

**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 SIMON GLENNIE

DATED 2 MAY 2023



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Summary of evidence

1. My name is Simon Glennie. I work as a sheep, beef and deer consultant for AbacusBio, based in Otago. I refer you to my full expertise and experience, outlined in my evidence.¹
2. The purpose of this evidence is to assist the Panel in understanding the process of transition that will be required by participants within the food and fibre sector of Otago. And the need to consider this when determining when new regulations and/or limits need to be achieved.
3. My discussion of freshwater is grounded in its relevance to the non-freshwater provisions.

Practical challenges²

4. Otago's farming diversity is remarkable but brings with it an array of challenges in setting policies and rules.
5. The first challenge to consider is implementing an array of practices that could be considered best practice or even good practice in terms of environmental management and freshwater outcomes.
6. Physical challenges need to be considered alongside the social and financial elements such as age and stage of farmers and the labour to support any change of practice. My evidence dives into actual examples to provide context.³

System change⁴

7. To go beyond the practices that can reasonably be adopted into current systems will require significant system change and could precipitate land use changes with bigger impacts that take longer to implement.
8. Where policy dictates that on farm change of this magnitude is required, there are generational impacts to consider.

¹ At [1]-[6].

² At [10].

³ For example, at [32]-[39].

⁴ At [11].

9. For many farmers, the risks involved are simply too great to bear and the status quo remains. Where the reasons for the change are driven or partly driven by compliance, the risk of failure is likely to climb.⁵

*Things to consider*⁶

10. Farmers know that change is needed but want to ensure that timeframes and the relative benefits of implementing best management practice are considered. This means that variation in physical, social and financial circumstances can be given due consideration. I have identified the following considerations:
- (a) **Social:** there are significant hurdles for a farming family to take on the debt required to support irrigation development. These can turn on social factors such as the stage of the farm's succession, intergenerational goals, access to finance, land use options and the skill or ability of the farmer.
 - (b) **Good management practice:** each Otago farm will have a stocking policy to suit the environment and the farm's limitations. Significant change in management practice is often impossible or financially imprudent.
 - (c) **Winter crop:** winter crops are critical to farm productivity and animal welfare in Otago.
 - (d) **Constructed wetlands:** whether a wetland should be constructed requires consideration of the impacts to farming systems. Where actions beyond best management practice are required a much wider and deeper consideration is required. Change of this magnitude requires more thought as to consequences for land value and the impacts on farmers that make significant system changes. Many of these will have detrimental financial outcomes.
11. Consideration is further required in light of the practical constraints associated with implementing these significant changes. As I describe

⁵ At [36].

⁶ At [86]-[87].

in this evidence, these large changes take time, even once they have been committed to and funding is available.

12. **I would be happy to answer any of the Panel's questions.**

Dated 2 May 2023

Simon Glennie