

**SUBMISSION BY NGATI KEA NGATI TUARA ON HEALTHY RIVERS/WAI
ORA: PROPOSED WAIKATO REGIONAL PLAN CHANGE 1**

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Te Runanga o Ngati Kea Ngati Tuara Trust

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Te Runanga o Ngati Kea Ngati Tuara Trust wish to be heard in support of this submission at any hearing.

If other parties make similar submissions, Te Runanga o Ngati Kea Ngati Tuara Trust may be prepared to present a joint case at any hearing.

SUBMISSION

1. This submission is made by Te Runanga o Ngati Kea Ngati Tuara Trust in relation to the Healthy Rivers/Wai Ora: Proposed Waikato Regional Plan Change 1 (**Proposed Plan Change 1**). This submission is made on behalf of Ngati Kea Ngati Tuara.
2. Ngati Kea Ngati Tuara are co-governors of the Waikato River, as reflected in legislation relating to the co-management of the Waikato and Waipā Rivers.

JOINT SUBMISSION BY THE WAIKATO AND WAIPĀ RIVER IWI

3. Te Runanga o Ngati Kea Ngati Tuara Trust has made a joint submission, together with the other Waikato and Waipā River Iwi, on Proposed Plan Change 1 (the **Joint Submission**). Te Runanga o Ngati Kea Ngati Tuara Trust endorses and supports the submissions made in the Joint Submission.
4. For the purposes of Schedule 1 of the Resource Management Act 1991 (the **RMA**):
 - (a) Te Runanga o Ngati Kea Ngati Tuara Trust repeats in this submission, the submissions made in the Joint Submission.
 - (b) Te Runanga o Ngati Kea Ngati Tuara Trust refers in this submission to each of the provisions of Proposed Plan Change 1 that are referred to in the Joint Submission.

RIGHT TO MAKE FURTHER SUBMISSION

5. As a co-governor of the Waikato River, Te Runanga o Ngati Kea Ngati Tuara Trust has an interest in Proposed Plan Change 1 that is greater than the interest that the general public has. Accordingly, Te Runanga o Ngati Kea Ngati Tuara Trust must be provided with an opportunity to make a further submission on Proposed Plan Change 1 pursuant to clause 8 of Schedule 1 of the RMA.

ADDITIONAL SUBMISSIONS

6. Ngati Kea Ngati Tuara farmers would like to further emphasize the points below: Plan Section – 3.11.5.2 – 3.11.5.7 (inclusive). Schedule B and all other areas in PC1 which refer to the Nitrogen Reference Point.
7. Consideration needs to be given to long term averaging of nitrogen losses should the use of the Nitrogen Reference Point be continued with. This gives more ability to cope with year on year changes that frequently occur within biological systems.
8. Further consideration must be given to alternative tools here such as the use of the natural capital approach.
9. The use of tools such as the MENU's created by WRC previously need to be more widely utilised as part of the solution toolbox as there are a number of mitigations that are relevant to reducing losses from farms that are not captured (accurately) by Overseer. The solution must look wider than this.

10. It is accepted that Overseer remains the best tool that the industry has to measure and manage nutrient losses from farming systems however it is imperative that the tool is used within its bounds. The significant margin of error that exists within Overseer needs to be taken into account when implementing policy that incorporates its use so as not to rely solely and completely on the numbers that are produced by this programme.