

**BEFORE THE INDEPENDENT HEARING PANEL APPOINTED BY
WAIKATO REGIONAL COUNCIL**

IN THE MATTER of the Resource Management Act 1991
(the Act)

AND

IN THE MATTER Submissions made on Proposed
Waikato Regional Plan Change 1 –
Waikato and Waipa River Catchments

**STATEMENT OF REBUTTAL EVIDENCE OF TIMOTHY MICHAEL
BAKER FOR HORTICULTURE NEW ZEALAND (WATER QUALITY)**

19 July 2019

QUALIFICATIONS AND EXPERIENCE

1. My full name is Timothy Michael Baker. I have described my qualifications and experience in my statement of evidence dated 8 July 2019.
2. In relation to this rebuttal statement of evidence I reiterate and confirm my compliance with the Code of Conduct for Expert Witnesses as set in my primary evidence.

CONTEXT AND SCOPE OF REBUTTAL EVIDENCE

3. In preparing my rebuttal evidence, I have reviewed the statements of evidence of numerous parties regarding Plan Change 1 appeals for Block 3. My rebuttal evidence focuses on the matters of disagreement and agreement.
4. The key issue covered in my rebuttal evidence is the points raised in Mr Mayhew for Waikato Regional Council regarding commercial vegetable production (CVP) and the management of contaminant losses.

CVP CONTAMINANT LOSSES

5. Paragraph 7 of Mr Mayhew's evidence¹ refers to Section C1 of the s42A report, which identifies a number of particular issues associated with the management of contaminant losses from CVP, including:

"In general, CVP is high in nitrogen, phosphorus and sediment losses – the highest of all land uses (unless otherwise mitigated) – and microbial contaminants are largely absent, other than in respect of incidental grazing"....

6. As previously covered in the technical reports by Jacobs (2017) and (2018), the contaminant losses from CVP need to be put into context of many different factors, not just through looking at a non-mitigated per-hectare contaminant discharge load, as the statement above indicates.
7. These factors include:
 - (a) The small percentage of land area within the Waikato catchment that CVP occurs on (i.e. the overall load of contaminants by CVP is low relative to other sectors);
 - (b) Cropping on dairy farms can have greater impacts on nutrient loads into rivers than CVP for human consumption, given the effect of direct animal foraging and the fact that dairy farms are not required to complete

¹ EIC Ian David Mayhew for Waikato Regional Council as submitter; para 7

a sediment management plan as part of the overall management of the farm; and

- (c) The numerous GMP and BMP mitigation measures that are currently being implemented on CVP properties in the region have been shown a reduction in contaminant losses from CVP.

- 8. Mr Mayhew continues in paragraph 8, by stating:

“In my opinion these industry-specific issues support the provision of focused policies and rules for the management of contaminant losses from CVP...”

- 9. I fully agree with this statement and support the industry-specific focused policies and rules put forward by HortNZ in their Block 3 evidence.

**Timothy Baker for Horticulture New Zealand
19 July 2019**