



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	oremail: rules@boprc.govt.nz
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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/** 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 **/do not 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.]*

Donald Ross Love _____

[Signature of person making submission or person authorised to sign on behalf of person making submission.]

Date 27th April 2016

*[NOTE: A signature is **not** required if you make your submission by electronic means.]*

Address for service of submitter:

691, Dansey Road RD2, ROTORUA 3072

Telephone:

Daytime: 07 332 5608

After hours:

Email:

donrosslove@gmail.com

Fax:

Originally from an engineering background i have been dry-stock farming in the Rotorua catchment for the past 35 years. I took advice from farm advisors and fertilizer companies who led me down a path of more fertilizer to grow more grass for more stock to make more money. However in 2008 when a soil test showed i had phosphate levels of more than 100 and the fertilizer company was still recommending to put more on I realized they were leading me in the wrong direction.

Changing to (Quantum laboratories) who advise on the basis of soil and herbage tests but do not sell fertilizer i changed my farming management.

I have not put on any phosphate nor nitrogen fertilizer in the past 5 years and continue to farm profitably. The bacteria in the soil have improved and now have the ability to utilise any urine patches more effectively. There is less potential for any leaching into the lake (and there are more worms on the farm)..

I am offended to need a resource consent to farm my own land and am cynical about whose interests are served by some farm advisors and fertiliser companies because of their vested interests. Those who continue to use nitrogen fertilizer to run more stock are the big polluters.

My recommendation is to limit/ban the use of artificial nitrogen fertilizers which kill soil bacteria which can otherwise utilise natural nitrogen/urine patches.

Research and some commitment into bio-farming would reflect a positive commitment to the healthy future of (Lake) Rotorua and need not be at the expense of farm profitability.

I am also very concerned about the changing and possibly inappropriate use of Overseer models for calculating and monitoring farm nutrient management: this was not its original intent. Its ongoing changes lead to general uncertainty at each change and anxiety for the future. Being locked into a future plan of action now on the basis of a dynamic tool is unsettling. Our own values have fluctuated and changed markedly with each version and this has been stressful. There are various research publications to date and research is ongoing but a greater confidence in more consistent scientific findings would be reassuring.

More than that however is my own experience with BOPRC and their publicised process for the rules. I took an early opportunity to engage an approved consultant to find out our nutrient status and future. Over twelve months of confusion, delay, inconsistent mixed messages from council staff, more confusion..... I am appalled at what i see as wicked waste of our rates money employing people who just number crunch with no real contribution to anything practical to solving the problem of nitrogen into the lake. I know of other farmers who are equally confused now.

It could be as simple as no cropping and no nitrogen fertilizer. We have done it. We can see it. However it took regional council a year of number crunching to tell us we have reduced by 30% on one farm and 19% on the other. Interestingly, influenced by Rule 11, after 3 years we are now at our 2032 limited requirement.

I recommend that rather than imposed rules being the stick to beat us into submission, a carrot in the form of an Accord is drafted- similar to the Forestry Accord. More consistent with a cooperative approach by all farming interests towards innovative and effective sustainable farming practices which do not compromise (Lake) Rotorua. Current inconsistencies in BOPRC's aspirations, methods and requirements as the rules have evolved require addressing for their final rules to have integrity.

My closing recommendation is to get more scientific evidence and postpone imposition of any new rules until 2017, with a review at 2022. In the meantime, make sure that land owners are meeting their constraints required by Rule 11. While i have been mindful of my rule 11 obligations since they were posted I know of others who have all but ignored them. There are farmers who feel their families' businesses and futures are at stake. As farmers we are made to feel we are a disproportionate and root cause of problems in Lake Rotorua when clearly past septic and sewage nutrients have been issues and addressed. The water quality in Lake Rotorua has improved. Farmers want a stronger sense of fairness.

We also support the Federated Farmers submission