

FURTHER SUBMISSION TO
Bay of Plenty Regional Council
on

***Proposed Plan Change 10 (Lake Rotorua Nutrient
Management) to the BOP Regional Water and Land
Plan***

From Deer Industry New Zealand



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1. DINZ supports the submission from Bryce Heard (submission 10) advocating an 'Accord' approach

- 1.1 It is clear from many livestock farming submitters that the process to arrive at the proposed Plan Change 10 (PC10) has not been inclusive and collaborative, despite the council's best efforts.
- 1.2 The basic elements for obtaining community ownership and action in achieving desired nitrogen target levels in Lake Rotorua have been succinctly stated in the submission and are consistent with more detailed methods as proposed by other submitters that follow.

2. DINZ supports submissions from Beef + Lamb New Zealand and Federated Farmers

- 2.1 DINZ has previously expressed support for key messages from Beef + Lamb New Zealand (B+LNZ) and Federated Farmers of New Zealand, Rotorua-Taupo Province (Federated Farmers). Having reviewed these submissions in detail DINZ re-iterates its support for these messages.
 - 2.2 B+LNZ (submission 61) requests that an Integrated Nutrient Management Framework for Lake Rotorua working at a sub catchment level is adopted that focusses on bringing all farms up to good environmental management practices via farm plans (a.k.a. a whole farm approach). The process is through council staff collaborating with farmer-led groups at a sub-catchment level.
 - 2.3 This approach is consistent with Federated Farmers (submission 75) request that "*Council re-prioritise resources to invest in increased land management team support and independent coordination for the development of Sub-catchment Action Plans*".
 - 2.4 Both of these requests also implicitly recognise established good management practices, thereby acknowledging existing efforts by farmers. This is a better base from which to increase efforts to minimise off-farm environmental impacts.
 - 2.5 Both submitters also request that any input-based prescriptive management is removed from the rules and all references in the rules to prescriptive management of farm plans are removed until at least the completion of the science review.
 - 2.6 DINZ considers that these requests are consistent with an over-arching Accord approach and also re-iterates its support to deer farmers in the catchment to collaborate with Council and other catchment land users and stakeholders in enabling such an Accord and engaging in sub-catchment action plans.
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