

In the Environment Court
at Wellington

under: the Resource Management Act 1991

in the matter of: appeals under clause 14 of the First Schedule to the
Resource Management Act 1991 concerning proposed
One Plan for the Manawatu-Wanganui Region

between: **Federated Farmers of New Zealand**
(ENV-2010-WLG-000148)

and: **Minister of Conservation**
(ENV-2010-WLG-000150)

and: **Horticulture New Zealand**
(ENV-2010-WLG-000155)

and: **Wellington Fish and Game Council**
(ENV-2010-WLG-000157)

and: **Andrew Day**
(ENV-2010-WLG-000158)

Appellants

and: **Manawatu-Wanganui Regional Council**
Respondent

and: **Fonterra Co-operative Group Limited**
Section 274 party

Supplementary statement of evidence of **Stewart Francis Ledgard** for
Fonterra Co-operative Group Limited

Dated: 26 April 2012

REFERENCE: John Hassan (john.hassan@chapmantripp.com)
Luke Hinchey (luke.hinchey@chapmantripp.com)

STATEMENT OF EVIDENCE IN REPLY OF STEWART FRANCIS LEDGARD FOR FONTERRA CO-OPERATIVE GROUP LIMITED

INTRODUCTION

- 1 My full name is Stewart Francis Ledgard and I have the qualifications and experience described in my Evidence in Chief (*EIC*). I repeat the confirmation given in that statement that I have read and agree to comply with the Code of Conduct for Expert Witnesses.
- 2 In this supplementary statement of evidence, I record the information provided to me by Dr A. Metherell from Ravensdown which supports my statements at paragraph 2 of Appendix B of my rebuttal statement dated 18 April 2012. I understand that this information was requested by counsel for Fish and Game in an email to Fonterra's counsel on 23 April 2012.

INFORMATION REQUESTED

- 3 On Wednesday, 11 April 2012, I contacted Dr Metherell to request information regarding current use of "Tier 1" mitigation practices (as referred to in my evidence in chief) in the Manawatu-Wanganui Region.
- 4 The information provided by Dr Metherell relating to my evidence is set out below. Except for DCD use, I understand that the information was derived by Dr Metherell from the Ravensdown database on OVERSEER input information for 2011/2012 from Ravensdown's representatives in the Manawatu-Wanganui Region. The associated OVERSEER output information from Ravensdown was provided by FertResearch and used in my evidence in chief (paragraphs 22-25).
- 5 The information provided to me by Dr Metherell was as follows:
 - 5.1 *DCD use*: Dr Metherell received information from G. Costello (Ravensdown eco-n business manager) on actual eco-N (a commercial DCD product) use in the Region and he advised me that 2% is used by dairy farmer customers.
 - 5.2 *N fertiliser use in winter*: 7 out of 437 pastoral blocks in the recent (2011/2012) OVERSEER dataset for the Region, i.e. 2%.
 - 5.3 *Fodder crop use*: The OVERSEER dataset (2011/2012) indicated that 49 out of 134 blocks used fodder crops (36%). However, this refers to summer and winter forage crops and these may be grown in the same area consecutively. Therefore, I assumed a value of 20% for the dairy area that

had fodder crops grown for the purposes of my rebuttal evidence.

- 5.4 *Wintering dairy cows off-farm*: 87 out of 134 farms were identified in the recent (2011/2012) OVERSEER dataset for the Region, i.e. 65%.

Stewart Francis Ledgard

26 April 201