

From: [Tony Cairns](#)
To: [rules](#)
Subject: Proposed Plan Change 10
Date: Wednesday, 27 April 2016 2:55:50 p.m.
Attachments: [rules 2 subm.pptx](#)

To: The Chief Executive
Bay of Plenty Regional Council
PO Box 364
Whakatane 3158

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Submission from:-
Oturoa Properties Ltd
726 Oturoa Rd.
Rotorua 3072

Name of Submitter - Tony Cairns

I wish to be heard in support of my submission please?

Regards Tony Cairns

This e-mail message has been swept for viruses and none was found.

Content was not checked

Oturoa Properties Ltd

Plan Change 10 – Submission



- Introduction

- Our daughter is a member of the Rotorua Rowing Club & our wish is for the water quality of the Rotorua Lakes to continue to support all water sports for many years to come.
- I support the Collective, Federated Farmers and Fonterra submissions. (15-Apr-16)
- OPL - Dairy & Dairy Support Platform – Oturoa Rd- 64 years
- Collective Exec Committee since conception.
- Attended StAG since conception with the exception of the first 2 or 3 meetings.
- Oturoa Agreement signed on OPL on the 18-Feb-13
- OPL won the 2015 BoP BEFA Award 1 – Surface water control, effluent management and energy efficiency.
- Until the draft rules were released OPL has never refused any request from DNZ – Fonterra or the Regional Council for assistance/support/data etc.

Overseer

Run 6.20 & 6.2.1 With Proposed Gnd Water Boundaries being used.

Benchmarking Yrs 2001 - 2004									
5.4.9	5.4.10	5.4.11	6	6.1	6.12	6.13	6.14	6.2	6.2.1
Rule 11		64.2				80			102.7
		8-Feb-13				8-Feb-13			26-Aug-15
Perrins Assessment		38				67.5			73
		26-Nov-14				26-Nov-14			4-Feb-16
									61.1
									11.9
									Kg N / Ha
							Eliminated Winter (68
Target NDA		35				44			61.1
Delta		3				23.5			6.9
		Kg N / Ha				Kg N / Ha			Kg N / Ha

/Users/tonyicp/Documents/[Collective Data Base 200425.xls]Sheet2

	2001 - 4	2016
Cow Numbers [01-June]	585	520
Effluent Area (ha)	30	60
Constructed 4 Stand Off Pads	0	4
Fenced off bush areas	5%	75%
Fenced off Awohau Stream		
Riparian Plantings		
Detainment bunds	0	9
Constructed 90d Storage pond		
Herd wintered off	0	70%
Eliminated All Cropping		100%
Introduced an earlier Culling Program		
System 3 to system 1	770 [2012]	224
NB - 1 Accuracy of Overseer - Clarify Area		
2 Every Overseer version the figures increase. plus data obsolete & needs to be re-run		
3 Soil Type accuracy		
4 Rain Fall differential		
5 Proposed Ground Water Boundaries		
6 Much confusion Balance - DNZ - Fonterra - EBoPRC Publishing 4 differing figures same data		

A) Unless the Science proves otherwise it is impossible to meet 2032 target without impacting GMP and further impacting the future of my family

B) I have spent \$348k getting my farm to the current leaching level of about the 2030 target. No further reduction is possible. I doubt that many farmers will be able to afford this let alone want to spend this amount.

Output OPL's Draft Nutrient Management Plan issued⁰⁵⁰ by Perrins for Approval 01-Apr-16 Data Date 04-Feb-16

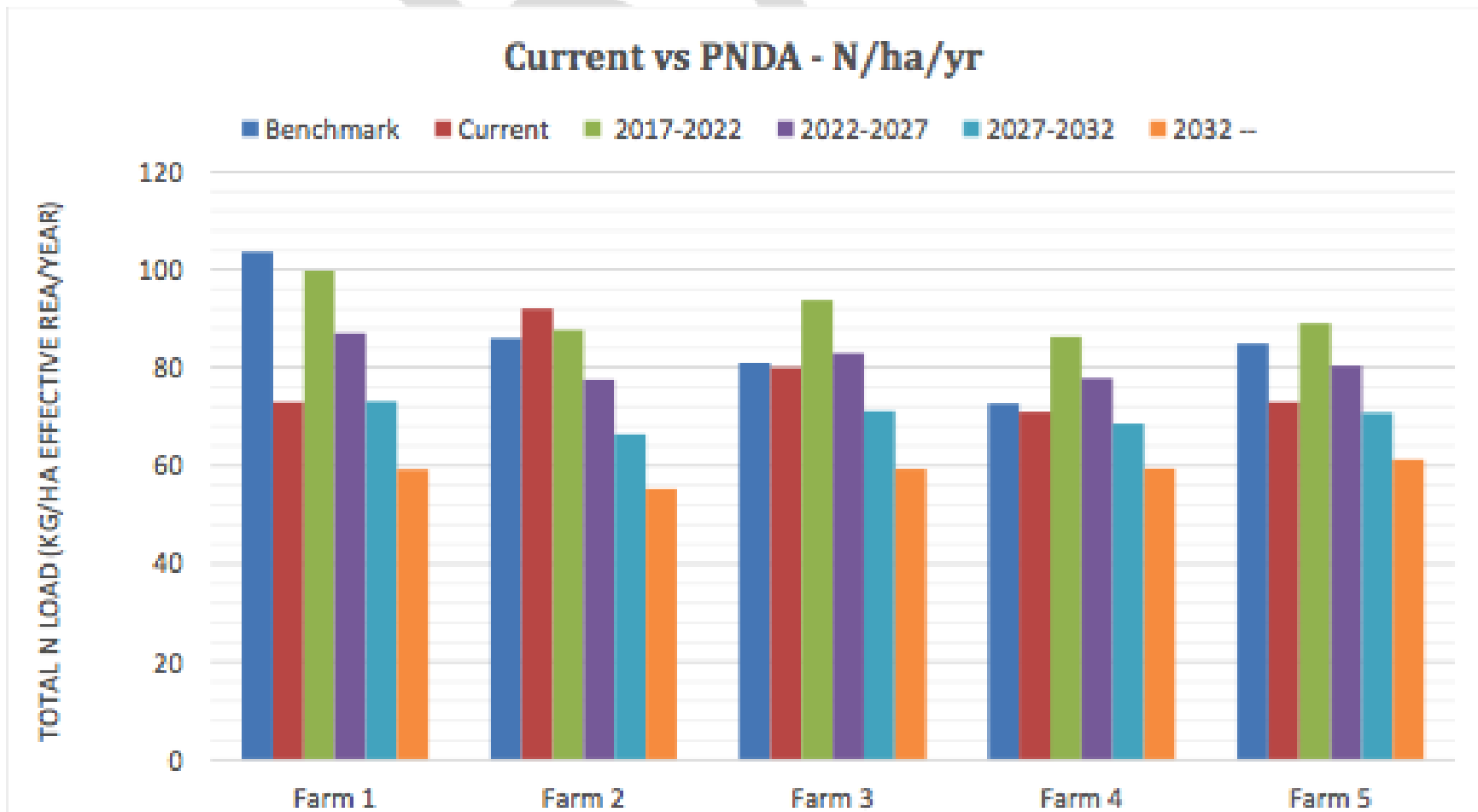
Section 6 – Actions to achieve nitrogen targets

6.1 Committed actions to achieve 2022 target		
Action	Date to be achieved by	Completed (Yes/No)
Current system compliant with 2022 target		Yes

6.2 Proposed actions to achieve 2027 target	
Action	Date to be achieved by
Cease all winter forage cropping (12ha)	May 2027
Reduce herd size to 518 cows with a commensurate reduction in replacements to 129 R1 heifers and PKE usage to 342t	May 2027
No change to Hydro lease	

6.3 Proposed actions to achieve 2032 target	
Action	Date to be achieved by
Reduce herd size to 467 cows with a commensurate reduction in replacements to 93 R1 heifers and PKE usage to 202t	May 2032
Graze 23 heifers external to farm system	May 2032
Lower fertiliser N usage to 52kg N/ha (on 220ha) from current level of 87kg N/ha (on 220ha)	May 2032
Plant 12.1 into permanent forestry (species to still be determined)	May 2032
No change to Hydro lease	

All 2027 objectives have been achieved. I.e. Ceased all winter cropping, raising 119 heifers, 224 t PKE.



PNDA – Provisional Nitrogen Discharge⁰⁵⁰ Allowance

- Major issue in how this is calculated - StAG
- Demonstrated our performance since 2001-2004
- We have been one of the leaders in the reduction of our leaching figures, yet we have received no credit for this and have actually been penalised with a lower figure as opposed to a farmer who has done absolutely nothing
- This is not right and not fair.

Oturoa Agreement

- MOU (Memorandum of Understanding)
 - between Lake Primary Producers Collective
 - Bay of Plenty Regional Council
 - Federated Farmers

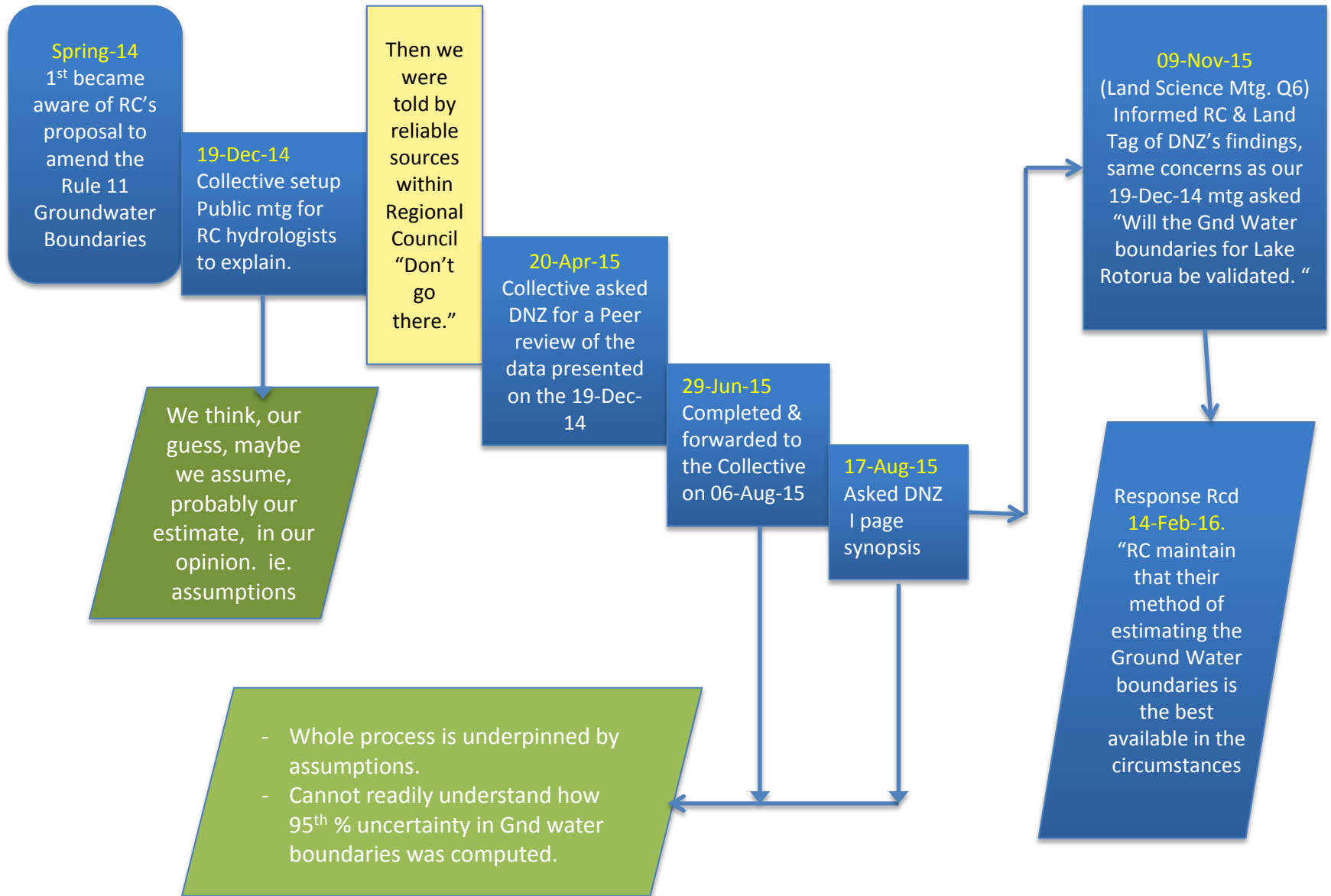
 - Signed 18-Feb-13

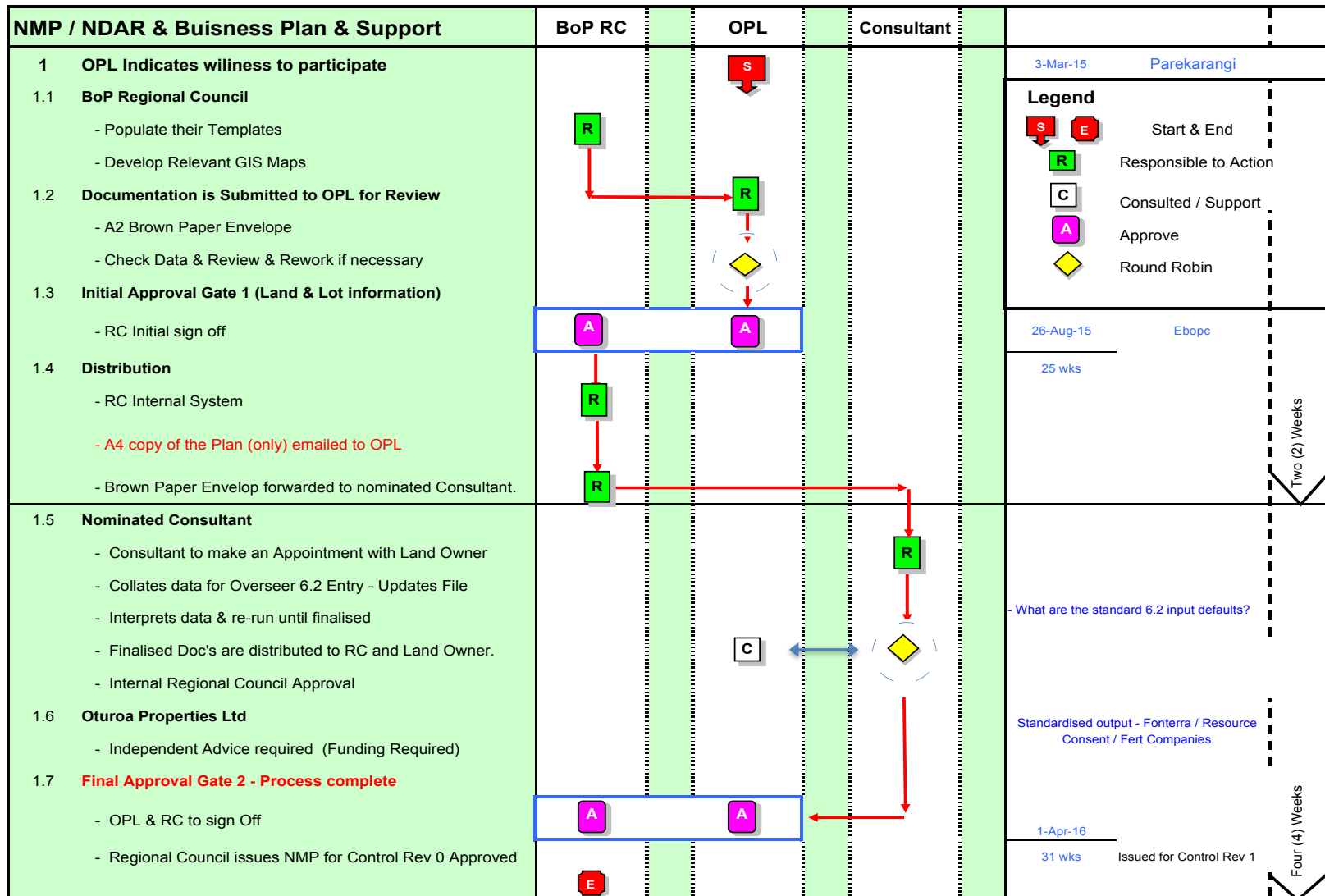
 - Witnessed by Lakes Water Quality Society Inc
 - New Zealand Government.

“All parties agreed that every effort will be made to meet the spirit of this agreement.”



Groundwater Boundary History⁰⁵⁰





Detainments Bunds – P Mitigation

- Pre 2011 constructed 5 off – stop water flow at OPL cost. The volume of water
- Post 2011 OPL / BoPRC joint venture constructed a further 4 off
- Collation of data to calculate how much p is being retained

Due to the topography of the land where our farm is located on Oturoa Road the rain water catchment is from a large area outside of our farm boundary. This rain water runs through our farm in three major areas. Two areas directly into the Awahou Stream and the third straight onto the Oturoa Road drainage system

During events of high rainfall the volume of water is huge and this has caused severe flooding at our cowshed, calf shed, workshop, tanker track, paddocks and also with Oturoa Road constantly being flooded. Plus obviously this surface water found itself directly into the Lake.

From 2005 to tackle this problem, OPL initiated and at full cost to OPL, the construction of their version of 5 off detainment bunds. Results – flooding in all key areas of farm and Oturoa Road was significantly reduced and the water flow was reduced.

Post 2011 OPL / EBoPRC joint venture constructed a further 4 off. Results – OPL has had to sacrifice paddocks during heavy rainfall events with large “lakes” in the paddocks for 2/3 days as the detainment bunds do their job. However, they have been a great success with no flooding now occurring and further reduction water flow in Lake Rotorua.

19-Oct-11 Total cost \$258k
25-Apr-16 Total cost \$348k

050



90 day effluent storage pond, \$150k
other effluent upgrades, \$22k



Fence and plant
streams & wet areas,
install bunds, \$21k



Stand off pads x 3, \$65k



Issues and Concerns

- NUTRIENT Management Plan (NMP) does not focus on P.
 - NMP & NDAR / Business Plan & Support process
- Ground Water Validation. +/- 640 m
- Overseer
 - Standardised input protocols and output.
 - Each upgrade gap widens between current and 2032 target
 - With each upgrade pervious version is obsolete and the farm data has to be re-run. (extra cost)
- The method of calculating the PNDA

- PNDA is not financially achievable. Breach of the Oturoa Agreement.
- Why cannot I sell my farm
- Why has the value of my farm been effected by this process.
- Why is central government trying to force me out of business.
- Clarifications as to the way forward (StAG) and the entire consulative process

In Conclusion

- Farmers need to be provided with a list of mitigation measures inclusive of cost impact to
 - Achieve the respective targets. In OPL's case this is the 2032 target.
 - Better understanding of Overseer
- We need to understand why RC has breached the Oturoa Agreement .
 - Setting unrealistic & sustainable targets.
 - Change out staff with the introduction of the draft rules.
 - No co-operation / replacement for StAG.
 - Unfair PNDA method of calculation.
 - Trying to force us out of Business
 - Proposed ground water boundaries



Scenario - Why Don't the Regional Council purchase 8 or 9 Dairy Farms or dry stock combination - Problem solved

Scenario	V5.0		
2001 - 4 Average	58		58
	Forestry		Land use Change
	4		13
Reduction	54 kg / n / ha		45
Assume av size	250 ha		250 ha
Reduction	13,500 kg		11,250 kg
No of Farms	7.41		9

Overview RPPC's Interpretation of the Proposed Process

