



**BAY OF PLENTY
REGIONAL COUNCIL
TOI MOANA**

Submission form

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

Submission number
Office use only

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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Submitter name: James Warbrick, Chairman Parekarangi Trust
Mark Johnston, Business Manager Parekarangi Trust.

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

- ~~I could/could not~~ gain an advantage in trade competition through this submission. *[Delete as required.]*
 - ~~I am/am not~~ directly affected by an effect of the subject matter of the submission that adversely affects the environment, and
 - ~~My submission does/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.]
- The details of my submission are in the attached table.
- ~~I wish/do not wish~~ to be heard in support of my submission. *[Delete as required]*
- 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.]*

26/4/16
Date

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Mark Johnston

SUBMISSION POINTS:

Plan Change 10

①

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
2	Table LR2	Oppose	To look for a better predictive model than Rotan. This model has proved ineffective at determining LR water quality.	LR TLI has averaged 4.2 (BPRC target for LR) from 2012-2014. It only increased last year to 4.4 after prolonged stratification.
3	Table LR3	Oppose	To enable science time to catch up & develop accurate models. Overseer has not been designed to use this way. Every version of Overseer can produce large changes	Version 6.2.0 of Overseer has seen large changes in output compared to previous models that may or may not be correct, depending on the base assumptions in the model.
5	LR P1	Oppose	To extend the time frame to achieve sustainable load to 2050, to allow more time for science & technology advances	There remains considerable disagreement between scientists on whether LR is limited by TP or TN. There is considerable TP legacy in LR from sewerage scheme that is recycled into water column during stratification
5	LR P2	Oppose	Change name to "Nutrient Management Plan"	This demonstrates BPRC continued bias to Nitrogen, when in fact both nitrogen & phosphorus are both key nutrients in the TLI measurements.
6	LR P6	Oppose	This should be an aspirational target by 2032, not an NDA that <u>must</u> be achieved.	The time frame is too tight. This will result in farmers suffering considerable financial pressure

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SUBMISSION POINTS:

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6	LR P8	Oppose	To amend this rule to requiring NRT plans to achieve best farming practice for each 5 year target, as set by DairyNZ	If farmers are given more time to adapt their farm systems, achieving best practice as science develops new systems there is likely to be less financial hardship & sustainable farming in the catchment.
7	LR P10	Oppose	Remove requirement for Resource Consent for all properties.	This is a blunt approach that will cost every farm \$10-20K per annum to administer. Further 1st July 2017 is too tight time frame for all parties.
8	LR P13	Oppose	To allow science more time to develop robust models that are capable of high degree of predictive ability.	Each version of Overseer released can result in major differences to output, with the same input
8	LR P16	Oppose	Extend controlled activity consent to 60 years	This allows farmers more time to evolve their business, without being shut down by the Council.
8	LR P17	Oppose	Remove this rule entirely	This makes no sense, has no boundaries & could be manipulated by Council.

SUBMISSION POINTS:

③

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
8	LR M2	Support	Support the TLI index of 4.2 for LR Support review of science every 5 yrs. Add to this if TLI index is \bar{x} 4.2 then NDA is relaxed for farmers.	^{target} The TLI is already being achieved. Therefore there is currently <u>no</u> reason to change on-farm practice where best practice is already being achieved.
16	LR R9	Oppose	This rule is linked to TLI. If TLI continues to average 4.2 or less then reduction targets are removed	There is simply no point to reducing NDA targets below 2017 if TLI for LR continues to average 4.2. The 2032 target will cause considerable hardship to farmers, resulting in predicted 30-35% decline in profitability. The capital value of these properties are already being effected, to the detriment of the property owner.
8	LR P8	Oppose	To link this rule to TLI & only phase in further reduction if the 5yr rolling TLI is >4.2	No point in reducing NDA further on farm if the target TLI is being achieved or bettered.

Submission on the Proposed Plan Change 10 on behalf of Parekarangi Trust

Submitters: James Warbrick – Chairman Parekarangi Trust
Mark Johnston – Business Manager

1. Economic and cultural well-being

Plan change 10, the RPS and all other previous documents including the Lakes Rotorua and Rotoiti Action Plan produced by BOPRC have categorically failed to address the “economic and cultural well-being” of the community, as defined by section 5 of the RMA.

The economic impact for the Rotorua community continues to be ignored. Plan change 10 will remove dairying from the Lake Rotorua catchment by 2032. What is the economic effect on the Rotorua community of removing dairying from the catchment? Further what is the financial effect on dairy farmers themselves through either promoting land use change or the effect on the profitability of dairying in the catchment by reducing NDA to proposed 2032 targets?

There is no consideration given to the cultural well-being of the community other than water quality.

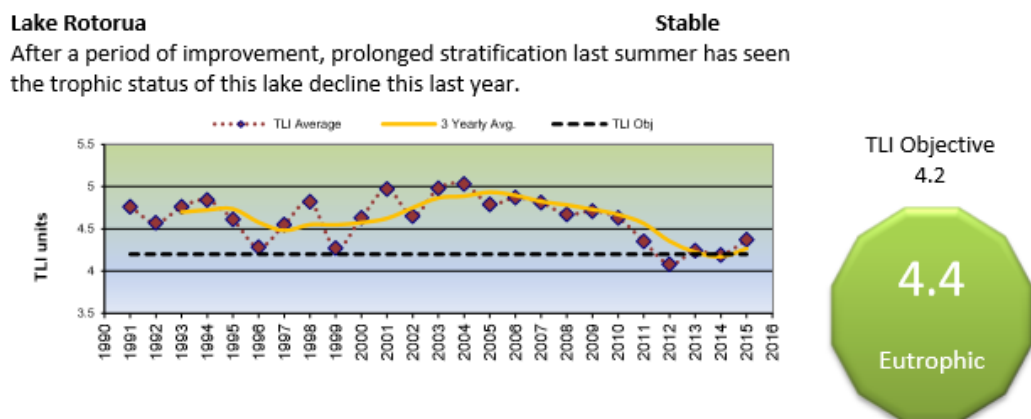
2. Parekarangi History

- i. Whakapapa – Tuhourangi Ngati Wahiao
- ii. Ownership – 300 beneficiaries
- iii. Historical use of the land to hunt birds and grow crops to supply food to our tribal affiliation. To this day the Trust provides food parcels to Komatua, Hui, Tangi, and other community events.
- iv. Inspired by Sir Apirana Ngata to improve the productivity of the land for future generations – Katiakitanga
- v. Aggregated smaller land parcels over time to ensure economic viability
- vi. Ahuwhenua Trust established in 1983
- vii. Strong governance has been a constant for the Trust over many decades
- viii. Made a bold move to convert to dairy in 1994 from sheep/beef to improve the profitability generated from the whenua.
- ix. Won the Ahuwhenua Award for Drystock in 1989 and finalists in the 2008 Ahuwhenua Award for Dairy
- x. The Trust has continually invested capital in the whenua over this time to improve the mauri. Examples over the past 5 years include:
 - \$45K increasing the effluent irrigation area
 - \$20K improving effluent stone trap and bunded pad for solids
 - \$80K in-shed meal feed system to limit the use of palm kernel trailers in the paddocks
 - \$200K on fencing
 - \$300K on weed spraying including spraying 50 ha of gorse
 - \$250K on upgrading dairy plant including installing new LIC Protrack automatic drafting facility
 - \$70K new bore
 - \$150K water reticulation
- xi. The Trust is involved in planting native trees/shrubs along water ways as well as experimenting with Rongoa.

- xii. Parekarangi Trust is a member of the Rotorua Catchment Farmer Collective and has volunteered the use of the property for research work headed up by Dr Tanira Kingi. The initial trial over the past four years, funded by MAFSFF, has looked at the effect of nitrogen fertiliser on pasture composition along with measuring nitrogen leaching under grazing conditions with either No-N or N applications. Further research is currently in the planning stages to assess the impact of deep rooting crops to mitigate N leaching.
- xiii. Parekarangi, as part of the Rotorua Catchment Farmer Collective, has signed a MOU with Lakes Water Quality Society which has an aspirational goal of reducing Lake N loading to 435 tonnes per annum.
- xiv. Parekarangi's aim is to continually improve the mauri of the whenua to ensure inter-generational succession, and has a goal of being in the top 10% of dairy farmers in NZ.

3. Trophic Level Index (TLI)

The BOPRC has a target of achieving a TLI of 4.2 for Lake Rotorua. The following graph shows the TLI for Lake Rotorua since 1990. This clearly demonstrates the TLI target has been achieved since 2012, with explanation as to why the TLI may have lifted in 2015.



Plan change 10 has been developed on the premise that TLI for Lake Rotorua will continue to increase, based on modelling with the likes of ROTAN. The reality is such models are poor predictors of Lake Rotorua water quality, with actual TLI confirming this, showing a steady decline since 2005. This is despite the TN and TP for streams entering Lake Rotorua reportedly increasing over this time.

There remains no current evidence to support the modelling that has determined a sustainable nitrogen load for Lake Rotorua of 435 tonN/year, when the steady state is up to 755 tonN/year, and yet the TLI target is being achieved.

4. Solutions

Current models being used to determine sustainable N and P loading for Lake Rotorua are poor at predicting TLI. The Overseer model is also a poor predictor of actual N leaching on – farm, with large variations in output depending on the version currently being used.

Changes being proposed in Plan Change 10 will result in farmers being forced off their land by 2032, with considerable loss in property values as a result of sinking NDA targets. System analysis shows with current technology, by 2032 farmers will be achieving 30-35% less profit in order to comply with NDA targets. Quite simply this is untenable. None of this achieves the policies set out in WL 5B, specifically equity/fairness, cultural values, existing on farm capital invested.

The TLI target of 4.2 for Lake Rotorua is supported. Proposed solutions are:

- i. By 2022 all dairy farmers are achieving best practice as defined by DairyNZ
- ii. By 2022 if TLI for Lake Rotorua continues to achieve a 5 year average of 4.2, then no further N or P reductions are required on-farm.
- iii. If 5 year average TLI for Lake Rotorua exceeds 4.2, then new NDA's are set subject to advances in science and technology, that ensure farmers profitability and long term viability are not impacted.
- iv. If (iii) above is unable to be achieved, then farmers will be compensated for their loss in capital value.