



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

Submitter name:

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

- 1 I **could not** 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.]*

Warren Parker

[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.]*

27/4/16
Date

Address for service of submitter:

Scion, Private Bag 3020, Rotorua

Telephone:

Daytime: 07 343 5446

After hours: 0274706286

Email:

Warren.parker@scionresearch.com

Fax:

Contact person: *[Name and designation if applicable]*

Warren Parker, CEO

SUBMISSION POINTS: Please also see accompanying letter

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
21	Tables 5-7	Oppose	Provide table of NDAs in kg/ha/yr and language land owners can readily understand/relate to.	The layout of the material and method of presenting the nutrient discharge allowances (NDAs) as per Schedule 1 is not intuitive. In particular, land owners have become accustomed to seeing NDAs expressed as units per hectare per year, eg milligrams Nitrogen/hectare/year. At some point the Regional Council will need to provide a ready look-up table to land owners that is straightforward for them to interpret and follow.
23	Additional matters	Comment	The future economic contribution of NDAs should be considered.	The proposal makes no reference to the future economic value of nutrients and thus overlooks the up-side opportunity of allocating nutrients differently in the future. It is not clear from the material provided that returns that could be generated in the future from each incremental unit of nutrient/water quality attribute have been estimated. For example, a Central North Island forester adding a modest amount of Nitrogen to their estate at key points of the growing cycle could have a substantial total impact on forest productivity and thus returns to the owner and also the wider region.
23	Additional matters	Oppose	Plantation forestry should be allocated a higher NDA – up to 5kg N/ha/year - than that based on historical published information, to enable the replacement of lost nutrients and boost forest productivity.	Grandparenting of allowances, irrespective of the time of land use change to a higher discharge land use enterprise, together with the potential for land owners to monetise NDAs at some future point in time is effectively a wealth transfer to those who caused the problem. This state of affairs is particularly objectionable in situations where land use change occurred after the announcement of the intention to introduce NDAs in the Bay of Plenty/Waikato Regionals more than a decade ago.

23	Additional matters	Comment	OVERSEER® development should review/utilise information in Scion's plantation forestry nutrient balance model.	OVERSEER® evolution has been from pastoral farming. It is essential that the latest science on nutrient cycles, stocks and flows is integrated into OVERSEER® calculations.
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27 April 2016

Mary-Anne MacLeod
Chief Executive Officer
Bay of Plenty Regional Council
P O Box 364
WHAKATANE 3158

By email to rules@boprc.govt.nz

Dear Mary-Anne

Lake Rotorua Nutrient Management – Proposed Plan Change 10

Thank you for the opportunity to comment on the proposed plan change 10 with regard to Lake Rotorua nutrient management.

Scion wishes to make the following points with respect to the proposal:

- a) The layout of the material and method of presenting the nutrient discharge allowances (NDAs) as per Schedule 1 is not intuitive. In particular, land owners have become accustomed to seeing NDAs expressed as units per hectare per year, eg kilograms Nitrogen/hectare/year. At some point the Regional Council will need to provide a ready look-up table to land owners that is straightforward for them to interpret and follow.
- b) Plantation forestry, which has not contributed materially to nutrient enrichment of lakes and waterways, receives no up-side particularly from the grandparenting. Grandparenting of allowances, irrespective of the time of land use change to a higher discharge land use enterprise, together with the potential for land owners to now monetise NDAs at some future point in time is effectively a wealth transfer to those who caused the problem. Thus rather than “polluters paying” they are being rewarded. This state of affairs is particularly objectionable in situations where land use change wilfully occurred after the announcement of the intention to introduce NDAs in the Bay of Plenty/Waikato Regions more than a decade ago. In particular, the 2007 deforestation of the Reporoa/Central North Island land from forestry to dairy has effectively captured a public subsidy. Scion submits the NDA should place more consideration on fairness and equity, and not allow “gaming” the system for pecuniary benefit. A consequence of the present approach to allocation is the forest owner who wishes to intensify forest productivity or even just replace nutrients lost through harvest is disadvantaged.
- c) The proposal makes no reference to the future economic value of nutrients. Thus the up-side opportunity by allocating nutrients differently in the future is overlooked. It is not

clear from the material provided that the future returns that could be generated from each incremental unit of nutrient or other water quality attribute has been estimated. For example, research evidence from Central North Island forests shows a forester adding modest amounts of Nitrogen to their estate at key points of the growing cycle could have a substantial total impact on forest productivity and thus returns to the owner and also the wider region.

- d) It is important to ensure OVERSEER®'s treatment of plantation forestry incorporates the latest science of nutrient cycles and flows. Scion has developed a nutrient balance model (NuBalm) for this purpose for forest owners and specific instruction should be made for OVERSEER® to review and utilise either the information incorporated in NuBalm or integrate NuBalm directly as a sub-model. The OVERSEER® estimate should be regularly calibrated against the latest research findings.

Scion recognises that this proposed plan change is nearing the final stages and has been through years of discussion. We do not wish to relitigate the thinking to date. However, there are some points of principle here that should be explained in light of the fact forestry is a vital land use in the Bay of Plenty region and many of the macro signals relating the future economic development point to the need to encourage further afforestation to mitigate loss of water quality, store carbon, and stabilise slopes while concurrently generating economic returns through wood processing for the region.

I would be happy to present and discuss the points outlined in this letter.

Yours sincerely

A handwritten signature in black ink that reads "Warren Parker". The signature is written in a cursive style with a large, prominent loop for the letter 'P'. Below the signature is a solid horizontal line.

Warren Parker
Chief Executive Officer