

SUBMISSION TO PPC10 HEARING COMMISSIONERS re BOPRC's REVISED NUTRIENT MANAGEMENT PLAN FOR LAKE ROTORUA

Submission by Rotorua District Residents and Ratepayers, 6 March 2017

To be presented by Dr Reynold Macpherson and Mr Rex Charleton

Introduction

The Rotorua Ratepayers & Residents Inc (RDRR) was launched on the 25th of September 2015, replacing its predecessor, the Rotorua Pro-Democracy Society, with a wider mandate. It has grown steadily to over 400 members.

The RDRR has a vision to restore democracy, the rule of law, financial responsibility and policy making power to elected representatives.

The objectives of the RDRR are to:

1. Promote and advocate representative democracy in the Rotorua District, and elsewhere;
2. Ensure the Mayor and councillors of Rotorua District comply with the law with respect to operations, policy making, purposes, performance and governance principles;
3. Ensure that councillors give due consideration to the wishes of citizens when deciding policy;
4. Ensure that Council officials advise councillors impartially and act to implement Council policy with fidelity.

Dr Macpherson and Mr Charleton have been delegated responsibility by the RDRR Committee to represent the views of the membership.

Background to this Submission

This submission responds to the Section 42A Report by Bay of Plenty Regional Council.

Many aspects of the Section 42A Report by the Bay of Plenty Regional Council are endorsed, such as the improved science around nitrogen and phosphorous, but there are serious concerns over its unwillingness to facilitate and enable Catchment Management Groups to play a significant role in implementation, continuing to have an exclusive focus on nitrogen management, and its unwillingness to address the community's real concerns over economic impacts.

The Proposed Planned Change 10 (PPC10) would establish a regulatory regime consistent with national and regional policy statements and plans. The regime comprises an Integrated Framework including an Incentives Programme to buy back nitrogen and replace gorse with commercial plantations, Nitrogen Discharge Allowances based on OVERSEER predictions, and resource consenting for land use changes on farms over 40 ha from July 2017 and less than 40 ha from 2022, with small blocks less than 5 ha exempted.

The RDRR would be conditionally supportive of a modified version of the PCC10 if the following improvements are made.

Catchment Management Groups and Planning

Catchment Management Groups and Planning has been confused in the Section 42A Report with 'sub-catchment plans as an alternative approach to Plan Change 10 (p. 3).

The RDRR proposed Catchment Management and Planning Groups as a socially and culturally sophisticated approach to implementing PPC10.

Engaging landowners in collaborative catchment groups, supported by regional staff expert in measurement and mitigation, would create local learning organisations. Sustainable implementation would be achieved through investing in community capacity building with rules only needing to be enforced by exception.

Community capacity building (CCB), also referred to as capacity development, is a conceptual approach to social or personal development that focuses on understanding the obstacles that inhibit people, governments, international organizations and non-governmental organizations from realizing their development goals while enhancing the abilities that will allow them to achieve measurable and sustainable results.¹

One of the great strengths of CCB is that it avoids the use of coercion to achieve compliance which can generate misunderstandings and resistance.

RDRR was encouraged when the Chair of the BOPRC, Doug Leeder, and a senior official Eddie Grogan, considered this alternative approach in late 2016 and considered the possibility of a trial. It was very disappointed that there was no reference to such a trial in the Section 42A Report.

Integration and Co-Management of N and P

Emergent science points to the practicality of integrating and co-managing N and P reductions by catchment. What empirical scientists research as discrete systems have to be

¹ https://en.wikipedia.org/wiki/Capacity_building#References

managed by farmers as integrated systems, and balanced against other complex economic and environmental risks.

Isolating N and P management from each other and other interdependent systems runs counter to the systematic growth of multi-disciplinary practical knowledge on farms that can be appropriately governed by the consenting process to achieve nutrient targets.

For example, we are unconvinced with the claim that alum dosing is not part of a long term solution when it has been part of the natural ecosystem of Lake Rotorua for millennia, the dosages are undetectable against background measures, and they are more effective than was expected. Another example is where detention dams have significantly reduced P discharges into the lake from storm water, forest harvesting, harvesting forage crops, etc. We are now sceptical that an approach based solely on N mitigation will achieve the TLI target, and regard the 435 tonne N target as overly simplistic so as to be compromised.

RDRR requests that the Hearing Commissioners direct that a P mitigation programme be designed using best available science, its economic impact be modelled, including estimates of viability and effectiveness. Further, we ask that the Commissioners direct that the solely P mitigation strategy be compared to a solely N mitigation programme, and again to a N + P mitigation programme.

Incentive Programme

The success of the Incentive Programme depends critically on public confidence in the political neutrality and independence of its administration and its use of sophisticated science.

The RDRR expressed concern that a conflict of interest had arisen when the first chair of the Incentive Programme accepted an additional appointment as chair of the political arm of a major potential beneficiary. The RDRR warmly acknowledges that this anomaly has been resolved with the appointment of Judith Stanway.

On the other hand, the Incentive Programme uses only N targets. RDRR recommends that it adopt P targets as well.

Economic Analyses of the Impacts of PPC10

The RDRR remains unconvinced by the additional economic analyses of the impacts of PPC10 across different land use options.

The first impression gained is that literature reviews were limited. For example, only local research sources were seriously considered.

Even more seriously, the Section 42A Report does not project the economic consequences of land use conversions from intensive dairying to sheep and beef farming and to

commercial tree farming that are required to achieve nutrient targets. The focus on moving from mono-cultural to limited bi-cultural farming does not reflect the reality where farmers are actively considering the unique blend of practices most suitable for their situation.

The Section 42A Report does not project the impact on Rotorua's GDP and on export earnings by farming sector.

The Section 42A Report does not project the impact on rural land values relative to comparable land outside the catchment. It does not project the impact on the saleability of rural properties. It does not project the impact on the rates take, and the consequent needs for urban rates rises, even if expenditure remains constant.

All of these projections are requested by the RDRR in the interests of residents and ratepayers in Rotorua. It awaits this crucial modelling prior to the Commissioners' decisions.

Thank you.