

BEFORE INDEPENDENT HEARING COMMISSIONERS

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

Proposed Waikato Regional Plan Change 1:
Waikato and Waipa River Catchment

**STATEMENT OF PRIMARY EVIDENCE OF JUSTINE YOUNG
FOR DAIRYNZ LIMITED
15 FEBRUARY 2019**

SUBMITTER 74050



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Introduction

- 1 My full name is Justine Young. I hold a BSc from Massey University and a MSc in Resource Management from Lincoln and Canterbury Universities. I have completed post graduate papers from Massey University on policy theory and resource management law.
- 2 I have 23 years' experience working for local, regional and national government in resource management planning and policy advisor roles. I have experience developing regional land and water plans, including regulation and trading of diffuse discharges of nitrogen. I was the Waikato Regional Council (WRC) planner throughout the development and First Schedule process for the Waikato Regional Plan - Lake Taupo Catchment. I led the policy development team for the Waikato Healthy Rivers Wai Ora project, up until finalising the Proposed Waikato Regional Plan Change 1 - Waikato and Waipa River catchments.
- 3 As senior policy advisor, my role at DairyNZ is to provide policy advice for DairyNZ involvement in regional plans. I co-ordinate the Waikato Dairy Leaders Group, which was set up in 2012 to provide a unified voice for dairy farmers in Waikato, and comprises governance-level representatives and executives from DairyNZ, Miraka, Fonterra, Open Country Dairy, Tatua, and Federated Farmers.
- 4 I am familiar with Proposed Waikato Regional Plan Change 1: Waikato and Waipa River Catchment (hereafter referred to as PC1).
- 5 My direct involvement in this process began when I was employed by Waikato Regional Council as a senior policy advisor. My role was to assist in the set-up of the Healthy Rivers Wai Ora project from 2011 onwards, and then to lead the policy development that resulted in PC1. During this time my key responsibilities were to assist the Collaborative Stakeholder Group, River iwi and Council. This ended at the time PC1 was finalised by the Collaborative Stakeholder Group in mid-2016. My next involvement with PC1 occurred when I joined DairyNZ where, together with other DairyNZ staff, I have been working with WRC council staff on implementation set up for PC1 on behalf of dairy farmers. I co-ordinated the preparation of DairyNZ's original and further submissions, attended WRC's information forum and experts day on 21-22 November 2018, and have co-ordinated the preparation of the statements of primary evidence from DairyNZ.

Code of Conduct

- 6 I have read the Environment Court's Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note 2014 and agree to comply with it. I confirm that the issues addressed in this statement of evidence are within my area of expertise except where I state that I am relying on the evidence of another person.

Scope of Evidence

- 7 I have been asked by DairyNZ to provide evidence to set the scene for DairyNZ's involvement in PC1 hearings, and submission matters related to topics in block 1 of the hearings. I structure my evidence as follows:
 - a) Overview of DairyNZ's submission
 - b) Overview of three pieces of DairyNZ expert evidence relating to the water quality and economic underpinning of PC1. This includes evidence to support Healthy Rivers model suitability as a tool to assist policy decisions made by the Collaborative Stakeholder Group, economics evidence about DairyNZ farm-level modelling and the contribution of dairy farming to the Waikato economy, and water quality evidence in terms of overall support for the technical underpinning of PC1.
 - c) Review and comment on Waikato Regional Council section 42A report; and
 - d) Appendix 1 listing the changes DairyNZ seek to PC1.

Overview of DairyNZ Submission and approach to the hearing

- 8 DairyNZ's submission supports the overall intent of PC1 as the first stage toward improving water quality in the long term, thereby assisting achievement of the Vision and Strategy for the Waikato and Waipa River catchment, including the need for all dairy farmers to take action to achieve the objectives.
- 9 DairyNZ's approach to Block 1 of the PC1 hearings is to ensure the technical underpinning for the provisions is sound. For that reason, we have submitted expert evidence on the economic and water quality aspects of PC1, and I outline that below. The DairyNZ evidence concludes that the hearings panel can be confident of the evidence base for decisions on PC1. DairyNZ submission points on policies and methods, to be heard in later hearing blocks, acknowledges that further information-gathering and knowledge is important to start now, so that this is used in modelling and community engagement for the next plan change.
- 10 Appendix 1 of my evidence sets out the relevant aspects of the DairyNZ submission. This includes a summary statement of support for retaining some listed key aspects of PC1. The submission also requested clarification changes to the Background and Explanation and to Objectives 1,3, and 4. The submission did not request any changes to values set out in PC1, or to water quality attributes, targets and desired water quality set out in Table 3.11-1.
- 11 The staged approach is necessary to sustain regional economic performance and safeguard the wellbeing of Waikato's local communities. PC1 has challenging long term water quality desired states that will require far reaching land use change. I agree with the Officers conclusions in paragraph 296, that one of the purposes of PC1 is to gather better information to inform future plan changes. Before we can decide how to do this, we must know more about property-level footprint, and ensure we are set up with the right science and farm-level mitigations. Preparation for future

limits should be based on a broad assessment of land use suitability, and management of the four key contaminants, rather than the short-term focus on nitrogen allocation contained in many submissions to PC1.

- 12 DairyNZ's key concern throughout this hearing, will be that provisions in PC1 can be implemented by dairy farmers, to make a start on achieving the Vision and Strategy. The DairyNZ submission summarised key aspects of PC1 that should be retained. These aspects were developed and debated at a governance level amongst the dairy sector governance-level Waikato Dairy Leaders Group. In the next block of hearings, DairyNZ will bring more evidence about impacts on dairy farmers of the current provisions, and fine-tuning for implementation, including alternatives for identifying the most nitrogen-leaky farms and tracking nitrogen leaching on dairy farms.

Water Quality and Economics Evidence

- 13 DairyNZ expect wide-ranging debate on technical reasons for PC1 limits in block 1 of the hearings, including whether there is a need to reduce nitrogen in every sub catchment in the long term. Some submitters have commissioned new water quality assessments and modelling. Horticulture NZ is the only organisation who has provided public information about technical work, so we have been unable to evaluate other approaches until evidence is available to the public. For that reason, Dr Craig Depree has described the aspects of the water quality work commissioned by the Technical Leaders Group that he supports.
- 14 DairyNZ's submissions about nitrogen is that it is important to manage in the life of this plan change to achieve long term water clarity. DairyNZ supports the judgement made by Technical Leaders Group on the importance of managing both phosphorus and nitrogen. Dr Depree has assessed this work with fresh eyes, and his water quality evidence concludes that the technical work was sound. He has identified several aspects for the hearings panel to consider in terms of making sure the attributes chosen can continue to be justified by the council as it develops its freshwater accounting framework.
- 15 Dr Graeme Doole sets out his reasons why he believes the Healthy Rivers Wai Ora model structure and application align with best practice in economic assessments of environmental policy. I understand from him that the model was the best and most robust that could be put together at the time, given time and resource constraints, that was able to integrate multiple biophysical water quality aspects, best estimates of mitigation cost effectiveness and flow on impacts to the economy.
- 16 DairyNZ farm mitigation modellers and economists provided some of the base information about mitigations and costs across dairy farms in the Waikato River catchment, that went into the model. Mr Mathew Newman led the DairyNZ economics group when this work was completed in 2014 and sets out the results and assumptions used.

17 Dr Depree has assessed the water quality modelling layers that went into the Healthy Rivers Wai Ora model and concludes that overall, the approach is soundly based.

18 Despite concerns and alternative approaches raised by some submitters at the information days 21-22 November 2018, in my opinion the hearings panel does not need to choose another modelling approach. For these reasons, I agree with the Officers conclusions in the s42A report (paragraph 288) that the modelling undertaken was fit for purpose in that it informed an assessment of costs and benefits of PC1.

Comment on s42A Officers Report

19 Appendix 1 sets out the DairyNZ submission points and s42A response. I agree with the recommendations made.

20 DairyNZ made a submission and further submission to the Background and Explanation to PC1. This is not covered in the s42A, and as it is akin to an executive summary of PC1, I assume it will be part of block 3.

Justine Young

15 February 2019

Appendix 1: Changes sought by DairyNZ to topics in Block 1 of PC1 hearings

Submitter 74050

Provision of PC1	Submission point	Key reason for DairyNZ submission	S42A response	DairyNZ request to hearings panel
Various	submission p 1	Support for list of key aspects of PC1 including staged approach and retaining 2096 as long term water quality goal; all contributors to discharges are required to take action; actions on the land are used to assess progress in PC1; work is started now to prepare for the next plan change; implementation detail includes sectors; amendments to some aspects to improve clarity for farmers.	Wording of Objectives has been clarified. Overview of topics in section 1.3 paragraphs 127 -149 gives overview for next blocks of hearings and is broadly in line with DairyNZ submission.	Confirm Officers recommendation on Objectives.
Objective 1	Further submission to Fish and Game PC1-10806	Concern that Fish and Game were adding attributes that could not be technically justified and wanting to see a complete change to the water quality modelling approach to set sub catchment loads	No change to Objective 1 or addition of new attributes including MCI, periphyton	Confirm Officers recommendation
Objective 3	PC1 10168	Clarify the 10% change and how it applies	Different changes made to Objective 3	Confirm Officers recommendation
Objective 3	PC1 10189	Concern that plan users will expect a direct link between measured water quality and actions on-farm	Explanations are deleted as potentially confusing	
Objective 4	PC1 10193	Make language about change required more specific	Objective is more specific on diffuse contaminants and removes additional terms that attempt to explain that future is unknown, and community must adapt over time	Confirm Officers recommendation
Objective 4	Further submission to Federated Farmers PC1 V1 143	Addressing information gaps in PC1 is important, but concern that changes requested implied subsequent plan changes would not require contaminant reductions	No change to Objective 4	Confirm Officers recommendation