

**I MUA I TE KOOTI TAIAO  
I ŌTAUTAHI ROHE**

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

**A N D**

**IN THE MATTER** of appeals pursuant to clause 14 of the First  
Schedule to the Act

**BETWEEN** **SOUTHLAND FISH AND GAME COUNCIL**  
(ENV-2018-CHC-37)

**ROYAL FOREST AND BIRD PROTECTION  
SOCIETY OF NEW ZEALAND**  
(ENV-2018-CHC-50)

**Appellants**

**A N D** **SOUTHLAND REGIONAL COUNCIL**  
**Respondent**

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**‘WILL SAY’ STATEMENT OF ANNA MARY WILKES  
FOR RAVENSDOWN LIMITED – A SECTION 274 PARTY**

**29 OCTOBER 2021**

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**NATURAL RESOURCES LAW LIMITED**

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**ANNA MARY WILKES will say:****Qualifications and experience**

1. I am employed by Ravensdown as Environmental & Policy Manager. I have worked in this role since February 2020 and for three years prior I was the Environmental Policy Specialist.
2. 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.
3. 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.
4. I am an Associate Member of the New Zealand Planning Institute and a member of the Resource Management Law Association

**Use of Farm Plans to drive change improved on-farm practices**

5. I will provide an overview of how Farm Plans can be used to prioritise and monitor changes in on-farm practices through the implementation of Good Management Practices that will ultimately lead to improved environmental outcomes for the catchment. I will illustrate this point using experience from the Canterbury Farm Environment Plan auditing programme.
6. I will also discuss the evolution of Farm Environment Plans to Freshwater Farm Plans and the opportunity that this presents to better contribute to the achievement of catchment level water quality outcomes. I will include reference to the need for Farm Plan templates to be easily adapted to include future changes to regulations (e.g., greenhouse gas mitigation requirements) without farmers having to 'go back to the drawing board'.

7. My conclusion will be that while Farm Plans are a valuable tool for farmers to use to guide their on-farm decision making leading to improved environmental outcomes, Farm Plans should not be considered as the sole panacea for Southland's water quality challenges. I consider that Farm Plans are part of the solution, and should function alongside other controls and restrictions, particularly on high-risk farming activities, as provided for by national level regulation and the new rules of the Proposed Southland Water and Land Plan and the impending freshwater planning instruments.

**Resourcing constraints to implement the proposed Southland Water and Land Plan farming provisions**

8. I will discuss the professional resourcing constraints that may impact on the ability for the proposed Southland Water and Land Plan to be implemented in the desired timeframes. I will also discuss the ramifications of overly complex provisions and the potential environmental cost that these pose.
9. I will conclude that overly complex provisions will cause delays in implementation that will ultimately delay improvements in environmental outcomes. Subject to implementation timeframes, I consider that the amendments Ravensdown has proposed to Appendix N can be implemented with existing resources.

**DATE: 29 October 2021**

Ms Anna Wilkes