



Lake Rotorua Primary Producers Collective

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Chairman

Commissioner Panel

Plan Change 10

Bay of Plenty Regional Council

Dear Sir,

This letter is written in response to the Commissioners' Memorandum No 2 seeking clarification of the Collective's request for deferral of the Hearing of Plan Change 10.

There has always been an understanding by all parties attending the Stakeholder Advisory Group (StAG) that Bay of Plenty Regional Council, (BOPRC) would initiate a full science review in 2017. Indeed BOPRC signed a MOU to this effect with stakeholders in August 2016. A copy of the MOU is attached and the relevant extracts are set out in the bullet points below. BOPRC stated it will carry out a science review in 2017 and that this review will cover:-

- “the trends in lake water quality attributes including nitrogen, phosphorus, chlorophyll a, algal blooms, clarity, TLI, inflows & outflows.”
- “Review RPS catchment nitrogen load, and the phosphorus catchment load and any other nitrogen and phosphorus load combinations that catchment modelling shows would meet the Lake Rotorua TLI index of 4.2”
- “review of relevant NZ & international lake water quality remediation science”
- “To have this review peer reviewed by a suitably qualified independent expert & the Water Quality Technical Advisory group.”
- “A review & rerun of ROTAN (or any successor model), including nitrogen loss rates, ground water trends & attenuation rates, including Overseer or similar estimates.”

It is our request that the hearings are deferred until such time as this work is completed, peer reviewed and reported on, so that all stakeholders can be fully informed and respond to all the options and consequences that will impact on this community. Additionally this ensures that the Hearing Panel will be fully informed, rather than hearing contested evidence in advance of agreements established through the Science Review.

Our belief is that a policy and rule framework has to be based on quality evidence. Therefore we request that the results of the science review be allowed to inform the development of this policy and rule framework and that the Hearing Panel is convened as soon as practicable after that.

We know that the recalibration of ROTAN is also fundamental to this process. ROTAN was developed by NIWA to predict nitrate inputs to the lake for various land uses, rainfall & mitigation scenarios. It is the mechanism by which scientists and council staff wish to determine the catchment load to the lake. Land use and the science of farming have changed since the 1980's when the

sustainable load was first determined. The understanding of attenuation on catchment land has also changed significantly. In addition the lake has proven to be phosphorus limited not nitrogen limited, as first thought by scientists. All this needs to be considered in the lake water quality equation when Plan Change 10 requires a landowner to meet and continue to farm to a single figure nitrogen discharge allowance (NDA).

If for some reason ROTAN cannot be recalibrated then there is a fundamental disconnect between the RPS Nitrogen load which was calculated in Overseer version 5 and the rules framework which is based on Overseer version 6.

The development of 'action plans' along the transport pathways of the Sub-Catchments to mitigate and capture nutrients, particularly sediment & phosphorus, is essential to the lake. The larger sub-catchments experience in excess of 2.5 meters of rainfall per annum often in large pulses with heavy surface run off from land, roads and city concrete. To date BOPRC have no policy and no tools to work towards any mitigation of this surface nutrient loss. This is not an individual property, but a cross boundary issue, that needs to be worked on as a community. New science on the effectiveness of wet lands, filtering strips and detainment bunds is still being calculated and there are many success stories around NZ of communities achieving what we desire; we just need the support, guidance and enabling policy to make it happen. The Collective have initiated community meetings in three catchments to create interest and 'buy-in' from landowners.

It is of note that analysis of current farm systems shows that farmers have voluntarily made significant changes which have resulted in reduced nutrient losses. We believe this will continue through the work in sub-catchments and documented action plans.

Members of the Collective are currently working with contractors of BOPRC on a project to determine the true economic impact of Plan Change 10 Rules on individual farmer business's. The Section 32 economic report never looked at this aspect and therefore it was not able to definitively state what the true economic impact on the Rotorua Community would be.

The Collective believe that more understanding and clarification of science data is needed to ensure that all decisions made, and actions taken, in regard to Lake Rotorua's water quality are the most effective and efficient known and available. We are not seeking to cause unnecessary delays; we too crave certainty, but we want to do it once and do it well, with enabling & enduring solutions.

The Collective believe that the science review is fundamental in allowing the community to develop an enduring solution.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Gisele Schweizer', with a long, sweeping underline that extends to the right.

Gisele Schweizer
Co Chairman
Lake Rotorua Primary Producers Collective