

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Waikato Regional Plan
Change 1 - Waikato and Waipa Catchments

Block 1 Topics

AND

IN THE MATTER of the submissions and further submissions
by Fertiliser Association of New Zealand
(Submitter ID 73305)

HEARING SUBMISSION STATEMENT OF GREG SNEATH

15th FEBRUARY 2019

SUMMARY

- A. The Fertiliser Association of New Zealand does not intend to speak to this submission to the Block 1 Hearing, and provides this written statement in response to the Officer's Section 42 report and recommendations on the Proposed Plan.
- B. In its original submission the Fertiliser Association provided submission comments on Objective 1- 6 and Policy 14, with general support, but seeking some amendments to the text for the purpose of clarity and consistency.
- C. Comment and feedback in this statement address the Officers' Report recommendations on the proposed amendments for Objective 2, seeking an amendment to ensure the Objective 2 includes benefits to the wider community.

INTRODUCTION

1. The Fertiliser Association of New Zealand ('FANZ' or 'the Association'), is a trade organisation representing the New Zealand manufacturers of superphosphate fertiliser. The Association has two 'member companies' – Ballance Agri-Nutrients Ltd and Ravensdown Ltd. Both these companies are farmer co-operatives with some 45,000 farmer shareholders. Between them these companies supply over 98% of all fertiliser used in New Zealand.
2. The member companies have invested significantly in systems and capability to reliably estimate and document nutrient cycling on farms, with the purpose of providing sound advice and recommendations for nutrient management to support viable economic production and environmental responsibility. The systems and procedures used are applied in the same way nationally, but recommendations are specific to farmer goals, industry targets and regional council regulation. National and in particular regional consistency in the approach and framework for nutrient management is highly desirable.
3. FANZ takes a particular interest in regional policy statements and regional plans in terms of supporting provisions that enable the sustainable management of natural and physical resources, and ensuring any regulation of land use activities that may use fertilisers is appropriate and necessary.

4. The industry supports systems that provide flexibility for land users to engage appropriate tools and practices to farm within environmental limits, and to provide for economic, social and cultural well-being.

STATEMENT

5. While the Officers' report recommendations for Objective 1-6 and Policy 14 do not adopt recommendations presented by the Fertiliser Association in its original submission, the general intent and overall approach proposed in the Offers Report on these provisions is generally accepted.
6. However, the Fertiliser Association seeks a further amendment to Objective 2, in support of the submission made by Mercury NZ. The recommended amendment to Objective 2 remains very narrow in that the economic, social and cultural welling, as an objective of the Plan, only applies to Waikato and Waipa communities. Clearly the Waikato and Waipa Rivers and the land use within the region have significance for these matters regionally and nationally.
7. The Fertiliser Association considers that the original Objective 2 (in bold) was generic, as was the explanation for Objectives, which referred to communities in general. The text below the bold text in the original Objective 2 described the special importance to Waikato and Waipa communities.
8. Mercury NZ's submission on Objective 2 was that economic, social and cultural benefits are wider than just the Waikato and Waipa Community. The S42 report (paragraph 366) discusses Mercury NZ's submission - but the Officers' report states it is not considered appropriate to reference the wider community, because the wider community was not considered in the evaluation and development of the plan.
9. I don't agree with the Officers' Report that prior failure to consider the wider regional and national benefits in the evaluation and development of the Plan, is sufficient justification that Objective 2 should only apply to Waikato and Waipa communities.
10. Support is given to the intent and principles in the Mercury NZ submission that the revised Objective 2 should not limit cultural, social and economic well-being to only the Waikato and Waipa communities.

DECISION SOUGHT

11. Amend Objective 2 to read as follows, (or similar to the same effect):

Waikato and Waipa communities and wider regional and national communities and their economies benefit from the restoration and protection of water quality in the Waikato and Waipā River catchments, which enables the people and communities to continue to provide for their social, economic and cultural wellbeing.

CONCLUDING COMMENT

12. Thank you for the opportunity to provide comment on the Officers' Report and recommendations in relation to Block 1 Topics for the Hearing on the Proposed Waikato Regional Plan Change 1.



Greg Sneath

Executive Manager,

The Fertiliser Association of New Zealand
15th February 2019