

The Rotorua Branch of the NZ Deer Farmer's Association appreciates the opportunity to make a submission on **Lake Rotorua Nutrient Management Proposed Plan Change 10 to the BOP Regional Water and Land Plan**

We have two general areas of comment, (A) fundamental points of difference and (B) suggestions for improvement.

## **A Fundamental points of difference**

### **1 'Stake Holder Advisory Group' (StAG)**

- We request an independent review of the balance of 'representative' participants of the StAG group and independent assessment of StAG outcomes for bias relating to:
  - a) Balance of sector representation (Dairy, dairy support, sheep, beef, deer, forestry)
  - b) Balance of land owner representation on property number basis (farming, forestry, lifestyle blocks)
  - c) Assessment of vested interests in outcomes
- We believe that such a review will reveal that StAG has not adequately represented all landowners and that the negotiated outcomes it has achieved with BOPRC planning staff, particularly those relating to the proposed differential in allocation of nutrients, has resulted in bias towards vested interests of StAG participants

### **2 The N-loss footprint of Deer Farming**

Keith Betteridge, AgResearch, determined that deer and sheep have similar urine patch / nitrate leaching effects and that this is significantly less than cattle and even more significantly less than dairy cows.

We are appalled that the potential of farming deer, which has a relatively low n-loss footprint, is to be compromised to allow continuance of activity with farming an animal (the dairy cow) that is clearly recognised as a gross exacerbator of the nitrate loss issue.

### **3 Compromise of land owner 'Environmental Services'**

- Land owners who have applied best land use practice in the past such as retirement of steep land to forest, woodlots or indigenous revegetation are significantly penalised by the proposed nutrient allocation system
- Drystock farms tend to have much larger areas dedicated to 'environmental services' than dairy farms. These larger areas of retirements for biodiversity

or forestry on drystock farms are not given any credit in the proposed allocation system or acknowledgement for the 'proper' sustainable land use practices they have implemented in good faith in the past

- Willingness to undertake further works to protect significant natural areas such as bush remnants or wetlands is likely to be compromised by the proposed system which encourages maximisation of productive land area regardless of its suitability for purpose to maximise nutrient allocation

#### **4 Development of local Economy and Education**

Little has been done in the process to develop ideas for growth or share knowledge of farms that have successfully made positive changes to farm management systems . The advise and support service offered by Regional council has poorly supported effort to share information and help farmers understand what the rules.

## **B Suggestions for Improvement**

The Bay of Plenty Deer Farmers branch supports an accord in place of a rules based system. Working together to find on farm solutions and sharing knowledge through education and land environment plans developed with the support of industry and regional council would be a far more valuable approach to protecting the quality of lake Rotorua and other water bodies in the region. The cost saving for all councils and the progress that could be made with farmers working directly with scientist at Regional council would create a positive environment rather than the current negative rules based approach which has cost far too much money for the benefit to the lake and divided our rural community.

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