opinion warrant further consideration.
- 6.2 Ravensdown supports effects-based approaches to regulation, if needed, to reduce the environmental impacts of farming as well as its own industrial activities. As outlined in our evidence there are some aspects of PPC13 that we consider warrant further refinement in order to provide Bay of Plenty Regional Council with a sound basis for managing effects on air quality.

Anna Wilkes

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15 October 2018

