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LWQS Submission on Environment BoP Draft Annual Plan

The LakesWater Quality Society would again this year like to congratulate Environment Bay of Plenty for all that it has achieved under the Rotorua Lakes Restoration Programmes. An overview of the progress of the Rotorua Lakes Programme shows very tangible progress. We welcome the ongoing work in the Draft Annual Plan (DAP).

The major lakes' issue facing Environment BOP and the community is the future of Lake Rotorua, and so most of our submission deals with this Lake. We also refer briefly to other lakes, and to a few details of the DAP.

Lake Rotorua - the situation

The status of the Lakes Rotorua/Rotoiti Action Plan is somewhere between frozen and in limbo. Nevertheless the targets and key actions needed are now clear, and the very recent Special Projects Committee report suggests a way to make progress.

The facts are clear: Lake Rotorua continues to deteriorate with impacts on the Okere Arm and the Kaituna River. This has negative impacts on tourism, residential property, and the wealth of the district. Investment in changing land use is delayed, farming lacks certainty for its future, and opportunities for rural subdivision are restricted. Funding initiatives to stimulate change are not in place.

The targets for nitrogen reduction are well established:

Catchment Nutrient Targets		t/N/y
	Current exports	746
Less	Sustainable load	435

	Required target	311
Less	Non-farming targets	80

	Catchment Nitrogen Reduction Target	231

	This reduction equates to 41% of the nutrients from farming (Taupo 20%)	
	<small>(All information derived from the Lakes Rotorua and Rotoiti Action Plan)</small>	

However the Action Plan target date of 2250 to achieve reductions of nutrients in Lake Rotorua is shameful and irresponsible.

While there are some non-farming reductions in N flows possible (about 80 t N/yr), most of the reduction inevitably must come from farming. Both change in farming practice and change in land use to forestry or environmentally-friendly urban subdivision are needed. A new factor which offers funding for much of the land-use change is the Emission Trading Scheme. At the same time, RDC District Plan will either block or facilitate the necessary change.

Our conclusion on the facts of the Lake Rotorua situation is that Lake Rotorua can be restored while most dairy farming continues and the economy of the district is improved. Knowledge to achieve this is already available. Wise leadership required from RDC and Environment BOP and strong Counsel by Te Arawa.

(A presentation dealing with this issue is attached).

Regional Special Projects Committee Report

The Special Projects Committee has taken account of the above facts in its recent report. We welcome and strongly support the thrust of that report.

The DAP needs to take account of the Special Projects Committee work. In part this is because the DAP is one of the main statutory vehicles for action on the Lakes, and because the Action Plan vehicle is no longer on the road.

The Special Projects Committee report recommends a large amount of work be done, including: *Direct staff to undertake Cost effectiveness calculations for existing interventions for Lake Rotorua...;* and *Direct staff to analyse the cost effectiveness of any new interventions...includ[ing] catchment based assistance programmes and regulations...* Substantial other work is also recommended.

The Committee reported that the Chief Executive intends to report, amongst other things, on resourcing this work. While the detail of the work is to await the response of Environment BoP's partners, i.e. Te Arawa Lakes Trust and RDC, it is obvious that resourcing of the work should not wait until the 2011/12 Annual Plan. Much of the work for Lake Rotorua has been on hold for many years already.

Hence we strongly recommend that the DAP be amended to provide funding for the work proposed by the Regional Special Projects Committee on Lake Rotorua.

We also recommend that the work be organised as a project rather than responsibility being spread over several divisions of Environment BOP. This would involve:

- Appointment of a project manager from within Environment BOP staff,
- Placing resources at his/her disposal rather than requiring approval from other groups,
- Setting milestones and timelines, reporting against these, and making public the timelines and progress results.

The rest of the work for Rotorua Lakes could best be done within the same project.

Other lakes

We also have recommendations on several detailed aspects of the programme for other lakes.

It is now possible to almost "tick-off" several lakes for which the work done, or physically underway, should fix the lakes. These lakes on which great progress has been made are:

- Rotoiti OK apart from Okere Arm, for the lifetime of the wall;
- Okaro OK if capping continues;
- Tikitapu with sewerage completed, should only need minor effort.

For three more lakes the planning has mostly been done and implementation is proceeding:

- Rotoehu
- Okareka
- Rotoma

Three lakes are each special cases:

- Rerewhakaaitu farmers' initiatives a good basis for progress
- Okataina catchment nearly all indigenous forest - issues largely scientific
- Rotokakahi private ownership.

This leaves two lakes:

- Tarawera much preliminary work for Action Plan already done.
- Rotomahana appears to be deteriorating - little work done.

Our conclusion of the state of work for the other lakes is that good progress has been made, especially taking into account the sewerage works underway and planned. It would be dangerous for work on the other lakes, for which some momentum has been established, to be paused. All lakes are under threat of deterioration.

We firmly recommend that the work on the lakes other than Rotorua continue. Some increased focus on effectiveness of action would be desirable, but it would be tragic if work on the other lakes were to be deferred in order to fund planning only for Lake Rotorua.

Other issues

We totally support the principle of targeting rates paid to nutrients leached from each property, and greatly regret another year's delay in setting the targeted dairy rate. We urge that this year the work be done to set an appropriate dairy rate.

We support the Rotoiti sewerage subsidy being funded from general investment income.

We support the construction of a full scale Tikitere treatment system.

We support the construction of a wetland at Lake Rotoehu, if all technical issues are resolved.

Finally

The DAP provides for management work for the Tauranga Harbour catchment. It is good to see that part of the environment receiving attention. But a strange thing

happened in the drafting of the DAP: in almost every case the Tauranga project is mentioned ahead of Rotorua. This clearly indicates a psychological shift in emphasis by staff or Council, since in the past the Rotorua Lakes have been regarded as the first priority.

We urge that the Rotorua Lakes remain first environmental priority for Environment BOP, at least until more progress is made in restoring them.

We wish to be heard in support of our submission.

John Green
Chair, LWQS

27 April 2010

Att: Presentation