



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	or email: rules@boprc.govt.nz
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Submitter name: Maraeroa Oturoa 2B Trust

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.
 - (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.
- 2 The details of my submission are in the attached table (3 pages).
- 3 I **wish** to be heard in support of my submission.
- 4 If others make a similar submission, I will consider presenting a joint case with them at a hearing.

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

Date

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

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Trust Secretary – Tina Ngatai (07 348 8887)

Alternative contacts: Trust Chairman – Heather Smith (0273485604), Trust Farm Consultant – Peter Livingston (0274491078)

SUBMISSION POINTS:

Page no.	Reference (e.g. Policy, rule, method or objective number)	Support/oppose	Decision sought Say what changes to the plan you would like	Give reasons
1	<i>RPS Obj 28 and 11</i>	Support	Maraeroa Oturoa 2B Trust (the Trust) supports the need to reduce nitrogen levels in Lake Rotorua and are committed to being a part of the process to improve the environmental state of the Lake for the future.	The Trustees are bound to take the long-term view to the management and development of land in the Lake Rotorua catchment for the owners and their decendants. The farm belongs to a Maori multiple owned land Trust and as such is destined to remain a long-term owner in these two regional council catchments (BOPRC and Waikato). The Trust is committed to reducing nitrogen levels in Lake Rotorua.
5 6 22-24	<i>LR P3 (Table LR 1 and LR 2)</i> <i>LR P5</i> <i>Sch LR One</i>	Oppose	<p>The Trust opposes the use of 2001-04 benchmark as the starting point for nutrient allocation in this process. The current land use is significantly different from the benchmark years.</p> <p>The Trust opposes the allocation method and nitrogen reductions as outlined in the Integrative Framework. Ammend how the nitrogen discharge allowance is calculated and applied. Ammend the timeframes to determine nitrogen loads and reductions required by landowners</p>	<p>This land was in the very early stages of development throughout the benchmarking years. To use the benchmark figure as a starting point for nitrogen allocation is unfair and puts these landowners at a disadvantage. The ability to intensify in earlier years was not possible on many Maori land blocks, including Maraeroa Oturoa 2B and should not be equally comparable to freehold land.</p> <p>In the event of a proposed plan change being forced upon the Trust without due consideration for it's long term needs the Trust would most likely be required to farm in an extensive and therefore uneconomic fashion. Being a long-term farmer / land owner in the catchment means this has serious implications for this Trust from generation to generation.</p> <p>The Trust requests an alternative allocation methodology to be used, not based on their benchmark in order to remain economically and environmentally viable into the future. An alternative methodology should support long-term landowners in the catchment and not put them in a position that disadvantages them.</p> <p>Review nitrogen allocations so that the baseline better reflects the ultimate potential of the farm not just the current situation (i.e. consider current and future).</p> <p>Proposed changes must be fair and reasonable to all, take special account of multiple owned Maori land which is destined by ownership to remain as tenants in the area forever and allow changes over a sufficient time period so</p>

				that new technology can be developed for use in a cost effective economic manner.
7 8 16 22-24 32-33	<i>LR P11</i> <i>LR P16</i> <i>LR R9</i> <i>Sch LR One</i> <i>Sch LR Six</i>	Oppose	Length of the consent duration to be extended past 20 years. Extend the timeframe to set rules, meet nitrogen reduction targets and measure progress towards reductions. Provide further detail and examples of the mitigation options that would result in an operation being granted a 20-year consent duration.	<p>The likelihood of this land block ever being able to be sold or transferred to another party are virtually non-existent. The Trustees of Maraeroa Oturoa 2B are bound to take the long-term view to not only environmental / landcare matters but also economic development for the owners and their descendants. A 20-year consent term is not considered long-term by the Trust. The Trust requests the Council to review the duration of the proposed consent term taking into consideration Maori land ownership structures and business models to allow certainty for those that must remain operative within the Lake Rotorua catchment long-term.</p> <p>The Trust requests a longer timeframe for Regional Council to invest in better science, research, modelling (esp. of the statistical sample size and property type that are the basis of the nitrogen discharge allocation methodology) before setting the allocation methodology, rules, timeframes to meet targets and resource consents in concrete.</p> <p>The Trust request that the Regional Council also:</p> <ul style="list-style-type: none"> - Provides flexibility to allow for on-going development for the Trust to fully establish an economic unit (whilst fully establishing appropriate mitigation policies / practices). - Extend the years over which the calculation of nitrogen baselines are derived and work on the maximum discharge from any one of those years as the baseline. <p>It is difficult to make business decisions without a clear understanding of the “nature, scale and robustness” of the expected mitigation options to gain a 20-year consent.</p> <p>More information is needed, especially for businesses that intend to operate in the catchment long-term and intergenerationally. A number of mitigating practices have already been implemented in anticipation of the need and desire to manage environmentally related outcomes on the Trust’s property.</p> <p>Actions taken already have been:</p> <ul style="list-style-type: none"> • Dairy effluent management = solid separation system recycling green water for feedpad / yard wash-down.

				<ul style="list-style-type: none"> • spreading lower nutrient content (N) effluent water, with solids removed, onto a large area (>70 ha) to minimise nutrient loading. Large storage pond so effluent is not dispersed to wet soils or at times when nutrient uptake by plants is inhibited by environmental factors. • feedpad in operation to capture as high a percentage of nutrient as possible and manage it's pathway to the environment / land. • Riparian Strip fencing and retirement of significant tracts of sensitive land (Biodiversity Programme). • Winter-Off the farm grazing for a significant proportion of the herd from mid-May to August each year. • Graze off all replacement young stock year round. • Voluntary reduction in the amount of "purchased in feed" from off farm sources. • push to establish a sustainable dairy herd with a very high genetic merit in order to produce more / cow from fewer cows i.e. better efficiency of production and lower potential N & P loss per hectare of land.
7 29-31	<i>LR P13</i> <i>Sch LR Five</i>	Oppose	The Trust opposes the use of OVERSEER 6.2.0 and subsequent versions to determine the nitrogen loss from the land.	OVERSEER is a decision support tool and should be used as such to allow stakeholders to understand compliance with a whole farm view. The Trust requests that the Council provides an alternative process to determine nitrogen loss to the catchment, rather than OVERSEER as the first point of call.
17	<i>LR R10</i>	Support	The Trust supports the transfer of nitrogen loss entitlements between properties/farming enterprises.	The Trust supports this concept to allow for economic growth within the Lake Rotorua catchment while meeting environmental objectives.