

**BEFORE THE COMMISSIONERS APPOINTED ON BEHALF OF THE
OTAGO REGIONAL COUNCIL**

UNDER The Resource Management Act 1991
(the **Act** or **RMA**)

**IN THE
MATTER** of an original submission on the
Proposed Regional Policy Statement
for Otago 2021 (**PRPS**)

BETWEEN **OTAGO WATER RESOURCE USER
GROUP**

Submitter OS00235 and FS00235

FEDERATED FARMERS NZ INC

Submitter OS00239 and FS00239

DAIRY NZ

Submitter FS00601

AND **OTAGO REGIONAL COUNCIL**

Local Authority

SUMMARY OF EVIDENCE OF KATE SCOTT

DATED 1 MAY 2023



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Summary of evidence

1. My name is Kate Scott, I am a resource management and farm environmental planner. I am also the founder and executive director of Landpro Limited. I refer you to my expertise and experience outlined in my evidence.¹
2. Since my evidence in chief was filed, I have also been appointed to a group to review the draft Resource Management (Freshwater Farm Plans) Regulations 2023 for the Ministry for the Environment (MfE).
3. The purpose of this evidence is to set out the broad suite of regulatory changes that are in the pipeline and which are affecting the sector already, or that will do so within the life of the proposed RPS.
4. I note for clarity that whilst I am a planner, that I have not provided a planning brief of evidence and have not participated in expert conferencing related to planning matters.
5. Where I touch on freshwater provisions it is only for the purpose of explaining factors relevant to the non-freshwater provisions.

Change cannot happen overnight²

6. The agricultural sector is subject to reform from all angles and this is not expected to change in the near future. The reforms already in place will take decades to implement properly, with much of the cost borne by farmers themselves.
7. The sector does not disagree with the intent behind the reforms but needs time to properly be able to implement them in a way that will result in the best environmental outcomes.

The need for transition

8. Given that there is so much regulatory change currently being deployed in the rural sector, it is critical the combined and cumulative effects of reforms are considered by decision makers in determining

¹ At [1]-[13].

² At [150]-[152].

whether the visions and objectives in the RPS are 'ambitious but achievable'.³

9. The RPS should recognise the need for transitional provisions and take particular care to avoid unintended policy consequences. This should be recognised through a more explicit approach where competing priorities are acknowledged, and that where such competing values materialise, i.e. water vs carbon, that this should be signalled so that farmers can be directed to undertake action in accordance with the priorities identified, because there are insufficient resources available to enable everything to be undertaken and still achieve better outcomes for the environment.⁴

Consequences of a lack of direction

10. The lack of clarity puts farmers in a position where they do not want to incur the costs of undertaking changes on farm, for the regulations to change again and for the work they have done to be futile.⁵
11. The implications of not providing clear direction and clear priorities are starting to arise in an Otago context already. There are many farmers being forced to decide between pastoral farming and the planting of pine trees due to rising uncertainty and costs. Is that what Otago wants in its catchments? Have the hydrological implications of mass pine forestry been considered? What about landscape and effects on the soil resource? Let alone the economic and social effects on the community?⁶
12. This is an example of the lack of integration and explicit decisions about which issues are most important having unplanned for consequences. And yet this is exactly what the RPS is supposed to do.⁷

How do we fix it?

³ At [153].

⁴ At [154].

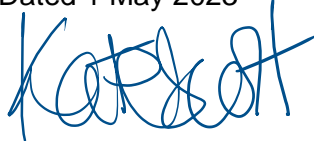
⁵ At [28].

⁶ At [155].

⁷ At [156].

13. This can be achieved through clear visions, priorities and values and by providing for a joined up holistic and transitional pathway to implement and adopt efficient change on the ground.⁸
14. Regulations and their transitional timeframes must recognise that change takes time to implement and because farms are made up of interconnected biological processes changes may not show immediate results.⁹
15. Challenges for farmers need to be in considered in a holistic manner as a disjointed approach will have widespread effects on environment, economy, and community and give rise to a suite of unintended consequences.¹⁰
16. We need clear transitional pathways, to set clear integrated objectives and to avoid duplication.¹¹
17. **I would be happy to answer any of the Panel's questions.**

Dated 1 May 2023



Kate Scott

⁸ At [157].

⁹ At [24].

¹⁰ At [123].

¹¹ At [28].