

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Otago Regional Policy Statement
2021

AND

IN THE MATTER of submissions by Ravensdown Limited
(Submitter ID. 00121)

STATEMENT OF EVIDENCE OF ANNA MARY WILKES

ON BEHALF OF RAVENSDOWN LIMITED

23 NOVEMBER 2022

SUMMARY

- A. Ravensdown Limited (**Ravensdown**) is a farmer-owned co-operative with almost 2,000 shareholders based in Otago. Ravensdown is a science-focused organisation delivering quality agri-products, technologies and services, and is an integral part of the food creation process, whether the food is grown for livestock or for humans.
- B. Ravensdown, in preparing its submission on the Proposed Otago Regional Policy Statement 2021 (**PORPS 2021**), has primarily focussed on our business' area of interest, that is the implications for our farming shareholders (close to 2,000 in the Otago region), Ravensdown's own operations at the Dunedin Works and its three bulk stores in Oamaru, Milton and Balclutha.
- C. The Dunedin Works, established at Ravensbourne in 1929, manufactures around 110,000 tonnes of superphosphate and despatches 160,000 tonnes of bulk product annually. It is a key contributor to both the local and national economy and also plays an essential part in providing the key nutrients required for the ongoing development of New Zealand agriculture. Also, given the significance of the Dunedin Works, and the upcoming 2025 expiry of a number of regional resource consents held for discharges at the Dunedin Works, Ravensdown anticipates that the PORPS 2021 will be a key planning instrument for the re consenting process.
- D. Accordingly, given the nature of Ravensdown's activities in the region, my statement of company evidence provides context for Ravensdown's involvement in this process.
- E. Ravensdown supports a robust PORPS 2021 that establishes a planning framework that aims to achieve long-term sustainability, by integrating the protection, restoration, enhancement and use of the region's natural and physical resources. Given Ravensdown's areas of focus, Ravensdown, through its submissions sought to ensure that farming activities, and associated rural activities, are appropriately recognised and provided for, and that they are protected from potential reverse sensitivity effects. In relation to Ravensdown's industrial activities at the Dunedin Works, and at its stores, the focus has been to strive for the appropriate recognition and provision for industrial activities as resource users, as well as ensuring that the PORPS 2021 provisions sets an appropriate policy direction for industrial wastewater discharges, stormwater management, discharges to air and ongoing use of the wharf at Ravensbourne
- F. While some of Ravensdown's submissions have been adequately addressed through the recommendations of the section 42A Reports recommendations and subsequent supplementary evidence, a number of matters, in my opinion, require further consideration and amendment. Ms Taylor traverses these matters in her planning evidence.

1. INTRODUCTION

- 1.1 My full name is Anna Mary Wilkes
- 1.2 I am employed by Ravensdown Limited (**Ravensdown**) as ESG & Policy Manager. I have worked for Ravensdown since February 2017 and held several environmental and policy roles during that time.
- 1.3 Prior to joining Ravensdown, I was employed by Golder Associates Limited (and its predecessor Kingett Mitchell Limited) in various environmental consulting roles between 2005 and 2017.
- 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 I am presenting evidence as a representative of Ravensdown, and not as an expert witness.

2. SCOPE OF EVIDENCE

- 2.1 In preparing my evidence, I have reread and/or reviewed the following documents:
 - (a) Proposed Otago Regional Policy Statement 2021 (**PORPS 2021**);
 - (b) Ravensdown's submission on the PORPS 2021 dated 3 September 2021;
 - (c) The section 42A Reports for the PORPS 2021, dated 4 May 2022, and subsequent supplementary evidence dated 11 and 21 October 2022, relevant to Ravensdown's submission points; and
 - (d) The evidence prepared by Ms Carmen Taylor, a planning consultant with Planz Consultants Limited.
- 2.2 I also attended the 'Air', 'Land and freshwater – Fresh water' and the 'Land and freshwater – Land and soil' prehearing meetings held in June 2022.
- 2.3 The scope of my evidence is to provide contextual background to Ravensdown's interest in PORPS 2021 prior to Ms Taylor addressing specific planning matters in her evidence.
- 2.4 In **Section 3** of my evidence, I provide an overview on Ravensdown's general interest in regulatory processes, the construct of the business as a farmer-owned co-operative and the general importance of the superphosphate manufacturing site at Ravensbourne.

3. RAVENSDOWN LIMITED

Ravensdown's Interest in Regulatory Processes

- 3.1 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, regional and district level through preparing submissions on regulatory, policy and plan mechanisms prepared under the Resource Management Act 1991 (RMA).
- 3.2 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, given the importance to New Zealand of its farming sector, 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.
- 3.3 In addition, Ravensdown has its own manufacturing, quarrying and bulk fertiliser store activities to service its customers. 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.
- 3.4 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.

Ravensdown's Shareholders in Otago

- 3.5 Ravensdown has close to 2,000 shareholders in the Otago region. Over half of these are sheep and/or beef farmers, with the remainder comprising dairy and dairy runoff, mixed or other livestock, horticulture, cropping systems and lifestyle blocks.

Ravensdown's Business

- 3.6 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.
- 3.7 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, manufactures, buys, ships, stores, spreads, measures and maps food-creating nutrients and fertiliser for its farmers in an integrated way.
- 3.8 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 Dunedin, Christchurch 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.
- 3.9 In addition to its three superphosphate manufacturing plants, Ravensdown operates a network of fertiliser bulk stores and quarries throughout New Zealand. In the Otago region there are three bulk stores (Oamaru, Milton and Balclutha), as well as the Dunedin Works manufacturing site at Ravensbourne, Dunedin.
- 3.10 Ravensdown also operates a user-pays consultancy, Ravensdown Environmental, as a business unit within Ravensdown. The team has a strong relationship with local councils in implementing national and regional farming land use provisions through completion of nutrient budgets, Farm Environment Plans (**FEP**) and resource consents.
- 3.11 In supporting our shareholders, Ravensdown recognises that 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 provides technical support, advice and technologies that ensure that fertiliser application is targeted and effective. Ravensdown is therefore generally supportive of regulatory approaches to control nutrient losses through good management practices (**GMP**) detailed in FEPs and supported by nutrient budgets.
- 3.12 Ravensdown also acknowledges that at the core of its business is the provision of nutrients to New Zealand's rural community 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).

Dunedin Works

- 3.13 The Dunedin Works, located in Ravensbourne between the harbour and local residences along Ravensbourne Road, undertakes the manufacture, storage and sale of fertilisers. The site was established in 1929 as the Dominion Fertiliser Company. It is a key contributor to both the local and national economy and also plays an essential part in providing the key nutrients required for the ongoing development of New Zealand agriculture. Dependant on customer demand, around 110,000 tonnes of superphosphate is manufactured on site each year and a total 165,000 tonnes of bulk fertiliser products is also despatched each year (based on data for 2021-2022). This supplies Ravensdown customers across the South Island, with periodic transfers to the North Island.
- 3.14 The Dunedin Works employs 32 full time staff, with a further 16 Ravensdown staff working from the office buildings at the site. In addition, a number of contractors work on-site annually to assist with maintenance and development projects.
- 3.15 The Dunedin Works supports essential infrastructure in the region. It also imports over 100,000 tonnes of raw materials and product through the Port of Otago. Direct economic activity, and indirect employment and economic activity associated with the Dunedin Works is significant.
- 3.16 The Dunedin Works operates under a number of resource consents issued by Otago Regional Council. Regional resource consents, which expire on 15 September 2023, are:
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|-----|-------------------------------|---|
| (a) | Discharge to air | 2004.143.V2. |
| (b) | Discharge to harbour | 2004.145 (Outfall 1 – cooling water, process water, stormwater). |
| (c) | Discharge to harbour | 2004.147 (Outfall 3 – stormwater, springwater, process water, yard washdown water). |
| (d) | Discharge to harbour | 2004.148 (Outfall 4 – stormwater, yard washdown water). |
| (e) | Discharge to harbour | 2004.149 (Outfall 6 – stormwater). |
| (f) | Discharge to harbour | 2004.150 (Outfall 6A – scrubber liquor from Den and Hygiene scrubbers). |
| (g) | Stormwater discharge to drain | 2004.151. |
- 3.17 Given the upcoming expiry of the above Dunedin Works' regional resource consents, a resource consent renewal project has commenced. Project work, in the form of technical assessments, is commencing in preparation for applying for replacement resource consents for both the discharge to air and the discharges to water (Otago Harbour). Stakeholder consultation will be a key component of the current phase of work.
- 3.18 The Dunedin Works also hold other regional resource consents for discharges associated with the loading and unloading of ships at the Ravensbourne wharf (RM12.502.01, RM12.502.03 – expiry 2048), and the abstraction of seawater

(2004.144 – expiry 2040). These resource consents do not form part of the above resource consent renewal project.

Ravensdown's Interest in PORPS 2021

- 3.19 Ravensdown interest in the PORPS 2021 revolves around two key areas, being the implications of the PORPS 2021 on its farming shareholders and Ravensdown's own operations at the Dunedin Works and its stores.
- 3.20 On behalf of Ravensdown's farming shareholders, Ravensdown is interested in the planning framework for farming activities that will apply under the PORPS 2021 and that future regional and district plans will need to give effect to. It is particularly important to Ravensdown that the provisions can be effectively implemented and that they are consistent with national planning provisions that apply to farming activities, or that have been signalled to apply in the near future. It is also important that farming activities, and associated rural activities, in rural areas are appropriately recognised and provided for, and that they are protected from potential reverse sensitivity effects.
- 3.21 Other provisions in the PORPS 2021 which are of particular interest to Ravensdown, relate to the implications of the provisions, in terms of establishing direction for future regulatory plans, on Dunedin Works and the stores. These include the appropriate recognition and provision for industrial activities as resource users, as well as the PORPS provisions that set the policy direction for industrial wastewater discharges, stormwater management, discharges to air and ongoing use of the wharf at Ravensbourne. These issues are of particular relevance to Ravensdown given its upcoming application for a replacement resource consents.

4. CONCLUSION

- 4.1 In conclusion, Ravensdown supports a robust PORPS 2021 that establishes a planning framework that aims to achieve long-term sustainability, by integrating the protection, restoration, enhancement and use of the region's natural and physical resources.
- 4.2 Ravensdown, in preparing our submission, participating in some of the prehearings, and now preparing evidence, has primarily focussed on our business' area of interest in the region, that is the implications for our farming shareholders and Ravensdown's own operations at the Dunedin Works and stores. In this context, Ravensdown's focus is to ensure that farming activities, and associated rural activities, are appropriately recognised and provided for, and that they are protected from potential reverse sensitivity effects. In relation to Ravensdown's industrial activities at the Dunedin Works, and at its stores, the focus has been to strive for the appropriate recognition and provision for industrial activities as resource users as well as ensuring that the PORPS provisions sets an appropriate policy direction for industrial wastewater discharges, stormwater management, discharges to air and ongoing use of the wharf at Ravensbourne
- 4.3 While some of Ravensdown's submissions have been adequately addressed through the recommendations of the section 42A Reports and the subsequent supplementary

evidence, some matters require further consideration and amendment. Ms Taylor has addressed these matters which in our opinion warrant further consideration.

- 4.4 Finally, while Ravensdown does not intend to seek formal leave to present its evidence by way of a single appearance, Ravensdown respectfully wishes to note to the Panel that it has a strong preference to present its evidence as part of a single appearance, rather than presenting relevant matters topic by topic. This preference is solely due to the time and resource commitments that is associated with myself and Ms Taylor having to reappear before the Panel on multiple occasions.



Anna Wilkes

23 November 2022