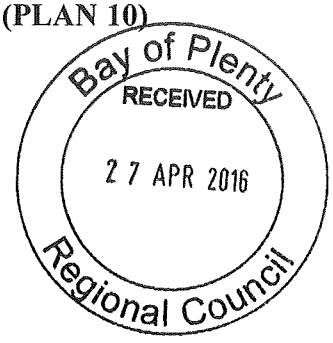
SUBMISSION ON LAKE ROTORUA NUTRIENT RULES (PLAN 10)



To:	The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatane 3158
Submission on:	Lake Rotorua Nutrient Rules (Plan 10)
From:	Fish & Game New Zealand (Eastern Region Fish and Game Council).
Address:	Private Bag 3010, Rotorua 3046.

SUBMISSION:

1. **Fish and Game**

The Eastern Region Fish and Game Council is one of twelve regional Fish and Game Councils in New Zealand. Under the Conservation Act 1987, as amended by the Conservation Law Reform Act 1990, Fish and Game Councils have a statutory function to represent the interests of anglers and hunters in planning process. Fish and Game Councils are also charged with the responsibility to manage, maintain and enhance the sports fish and game bird resource, including their habitats, in the recreational interests of anglers and hunters.

The Eastern Region Fish and Game Council manages the freshwater sports fishery in the Bay of Plenty region. Within the Eastern Fish & Game region there are approximately 215,000 angler days utilised fishing the various lakes and streams. The Kaituna Catchment alone makes up almost half of this total usage with 105,000 angler days (2007 National Angler Survey statistics). Lake Rotorua has 32,000 +/- 3200 (1SE). Lake Rotoiti has the highest rate of use within the Kaituna Catchment (48,070 +/- 3710) angler days. Consequently Fish & Game represents a large recreational fishery user group in this area with our interests being lake ecology (in particular the freshwater sports fishery and food web), water quality along with angler access, success and satisfaction.

While some nutrient entering lakes is beneficial to maintain fishery food webs supporting trout growth, excess nutrient can lead to negative effects such as harmful algal blooms, lowered water clarity, lowered public participation and even lake closures.

2. **Lake Rotorua Nutrient Rules (Plan Change 10)**

2.1 The Eastern Region Fish and Game Council recognize that the Rotorua lakes require further management initiatives to reduce nutrient loads. Historical land management practices involving deforestation, agricultural intensification and

urban development have combined to increase nutrient loads being received in lake environments. The amount of nutrient reaching the lakes from aquifers will continue to increase over the next 100 plus years. The ongoing use of chemical such as 'Alum' or applications of 'Phoslock' or 'Zeolite' to counteract the nutrient issue along with weed spraying in the lakes is neither sustainable, both environmentally nor financially. It is Fish & Game's opinion that it is therefore necessary to seek other means of reducing nutrient inputs.

2.2 The urban population have already been contributing to improved water quality through Waste Water Treatment Plant (WWTP) upgrades and targeted reticulation into the WWTP from septic tanks. The dairy sector has been under the spotlight for a number of years and many farmers have been working toward decreasing their nutrient footprint through more efficient systems and technological advances. Drystock operations have largely remained unchanged. The Lake Rotorua catchment differs greatly in slope, soil type and productivity. Bay of Plenty Regional Council has generously offered to provide support to land owners by way of agricultural consultancy assistance and advice. Fish & Game believe the offer extended to buy back particularly sensitive land parcels for retirement from potentially high nutrient loss activities is sensible.

2.3 Fish & Game support the land use allocation approach to nitrogen limitation as detailed within the Lake Rotorua Nutrient Rules (Plan Change 10). Much of the rural sector generate income derived from activities that consequently result in nutrients being lost to the lakes environment. The draft rules have been set by land use categories to more heavily target sectors that leach greater amounts of nutrient. These properties are generally the higher income generators also. Major changes to farm management practices may be required within each agricultural sector to meet nutrient limits proposed in the draft rules, but the timeframe proposed gives a fair and equitable period to plan for and meet objectives.
For land use operations that do not fit into the prescribed categories (such as nurseries and orchards), a fair and equitable range of nitrogen limitations must be allocated on a case by case basis. Professional assessment and advice must be provided to assist alternative use properties in planning and meeting targets.

2.4 Fish & Game do not have the specific farm nutrient management expertise or knowledge of economic impacts to land values and operations to independently assess how rural land holders will be affected. Fish & Game therefore must take on board the expert advice provided by the Regional Council. Fish & Game seek a fair and equitable nutrient reduction approach that will reduce nutrient inputs while permitting farming operations to remain financially and environmentally viable.

2.5 Mitigating circumstances should be recognised when setting individual nutrient discharge allowances. Retirement of land within the last decade including fencing off of riparian areas, stock exclusion, tree planting and wetland development along with system upgrades such as herd home construction and effluent system upgrades should be taken into account. In this vein, landholders should not be penalised twice if they have already willingly and off their own initiative retired sensitive land areas.

3. Concluding comments
   Fish & Game recognise the contributions Bay of Plenty Regional Council has made along with key stakeholders to aid the rehabilitation of the Rotorua lakes. Fish & Game support the move to limit Nitrogen (and other nutrient) leaching from rural properties through introduction of the proposed Plan Change 10, Lake Rotorua Nutrient Rules.

   The current large-scale chemical applications to Lake Rotorua to limit algal and weed growth is neither sustainable from a financial nor lake-health perspective. If nutrient inputs continue to increase unchecked, resultant effects could lead to further algal blooms and ongoing negative lake water quality effects.

   Land holdings greater than 5ha in size must take responsibility for their land use practices to ensure improving lake health. Fish & Game believe a graduated and managed reduction in nutrient entering the lake environment is fair, equitable, specific, obtainable, realistic and time framed.

4. We do not wish to be heard in support of our submission.

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Dated: 22/04/2016

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