RCNZ wishes to be heard in support of this submission.

If others make a similar submission, RCNZ would be prepared to consider preparing a joint case with them at any hearing.
1 INTRODUCTION

1.1 Rural Contractors New Zealand Incorporated ("RCNZ") is the only national association and the leading advocate for rural contractors in New Zealand representing the interests of contractors engaged in a wide range of activities, and is an Affiliated Member of Federated Farmers. RCNZ monitors central and local government policies and plans. It maintains close relations with a wide number of organisations, government departments and other bodies.

1.2 There has been a growing trend in the share of rural contracting in total agricultural production with an estimated 1100 rural contractors nationwide. This has been indicative of a trend toward greater specialisation and contracting out of the inputs to rural production. Contractors are used for the skills they have gained through specialisation, the machinery and technology they can offer, and as a substitute for other labour.

1.3 The main industry users of services from the rural contracting industry are horticulture and fruit growing, livestock cropping and farming, dairy and cattle farming, forestry, and services to agriculture and hunting and trapping. Specific examples of rural contractor services include:

- Aeration;
- Cultivation;
- Earth moving;
- Fertilising;
- Grain and seed harvesting;
- Land clearing and development;
- Park and reserve maintenance;
- Root raking;
- Spraying;
- Windrowing;
- Hay and silage making;
- Drilling;
- Farm drainage;
- Hedge and shelter cut;
- Mowing;
- Ploughing;
- Aerial and land spraying;
- Track maintenance;
- Cartage;
- Fencing;
- Forestry;
- Horticulture;
- Mulching;
- Viticulture.

1.4 Rural contractors make a significant contribution to rural communities, by providing off-farm work and casual workers for the farming sector, and contributing to the economic and social health of local areas. Due to the nature of their business and the clients they serve, rural contractor depots are typically established in rural areas. The scale of rural contractor depots can vary from relatively small-scale seasonal operators, some of whom have established the business as a logical extension of an existing farming operation, to larger larger-scale businesses operating solely as a rural contractor depot.
1.5 Rural contractors are critical in ensuring the prosperity, security, and sustainability of New Zealand’s pastoral and forestry sectors which are the backbone of our economy and their continued success is essential to this country’s living standards. Sound planning is required to ensure that activities that are integral to the rural industry such as rural contractors are sufficiently recognised, provided for and protected for future generations in terms of key planning documents such as the Proposed Southland Water and Land Plan.

2 GENERAL SUBMISSION AND RELIEF SOUGHT

Submission

2.1 RCNZ generally supports the provisions of the Proposed Southland Water and Land Plan and seeks that they are retained, except to the extent that specific changes are made in accordance with the relief sought by RCNZ in the balance of this submission and any further submission that RCNZ may make at the appropriate time.

Relief Sought

2.2 Retain the existing provisions, except to the extent that specific changes are made in accordance with the relief sought by RCNZ in the balance of this submission and any further submission that RCNZ may make at the appropriate time.

2.3 Where RCNZ seeks specific relief in the balance of their submission, RCNZ would accept words to like effect or as otherwise may be required to ensure sustainable management.

3 SPECIFIC SUBMISSIONS AND RELIEF SOUGHT

3.1 Specific submissions and relief sought are addressed in the table below.

Signature: RURAL CONTRACTORS OF NEW ZEALAND INCORPORATED
by its authorised agents Environmental Management Services Ltd

G.J. Mathieson

Date: 27 July 2016
<table>
<thead>
<tr>
<th>REF</th>
<th>PROVISION</th>
<th>SUPPORT</th>
<th>SUBMISSION</th>
<th>RELIEF SOUGHT</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Rule 9 – Discharge of agrichemicals onto or into surface water</td>
<td>Support in part</td>
<td>Rule 9 permits the discharge of agrichemicals and associated wetting, antifoaming and antidrifting agents and marker dyes into surface water for the control of aquatic plants subject to conditions. A key condition is that the agrichemical is approved for aquatic use within New Zealand under the Hazardous Substances and New Organisms Act 1996. RCNZ supports Rule 9 but considers a minor amendment is required to ensure it also covers discharge of agrichemicals onto surface water for consistency with the heading.</td>
<td>Amend Rule 9 as follows: The discharge of agrichemicals and any associated wetting, antifoaming and anti-drifting agents and marker dyes, onto or into surface water, is a permitted activity provided the following conditions are met...</td>
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<tr>
<td>2</td>
<td>Rule 10 – Discharge of agrichemicals to land where they may enter water</td>
<td>Support</td>
<td>Rule 10 permits the discharge of agrichemicals and associated wetting, antifoaming and antidrifting agents and marker dyes onto or into land where they may enter water subject to conditions. A key condition is that the agrichemical is approved for aquatic use within New Zealand under the Hazardous Substances and New Organisms Act 1996. RCNZ supports Rule 10 but considers a minor amendment is required to ensure it also covers discharge of agrichemicals onto or into land where there are no waterways present.</td>
<td>Amend Rule 10 as follows: Rule 10 – Discharge of agrichemicals onto or into land including where they may enter water The discharge of agrichemicals and any associated wetting, antifoaming and anti-drifting agents and marker dyes onto or into land including where they may enter water is a permitted activity provided the following conditions are met...</td>
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<tr>
<td>3</td>
<td>Rule 14 – Discharge of fertiliser</td>
<td>Support</td>
<td>Rule 14 permits the discharge of fertiliser in circumstances where contaminants may enter water is a permitted activity subject to conditions. RCNZ supports Rule 14 but considers amendments are required to specify that the discharge of fertiliser is to land, and to ensure that it also covers the discharge of fertiliser to land where there are no waterways present.</td>
<td>Amend Rule 14 as follows: Rule 14 – Discharge of fertiliser to land (a) The discharge of fertiliser to land including in circumstances where contaminants may enter water is a permitted activity provided the following conditions are met... (b) The discharge of fertiliser to land including in circumstances where contaminants may enter water that does not meet the conditions of Rule 14(a) is a non-complying activity.</td>
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<td>4</td>
<td>Rule 71 – Channel realignment, widening or deepening</td>
<td>Support in part</td>
<td>Rule 71 provides for the excavation or disturbance of the bed of any river, modified watercourse or lake for the purpose of realigning, widening or deepening any channel within the bed as a discretionary activity. It is considered that Rule 71 requires amendment to avoid triggering resource consent for permitted drainage maintenance activities under Rule 78.</td>
<td>Amend Rule 71 as follows: Unless provided for as a permitted activity under Rule 78, the excavation or disturbance of the bed of any river, modified watercourse, or lake for the purpose of realigning, widening or deepening any channel within the bed is a discretionary activity.</td>
</tr>
<tr>
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<td>5</td>
<td>Rule 78 – Weed and sediment removal for drainage maintenance</td>
<td>Support</td>
<td>Rule 78 permits the removal of aquatic weeds and plants and sediment from any modified watercourse for the purpose of maintaining or restoring drainage outfall subject to conditions, and is supported by RCNZ).</td>
<td>Retain Rule 78.</td>
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</tbody>
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