

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

**AND**

**IN THE MATTER of Lake Rotorua Nutrient Management –  
Proposed Plan Change 10 to the Bay of  
Plenty Regional Water and Land Plan**

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**MEMORANDUM ON BEHALF OF FEDERATED FARMERS**  
**17 March 2017**

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**FEDERATED  
FARMERS**  
OF NEW ZEALAND

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169 London Street  
PO Box 447  
Hamilton  
Telephone: 07 858 0815  
Email: [nedwards@fedfarm.org.nz](mailto:nedwards@fedfarm.org.nz)  
Solicitor acting: Nikki Edwards

## **MEMORANDUM ON BEHALF OF FEDERATED FARMERS**

### **May it please the Hearing Commissioners**

1. Counsel refers to Memorandum Number 9 of the Hearing Commissioners and the direction that parties advise by memorandum the submission points upon which their witnesses rely if they seek amendments to Proposed Plan Change 10 ("Plan Change 10").
2. Federated Farmers seeks changes to Plan Change 10. Those changes are summarised in the Statement of Evidence of Elizabeth McGruddy and are set out in considerable detail in Federated Farmers' original submission.
3. The purpose of this memorandum is to specifically identify the submission points upon which Federated Farmers relies for the changes sought.

### **Submission numbering**

4. An issue that has arisen in identifying the specific submission points relied upon is that Bay of Plenty Regional Council ("Council") has advised that due to issues with its database it cannot provide a copy of Federated Farmers' original submission with the specific points numbered. Accordingly, Federated Farmers has relied on the submission point numbering adopted in the section 42A report.

### **Statement of Evidence of Elizabeth McGruddy**

5. A summary of Federated Farmers' recommended approach is set out at paragraphs 3.1 to 3.15 of Ms McGruddy's evidence. Ms McGruddy provides a summary of the overall approach proposed by the specific amendments to objectives, policies, methods and rules set out in Federated Farmers' original submission. Ms McGruddy has not enlarged on or deviated from the changes sought in the original submission.
6. At paragraph 3.2 of her evidence, Ms McGruddy refers to amendments to policies, methods and rules and a different balance of regulatory and non regulatory methods. For clarity, the specific submission points for the amendments sought are:

Amendment	Submission point (from s42A report)
Objectives	75-122
Policies	75-158, 75-124, 75-125, 75-126, 75-127, 75-128, 75-129, 75-130, 75-132, 75-135, 75-131, 75-133, 75-134, 75-136, 75-138, 75-137, 75-139, 75-140, 75-141, 75-142, 75-143, 75-144, 75-149, 75-145, 75-146, 75-147, 75-148, 75-150, 75-151, 75-152, 75-15375-155, 75-154, 75-156, 75-157
Methods	75-117, 75-229, 75-14, 75-113, 75-114, 75-118, 75-119, 75-141, 75-172, 75-169, 75-170, 75-175, 75-57, 75-164, 75-165
Rules	75-177, 75-175, 75-178, 75-179, 75-180, 75-181, 75-182, 75-183, 75-184, 75-185, 75-186, 75-187, 75-188

7. Federated Farmers proposes a comprehensive package of changes that is intended to be viewed as a whole. Upon reviewing Federated Farmers' original submission, it has come to our attention that the proposed package may be difficult to comprehend in the context of the explanation of the reasons for the changes sought.
8. To assist the Commissioners, we have prepared the **attached** document showing the main changes to the objectives, policies, methods and rules as track changes to the relevant sections of Plan Change 10. This has simply been cut and pasted from Federated Farmers' submission.

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N J Edwards

Counsel for Federated Farmers