



Submission form

Send your submission to reach us by **4:00 pm on Wednesday, 27 April 2016.**

Post: The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatāne 3158	or Fax: 0800 884 882	or email: rules@boprc.govt.nz
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Submission number

File No. Office use only

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BOP Regional Council

15 APR 2016

ID:

Name	Signed

Submitter name: ROBIN BOOM

This is a submission on **Proposed Plan Change 10 (Lake Rotorua Nutrient Management)** to the BOP Regional Water and Land Plan.

- 1 I could gain an advantage in trade competition through this submission. *[Delete as required.]*
 - (a) I am not directly affected by an effect of the subject matter of the submission that adversely affects the environment, and
 - (b) My submission **does not** relate to trade competition or the effects of trade competition.
[Delete the entire paragraph if you could not gain an advantage in trade competition through this submission.]
- 2 The details of my submission are in the attached table.
- 3 I wish to be heard in support of my submission. *[Delete as required]*
- 4 If others make a similar submission, I will consider presenting a joint case with them at a hearing. *[Delete if you would not consider presenting a joint case.]*

[Signature of person making submission or person authorised to sign on behalf of person making submission.]
*[NOTE: A signature is **not** required if you make your submission by electronic means.]*

Date

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Email:	agronomics@xtra.co.nz	Fax: 07-8298368
Contact person: <i>[Name and designation if applicable]</i>	Robin Boom. Self employed agronomist providing soil fertility advice to farmers in Waikato/BOP/King Country region.	

BOPRC ID: A2288702

SUBMISSION POINTS:

Page no.	Reference (e.g. Policy, rule, method or objective number)	Support/oppose	Decision sought Say what changes to the plan you would like	Give reasons
25	Schedule LR Two Stocking Rates	Oppose	Horses/ponies should be able to be stocked higher (up to 3/ha) based on feed inputs	Many recreational and working horses are fed additional feeds such as grains, chaff, hay etc which are naturally lower in protein (N) and higher in structural carbohydrates and starch than horses fed on straight pasture, therefore the N content in their urine will be lower than those fed straight pasture. Also horse pastures are rarely high protein ryegrass/clover pastures but are often weedy and poor fertility so the N content of such pastures will be lower, hence as a rule horses will excrete less N/ha than say dairy cows and I think the proposed horse stocking limits is unjustifiable.
25	Schedule LR Two Stocking Rates	Oppose	Dairy cows and other cattle should have their limit raised by at least 40% with cows going from 1.5/ha to 2.5/ha and all other cattle classes similarly. Remember this is an upper limit and it may not be suitable for all.	Cow urine N content can vary 20-fold depending on N content and type of N in feed. Nitrogen (urea) boosted pastures have a lot of non-protein N which is excreted in urine, whereas natural clover/grass/herb based pastures have most of N in true protein form which cows can utilise. Sharon Woodward's DairyNZ trial with herb/clover pastures showed 40% less N lost in urine as cows could utilise this better, putting N protein into milk. Also feeding cows salt increases water consumption which means cows urinate more and less N concentration in urine means more of N in the urine is taken up by pastures and recycled. The problem of N in cow urine is exacerbated by use of artificial N (urea) inputs which causes plants to produce non protein N which cows cannot utilise in rumen and therefore excretes. Applying no fertiliser N and relying on natural legume produced N in a natural biological farming system will mean more cows can be run per ha before reaching tipping point as far as N loading of soil is concerned, with most of the N being excreted being able to be captured again by plant roots and recycled. As Overseer improves and takes on board these options, then N losses from farms into lake will naturally drop. The big thing is do not use artificial N on pastures as the more N brought into system, the more which is leaked out, a fact that Overseer does not fully recognise.

25	<i>Schedule LR Two Stocking rates</i>	Goats	Goat numbers should be able to be 40% greater than sheep numbers due to lower N content in urine.	Having farmed angora goats in the past, their body weight is considerably lower than the average ewe, and normally considered only 0.6 stock unit (ewe equivalent). Goats also are natural browsers and prefer more woody, stalky type plants, seedheads and weeds as opposed to fresh green legume based pastures. This is because their rumen is naturally adapted for slower breaking down cellulose plants and consequently the N content of their urine will be lower than sheep which prefer leafy pastures, and their stocking rate should therefore be able to be higher.
25	<i>Schedule LR Two Stocking rates</i>	Support	Deer and Sheep	These numbers seem to be fair.
6, 21-24	<i>LR P5 Nitrogen Allocation as it relates to Schedule LR One on Benchmarks, allocation and managed reduction targets.</i>	Oppose	Historical benchmarking gives an unfair advantage to polluting dairy farms compared to environmentally friendlier drystock operations.	Any form of grand-parenting will naturally benefit dairy farmers who have not used environmentally sustainable practices. By default it will advantage polluters and disadvantage those farmers who have been farming more conservatively. Biological farming practices should be adopted which encourage natural legume based farming as opposed to the high input farming practices (artificial N and high feed inputs) where more stock are run per ha, pushing land to the limit. It is the polluters which need to be reigned in, and not those who farm more naturally and within the biological limit. With the high relative milk-price up until two years ago, most dairy farmers have built their soil fertility levels at or above biologically optimum levels, and also bought in copious amounts of feed and artificial N to become high polluters. The benchmark for dairy farmers should therefore be set close to those who have until now been farming biologically, which in my view would sit around the 55 kg N limit for dairy farmers I have personally worked with. All dairy farmers should be aiming at getting levels at or below this figure, and no favour or bias for those who currently have levels much higher. Those leaking out less than 60 should be able to continue as they are, or maybe look at best management practices so that this figure can become less. Dairy farmers should be able to all profitably run their businesses using biologically friendly practices, avoiding artificial N and brought in feeds. The current poor returns in dairying has meant many dairy farmers have dropped stock numbers by 10-20% during the past 12 months, with no brought in feed and less need for artificial N, so will probably be leaking around 20% less N than what

				<p>they were doing two years ago by default.</p> <p>For drystock farmers, until the past couple of years they have been barely able to survive financially with poor returns. With beef in particular being on a high, these farmers can finally improve their farms natural productivity through better subdivision and improving soil fertility, with potential to increase natural legume based pasture productivity by at least 30-40% in many situations through the application of lime, phosphate, potassium, sulphur and trace elements to bring these levels close to biological optimum. They can therefore realise the full potential of their land capability which because of historical low returns have been unable to do so. To expect drystock farmers to go down to 18 kg N loss/ha because one farmer is currently at this low level is inequitable and unfair compared to dairy farmers. My suggestion is that for drystock farmers, a good benchmark limit would be at least 30, possibly 35 kg N/ha. Again using good management practices, using less female cattle, more male cattle and sheep/deer/goats, they will be able to have highly profitable, productive and environmentally friendly operations. Those drystock farmers currently farming with N losses exceeding 30-35 kg N should be able to quickly adapt to a benchmark of below 35 kg N.</p>
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