

# FURTHER SUBMISSION



TELEPHONE 0800 327 646 | WEBSITE [WWW.FEDFARM.ORG.NZ](http://WWW.FEDFARM.ORG.NZ)

---

**To:** The Chief Executive  
Bay of Plenty Regional Council  
PO Box 364  
Whakatane 3158

**From:** Federated Farmers of New Zealand

**On the:** Proposed Plan Change 10 (Lake Rotorua Nutrient Management) to the Bay of Plenty Regional Water and Land Plan

**Date:** 1 August 2016

**Address for service:** Nikki Edwards  
Senior Policy Advisor  
Federated Farmers of New Zealand  
PO Box 447, Hamilton, New Zealand  
P 07 858 0815  
F 07 838 2960  
E [nedwards@fedfarm.org.nz](mailto:nedwards@fedfarm.org.nz)

Federated Farmers of New Zealand's Further Submission on Plan Change 10 (Lake Rotorua Nutrient Management) to the Bay of Plenty Regional Water and Land Plan ("Plan Change") is set out in the table below.

Where Federated Farmers submitted on the same point as any other submitter we stand by our original submission. This Further Submission seeks to provide Federated Farmers' views on points raised by other submitters that are not already covered in our original submission.

We wish to be heard in support of our submission.

Federated Farmers acknowledge that by taking part in this public submission process the submission (including names and addresses) will be made public.

**FURTHER SUBMISSION POINTS: FFNZ**

<b>Submission number</b>	<b>Submitter name</b>	<b>Submission point</b>	<b>Support /oppose</b>	<b>Reasons</b>	<b>Relief Sought</b>
27	Gro2 Ltd	27-10	Support	It is important to understand the history of the lake catchment including the significant reductions in stock numbers since the 1970s as described by the submitter; and the range of factors relevant to the health of the lake as set out by the submitter	Amend Method LR M2 Science reviews to include consideration of: <ul style="list-style-type: none"> <li>• the effects of the weir in Ohau Channel</li> <li>• the effects of loss of kakahi consequent to introduction of trout</li> </ul>
66	Lake Rotorua Primary Producers Collective (PPC)	66-3	Support	For the reasons set out by the submitter	As requested by the submitter, including that greater emphasis is placed on biodiversity in policy and methods and in particular within the scope of the sub-catchment action plans recommended in the FFNZ primary submission
87	John Beuth	87-1	Support	It is important to consider a wide portfolio of methods for supporting the health of the lake, eg, stormwater filters	Make provision for sub-catchment action plans to consider a wide portfolio of methods, eg, as suggested by the submitter

26 & 54	Rotorua Lakes Council (RLC) & Maori Trustee	26-19  26-5  26-18	Oppose in part	Support the intent that PC10 should provide an enabling framework for growth alongside safeguarding health of the lake, both urban and rural and including underdeveloped maori land; that consideration is given to inter-generational equity; that proposed restrictions – urban or rural - are subject to robust cost-benefit analysis; and that expensive solutions should not be mandated when it is not known if the PC10 targets and timings are correct.  We do not support exemptions for particular sectors – rather we seek an enabling framework for whole of community solutions.	As recommended in FFNZ primary submission including that the scope of PC10 include all sectors and contributors to both the problems and the solutions.
47 & 56	Z Energy & BoPRC	47-3 & 56-1	Oppose	The submitters seek that Map LR1 exclude urban areas, but PC10 must provide an integrated framework for whole of community solutions, ie, urban, industrial, lifestyles and rural	As recommended in FFNZ primary submission including that sub-catchment action plans must include all catchment contributors
66	PPC	66-34	Support	As stated by the submitter - more reliable science is required for groundwater boundaries and movements in the Mamaku	Add to Method LR M2 Science Reviews
70	Fertiliser Assn (FANZ)	70-3	Support	As stated by the submitter - an input control approach does not enable innovation and flexibility in farming options	As recommended in FFNZ primary submission

48	Parekarangi Trust	48-3	Support	As stated by the submitter – timeframes should be extended to allow time for science and technology; their recommendation is 2050	As recommended in FFNZ primary submission – explicit analysis is required on timeframes for change. These would most appropriately be considered in the Rotorua Lakes WMA process scheduled from 2020.
43 & 70	Ravensdown & FANZ	43-25 & 70-23	Oppose in part	<p>Support the intent to provide for an adaptive management approach without 'locking in' obsolete numbers.</p> <p>Overseer numbers can be expected to change regularly: some may be very small technical changes, others may significantly change both total estimates and relativities across farms, sectors or sub-catchments.</p> <p>Changes of any significance must properly be subject to public process to reconsider options and implications.</p>	As recommended in FFNZ primary submission
49	CNI Iwi Land Management Ltd	49-21 & 49-37 & 49-38 & 49-60	Support In part	<p>Support the recommendation that policy and methods need to acknowledge the imperfect precision and accuracy of Overseer estimates.</p> <p>Oppose the recommendation to replace Overseer estimates with input measures; and for the development of a "landuse input data register"</p>	As recommended in FFNZ primary submission
26 & 62 & 64	RLC & Sharon Morrell & DairyNZ and Fonterra	26-37 & 62-1 & 64-1	Support	As stated by the submitters	<p>Amend LR M2 to provide that:</p> <ul style="list-style-type: none"> <li>• science reviews "will" rather than "may" include the matters listed</li> <li>• stating 2017 as the first year</li> <li>• clarify that the review will include peer review from independent scientists</li> </ul>

					<ul style="list-style-type: none"> <li>clarify that each science review will assess all science and policy aspects</li> </ul>
37 & 53 & 66	Ngati Whakaue Tribal Lands Incorp & Lachlan MacKenzie & PPC	37-3 & 53-1 & 66-1	Support	As stated by the submitters – a catchment landowners/stakeholder group should oversee the science review process	As recommended by the submitters
70	FANZ	70-71	Support	As stated by the submitter – it is entirely inappropriate to require annual estimates using annual data locking in farm inputs	As recommended in FFNZ primary submission
61 & 66	Beef & Lamb NZ & PPC	61-9 & 66-12	Support	As stated by the submitter – coordinated, well-supported prioritised actions at sub-catchment scale are recommended; and farm plans should be used as living planning tools, outside of regulation	As recommended by the submitters and in FFNZ primary submission

70	FANZ	70-78	Support	As stated by the submitter – requiring from the outset a plan for achieving 2032 targets is contrary to adaptive management principles	As recommended in FFNZ primary submission
70	FANZ	70-92	Support	As stated by the submitter – the definition of block should be consistent	As recommended by the submitter
66	PPC	66-23	Support	As stated by the submitter – it is important to acknowledge effects of environment work completed before the 2001-4 benchmark years	Include in scope of Method LR M2 Science Review
66 & 70	PPC & FANZ	66-40 & 70-108	Support	As stated by the submitters – Overseer outputs should be interpreted as multi-year rolling averages, recommended 5 years	Overseer outputs should be interpreted as five year rolling averages.
66	PPC	66-8 & 66-9 & 66-126	Support	As stated by the submitter – farm plans should sit outside regulation, and industry should report sector progress as five year rolling averages	As recommended by the submitter

35	Rotorua Chamber of Commerce	35-1	Support	As stated by the submitter, urging BoPRC to consider win-win options through meaningful partnerships	As recommended in FFNZ primary submission in particular for the resourcing and coordination of sub-catchment action plans, aligned to a wider scope for the Incentives Fund
66	PPC	66-2 & 66-14	Support	As stated by the submitter – more comprehensive analysis of options and timeframes to account for inter-generational change is required	As recommended by the submitter and consistent with FFNZ primary submission
66	PPC	66-37	Support	<p>As stated by the submitter, recommending that Council provide analysis of changes in stock numbers/landuse in the catchment relative to estimated lake nutrient loads.</p> <p>It is our understanding that in the 20 years from 1994-2013, the catchment has experienced a significant net loss in stock numbers, in total a decrease of over 500,000 or 30% including:</p> <ul style="list-style-type: none"> <li>• beef cattle down 72,000; dairy cattle up 22,000</li> <li>• beef calves down 22,000; dairy cows up 10,000</li> <li>• deer down 43,000</li> <li>• pigs down 12,000</li> <li>• horses down 600</li> <li>• sheep down 300,000; lambs down 160,000</li> </ul> <p>It is also our understanding that in the period 1990-2012, 1600ha of productive grassland were lost from the catchment, mostly to forestry.</p>	As recommended by the submitter.



30	Fish & Game Eastern Region	30-9	Support	<p>As stated by the submitter, specifically:</p> <ul style="list-style-type: none"> <li>• acknowledgement of progress made across sectors (which should include drystock)</li> <li>• acknowledgement of the differences in slope, soil type and productivity across the catchment</li> <li>• acknowledgement of the agricultural assistance and advice from BoPRC</li> <li>• endorsement of buying back sensitive land parcels for retirement; and</li> <li>• recommending a fair and equitable nutrient reduction approach that will reduce nutrient inputs while permitting farming activities to remain financially and environmentally viable.</li> </ul>	<p>As recommended in FFNZ primary submission, in particular for the resourcing and coordination of sub-catchment action plans, aligned to a wider scope for the Incentives Fund</p>
40 & 72 & 64	Maraeroa Oturoa 2B Trust & Rotorua District Residents & Ratepayers Assn & DairyNZ & Fonterra	40-7, 40-8 & 72-1 to 72-3, 72-4 to 72-7. & 64-1  PC10 Delayed Implementation	Support	<p>As stated by the submitters, ie:</p> <ul style="list-style-type: none"> <li>• requesting longer timeframes (40) for BoPRC to invest in better science, research and modelling before setting the allocation methodology, rules, timeframes to meet targets and resource consents in concrete; and</li> <li>• recommending that implementation of PC10 be suspended (72) subject to             <ul style="list-style-type: none"> <li>- completion of independent science review</li> <li>- commissioned s32 impact assessment</li> <li>- empowering stream and landcare management groups with science about hotspots, mitigation strategies and expert advice</li> </ul> </li> <li>• recommending that PC10 maintain maximum flexibility to recalibrate the approach in response to science and policy reviews (64) and that             <ul style="list-style-type: none"> <li>- the plan needs to specify that a full science review will be undertaken in 2017 before consents become operative</li> <li>- support for 2032 targets is contingent on the results of the 2017 Science Review as to whether these still represent the most cost-effective and efficient way of meeting desired outcomes for the lake</li> </ul> </li> </ul>	<p>As recommended in FFNZ primary submission</p>

				<p>The DairyNZ/Fonterra submission is informed by a review of lake science including that:</p> <ul style="list-style-type: none"> <li>• internal nutrient loading is currently perceived to be a main driver of algal dynamics in the lake</li> <li>• release from internal stores is the primary mechanism for supply of phosphorous during critical periods for algal growth</li> <li>• the improvements in lake TLI strongly indicate that algal growth is primarily limited by P availability</li> <li>• this is a divergence from the previous consensus that N was the most limiting factor, as reflected in the current rule framework</li> <li>• there are a number of scientific uncertainties associated with the ROTAN model; and knowledge about catchment and in-stream attenuation processes is almost non-existent and is a major gap</li> <li>• these results suggest the loads of N and P required to achieve TLI 4.2 in the longterm are uncertain and need revision</li> <li>• this is especially important given the significant financial costs and uncertainty to individual landowners and the community</li> </ul> <p>These points are consistent with the FFNZ primary submission, ie, that the load/allocation numbers referenced in PC10 cannot be relied on for the imposition of rules in advance of the 2016 ROTAN review and the 2017 Science Review.</p>	
43 & 64	Ravensdown & DairyNZ & Fonterra	43-5, 43-102 & 64-2  Rule Framework & New policy benchmarking	Support in part	<p>Support the points that the rule regime is overly complex and confusing (43); and that provision be made for permitted activity status for properties &gt;40ha through to 2022 (64-2).</p> <p>Oppose the 2032 Nitrogen Discharge Allowance and the proposal that all dairy farms in the Rotorua Lake Surface water catchment should be required to meet their 2022 Nitrogen Discharge Allowance and on that basis we oppose the new permitted rules as drafted by Dairy NZ and Fonterra (64-2).</p>	As recommended in FFNZ primary submission

				<p>Oppose the suggestion for a new approach for benchmarking for existing farms (43-102): this would only serve to make a complex and confusing situation even more so. We also oppose the determination of an individual Nitrogen Discharge Allowance that must be achieved by 2032 (43-5).</p> <p>FFNZ have made recommendations for a simplified rule framework in our primary submission.</p>	
56	BoPRC	56-4 Method LR M5 & Rules	Oppose	<p>Oppose suggestion that a Rule Implementation Plan be developed to enable accurate and consistent interpretation and implementation of PC10.</p> <p>It is our very strong submission that PC10 be expressed with sufficient clarity to allow accurate and consistent interpretation without requiring further reference to another document.</p> <p>We agree that the PC10 rules as currently written are unclear and confusing; and we have made recommendations in our primary submission for improved clarity and readability.</p>	As recommended in FFNZ primary submission

Note: A copy of your submission must be served on the original submitter within 5 working days after making this further submission.