

Summary of comments made in relation to Proposed Plan Change 10 by Gisele and Peter Schweizer and Mark and Donna Keaney on behalf of Bushland Estate Ltd and Adolle Farms Ltd

Background Information: Peter Schweizer

1. Bushland Estate is a large dairy farm of 335 Ha situated at the end of Central Road. Adolle Farms is a lifestyle block of 14.3 Ha situated on Jackson Road, which is a 5 minute drive from the main dairy farm.
2. The lifestyle block was originally part of a dairy farm but was subdivided by the previous owners. It was purchased specifically for use as part of our dairy farming operation in keeping with Rule 11.
3. We lived on the main farm from 1999 until 2012, then moved to the lifestyle block at Jackson Road. Our 3 teenage sons were all born in Rotorua and have spent their lives growing up on the farm.
4. Bushland Estate operates on 240 hectares of effective land, (with an additional 10 hectares of races / buildings etc.). Pre 2001, 40 Ha was retired into native bush under permanent covenants. The rest of the farm which includes the steeper sidlings and ridges, as well as some flat land, was also voluntarily retired into native bush without any monetary reward to date. In total this equates to a ¼ of our farm that we do not use as part of our dairy farming operation.
5. We also currently utilise 42 Ha of local, in catchment, dairy benchmarked lease land, but we have now lost this land (since writing the original submission) as a direct consequence of these proposed rules.
6. Our farm is prime productive dairy land, flat to gently rolling with some steeper sidlings. We are summer safe with very good rainfall & good sunshine hours. We have a combination of Podzol and Pumice soils. Our stocking rate is currently 3 cows / Ha, and we are operating a farm system 3 - 4, but due to the combined effect of the loss of our lease land and the requirements of our current PNDA we are having to change to a system 2 – 3. This is in the main as a result of having to lower cow numbers by nearly 10%.
7. Please see our original submission for the list of additional mitigations that we have undertaken since 2001.
8. We are fully compliant with Rule 11 and have been operating within the rules framework at all times. We are surprised that RLC through their expert evidence are suggesting that the intent of Rule 11 should be reversed for some sectors of the community.
9. We are on track to achieve the 2022 PNDA as a result of the changes outlined above. But clearly this will have a direct impact on our farm's productivity and profitability as well as on our ability to pay off our debt.
10. The farm supports five families. These families have young children who attend local pre-schools and schools. As well as the direct financial losses of compliance with our 2022 PNDA this will also shortly result in a restructuring of our workforce and the loss of at least one member of staff and their family. This is just the beginning.

11. We do have a proposed pathway to achieve the 2032 PNDA but this is still a challenging and daunting task. We are currently reliant on using a small part of the farm, (22 Ha), that is out of catchment. In this regard we are more fortunate than most dairy farmers. However this advantage may not last; if proposed rules are applied to the Kaituna catchment then this area of land will be captured and so this avenue will disappear.
12. In addition, we are acutely aware that costs will continue to increase, payouts will fluctuate, and production reducing in the proposed manner will eventually result in the farm no longer being profitable. As our cost structures increase, quite simply we will have no ability to keep pace with it.
13. Our farm equity was re-evaluated in 2016 by our bank. Our bank manager informed us and they have devalued the property by 30%, as a direct result of PPC10.
14. Even before these rules are operative it is therefore clear that they have had a massive impact on our profitability as well as our equity, and will therefore have a direct impact on our future retirement plans.
15. We are paying the price for a legacy of pollution into Lake Rotorua. But it is also clear that it is not just ourselves and our families who will suffer, but the entire Rotorua community.

Our involvement and further impacts of these rules: Mark Keaney

16. We have been fundamentally involved with trying to find the right environmental solutions for Lake Rotorua.
17. Gisele has sat at The Stakeholder Advisory Group [StAG] since its inception, and on various sub-committees as well. She was also a founding member of the Waiora Group that led to the signing of the Oturoa Agreement as well as a founding member of the Lake Rotorua Primary Producers Collective [The Collective] and is currently co- chair of that organisation alongside Neil Heather.
18. Gisele submitted on our behalf on Rule 11 and later sat around the table at the RPS mediation appeal hearings and since then has worked collaboratively with the Council, LWQS and all stakeholders in an effort to find a solution for Lake Rotorua.
19. I think it is important to acknowledge that she has unselfishly given a lot of her own time in her genuine desire to see a positive outcome and solution; one that is fair and equitable for the entire community *and* across more than one generation.
20. The goal was to ensure that the TLI of 4.2 was achieved and maintained into the future. This we are told is what will keep the lake at the 1960's level of cleanliness - which we are also told is what 'the community' desires. Unfortunately, when Council refers to 'what the community desires', this understanding is apparently based on a very small survey of Rotorua residents undertaken in the 1980's, when they were asked without qualification if they'd like a clean lake, a lake 'just as it was in the 1960's' – not surprisingly they said yes!
21. We are aware that the lake is currently at this level and it is indeed in a good state and we accept the challenge to try and maintain this level of lake health into the future.

22. We have chosen, and continue to choose, a life in Rotorua for the lifestyle opportunities it affords our families. The Schweizer's are keen fishermen and love doing a myriad of water sports in the lakes of Rotorua. As stated above we share the community's desire for a clean lake but we note that we personally have never actually had a problem with any of the lakes in Rotorua, and have indeed seen massive improvements in the lakes, in particular Lakes Rotorua and Rotoiti.
23. The impact of these proposed rules is already quite apparent. We have seen the beginnings of the large-scale conversion of several properties on Central Road, including our lease block referred to above. As well as the sad and permanent loss of this prime productive farmland we note that the infrastructure and roading is going to be severely challenged by this as well.
24. We have seen farming friends give up the battle, throw up their hands in despair, and walk away from their life's works. The social impacts too are already devastating on this small community.
25. We have had 'neighbours' turning on each other and attacking each other on Facebook. The dairy farmers in particular have had to have a pretty thick skin to withstand the constant abuse that we have endured in social and the wider media over the previous two years. This has been particularly hard to bear when we know how much we have offered to give up in order to play our part in the solution.
26. I am aware that the personal impact on Gisele, Peter and their family has been massive. They have had to juggle their businesses and raising a young family and this battle has gone on for most of their children's lives. The times spent fighting this battle instead of spending time with the family are precious times which will never be recovered.
27. It is abundantly clear that if the target remains at 435 T of N, 'the pie' (of available N) which needs to be divided up will never be big enough. What is also clear is that we, along with the other farmers in The Collective, willingly accepted a proportionally larger share of the burden.
28. We are horrified that this is not seen as enough by certain sectors of the community. Submitters have asked for a bigger piece of the pie so that they can have some of our N to use? Or to sell? - it's often not clear which. We do not believe that their desire to intensify, (or make a profit from these rules), should take priority over existing compliant businesses and their desire to survive.
29. I remember my father John Keaney - (Past Mayor of Rotorua District Council and former chair of the BOPRC) - with pride, knowing that he was instrumental in starting the much needed clean-up of the lake and I know that he would have been delighted by the progress and the state of the lakes today. However, my father was also a proud and successful farmer and he would have been both dismayed by this community tearing itself apart, and horrified that the pastoral sector is being attacked by other sectors of the community who are clamouring for 'more'.
30. I hope the equity that became abundantly clear at StAG to those who sat through three years of workshops and meetings, also becomes clear to the panel.
31. Gisele tells me that during these hearings Iwi accepted the inherent problems this community faces, and displayed 'mana' and grace when they asked simply if there was

another way, a better way, forward. They asked that you allow the time needed, ('one cup of tea at a time' if necessary), to find the best solution. We respect and support this position.

32. We also support Federated Farmer's, DNZ and Fonterra's submissions where they have pooled their collective wisdom and identified the shortcomings with the current rules, and the real risk to the lake that exists if we do not stop and consider the realities of attenuation and sub-catchments and what this means for the lake. It is these alternative pathways that we ask you to consider before PC10 is written in stone and further harm is done.
33. We support Doctor Tom Stephens who has challenged the evidence of Professor Hamilton, and we ask that this science debate is resolved with respect and openness. We want you to be sure that the pain described above is in fact the best way forward.
34. If there is a realistic possibility of another way of achieving the community's goal; whether by targeting any alternative combinations of N, P and Alum, or through more accurate sub-catchment targeting of nutrients, we ask that this be fully explored, as this could be a sustainable solution for all stakeholders in the Rotorua Community.

What do we want? – Gisele Schweizer

- I. We support the goal of a clean lake, but ask that this is achieved with the least social & economic impact on individuals.
- II. We want Council to implement an immediate and complete science review, without any further delay, in accordance with the Science MOU.
- III. We want re-consideration of the Nitrogen, Phosphorus and variable sustainable loads within Lake Rotorua.
- IV. We want further research into catchment attenuation; the need for this being clearly signalled by the evidence of Dr. Rutherford.
- V. As part of this science review, we also want sufficient research undertaken into the continued use of Alum, in order to rule it in or out, as a long-term solution.
- VI. We support the sub-catchment approach suggested in the submission of Federated Farmers as a way forward; a way that will allow for the possibility of the best solution for the Rotorua Community as a whole. We ask that this analysis is completed in order to establish if there is in fact a better way forward for the lake *and* the Community.
- VII. We support the proposed PC10 allocation methodology, and ask that you implement the 2022 targets, (or any other targets that are imposed), in accordance with this allocation methodology.
- VIII. Furthermore, we ask that the 2022 NDA, if imposed by way of rules, is implemented as a Permitted activity and not as a Controlled consent, in order to avoid a costly and unnecessary consenting regime, during this interim period.
- IX. We ask that you prevent the implementation of any rules that will result in permanent and irreversible harm, until completion of both the full science review and the sub-catchment analysis, so that the full implications of both are known first.

- X. We seek that compliance of any rules is by way of farm Outputs measured by OVERSEER and that the Farm Management Plans sit outside all compliance measures, in order to allow for flexibility and adaptability in the face of unknown influences and changing science, and in order to avoid unnecessary and costly bureaucracy.

Thank you for giving us this opportunity to address our concerns and we look forward to answering any questions.