

**IN THE MATTER of the Resource Management Act 1991**

**AND**

**IN THE MATTER of an appeal pursuant to clause 14 of the First Schedule of the Act**

**BETWEEN FEDERATED FARMERS OF NEW ZEALAND  
INC**

**Appellant**

**AND BAY OF PLENTY REGIONAL COUNCIL**

**Respondent**

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**NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS**

Section 274 Resource Management Act

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To: The Registrar  
Environment Court  
PO Box 7147  
Auckland 1141

Lachlan McKenzie wishes to be a party to the following proceedings:

**Federated Farmers of New Zealand Inc v Bay of Plenty Regional Council  
ENV-2017-AKL-000146**

I, Lachlan McKenzie made a submission about the subject matter of the proceedings.

I am not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991.

I am interested in all of the proceedings.

**I am interested in all of the issues raised by the Appellant and this includes an interest in the following issues:**

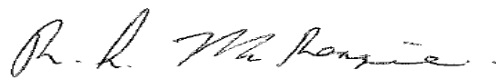
1. I have farming interests within the Rotorua and western Bay of Plenty district councils. Plan Change 10 will have significant adverse and detrimental impacts on my farming community and service industries operating in my district as well as the economic and social wellbeing of the whole community. Plan change 10 may have significant precedent for catchments in which I base my livelihood.
2. I am very concerned about the ability of farmers to reach their nitrogen discharge allowances (“NDAs”) and that they currently do not have a viable pathway for achieving them. The NDAs are unlikely to be achievable on the basis of currently recognised technology.
3. I am concerned about the nutrient management plan requirements in Plan Change 10. This includes the potentially significant nitrogen and phosphorous obligations and the prescriptive nature of the management plans being input focused as opposed to outcome based. The economic and social wellbeing implications of farmers in the catchment have been grossly underestimated.
4. The underlying concepts and methodologies upon which Plan Change 10 is based are flawed. For example: Overseer version changes and the application of the reference file methodology pegs NDA’s to current systems yet there are significant numerical changes in farm NDA’s for each version change. This creates significant uncertainty for farmers. Restricts innovation and adoption of new ideas and technologies. I am particularly interested in alternatives that are not premised on these (and the other) flawed concepts and methodologies.
5. The targets and limits prescribed in PC 10 are based on 1980’s science with limited regard for current scientific knowledge.
6. I am very interested in an alternative for reaching the desired water quality outcomes with least economic and social cost. I am interested in Federated Farmers’ proposal for substantive amendments to every provision of Plan Change 10 and Federated Farmers’ alternative nutrient management regime. The Federated Farmers proposal will better provide

for the economic and social wellbeing of my community whilst improving water quality with a significantly greater chance of succeeding in achieving our community values and goals.

**I support the relief sought by Federated Farmers because:**

7. Plan Change 10 is a flawed and risky approach for attempting to achieve the Regional Water and Land Plan TLI objective. Plan Change 10 will impose irreversible land use change on farmers and the community, as well as impose significant and unnecessary costs on farmers and the wider economy.
8. I do not support the underlying concepts and methodologies upon which Plan Change 10 is based.
9. I agree with Federated Farmers that a robust independent science review needs to be undertaken. The lake science shows the lake is phosphorus responsive yet Plan Change 10 focus is on Nitrogen rules. The relationship between nitrogen and phosphorous in regards to lake water quality needs to be rigorously examined.
10. Substantial amendments to Plan Change 10 are required to achieve the water quality goals for least economic and social cost to my community.
11. Accordingly, I consider that there is considerable merit in Federated Farmers' proposed alternative framework for integrated sub-catchment nutrient management that does not involve the allocation of nitrogen to an individual property level.

I agree to participate in mediation or other alternative dispute resolution of the proceedings.



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Signature of person wishing to be a party

Date: 17<sup>th</sup> October 2017

Address for service of person wishing to be a party:

Telephone: 073323440 or 021382442

Fax/email: lachlanm289@gmail.com

Contact person: Lachlan McKenzie