

IN THE MATTER OF hearing by the Canterbury  
Regional Council under the  
Resource Management Act 1991

AND

IN THE MATTER OF submission on Variation 6 of the  
Proposed Natural Resources  
Regional Plan,  
Chapter 4: Water Quality –  
Christchurch Groundwater  
Protection Zones and Related  
Map Volume Amendments

**Statement of Evidence on behalf of Federated Farmers of New Zealand, North  
Canterbury Province (Submitter Nos. Variation 6: 34 & F114), and Combined  
Canterbury Provinces (Submitter Nos. Variation 1: 586 & F1074)**

**1 Introduction**

- 1.1 Federated Farmers of New Zealand welcomes the opportunity to present this evidence on Variation 6 of the Canterbury Region's Proposed Natural Resources Regional Plan.
- 1.2 My name is Chris Sundstrum. I am Chair of the Canterbury Regional Policy Committee of Federated Farmers of New Zealand and Immediate Past President of the North Canterbury Province of Federated Farmers. I own and manage a fibre exporting business, Mohair Pacific, and produce fibre on a small land-holding near Rangiora.
- 1.3 With me is Lionel Hume. He is employed by Federated Farmers of New Zealand as a Senior Policy Analyst, based in Ashburton. He holds B.Ag.Sc. and M.Sc.(1<sup>st</sup> Class Hons) degrees from Massey University and a Ph.D.(Plant Science) from Lincoln University. His previous work experience was in plant and soil science. He is currently a member of Federated Farmers' Regional Policy Team.

- 1.4 This submission is made on behalf of the North Canterbury Province of Federated Farmers of New Zealand. Federated Farmers has actively consulted with members on all of the Proposed NRRP chapters, and specifically on Variation 6. The Federation wishes to maintain ongoing dialogue with Environment Canterbury staff and councillors, to ensure that there is clarity of understanding and a good working relationship between the Council and the Federation.
- 1.5 Federated Farmers recognises the value of Christchurch's high quality, untreated water supply, and supports the protection of Christchurch groundwater recharge through the Groundwater Protection Zones. However, land owners and managers within the Christchurch Groundwater Protection Zones must be able to carry out normal farming operations without the need to obtain resource consents. This is vital in order to retain the economic viability of farms within the zones, and to maintain the zones in a good environmental state. For example, the use of fertilisers and agrichemicals is necessary in order to maintain plant and livestock health, and to control weeds and pests.
- 1.6 Federated Farmers is not opposed to wise regulation but asks that emphasis be placed on education and good information in order to raise performance standards. If rules are needed to modify behaviour, they must be effective, be clearly articulated, be understood by those to whom they apply, and be fair to all.

## **2 Potential for Reduction of Groundwater Quality**

- 2.1 Federated Farmers asked that Issue WQL4 refer to *The potential for reduction and loss of ...the current high quality of Christchurch groundwater* (34.1, p 57). Our submission was rejected on the basis that groundwater quality is already degraded in some places. However, the overall quality is currently high. The current wording states that there will be reduction in water quality. There is the potential for future reduction and loss but we should strive to avoid that. Indeed, it is the purpose of this plan variation to avoid loss of groundwater quality. Therefore, Federated Farmers retains the view that it would be more accurate for the objective to refer to potential loss of groundwater quality.
- 2.2 Federated Farmers submitted that the use of the words *enhanced* and *enhancement* in Objective WQL4 (1) and (2) is problematic, given the already high quality state of

Christchurch groundwater (34.2, p 62 & 34.3, p 63). It may be very difficult to enhance the quality of Christchurch's groundwater. We support the objective to maintain the quality of Christchurch groundwater and address issues of localised contamination.

- 2.3 Federated Farmers submitted (on the Explanation and principle reasons for Objective WQL4) that the intensification of rural productive activities is a lesser threat to groundwater quality than intensified use and storage of hazardous substances or urban the spread of urban development, and that intensification of rural productive activities should not head the list of risks to groundwater quality (34.4, p 71). Our submission was rejected on the basis that no hierarchy of risks is intended. Despite intentions, a hierarchy is implied and the order of the list should be amended, as requested.

### **3 Protection of Groundwater Quality**

- 3.1 Federated Farmers submitted that Zone 1 is not the ultimate source of high quality water for the Christchurch aquifers (34.8, p 100). The water sources are the Waimakariri River and rainfall onto the recharge zone. Although it is very important to maintain water quality as it passes through Zone 1, that alone will not ensure the quality of Christchurch groundwater. Further, water from the river and from rainfall will dilute any contaminants derived from Zone 1. The recommended amendment is supported but it also needs to be recognised that an intensive focus on zone 1 alone will not ensure the quality of water entering the confined aquifers beneath Christchurch.

### **4 General Control of Activities**

- 4.1 Federated Farmers submitted that Policy WQL14(1)(a) should be amended to read: *minimise the effects on groundwater quality of legally established existing activities by requiring that appropriate practicable management measures are implemented to achieve this* (34.9, p 110). Our submission was rejected on the basis that the word *practicable* ensures that the measures are appropriate. This is not correct. The word *practicable* simply means that something is able to be done. When measures are imposed to protect water quality, they must not only be able to be done, but also be

appropriate (relevant to the issue), and contribute to achieving the desired result. Therefore, Federated Farmers continues to recommend the requested amendments.

- 4.2 Similarly, Federated Farmers submitted that Policy WQL14(2)(a) should be amended to read: *minimising adverse effects on groundwater quality by requiring that appropriate practicable management measures are implemented to achieve this* (34.12, p 123). As argued above, the word practicable simply means that something is able to be done. When measures are imposed to protect water quality, they must not only be able to be done, but appropriate (relevant to the issue), and contribute to achieving the desired result. Therefore, Federated Farmers continues to recommend the requested amendments.
- 4.3 Federated Farmers requested that item 3 of the Explanation and principle reasons following Policy WQL14 be amended as follows: : *The application of pesticides and fertilizers in both the urban and rural environments associated with intensive land use activities (e.g. horticulture) ~~has~~ may have significant consequences for groundwater contamination. and ..., ~~will~~ may result in contaminants being ~~readily~~ flushed into the groundwater system* (34.17, p 130). Our submission was rejected on the basis that intensification and associated use of fertilisers and pesticides will affect unconfined groundwater quality. The possibility of this happening must be recognised but it is not a certainty. Therefore, we recommend that our requested amendments be adopted.
- 4.4 Federated Farmers suggested that the wording of the explanation and reasons following Policy WQL14 should be amended as follows: *The likelihood of contaminants entering groundwater ~~will~~ may also increase if land use intensification proceeds.... and Despite all precautions, including the application of high design standards, ~~it is inevitable~~ some discharges may occur* (34.18, p 133). Our submission was rejected on the basis that “intensification over unconfined groundwater does lead to degraded water quality”. Federated Farmers agrees that intensification may lead to a decrease in groundwater quality but it is neither certain or inevitable. Therefore, we recommend that our requested amendments be adopted.

## **5 Control of Rural Production**

- 5.1 Federated Farmers submitted that Policy WQL16(1) should be amended by replacing the word *all* with the word *appropriate* so that *appropriate practicable management*

*measures* would be required to minimise the potential for contaminants to enter groundwater (34.19, p 140). Our submission was rejected on the basis that the word *practicable* ensures that the measures are appropriate. This is not correct. As discussed in paragraph 4.1, above, the word *practicable* simply means that something is able to be done. When measures are imposed to protect water quality, they must not only be able to be done, but also be appropriate (relevant to the issue), and contribute to achieving the desired result. Therefore, Federated Farmers continues to recommend the requested amendment.

- 5.2 Federated farmers submitted that Policy WQL16(2) be amended as follows: *Rural productive land uses must not be intensified, or new rural productive uses established, that significantly increase the potential, based on clear evidence, for nutrient, chemical and microbiological contaminants adversely affecting groundwater quality....* (34.20, p 141). Our submission was rejected, based on the need to avoid any unnecessary risk and that intensification of land use will eventually degrade water quality. Intensification of land use will not necessarily result in degraded water quality. A number of factors, such as the nature of the activity and quality of management, will determine effects on groundwater quality. Therefore, Federated Farmers continues to recommend the requested amendment.
- 5.3 Federated Farmers requested amendment of the final sentence of paragraph 1 of the Explanation and principle reasons following Policy WQL16, as follows: *...this is appropriate if the risk these activities pose to groundwater is carefully ~~controlled~~ managed* (34.21, p 143). Our submission was rejected on the basis that the word *control* better reflects the context of the chosen policy approach. Federated Farmers continues to believe that, to minimize the risk of rural productive activities to groundwater quality, they need to be carefully managed, with the willing cooperation of land owners/managers. It is good, careful management which will deliver the desired water quality outcomes rather than controls or regulations.
- 5.4 Federated Farmers supported a submission by Horticulture NZ requesting deletion of the final paragraph of the Explanation and principle reasons following Policy WQL16 (F114.15, p 143). The original submission, and our further submission, were rejected to avoid any unnecessary risk associated with land use intensification over the unconfined aquifers. In the final sentence, irrigation is identified as “a key indicator of undesirable intensification”. It is relevant to point out that irrigation can assist in the management of nutrients by ensuring that there is an actively growing crop to take up

nutrients when they are available. The use of water for irrigation should not, in isolation, be used as an indicator of undesirable intensification.

## **6 Control of intensity of Activities**

6.1 Federated Farmers submitted that Policy WQL17(2) should be amended to by replacing the word *all* with the word *appropriate* so that *appropriate practicable management measures* would be implemented to minimise adverse effects on groundwater (34.23, p 154). Our submission was again rejected on the basis that the word *practicable* ensures that the measures are appropriate. This is not correct. As discussed in paragraphs 4.1 and 5.1, above, the word *practicable* simply means that something is able to be done. When measures are imposed to protect water quality, they must not only be able to be done, but also be appropriate (relevant to the issue), and contribute to achieving the desired result. Therefore, Federated Farmers continues to recommend the requested amendment.

## **7 Use and Storage of Fertilisers and Agrichemicals**

7.1 It is important to retain the economic viability of farms within the Christchurch Groundwater Protection Zones, and to maintain these zones in a good environmental state. The use of fertilisers and agrichemicals is necessary in order to maintain plant and livestock health, to control weeds and pests, and generally to maintain a stable environment on the rural land within the zones.

7.2 Federated Farmers requested deletion of Condition 8 of Rule WQL26 (34.28, p 226). This condition means that the discharge of animal effluent or other contaminants onto land within the Groundwater Protection Zones would not be a controlled activity, but would be a fully discretionary activity. Our submission was rejected on the grounds that such discharges must be considered through the consent process in order to protect groundwater quality. Under Rule WQL26, discharges are controlled activities, which require a consent to which appropriate conditions can be attached to protect groundwater quality. Federated Farmers continues to believe that this is the most appropriate approach. Alternatively, if it is decided that the power to decline a consent application is required, even if the conditions are met, a restricted discretionary classification would be more appropriate than fully discretionary, with

discretion restricted to matters relevant to groundwater quality. Therefore, Federated Farmers recommends that condition 8 be removed, but, if this is not done, that the discharge becomes a restricted discretionary activity, with discretion restricted to matters relevant to groundwater quality.

- 7.3 Similarly, with regard to Rule WQL27, classification as a restricted discretionary activity should be sufficient to control the adverse effects of animal effluent on water quality. It should not be necessary to invoke a fully discretionary rule (34.29, p 227).
- 7.3 Federated Farmers is concerned that rules and conditions designed to protect water quality in the Groundwater Protection Zones do not adequately recognise the value of industry best management practices encapsulated in the GrowSafe Code for agrichemicals and Spreadmark Code for fertilisers. Both of these industry codes are rooted in the legislative requirements of the Hazardous Substances and New Organisms Act 1996 and provide management tools for growers and farmers which go a considerable way towards addressing concerns about groundwater quality in the Christchurch Groundwater Protection Zones.

On behalf of Federated Farmers, we thank you for the opportunity to present these submissions.

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Federated Farmers of New Zealand

Lionel Hume  
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Federated Farmers of New Zealand

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