

# FURTHER SUBMISSION FORM

IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION/S ON NOTIFIED:



## PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS AND VARIATION 1 TO PROPOSED WAIKATO REGIONAL PLAN CHANGE 1: WAIKATO AND WAIPĀ RIVER CATCHMENTS

Save this PDF to your computer before answering. If you edit the original form from this webpage, your changes will not save. Please check or update your software to allow for editing. We recommend Acrobat Reader.

**Council needs to receive your further submission by 5pm, Monday, 17 September 2018. Please read the notes on making a Further Submission at the end of this form before completing your submission.**

### IMPORTANT NOTE

A copy of your further submission must be served on the original submitter/s within 5 working days of being lodged with council. An address list of all submitters is included with the summary of decisions requested documents and is available at [waikatoregion.govt.nz/healthyivers](http://waikatoregion.govt.nz/healthyivers)

### YOUR NAME, ADDRESS FOR SERVICE AND CONTACT DETAILS (MANDATORY INFORMATION)

Name of submitter (individual/organisation)		
Contact person (if applicable)		
Agent (if applicable)		
Email address for service		
Postal address for service		
		Post code:
Phone number/s	Home:	Business:
	Mobile:	Fax:

### IN ACCORDANCE WITH SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT:

I am:

- A person representing a relevant aspect of the public interest.  
*In this case, also specify the grounds for saying that you come within this category; or*
- A person who has an interest in the proposal that is greater than the interest the general public has.  
*In this case, also explain the grounds for saying that you come within this category; or*
- The local authority for the relevant area.

My reasons are (i.e. grounds for selection above):

The land Tahi made submissions on Variation 1 ("V1") to proposed Plan Change 1 ("PPC1"). It is a significant farming stakeholder within the Waikato catchment, which is the catchment at issue in PPC1/V1. Its business will be directly impacted by the proposed planning framework for diffuse discharges from farming activities as promulgated in PPC1/V1.

**PLEASE INDICATE WHETHER YOU WISH TO SPEAK AT A HEARING**

- Yes, I wish to speak at the hearing in support of my further submission.  
 No, I do not wish to speak at the hearing in support of my further submission.

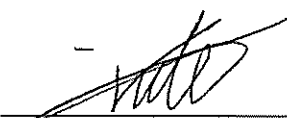
**JOINT SUBMISSION**

- If others make a similar submission, please tick this box if you would consider presenting a joint case with them at the hearing.





**IF YOU HAVE USED EXTRA SHEETS FOR THIS SUBMISSION PLEASE ATTACH THEM TO THIS FORM AND INDICATE BELOW**

- Yes, I have attached 375 extra sheets.  No, I have not attached extra sheets.

**SIGNATURE** - NOTE A SIGNATURE IS NOT REQUIRED IF YOU MAKE YOUR SUBMISSION BY ELECTRONIC MEANS

Signed  Date 17/9/2018  
*Type name if submitting electronically*

**FURTHER SUBMISSIONS CAN BE SENT BY**

-  Chief Executive, 401 Grey Street, Private Bag 3038, Waikato Mail Centre, Hamilton 3240  
 Waikato Regional Council, 401 Grey Street, Hamilton East, Hamilton  
 (07) 859 0998  
 [healthyrivers@waikatoregion.govt.nz](mailto:healthyrivers@waikatoregion.govt.nz) Please note: Submissions received by email must contain full contact details.

**PLEASE CHECK** that you have provided all of the information requested and if you are having trouble filling out this form, phone Waikato Regional Council on 0800 800 401 for help.

**Personal information is used for the administration of the submissions process and will be made public.** All information collected will be held by Waikato Regional Council, with submitters having the right to access and correct personal information.

Form 6 of Schedule 1, Resource Management Act 1991.

**FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 1 AND VARIATION 1 TO PROPOSED PLAN CHANGE 1**

**NAME OF ORIGINAL SUBMITTER:** \_\_\_\_\_ **ORIGINAL SUBMITTER ID:** \_\_\_\_\_

**ADDRESS OF ORIGINAL SUBMITTER:** \_\_\_\_\_

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. Also indicate the Submission Point ID.*

<b>PROVISION</b> (e.g. Objective 4 or Rule 3.11.5.1): _____	<b>SUBMISSION POINT ID</b> (e.g. PC1-1234 or V1PC1-1234) _____
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Do you support or oppose the submission?     Support     Oppose

<b>THE REASONS FOR MY SUPPORT OR OPPOSITION ARE:</b> <i>Tell us why you support or oppose this submission. These reasons will help us to understand your further submission</i>	<b>I SEEK THAT THE WHOLE (OR PART [DESCRIBE PART]) OF THE SUBMISSION BE ALLOWED (OR DISALLOWED):</b> <i>Give precise details</i>
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## Appendix 1

Submitter_ID	Submitted to	Company/Org	Contact Name	Address1	Address2	Address3	Town/City	Email
74085	PC1 & V1	Auckland/Waikato Fish and Game and Eastern Region Fish and Game	Ben Wilson Attn: Matt Harcombe, Julia Beijeman and Corina Jordan	156 Brymer Road	RD 9 Canterbury		Hamilton 3289	bwilson@fishandgame.org.nz
73369	PC1 & V1	Beef + Lamb New Zealand Limited		1/585 Wairakei Road Cnr Ruakura and		Private Bag	Christchurch 8545	corina.jordan@beeflambnz.com
74050	PC1 & V1	DairyNZ	Justine Young Attn: Gemma White and David Speirs	Morrinsville Roads Director-General of Conservation	Newstead Private Bag 3072	3221	Hamilton 3240	justine.young@dairynz.co.nz gwhite@doc.govt.nz; dspeirs@doc.govt.nz
71759	PC1 & V1	Department of Conservation					Hamilton 3240	
74191	PC1 & V1	Federated Farmers of New Zealand	Nikki Edwards	PO Box 447			Hamilton 3240	nedwards@fedfarm.org.nz
74057	PC1 & V1	Fonterra Co-operative Group Ltd	Richard Allen	80 London Street	Po Box 459		Hamilton 3204	richard.allen2@fonterra.com
73724	PC1	Hancock Forest Management (NZ) Ltd	Sally Strang	PO Box 648			Tokoroa 3420	sstrang@hnrg.com
73801	PC1 & V1	Horticulture New Zealand (HortNZ)	Astra Foster	PO Box 10-232			Wellington 6143	astra.foster@hortnz.co.nz
73492	PC1	Miraka Limited	Grant Jackson	108 Tuwharetoa Street	PO Box 740		Taupo 3352	grant.jackson@miraka.co.nz
74122	PC1	The Royal Forest and Bird Protection Society of New Zealand Incorporated	Jen Miller	PO Box 2516			Christchurch 8140	j.miller@forestandbird.org.nz
73356	PC1 & V1	Tuwharetoa Maori Trust Board	Simon Bendall	C/- Mitchell Daysh	PO Box 245		Taupo 3351	simon.bendall@mitchelldaysh.co.nz
74035	PC1 & V1	Waikato and Waipa River Iwi	Damian Stone	Kahui Legal Corner Ruakura and	PO Box 1654		Wellington 6140	damian@kahuilegal.co.nz
74049	PC1	Waikato Dairy Leaders Group	Justine Young	Morrinsville Roads	Newstead Waikato Mail Centre	Private Bag 3221	Hamilton 3240	justine.young@dairynz.co.nz andrew.tester@waikatoregion.govt.nz
72890	PC1 & V1	Waikato Regional Council	Andrew Tester	Private Bag 3038			Hamilton 3240	z
74095	PC1 & V1	Wairakei Pastoral Ltd	Trevor Daya-Winterbottom	PO Box 75-945 271 Mystery Creek Road			Manurewa 2243	daya.winterbottom@xtra.co.nz
72480	PC1	Wairarapa Moana Incorporation	C/o Jude Addenbrooke				Ohaupo 3881	jude@addenbrooke.nz

## Appendix 2

### **FURTHER SUBMISSION OF THELAND TAHI ON DECISIONS REQUESTED IN RELATION TO PROPOSED WAIKATO REGIONAL PLAN CHANGE 1 (PPC1) and VARIATION 1 (V1) TO PPC1: WAIKATO AND WAIPĀ RIVER CATCHMENTS.**

**This submission is made pursuant to clause 8 of Schedule 1 to the Resource Management Act 1991 (“RMA”) on the basis that Theland Tahī has an interest in PPC1/V1 greater than the interest that the general public has for the following reasons:**

Theland Tahī made a submission on V1 to PPC1. It is a significant farming stakeholder within the Waikato catchment and its farming activities and business will be directly impacted by the proposed planning framework as promulgated through PPC1/V1 to address diffuse discharges from farming activities.

### **BACKGROUND TO FURTHER SUBMISSION BY THELAND TAHI**

1. Theland Tahī made a submission on V1 which set out Theland Tahī’s position on the provisions of PPC1/V1. Since that time, Theland Tahī has developed its thinking in relation to some of the key issues and topics of PPC1/V1 – particularly in relation to the concept of a sub-catchment approach (which it supported in general terms in its original submission). This evolution in thinking has been assisted through reviewing submissions of others and discussions with some key stakeholders. To that end, Theland Tahī’s position on PPC1/V1 is underpinned by its original submission on V1 (which has been refined and is reflected in its further submission) and the following principles/propositions which, in its view, better give effect to the Vision and Strategy, the NPS-FWM and better achieve the purpose of the RMA. These have formed the basis for the reasons for its further submission and are set out below:
  - (a) The section 32 evaluation for both PPC1 and V1 is inadequate and does not satisfy the requirements of the RMA.
  - (b) Farmers who currently implement best practice and have invested significant capital into high quality farming systems should not be penalised by a rule framework which rewards those who have not.
  - (c) PPC1/V1 requires amendments to objectives, policies and methods (including rules), in order to satisfy the requirement to give effect to the NPS-FWM.
  - (d) The upper Waikato catchment is unique and requires a tailored approach for nutrient management to achieve the objectives of PPC1/V1, and to give effect to the NPS-FWM and the Vision and Strategy.
  - (e) Theland Tahī supports a sub-catchment approach which is based on an appropriate sub-catchment scale and that the sub-catchments in the upper Waikato should consequently be amended. In that regard, there is a significant degree of uncertainty associated with the so-called “load to come”, the extent of which is unknown and unverified.

- (f) Theland Tahī supports a sub-catchment approach which includes the use of adaptive management.
- (g) Theland Tahī supports the NRP concept in principle, to measure and monitor Nitrogen losses and to manage (optimise) Nitrogen utilisation. However, the NRP must not be used as a tool for future allocation (grandparenting). A “grandparenting” approach rewards those who have historically and continue to discharge the greatest amounts of nutrients (N) and have not implemented high quality farm systems/management to minimise their environmental footprint.
- (h) Theland Tahī considers that it is inappropriate for PPC1/V1 to determine an allocation method for nutrient management (this being a matter for a subsequent plan change), and that any moves to an allocation approach must be based on sound data and science.
- (i) In its submission on PPC1, Theland Tahī previously identified and supported the potential for N trading or a similar mechanism for the purposes of achieving the objectives of PPC1. As set out in this background to further submission, Theland Tahī does not support nutrient allocation as a method within PPC1/V1. However, if an allocation regime were to be introduced in another plan change in the future (or as part of PPC1/V1 as sought by some submitters), Theland Tahī would support the concept of a N trading mechanism.
- (j) Theland Tahī does not support a “Land Use Capability” or “natural capital” approach to allocation (within PPC1/V1 or any subsequent plan change). While Theland Tahī may have referred to “land use suitability” in its original submission, this should not be taken to mean, or otherwise be a proxy for, Land Use Capability/Natural Capital. This is on the basis that, *inter alia*, Land Use Capability as currently used is restricted to considering the biophysical limitations of the land in assessing its suitability for productive use. However, Land Use Suitability considers a broader range of matters including economic, environmental, social and cultural impacts. This enables a more appropriate balance between productive outcomes and environmental benefits. Theland Tahī consider the latter to be a more appropriate approach, particularly in the context of a section 32 evaluation under the RMA.
- (k) Theland Tahī does not consider it appropriate to set specific targets or limits for the long term/80 year goals (Table 3.11-1 and relevant provisions), given the lack of data available to support such an approach and that some are not achievable.
- (l) Theland Tahī supports the concept of the 75<sup>th</sup> %ile in principle as a tool to measure and monitor nutrient losses. It does not support its use as part of a “grandparenting” approach for the purposes of a future allocation regime. If used as a tool in PPC1, the 75<sup>th</sup> %ile should be established at an appropriate sub-catchment scale and used to focus resources in the first 10 years to improve environmental performance, including through the implementation of mitigation measures as part of a Farm Environment Plan (“FEP”).
- (m) Theland Tahī supports the proposition that FEPs be tailored to a sub-catchment level. However, the substantive content of FEPs as set out in PCC1/V1 is not appropriate. The template does not provide sufficient certainty for farmers and lacks detail which can and should be used in any resource consent process.

- (n) Theland Tahī considers that the “Certified Industry Scheme” provisions in PPC1/V1 are not certain enough and have concerns regarding the *vires* of the provisions as drafted. However, Theland Tahī broadly supports the concept (as signalled in its original submission), as it provides a degree of flexibility for farmers for the purpose of compliance.
- (o) Theland Tahī does not support the attribute numerics in Table 3.11-1 (as outlined in its original submission). On the basis that it has carried out data collection and analysis in relation to the upper Waikato, Theland Tahī supports the proposed amendments as set out in the Wairakei Pastoral Limited submission.
- (p) Theland Tahī supports the enterprise approach and opposes any amendments to confine its meaning to areas in pasture or to a property scale.
- (q) Theland Tahī strongly opposes the non-complying land use change rule as notified and any amendments which would make obtaining consent more onerous for an applicant. Theland Tahī supports amendments to the non-complying land use change rule which is based on the proposition that provided the change results in “no net increase” of nutrient loss across an enterprise – and otherwise satisfies the requirements for the relevant sub-catchment – then resource consent can and will be granted. In that regard, Theland Tahī supports a rule framework whereby the Land Use Change rule remains as a land use rule only, with the other farming activity rules having a “hybrid” approach with both land use and associated diffuse discharge components.
- (r) Theland Tahī is concerned at the lack of rules or methods in PPC1/V1 that address how the NRP is to be dealt with when land is sold, subdivided and sold, or otherwise dealt with in a property transaction (including leasing). Some submitters have raised the same concern and it is appropriate that wording is developed through the submission hearing process to address this critical issue.

## FORMAT OF FURTHER SUBMISSION

- 2. The following further submissions is based on the Waikato Regional Council’s summaries of submissions on PPC1 and V1 lodged by the parties listed in the index of each section. There are two sections:
  - (a) Section 1: further submission on PPC1; and
  - (b) Section 2: further submission on V1 to PPC1.
- 3. Where relevant, the position taken in this further submission in relation to the submissions on Variation 1 to PPC1 cross references the position taken on the original submission on PPC1. However, where a submitter has amended or otherwise modified their position through its submission on Variation 1, the further submission on Variation 1 applies.

## REASONS FOR FURTHER SUBMISSION

- 4. For the purposes of its further submissions on each submission point in the **attached** documents the reasons for opposing/supporting; and/or opposing in part/supporting in part as stated in the right-hand column, are:
  - (a) As stated in the “Background to further submission”; and/or
  - (b) As set out in its original submission on Variation 1 to PPC1; and/or

- (c) That the relief sought by the submitter will not promote sustainable management of natural and physical resources in accordance with Part 2 of the RMA; and/or
  - (d) That the relief sought by the submitter is not the most appropriate way to achieve the purpose of the RMA; and/or
  - (e) That the relief sought will not give effect to the NPS-FWM.
5. Where Theland Tahī supports the relief sought by the submitter, the reasons given in the relevant submission area also adopted to the extent that those reasons are consistent with Theland Tahī's position.
6. Where considered necessary or appropriate, additional specific reasons are also given.

**DECISION REQUESTED/RELIEF SOUGHT – whether the submission in whole or in part be allowed or disallowed:**

7. Where a submission (or submission point), is opposed or opposed in part, Theland Tahī seeks that the submission (or submission point) be **disallowed**.
8. Where a submission (or submission point), is supported or supported in part, Theland Tahī seeks that the submission (or submission point), be **allowed** to the extent that the relief sought is consistent with its reasons for further submission as set out above.
9. Where further reasons are provided in the further submission, those reasons are additional to those stated above.

**17 September 2018**



## Appendix 3

# **FURTHER SUBMISSION OF THELAND TAHI FARM GROUP LIMITED (“THELAND TAHI”)**

**ON DECISIONS REQUESTED IN RELATION TO PROPOSED WAIKATO REGIONAL PLAN CHANGE  
1 (“PPC1”) and VARIATION 1 (“V1”) TO PPC1: WAIKATO AND WAIPĀ RIVER CATCHMENTS.**

**This submission is made pursuant to clause 8 of Schedule 1 to the Resource Management  
Act 1991 (“RMA”) on the basis that Theland Tahi has an interest in PPC1/V1 greater than the  
interest that the general public has.**

**17 September 2018**

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# Auckland/Waikato Fish and Game and Eastern Region Fish and Game

Submitter ID: 74085

Plan Section	Submission Point ID	Support or Oppose	Decision requested by submitter	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	PC1-11007	Oppose the provision with amendments	<p>REMOVE the forestry exclusion in the existing Regional Plan Rule 5.1.4.14.6 and 7 and require a 10 metre buffer for ephemeral streams, perennial streams, wetlands and lakes</p> <p>AND AMEND to ensure that no more than 50 per cent of a catchment or sub-catchment is harvested in a 10-year period unless 20 metre buffers are used on perennial streams, wetlands, and lakes to protect the downstream environment during harvest</p> <p>AND AMEND to ensure that any area of forestry that is harvested (other than firebreaks, tracks, landing sites) must be planted or replanted to protect from erosion and nutrient loss as soon as practicable and no later than 14 months from the date of the harvesting</p> <p>Note also the submitter's Decisions Requested with respect to forest harvesting in the Part B, 5.1.5 q Submission Summary Point 11016</p> <p>AND ADD a NEW Schedule D for buffer requirements as provided in the table in Appendix 1 of the submission (page 64)</p> <p>AND ADD a NEW Schedule E that includes a 30% short term change as per the table in Appendix 1 of the submission (page 65)</p> <p>AND AMEND 3.7.7 Table of Wetlands in the Waikato Region to list all wetlands in the Waikato and Waipā catchments for Rule 3.7.4.6</p> <p>AND AMEND to include the entire Waikato catchment in notification of PPC1, including the withdrawn area and all elements of PPC1 pertaining to the withdrawn area</p> <p>AND AMEND to give effect to the following points:</p> <ol style="list-style-type: none"> <li>1. That PC1 gives effect to Part 2 of the Resource Management Act 1991;</li> <li>2. That PC1 gives effect to the New Zealand Coastal Policy Statement 2010 and the National Policy Statement - Freshwater Management 2014;</li> <li>3. That PC1 gives effect to the Waikato Regional Policy Statement 2016;</li> <li>4. That the Auckland/Waikato and Eastern Sports Fish and Game Bird Management Plans are had regard to;</li> <li>5. That PC1 gives effect to the Vision and Strategy;</li> </ol>	<p><b>OPPOSE IN PART (shown in green highlighting).</b></p> <p><b>OPPOSE</b> submission points highlighted in green, including on the basis that the implications of the relief sought are not clear due to the absence of detailed alternative drafting.</p> <p><b>AND</b></p> <p><b>OPPOSE</b> point 20 to the extent that it seeks to introduce allocation and/or allocation based on LUC/Natural Capital.</p> <p><b>SUPPORT</b> point that section 32 evaluation is flawed.</p> <p><b>OPPOSE</b> all remaining points.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested by submitter	<b>FURTHER SUBMISSION</b> Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			<p>6. That all remaining wetland habitats, particularly the Whangamarino wetland are recognised as significant and protected from further degradation and loss, and that their significant values including game bird values are protected, and the creation of new wetland habitats is facilitated;</p> <p>7. That the heightened significance of the Whangamarino wetland complex is recognised by way of a specific FMU, with the inclusion of appropriate attributes and targets in appropriate sites;</p> <p>8. That the objectives of PC1 and numerical attribute targets in Tables 3. 11-1 are capable of establishing a trajectory of improvement in water quality as measured through regular review periods to ensure that the water quality objectives of the Vision and Strategy are achieved in 80 years;</p> <p>9. That the objectives of PC1 and numerical attribute targets and limits are sufficient to safeguard life supporting capacity, ecosystem health and processes of fresh water, provide for the habitat of trout and indigenous fish, provide for primary contact recreation and cultural values including mahinga kai, and recognise and protect the natural character of rivers, lakes and wetlands;</p> <p>10. That Tables 3.11-1 includes appropriate attributes including limits and targets, which provide for the life supporting capacity, ecosystem health and processes, of fresh water, provide for the habitat of trout and indigenous fish, provide for primary contact recreation and cultural values including mahinga kai, and recognise and protect the natural character of rivers, lakes and wetlands. This includes the introduction of additional freshwater attributes as limits and targets, such as nitrate-nitrogen, phosphorus, and ecosystem health as measured through the macroinvertebrate community index (MCI) and other appropriate measures;</p> <p>11. That Tables 3.11-1 includes appropriate attributes to enable an accurate characterisation of water quality and ecosystem health and therefore enable regular reviews to assess the effectiveness of the provisions of the plan and progress towards its objectives, policies, limits, and targets;</p>	

Plan Section	Submission Point ID	Support or Oppose	Decision requested by submitter	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
			<p>12. That discharge rules, including those for diffuse discharges ancillary to land use activities meet the requirements of s70 RMA, administrative law requirements, and relevant planning considerations;</p> <p>13. That values, objectives, policies and methods (including rules) ensure that land is managed sustainably to achieve freshwater objectives, including the maintenance of water quality and where degraded, its improvement overtime;</p> <p>14. That Farm Environment Plans are placed into an appropriate and transparent framework of review and accountability;</p> <p>15. The inclusion of regulations which ensure that point and non-point discharges are managed and allocated within science-defined limits and that the property or enterprise-level allocation of discharges within these limits is equitable and consistent, efficient and effective, occurs as part of a trajectory of water quality improvement, and promotes sustainable management;</p> <p>16. That in at- or under-allocated sub-catchments (where freshwater objectives and targets are met but not exceeded), land use and ancillary discharge activities are regulated to ensure that at a minimum, that water quality is maintained;</p> <p>17. That in sub-catchments approaching, or at full allocation, and in over-allocated sub-catchments (where freshwater objectives and targets are currently being exceeded), land use and ancillary discharge activities are regulated to ensure that sub-catchments are placed on a trajectory of improvement;</p> <p>18. That nitrogen leaching limits and targets within catchments are established based on known water quality requirements for ecosystem health and then allocated back to land based on the natural capacity of soil, using a land suitability approach such as Land Use Capability (LUC) or similar alternative;</p> <p>19. That any required percentage reductions in nutrient loss or leaching utilise farm system economic analysis to assist in determining the extent of possible reductions at the farm, catchment, and regional scale;</p> <p>20. That nutrient transfer or trading regimes are provided in order to enable leaching reductions to be achieved at least cost and with maximum flexibility of resource use (to enable economic</p>	

Plan Section	Submission Point ID	Support or Oppose	Decision requested by submitter	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			<p>benefits to be maximised from the available resource) in cases where the required outcome and targets for that catchment cannot be met with natural carrying capacity based allocation systems or where communities choose this system of allocation;</p> <p>21. That provisions are included in the Plan to preserve the natural character of the coastal environment, wetlands, lakes and rivers and their margins and the protection of them from inappropriate subdivision, use and development;</p> <p>22. The inclusion of objectives, policies and methods (including rules) that holistically address sediment discharge and include diffuse sediment discharge from farming activities;</p> <p>23. That the implementation methods (including rules) are sufficient to achieve the objectives of PC1;</p> <p>24. Any further relief which addresses the issues raised by this submission and any consequential amendments.</p> <p>AND AMEND to include re-inclusion of the entire Waikato catchment in notification of PC1 including the withdrawn area and all elements of PC1 pertaining to the withdrawn area</p> <p>The submitter has stated that the s32 report is flawed and lists reasons relating to the development of the plan change, the scenario modelling outputs, the methods for making reductions, catchment wide rules and output limits for nitrogen discharge, but has not requested a specific decision in response.</p> <p>With respect to the s32 report, the submitter disagrees that the proposed rules are the most appropriate, efficient and effective provisions to achieve the objectives of the proposed plan and the purpose of the RMA and considers that alternative methods (including rules) to achieve these are necessary if the objectives are to be met.</p>	
Intrinsic values - Ecosystem health	PC1-10768	Support the provision with amendments	AMEND the intrinsic value Ecosystem health to add a new bullet point to come first, to read: " <u>Freshwater standards are set to achieve ecosystem health</u> ".	<b>OPPOSE</b>
Intrinsic values - Natural form and character	PC1-10769	Support the provision with	AMEND the intrinsic value Natural form and character to include the appearance of water, including colour and clarity.	<b>OPPOSE</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested by submitter	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
		amendments		
Use values - Mahinga kai	PC1-10770	Support the provision with amendments	AMEND the use value Mahinga kai to specifically include fisheries AND AMEND to include brown and rainbow trout as sports fish of interest to anglers AND AMEND to include the Macroinvertebrate Community Index as an indicator to ensure the primary food supply of the ecosystem is considered.	<b>OPPOSE</b> Unnecessary and inappropriate to specifically include sports fishing in identifying values.
Use values - Human health for recreation	PC1-10787	Support the provision with amendments	AMEND the use value Human health for recreation to include the use of rivers, lakes and wetlands for recreational hunting and angling.	<b>OPPOSE</b> Unnecessary and inappropriate to specifically include sports fishing in identifying values.
3.11.2 Objectives	PC1-10790	Support the provision with amendments	ADD a NEW Objective to read: <u>"New Objective: Restoration and protection of ecosystem health Ecosystem health is achieved in Waikato rivers, lakes and wetlands within 80 years as a result of staged reductions in point and non-point source discharges."</u> AND ADD a NEW Objective to read: <u>"New Objective: Classification, Maintenance and Enhancement of Significant Wetlands a) All wetlands within the Waikato and Waipā catchments are assessed and added to Table 3.7.7 of the parent plan. b) Wetlands within the Waikato and Waipā catchments are maintained or enhanced to protect their ecosystems, including hydrological functioning and extent."</u>	<b>OPPOSE</b>  Lack of certainty as to what constitutes a wetland. Introduces potentially onerous requirements for farmers.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10806	Support the provision with amendments	AMEND Table 3.11-1 so that 80 year attributes and targets are consistent with ecosystem health measures and achieving healthy freshwater ecosystems AND AMEND to include a range of attribute targets for all sites and sub-catchments that provide a clear linkage and assessment and measurement chain from the desired freshwater outcome to required reductions in nutrient loss from land by way of an allocation system AND AMEND to include appropriate sites for every sub-catchment AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2 AND AMEND Table 3.11-1 to add missing targets and limits, including ecosystem health based limits and targets	<b>OPPOSE</b> except to the extent that the submission supports a sub-catchment approach to the management of nutrient discharges.

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			AND AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages 66 to 69).	
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10809	Support the provision with amendments	<p>AMEND the heading of Objective 3 to read: "Short-term improvements in water quality in the first stage of restoration and protection water quality for each sub-catchment and Freshwater Management Unit <u>as required by the Vision and Strategy</u>"</p> <p>AND AMEND the explanatory narrative to read: "Actions put in place and implemented by 2036 to reduce discharges of nitrogen, phosphorous, sediment and microbial pathogens, have achieved thirty percent of the required change between current water quality and the 80 year water quality attribute targets in Table 3.11-1 <u>once this Plan has been operative for 20 years.</u>"</p> <p>AND AMEND to define and refine short term targets AND AMEND Table 3.11-1 to include short-term attribute targets for all sites AND AMEND Table 3.11-1 to include a range of attributes and attribute targets that enable an accurate characterisation of water quality and ecosystem health AND that ensure freshwater resources are sustainably managed, provide for the habitat of trout and indigenous fish and the significant values of wetlands, AND that measure progress toward outcomes and enable reviews to assess the effectiveness of PPC1 AND AMEND the Table 3.11-1 numerical 80-year targets to give effect to the water quality objectives of the Vision and Strategy AND AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages 66 to 69) for rivers and streams, and add appropriate indicators for lakes and wetlands.</p>	<b>OPPOSE</b>
3.11.3 Policies	PC1-10833	Oppose the provision with amendments	<p>RETAIN, DELETE or AMEND 3.11.3 Policies to ensure they will, individually and collectively, direct how the objectives (as retained or amended by the submission) are to be achieved AND ADD new policies to ensure they will, individually and collectively, be capable of implementing the objectives.</p>	<b>OPPOSE</b>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and	PC1-12569	Support the provision with amendments	<p>AMEND Policy 1 to read: "<u>...e. Progressively increasing riparian buffering of rivers, streams, drains, wetlands and lakes.</u>"</p>	<b>SUPPORT</b>



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microbial pathogens				
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-10875	Support the provision with amendments	AMEND Policy 1 to read: "...a. Enabling, <u>through permitted activity rules</u> , activities with a low level of contaminant discharge to water bodies provided those discharges do not increase <u>and adverse effects, including cumulative effects, are avoided</u> ; and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges <u>so as to avoid adverse effects, including cumulative effects, through the use of resource consents</u> ; and ... <u>d. Allocating diffuse discharges to land based on science defined limits and targets, and progressively phasing out the over-allocation of contaminant discharges over time; and...</u> "	<b>OPPOSE</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12693	Support the provision with amendments	ADD a NEW clause (f) to Policy 2 to read: <u>"f. Promoting the use of riparian buffers to avoid sediment discharge."</u>	<b>OPPOSE</b> use of term "avoid" as this may not be achievable in every circumstance.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12692	Support the provision with amendments	AND AMEND Policy 2(a) to read: "a. Taking a tailored, risk based approach to define mitigation actions on the land <del>that will reduce</del> <u>which will achieve required reductions specified in this plan in</u> diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm Environment Plan <del>either associated with as part of a resource consent; or in specific requirements established by participations in a Certified Industry Scheme;</del> " AND DELETE Policy 2(b).	<b>OPPOSE</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-10876	Support the provision with amendments	AMEND Policy 2 to ensure consistency with the amendments sought in Appendix 1 of this submission AND AMEND Policy 2(d) to read: "d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be <del>proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment in accordance with the short</del>	<b>OPPOSE</b>

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			<p><u>and long term targets in Table 3.11-1, the sub-catchment reduction targets and timeframes in Table 3.11-2, and the sub-catchment nitrogen leaching requirements in Schedule E.; and..."</u></p>	
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-10877	Support the provision with amendments	<p>AMEND Policy 3 to ensure consistency with the amendments sought in Appendix 1 of this submission AND AMEND Policy 3(a) to read: "a. Flexibility is provided to undertake crop rotations on changing parcels of land for commercial vegetable production, while reducing average contaminant discharges over time, <u>and while avoiding significant adverse effects; and..."</u> AND AMEND Policy 3(e) to read: "e. Identified mitigation actions are set out and implemented within timeframes specified in either a Farm Environment Plan <del>and associated as part of a resource consent, or in specific requirements established by participation in a Certified Industry Scheme..."</del> AND AMEND Policy 3(g) to read: "g. <u>Requiring</u> the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be <del>proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment</del> <u>in accordance with the short and long term targets in Table 3.11-1, the sub-catchment reduction targets and timeframes in Table 3.11-2, and the sub-catchment nitrogen leaching requirements in Schedule E.; and..."</u> AND ADD a NEW clause (h) to Policy 3 to read: "<u>Promoting and incentivising the use of riparian buffers to avoid sediment discharge.</u>"</p>	<b>OPPOSE</b>
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-10878	Support the provision with amendments	<p>AMEND Policy 4 to read: "Manage sub-catchment wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new low discharging activities to continue provided that achievement of Objective 3 is not compromised <u>and significant adverse effects are avoided..."</u></p>	<b>OPPOSE</b>

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Policy 6: Restricting land use change	PC1-10879	Support the provision with amendments	AMEND Policy 6 to read: "... Land use change consent applications that demonstrate clear <del>and</del> , enduring <u>and meaningful</u> decreases in existing diffuse discharges..."	<b>OPPOSE</b>
Policy 7: Preparing for allocation in the future	PC1-10880	Support the provision with amendments	AMEND PPC1 to define and include the schedule in Appendix 1 of this submission which shows the allocation status of nutrient loads in sub-catchments AND AMEND to ensure that farming activities comply with a nitrogen leaching rate which is based on allocating the total allowable load of nitrogen for the sub-catchment on the basis of either a flat per hectare allocation of nitrogen leaching (~15khN/ha/yr), or a nitrogen leaching allowance per hectare based on an allocation defined by natural carrying capacity AND AMEND to enable users undertaking farming activities to manage discharges allocated on a sub-catchment level to make further reductions in the future, including provision for trading of contaminant loss rates in the same sub-catchment.	<b>OPPOSE</b>
Policy 12: Additional considerations for point source discharges in relation to water quality targets	PC1-10888	Support the provision with amendments	REMOVE the word 'Additional' from the Policy 12 title AND REPLACE Policy 12 with the following: " <u>Impose conditions and discharge standards on point source discharges to ensure that the reduction targets and timeframes in Tables 3.11-1 and 3.11-2, and the sub-catchment nitrogen leaching reductions in Schedule E, can be met, based on a consideration of the contribution made by the discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads, and having regard to:</u> <u>a. The relative proportion of nitrogen, phosphorus, sediment and microbial pathogens that the particular point source discharge contributes to the catchment; and</u> <u>b. Whether it is appropriate to stage future mitigation actions to allow investment costs to meet the water quality targets specified above to be spread over time.</u> <u>c. The need to favour caution and environmental protection where the information available is uncertain or inadequate.</u> "	<b>OPPOSE</b>
Policy 13: Point sources consent duration	PC1-10900	Oppose the provision	DELETE Policy 13 OR AMEND to read: <b>"Point source consent duration</b>	<b>OPPOSE</b>

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			<p>When determining an appropriate duration for any point source consent granted consider the following matters:</p> <p>a. <u>Alternative methods of discharge, technology improvements or other changed circumstances that may arise in the future; A consent term exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 11 and 12 will be met; and</u></p> <p>aa. <u>The sensitivity of the receiving environment and the adequacy/certainty of information that is available; and</u></p> <p>ab. <u>The applicant's past record of responsiveness to adverse effects including past technology upgrades undertaken to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment or microbial pathogens within the previous consent term and their success; and</u></p> <p>b. The magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality;</p> <p>c. The need to provide appropriate certainty of investment where <u>substantial</u> contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)."</p> <p>AND AMEND to include guidance on consent term for diffuse discharges which should be aligned with sub-catchment progress review timeframes as specified in Table 3.11-2.</p>	
Policy 17: Considering the wider context of the Vision and Strategy	PC1-10906	Oppose the provision	<p>AMEND Policy 17 to remove the functioning of ecosystems and wetland values, and the enhancement of biodiversity</p> <p>OR AMEND to clarify that these are primary considerations/values integral to Chapter 3.11.</p>	<b>OPPOSE</b>
3.11.4 Implementation methods	PC1-10910	Oppose the provision	<p>RETAIN, DELETE or AMEND 3.11.4 Methods to ensure they will, individually and collectively, direct how the objectives (as retained or amended by the submission) are to be achieved</p> <p>AND ADD NEW methods to ensure that they will, individually or collectively, be capable of implementing the objectives</p> <p>AND ADD a NEW method to read:</p> <p><b><u>"3.11.4.x Initiate allocation of diffuse discharges:</u></b></p> <p><u>The Waikato Regional Council will initiate a framework for the allocation of diffuse discharges including reductions in nitrogen load according to specified timeframes for reductions by sub-catchment. The Waikato</u></p>	<b>OPPOSE</b>

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			<p><u>Regional Council will:</u></p> <p><u>a. Use science-based limits for the total allowable load of a contaminant for sub-catchment which will meet the water quality objectives of the plan;</u></p> <p><u>b. Implement contaminant leaching rates for diffuse discharges from properties and enterprises by allocating to limits, targets and timeframes;</u></p> <p><u>c. Quantify nitrogen load reductions based on over-allocation of nitrogen beyond the science-based limit for sub-catchments; and</u></p> <p><u>d. Define timeframes for sub-catchment nitrogen load reductions to be made."</u></p>	
3.11.4.2 Certified Industry Scheme	PC1-10911	Oppose the provision	DELETE Method 3.11.4.2.	<b>OPPOSE</b> While there are concerns regarding certainty (substantive requirements) and <i>vires</i> of the method, the intent of the method is supported.
3.11.4.3 Farm Environment Plans	PC1-10912	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "... A Farm Environment Plan will be prepared by a certified person as per the requirements outlined in Schedule 1, and will assess the risk of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens and specify actions to reduce those risks in order to bring about reductions in the discharges of those contaminants <u>which ensure that targets and limits for sub-catchments are being met as required by consent documents...."</u>	<b>OPPOSE</b>
3.11.4.5 Sub-catchment scale planning	PC1-10933	Support the provision with amendments	AMEND Method 3.11.4.5 to include provision for trading of contaminant loss rates between enterprises or properties in the same sub-catchment where the reductions required cannot be achieved whilst maintaining profitability on-farm AND AMEND to include the potential for collective consents to minimise the regulatory burden, as well as enable management to occur across multiple properties or landholdings.	<b>SUPPORT</b> in part, to the extent that the decision sought is consistent with the reasons for further submission – i.e., that any allocation regime is the subject of a subsequent plan change.
3.11.4.7 Information needs to support any future allocation	PC1-10959	Support the provision with amendments	AMEND Method 3.11.4.7 to read: <b>"3.11.4.7 Information needs to support any <u>current and future allocation.</u></b> Gather information and commission appropriate scientific research to inform any <u>current and future</u> framework for the allocation of diffuse discharge including: a. Implementing processes that will support the <u>revision</u> and setting of property or enterprise-level diffuse discharge limits <u>now and in the future</u> to support sub-catchment reviews..."	<b>OPPOSE</b>

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3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-10962	Support the provision with amendments	AMEND Method 3.11.4.8 as follows: <b>"3.11.4.8 Reviewing Chapter 3.11 and refining and developing an allocation framework for the next Regional Plan</b> Waikato Regional Council will: a. Refine and review discharge and allocation frameworks as part of the rolling review of sub-catchment performance <del>Develop discharge allocation frameworks for individual properties and enterprises based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and...</del> "	<b>OPPOSE</b>
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-10987	Support the provision with amendments	AMEND Method 3.11.4.11(a) to read: "a. Review and report on the progress towards and achievement of the <del>80</del> year water quality objectives of Chapter 3.11 according to amended Table 3.11-1."	<b>OPPOSE</b>
3.11.5 Rules	PC1-11003	Support the provision with amendments	ADD a NEW Rule to read: <b>"3.11.5.9 Prohibited Activity Rule - The discharge of sediment from <u>disturbed land to water without a buffer</u></b> <b>Rule 3.11.5.9 Prohibited Activity Rule - The discharge of sediment from <u>disturbed land to water without a buffer</u></b> <u>Except where authorised by consent or any other rule in this plan, any discharge of sediment without mitigation from disturbed land to a waterway in Schedule C is a prohibited activity.</u> "	<b>OPPOSE</b>  Void for uncertainty, given that the rule envisages that the same activity may obtain consent via another rule. Conditions of those rules and/or consents/FEPs will address the effect. Onerous and difficult to enforce.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-10997	Support the provision with amendments	DELETE Rule 3.11.5.2(4)(b)(i) AND AMEND Rule 3.11.5.2(4)(b)(ii) to read: "15kg nitrogen/hectare/year, <del>whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and</del> " AND DELETE Rule 3.11.5.2(4)(c) AND AMEND Rule 3.11.5.2(4)(e)(i) to read: "There shall be no cultivation within 5 metres of the bed of the waterbody <u>and/or the defined buffer sizes in Schedule D, whichever is the greater;</u> and"	<b>OPPOSE</b>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm	PC1-10998	Oppose the provision	DELETE Rule 3.11.5.3.	<b>OPPOSE</b>

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Environment Plan under a Certified Industry Scheme				
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-10999	Support the provision with amendments	<p>AMEND Rule 3.11.5.4 to read:</p> <p><b>"3.11.5.4 Controlled Activity Rule - Farming activities including multiple farms with a Farm Environment Plan <del>not under a Certified Industry Scheme</del></b></p> <p><b>Rule 3.11.5.4 Controlled Activity Rule - Farming activities with a Farm Environment Plan <del>not under a Certified Industry Scheme</del></b></p> <p>Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) <del>where that land use is not registers to a Certified Industry Scheme,</del> and the associated diffuse discharge ... is a permitted activity until:</p> <p>1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, <del>and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</del></p> <p>...</p> <p>5. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and</p> <p>After the dates set out in 1), 2) and 3) above the use of land <u>and associated discharges</u> shall be a controlled activity (requiring resource consent), <del>subject to provided it complies with</del> the following standards and terms:</p> <p>a. A Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council <del>at the time as part of the resource consent application is lodged,</del> <u>which must be lodged by</u> the dates specified in I-III below; and</p> <p>...</p> <p><u>e. Nitrogen Discharges from the properties meets the targets and timeframes set out in Schedule E, as assessed by the Regional Council under the methodology contained in Scheduled B (including Updated Nitrogen Leaching Assessments).</u></p> <p><b>Matters of Control:</b></p> <p>Waikato Regional Council reserves control over the following matters:</p> <p>i. The content of the Farm Environment Plan, <u>which in any event must be in accordance with Schedule 1.</u></p>	<b>OPPOSE</b>

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			<p><u>i1. Buffers, as specified in Schedule D.</u></p> <p>...</p> <p>iii. The actions, timeframes and other measures to determine the diffuse discharge of nitrogen from the property or enterprise, <u>in accordance with Schedule B -as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprises Nitrogen Reference Point, unless other suitable measures are specified, to ensure that nitrogen discharge is reduced to or maintained at the level specified in Schedule E or the level authorised by any nitrogen discharge rights if a trading scheme is operative within the catchment.</u></p> <p>iv. <del>Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026.</del></p> <p>...</p> <p>vi. The monitoring, record keeping, reporting and information provision, <u>including public information provision,</u> requirements for the holder of the resource consent to demonstrate and/or monitor compliance <del>with the Farm Environment Plan.</del></p> <p>vii. The timeframe and circumstances under which the consent conditions may be reviewed <del>or the Farm Environment Plan shall be amended.</del></p> <p>viii. Procedures for reviewing, amending and <del>re-certifying-re-approving the Farm Environment Plan</del> <u>the resource consent including:</u></p> <p>a) <u>Periodic reviews in accordance with the sub-catchment progress review timeframes as specified in Table 3.11-2.</u></p> <p>b) <u>Reviews, initiated by the consent holder under section 128 on the purchase or sale of any nitrogen discharge rights under any operative catchment nitrogen trading scheme, in order to change the level of discharge authorised by the consent in clause iii.</u></p> <p><b>Dates:</b></p> <p>I. For Priority 1 sub-catchments, <del>and properties with a Nitrogen Reference Point of greater than 75th percentile nitrogen leaching values,</del> by 1 July 2020</p> <p>...</p> <p><del>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.</del></p> <p><u>Reviews will be subject to limited or public notification based on progress</u></p>	



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			<u>against the sub-catchment progress review targets and timeframes specified in Table 3.11-2."</u>	
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-11001	Support the provision with amendments	<p>AMEND Rule 3.11.5.6 to read:  <b>"3.11.5.6 <del>Restricted Discretionary</del> Non Complying Activity Rule - The use of land for farming activities</b>  <b>Rule 3.11.5.6 <del>Restricted Discretionary</del> Non Complying Activity Rule - The use of land for farming activities</b></p> <p>The use of land for farming activities that does not comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a <del>restricted discretionary</del> <u>non-complying</u> activity (requiring resource consent).  Waikato Regional Council <del>restricts its discretion over</del> <u>will consider</u> the following matters:</p> <p>i. <del>Cumulative Effects</del> <u>on water quality of the catchment of the Waikato and Waipā Rivers, including cumulative effects and the extent to which the limits and targets in Schedule E are achieved.</u></p> <p>...  Notification: Consent applications will be considered <del>without</del> <u>limited or public notification, and without the need to obtain written approval of affected persons."</u></p>	<b>OPPOSE</b>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-11002	Support the provision with amendments	<p>AMEND the notification section of Rule 3.11.5.7 to read:  "Notification: Consent applications will be considered <del>without</del> <u>limited or public notification, and without the need to obtain written approval of affected persons, subject to the Council being satisfied that the loss of contaminants from the proposed land use will be lower than that from the existing land use."</u></p>	<b>OPPOSE</b>
Schedule B - Nitrogen Reference Point	PC1-11021	Not stated	<p>AMEND Schedule B to read:  <b>"Schedule B - Nitrogen Reference Point <u>and Updated Leaching Assessments/Te Āpitihanga B - Te tohu ā-hauota</u></b>  A property or enterprise with a cumulative area greater than 20 hectares (or any property or enterprise used for commercial vegetable production) must have a Nitrogen Reference Point calculated as follows. <u>Upon consent review, assessments of leaching may need to be recalculated, and the methodology for the calculation of Updated Leaching Assessments is provided as well:</u></p>	<b>OPPOSE</b> for the reasons set out in background to further submission; and that an updated assessment can be addressed through conditions of consent.

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			<p>a. The Nitrogen Reference Point <u>or Updated Leaching Assessment</u> must be calculated by a Certified Farm Nutrient Advisor to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point <u>or Updated Leaching Assessment</u> shall be determined through the Rule 3.11.5.7 consent process.</p> <p>b. The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period specified in clause f), except for commercial vegetable production in which case the Nitrogen Reference Point shall be the average annual nitrogen leaching loss during the reference period. <u>The Updated Leaching Assessment will be the rolling average of all years within a review period.</u></p> <p>c. The Nitrogen Reference Point <u>or Updated Leaching Assessment</u> must be calculated using the current version of the OVERSEER Model (or any other model approved by the Chief Executive of the Waikato Regional Council).</p> <p>d. The Nitrogen Reference Point <u>or Updated Leaching Assessment</u> data shall comprise the electronic output file from the OVERSEER or other approved model...</p> <p>...</p> <p>f. The reference period is the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016. <u>For Updated Leaching Assessments, the period is stated in Table 3.11-2 for that sub-catchment.</u></p> <p>g. The following records (where relevant to the land use undertaken on the property or enterprise) must be retained and provided to Waikato Regional Council <u>at its request as part of the nitrogen leaching assessment:</u></p> <p>...</p> <p>h. <u>Where changes to OVERSEER (or another model approved by the Chief Executive) results in a higher nitrogen discharge modelled for the same OVERSEER input file on any particular property or properties, then the consent holder will be required to modify inputs in order to continue meet the level stated on the consent based on the new version of the model (or new model) unless and until all consents in the sub-catchment are reviewed under the sub-catchment review timeframes as specified in Table 3.11-2.</u></p>	

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			Table 1: Data input methodology for ensuring consistency of Nitrogen Reference Point <u>or Updated Leaching Assessment</u> data using the OVERSEER® Model"	
Schedule C - Stock exclusion	PC1-11022	Not stated	AMEND Schedule C(1) to read: "The water bodies must be fenced to exclude cattle, horses, deer and pigs, unless those animals are prevented from entering the bed of the water body by a stock proof natural barrier, <u>including constructed barriers</u> , formed by topography or vegetation."	<b>SUPPORT in part</b> , subject to amendment to proposed definition of "livestock crossing structure" (i.e., that it should exclude fords and be proportional to stream flow and when covered).
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-11004	Support the provision with amendments	AMEND Table 3.11-1 so that 80-year attributes and targets are consistent with ecosystem health measures and achieving healthy freshwater ecosystems AND AMEND the numerical 80-year targets to give effect to the water quality objectives of the Vision and Strategy AND AMEND Table 3.11-1 to include a range of attribute targets for all sites and sub-catchments that provide a clear linkage and assessment and measurement chain from the desired freshwater outcome to required reductions in nutrient loss from land by way of an allocation system AND AMEND to include attribute targets that enable an accurate characterisation of water quality and ecosystem health AND that ensure freshwater resources are sustainably managed, provide for the habitat of trout and indigenous fish and the significant values of wetlands, AND that measure progress toward outcomes and enable reviews to assess the effectiveness of PPC1 AND AMEND to include appropriate sites for every sub-catchment AND AMEND to define and refine short-term attribute targets for all sites AND AMEND the explanatory narrative to read: " <u>Actions put in place and implemented by 2036 to reduce discharges of nitrogen, phosphorous, sediment and microbial pathogens, have achieved thirty percent of the required change between current water quality and the 80 year water quality attribute targets in Table 3.11-1 once this Plan has been operative for 20 years.</u> " AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2 AND AMEND Table 3.11-1 to adopt the amendments sought for rivers and streams, and add appropriate indicators for lakes and wetlands, as detailed in the table in Appendix 1 of the submission (pages 66 to 69).	<b>OPPOSE</b>
Table 3.11-2: List of sub-	PC1-11005	Support the provision	AMEND Table 3.11-2 to adopt the amendments sought in the table in Appendix 1 of the submission (pages 69 to 74)	<b>OPPOSE</b>

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catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments		with amendments	AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2.	
Additions to Glossary of Terms	PC1-13134	Support the provision with amendments	RETAIN, DELETE, OR AMEND terms in Part C to ensure that they will, individually and collectively, give effect to substantive amendments sought and enable objectives, as retained or amended by the Fish and Game submission, are to be achieved.	<b>OPPOSE</b>
Definition - Livestock crossing structure	PC1-11017	Support the provision with amendments	AMEND Definition - Livestock crossing structure with detailed specifications of the structure required, which rely on the risk factors for adverse effects arising including the type of stock crossing, the land use, and the frequency of use AND AMEND to ensure it does not include structures which require livestock to pass through the flow of the water, such as submerged in-stream platforms.	<b>SUPPORT</b> in part. Should exclude fords and be proportional to stream flow and when covered.
Definition - Offset	PC1-11018	Support the provision with amendments	AMEND Definition - Offset/s to read: "Offset/s: For the purpose of Chapter 3.11 means for a specific contaminant/s a <u>measurable conservation</u> action that reduces <u>the intensity, extent and/or duration of residual adverse effects of that contaminant on water quality and achieves conservation outcomes above and beyond that which would have been achieved if the offset had not taken place.</u> "	<b>OPPOSE</b>  Inappropriate to characterise offsets and/or outcomes as "conservation" outcomes.
Consequential amendments to Waikato Regional Plan	PC1-11019	Support the provision with amendments	RETAIN, DELETE or AMEND provisions in Consequential amendments to Waikato Regional Plan to ensure they will, individually and collectively, give effect to substantive amendments sought by the submission and enable objectives to be achieved. AND RETAIN, DELETE or AMEND provisions to ensure that inconsistencies are resolved and that the more stringent provision prevails.	<b>OPPOSE</b>
Management of Water Resources	PC1-11020	Support the provision with amendments	AMEND the consequential amendment to Water Management Classes 3.2.4.1(e) to read: ".... apply to a water body as well as policies in Section 3.11.3 for waterbodies in the Waikato and Waipā River catchments, when making decisions.... the same issue <del>and are inconsistent</del> particular regard...."	<b>OPPOSE</b>

## Beef + Lamb New Zealand Limited

Submitter ID: 73369

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	PC1-11511	Oppose the provision with amendments	ADD the lower catchment back into PPC1 AND undertake a Section 32 analysis on the alternative methods and rules proposed in this submission.	
General	PC1-13160	Not stated	AMEND PPC1 so that methods, including rules, are put in place now to achieve the policies and objectives of the Plan, give effect to the RMA, and the NPSFM. AND AMEND to incorporate management frameworks into proposed V1 now which provide for land use and discharge permits to be consented for up to 35 years as is provided for under section 123(d) RMA.	<b>OPPOSE</b> insofar as the proposed amendments are inconsistent with Theland Tahī's position as per its reasons for further submission.  <b>SUPPORT</b> proposed consent duration.
General	PC1-13161	Not stated	AMEND PPC1 so that in over allocated catchments (where numerical water quality limits are currently being exceeded) land use and ancillary discharge activities that have caused or contributed to the over allocation, are managed to discharge standards which are set to progressively decline over time to ensure that discharges are reduced to meet the receiving water numerical limits/targets and achieve the Vision and Strategy for the Waikato River and the NPSFM.	<b>OPPOSE.</b> Detailed data about water quality are unknown and decision requested is too broad to determine position at this point.
General	PC1-13162	Not stated	AMEND PPC1 to provide for such other or further relief as addresses the issues raised by this submission.	
General	PC1-13151	Not stated	PROVIDE in PPC1 for full compensation to those that are required to make large scale land use changes.	<b>SUPPORT</b>
General	PC1-13152	Not stated	WITHDRAW PPC1 in its current form.	<b>SUPPORT</b>
General	PC1-13153	Not stated	AMEND PPC1 and re-notify inclusive of amended stock exclusion policies and methods that are the same as the proposed national regulations AND AMEND policies and methods requiring the exclusion of stock from water and adopt methods that are set out in the national regulation for exclusion of stock from waterbodies.	<b>SUPPORT</b>
General	PC1-13154	Not stated	No specific decision requested for PPC1, however the submission considers that the NPSFM has not been given effect to, in particular:	<b>SUPPORT IN PART.</b> Theland Tahī supports the statements in principle. However, Theland Tahī reserves its position in respect of detailed drafting/amendments and <b>OPPOSES</b> any decision which would conflict with its reasons for submission and background as stated above.

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			<ul style="list-style-type: none"> <li>• There is a lack of clarity around what is considered to be a freshwater objective, limit or target and a failure to establish freshwater objectives and attributes.</li> <li>• The freshwater objectives established in PPC1 do not reflect values of freshwater including national values and do not recognise regional and local circumstances, as is required by Objective CA1, Policy CA2 or Policy CA3 of the NPSFM.</li> <li>• PPC1 provides for higher discharges to continue at their historic rate, even though this will not give effect to the NPSFM or the Vision and Strategy.</li> <li>• Table 3.11-1 is contrary to the NPSFM.</li> </ul> <p>AND AMEND to give effect to the RMA and the NPSFM, and in particular ensure consistency with the objectives and policies under section C(a) National Objectives Framework.</p> <p>AND AMEND so that when formulating freshwater objectives and limits (including Table 3.11-1), the economic wellbeing, including productive economic opportunities, are provided for within the context of environmental objectives, attributes and limits.</p>	
General	PC1-13155	Not stated	<p>The submission is concerned that the section 32 analysis:</p> <ul style="list-style-type: none"> <li>• Does not adequately assess costs, benefits and alternatives.</li> <li>• Does not comply with the RMA.</li> <li>• In some cases has failed to assess provisions</li> <li>• Fails to show PPC1 will achieve the improvements required by the Vision and Strategy</li> <li>• Fails to assess the efficiency and effectiveness of PPC1</li> <li>• Fails to assess the economic implications.</li> </ul> <p>[refer to further detail in paragraph 12-22 of the submission]</p>	<b>SUPPORT</b>
General	PC1-13156	Not stated	<p>AMEND PPC1 and re-notify inclusive of an amended and strengthened sub-catchment approach.</p> <p>AND AMEND PPC1 and re-notify inclusive of modified objectives, policies, rules and methods applying to the management of nitrogen.</p>	<b>SUPPORT IN PART.</b> Theland Tahī supports the point in principle specifically in relation to an enhanced sub-catchment approach (highlighted in blue). However, Theland Tahī reserves its position in respect of detailed drafting/amendments.

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			<p>AND DELETE policies and methods including rules applying to managing nitrogen discharges.</p> <p>AND AMEND to include an alternative nitrogen management and allocation method, in accordance with the submission and with the following principles [see the 14 principles in the full submission] for the allocation of nutrients.</p> <p>AND AMEND so that N discharge/leaching standards/allocations are established based not on existing use and discharge profiles, but on the underlying natural capacity of soils and within the assimilative capacity of water.</p> <p>AND AMEND so that allocation methods achieve the limits and targets set by PPC1 and the Objectives of the plan.</p> <p>AND AMEND so that nitrogen loads are allocated within (sub)catchments in such a way that there is an equitable allocation of total catchment nitrogen load to all users/activities who may wish to use the available resource.</p> <p>AND AMEND to establish a nutrient transfer regime for nutrient user groups within sub-catchments, where catchment loads and limits have been established but only where any allocation methods are not based on current discharges (NRP) or land use. Transfer regimes are to enable nitrogen loss reductions to be achieved at least cost and to enable and encourage maximum efficiency and flexibility of resource use and to optimise economic benefits. Nutrient transfer systems must meet the following conditions:</p> <ul style="list-style-type: none"> <li>• The initial allocation system meets all of the allocation principles;</li> <li>• Only occurs within a sub-catchment or watershed and only within a nutrient user/Catchment Collective Groups;</li> <li>• The transferable portion of the resource (e.g. nitrogen) only pertains to the load which achieves the desired environmental outcomes; and</li> <li>• Result in improved economic outcomes and land use optimisation.</li> </ul>	<p><b>OPPOSE</b> balance of the decision requested including that seeking to introduce N allocation and N allocation based on Land Use Capability and/or Natural Capital approach and allocation/transfer regime which is based on the same; and reference to limits and targets set by PPC1 and the Objectives of PPC1.</p>

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			<p>AND AMEND so that water quality outcomes below environmental limits which is caused by naturally occurring processes, or is due to the impacts of regionally or nationally significant infrastructure is provided for.</p> <p>AND AMEND so that objectives, policies, methods and rules, are included which facilitate and support the establishment and operation of (sub) catchment collective groups to manage water quality and biodiversity issues facing a catchment.</p> <p>AND AMEND so that objectives, policies and methods support innovative and, where required, edge of field mitigation which facilitates flexible, viable businesses and encourages communities to work together to identify, understand and act collectively to improve water quality.</p> <p>AND AMEND so that regulatory methods are tailored to address the environmental issues specific to a sub-catchment or watershed and that land use.</p>	
General	PC1-13157	Not stated	<p>AMEND in PPC1 land use (including “farming”) methods and rules to include ancillary discharges (s9 and s15 RMA)</p> <p>AND AMEND land use and ancillary discharge activity rules so that they are holistic, in that they apply to the farming operation and systems rather than taking a single activity focus.</p> <p>AND AMEND land use and ancillary discharge activity rules to meet the requirements of s70 RMA, and relevant planning considerations.</p>	<b>OPPOSE</b> Theland Tahī reserves its position.
General	PC1-13158	Not stated	<p>AMEND in PPC1 the land use and ancillary discharges (including nitrogen management or allocation) objectives, policies, methods and rules to recognise and provide for drystock sector farming operations including the matters identified in paragraph 39(i)-(ix) of the full submission.</p>	<b>OPPOSE</b>
General	PC1-13159	Not stated	<p>ADD provisions to PPC1 which ensure that the life supporting capacity of water, soil, and ecosystems are safeguarded.</p> <p>AND ADD provisions which ensure that freshwater resource use (assimilative capacity) is necessary, reasonable and efficient.</p>	<b>OPPOSE.</b> Decision requested lacks sufficient detail for Theland Tahī to determine what the consequences would be if the decision was allowed.
Full achievement of the Vision and Strategy will be intergenerational	PC1-11146	Oppose the provision with amendments	<p>AMEND 3.11 - Full achievement of the Vision and Strategy will be intergenerational, so that it explicitly recognises the role sub-catchment groups will have in achieving the Vision and Strategy.</p> <p>AND AMEND paragraph one, sentences three and four, to give effect to the intent as follows:</p> <p>" The 80-year timeframe recognises the 'innovation gap' that means full achievement of water quality outcomes set under Table 3.11-1 may require significant reductions in discharges from some land uses, in sub-catchments which are currently over allocated. As such, timeframes</p>	<b>OPPOSE</b>



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			<p><del>should provide for investment in infrastructure, remediation, mitigation, innovation, and farm optimisation. requires technologies or practices that are not yet available or economically feasible.</del> In addition, the current understanding is that <u>achieving water quality restoration takes time due to lag phases between changes in land management approaches and establishment of on farm and edge of field mitigation (for example slope stabilisation, critical source management, wetland creation and enhancement, and establishment of riparian vegetation) and resultant water quality improvements. requires a considerable amount of land to be changed from land uses with moderate and high intensity of discharges to land use with lower discharges (e.g. through reforestation).</u>"</p> <p>AND AMEND bullet points on page 15 by adding a new bullet point, as follows:</p> <p><u>" taking a targeted and risked based approach to managing land and water resources which is focused on sub-catchments and which ensures that:</u></p> <p><u>(i) water quality is managed to ensure that:</u></p> <p><u>(a) water quality is maintained in those rivers and lakes where the existing water quality is at a level sufficient to support the Values in Section 3.11.1 Objective 1A</u></p> <p><u>(b) water quality is enhanced in those rivers and lakes where the existing water quality is not at a level sufficient to support the Values in Section 3.11.1 Objective 1A, so that the values are supported by 2097;</u></p> <p><u>(c) accelerated eutrophication and sedimentation of lakes in the catchment is prevented or minimised"</u></p> <p>AND DELETE bullet point three in relation to the Nitrogen Reference Point and holding land uses to this historic discharge rate.</p> <p>AND AMEND bullet point five, to give effect to the intent as follows:</p> <p><u>"Waikato Regional Council to incentivise, enable, and support sub-catchment approaches to sustainable land and water management, and adoption of edge of field mitigation where required. Regulatory, non-regulatory, and financial instruments are provided to enable and support communities working together in their watershed (sub-catchments) to address <del>develop approaches outside the Rule framework that both point source and diffuse losses of contaminants to water, allow contaminant loss risk factors to be assessed at a sub-catchment level,</del> and implement mitigations that look beyond individual farm property boundaries to identify the most cost-effective and influential solutions."</u></p>	

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			AND AMEND Section 3.11 to reflect the outcomes sought in this submission.	
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-11149	Oppose the provision with amendments	AMEND PPC1 by incorporating the values within PPC1 as Objectives, and providing express links between these values and subsequent Sections of PPC1 to explain the relationship between particular values and uses and the desired water quality outcomes (Freshwater Objectives). AND AMEND to include a new Objective 1A OR AMEND existing Objectives to give effect to the following intent: <u>"Water Management Values: Surface water bodies are managed in a manner which safeguards their life supporting capacity and recognises and provides for the Values in Section 3.11.1."</u>	<b>SUPPORT</b>
3.11.2 Objectives	PC1-11150	Oppose the provision with amendments	AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which establish Freshwater Objectives based on the values of freshwater including cultural, recreational, and ecological values, along with consumptive values (ability to assimilate pollution, food production, and forestry). AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which change Table 3.11-1 numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli), and remove these parameters from Table 3.11-1 and instead hold as numerical freshwater Objectives. AND AMEND 3.11.2 Objectives AND ADD as required new Objectives which recognise and provide for the establishment and operation of collaborative sub-catchment groups, both through regulatory and non-regulatory methods, in sustainably managing water quality and biodiversity issues facing a catchment, providing innovative and where required edge of field mitigation and which facilitates flexible, viable businesses and communities, and enables sustainable management of resources such as nutrients within the assimilative capacity of soils and water, to achieve the Vision and Strategy for the Waikato River. AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure resource use is efficient including through establishment of nitrogen allocation frameworks if nitrogen is required to be allocated. AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure that resource use takes into account the natural capital of soils including the natural productive potential of soils (for example Land Use Capability), climate, geology, and assimilative capacity of water.	While Theland Tahī supports the intention behind the submission point in general terms, it <b>OPPOSES</b> the submission as it lacks sufficient detail for Theland Tahī to determine what the consequences would be if the decision was allowed. In particular, Theland Tahī <b>OPPOSES</b> point highlighted in green relating to LUC/Natural Capital approach.

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			<p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which provide for the economic and social well-being of people and communities, people and community resilience, adaptive management, and sub-catchment approaches lead by communities.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure that limits and targets are set appropriately and enable the economic and social well-being of people and communities and ensure that they are resilient, vibrant, and future proofed.</p> <p>AND AMEND PPC1 so that it adopts and truly encourages and empowers a sub-catchment approach to managing land use and water quality, tailored to the specific issues faced by the sub-catchment , and with appropriate time frames for achievement of its interim targets and long term Objectives.</p> <p>AND AMEND PPC1 to provide communities and individuals with certainty in relation to what will be required of them to enable sound business, succession, and investment decisions to be made, including investment into environmental mitigation.</p> <p>AND AMEND Objective 4 OR ADD a NEW Objective to give effect to the following intent:  <u>"People and community resilience / Te Whaingā 4: Te manawa piharau o te tangata me te hapori, and the achievement of the Vision and Strategy for the Waikato River.</u>  <u>Communities working together to sustainably manage land and water resources within their sub-catchments, to protect the values for freshwater, to maintain and where degraded improve water quality, and to protect and restore biodiversity, for generations to come."</u></p> <p>AND AMEND Table 3.11-1 and PPC1 Objectives to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets. Freshwater Objectives would include values of freshwater such as cultural, ecological, primary production, commercial, and recreational and may include numerical parameters for periphyton, chlorophyll a, macroinvertebrate community indices (MCI) and sediment and clarity.</p>	
Objective 1: Long-term restoration and protection of water quality for	PC1-11154	Oppose the provision with amendments	<p>AMEND Objective 1 AND/OR ADD new Objectives to give effect to the following intent:  <u>"Objective 1A Water management Values: Surface water bodies are managed in a manner which safe guards their life supporting capacity and recognises and provides for the Values in Section 3.11.1.</u></p>	<p><b>SUPPORT</b> (except to the extent that the decision sought imports a LUC/Natural Capital approach to nutrient management).</p>

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each sub-catchment and Freshwater Management Unit			<p><u>Objective 1B Targeted and risk based approach to managing land and water resources which is focused on sub-catchments:</u></p> <p><u>(ii) water quality is managed to ensure that:</u></p> <p><u>(a) water quality is maintained in those rivers and lakes where the existing water quality is at a level sufficient to support the Values in Section 3.11.1 Objective 1A</u></p> <p><u>(b) water quality is enhanced in those rivers and lakes where the existing water quality is not at a level sufficient to support the Values in Section 3.11.1 Objective 1A, so that the values are supported by 2097;</u></p> <p><u>(c) accelerated eutrophication and sedimentation of lakes in the catchment is prevented or minimised."</u></p>	
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-11233	Oppose the provision with amendments	<p>AMEND Objective 2 so that it is made explicit that the Objective is to enable people and communities to continue to provide for their social, economic, and cultural well-being, to be resilient and vibrant, and to provide for future generations.</p> <p>AND AMEND Objective 2 to give effect to the following intent: "Social, economic and cultural well-being is recognised and maintained in the long term/Te Whaingā 2: Ka whakāonga tenoranga a-papori, a-ohanga, a-ahurea hoki i nga tauroa. Management of land and water resources within the Waikato River Catchment recognises and provides for Waikato and Waipā communities and their economic and social well-being, vibrancy and resilience."</p>	<b>SUPPORT</b>
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-11482	Oppose the provision with amendments	<p>AMEND Objective 3 so that it provides for and enables management approaches tailored to the sub-catchment unit or waterbody and which specifically focus on the issues identified for that waterbody (i.e. in some catchments it may be Nitrogen but in others it may be sediment).</p> <p>AND DELETE reference to 10 percent of the required change.</p> <p>AND AMEND Table 3.11-1 so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications.</p> <p>AND AMEND Objective 3 by extending timeframes to longer than 10 years, preferably 30 years.</p>	<b>SUPPORT</b>

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Objective 4: People and community resilience	PC1-11483	Oppose the provision	<p>ADD a NEW Objective to PPC1 which provides for people and community resilience, adaptive management, and sub-catchment approaches led by communities.</p> <p>AND DELETE from Objective 4 reference to the staged approach and future plan changes including increasing stringency in land use controls and requirements AND REPLACE with adaptive management Objectives and Policies.</p> <p>AND AMEND Objective 4 OR ADD a new Objective to PPC1 to give effect to the following intent:</p> <p>"People and community resilience / Te Whaingā 4: Te manawa piharau o te tangata me te hapori, <u>and the achievement of the Vision and Strategy for the Waikato River.</u></p> <p><u>Communities working together to sustainably manage land and water resources within their sub-catchments, to protect the values for freshwater, to maintain and where degraded improve water quality, and to protect and restore biodiversity, for generations to come."</u></p> <p>AND AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 years, for those parameters which are significantly over allocated now AND AMEND the interim targets so that they progressively reduce over allocation at a rate and scale which provides for people and community resilience including economic well-being.</p> <p>AND AMEND Table 3.11-1 and Objective 4 so that PPC1 provides a pathway for individuals and communities to work together to achieve the Vision and Strategy over the long term.</p>	<p><b>SUPPORT</b></p>
3.11.3 Policies	PC1-11484	Not stated	<p>ADD new Policy 1A OR AMEND Policy 1 to give effect to Objective 1A and 1B with the intent of:</p> <p><u>"Where current water quality meets the relevant Table 3.11 - 1 water quality outcomes (interim targets or 80 year targets/limits) within each sub-catchment, water quality must be managed in a manner which ensures that the water quality targets/ limits continue to be met beyond the zone of reasonable mixing.</u></p> <p><u>Where Table 3.11-1 water quality targets/limits are not met, water quality within the sub-catchment must be managed in a manner which progressively improves existing water quality relevant to the parameter exceeded , in order to meet:</u></p> <p><u>(i) The water quality target/limit for the sub-catchment by 2096, and/or</u></p> <p><u>(ii) The relevant value that the water quality target/limit is designed to safeguard"</u></p>	<p><b>SUPPORT</b> in respect of sub-catchment approach</p> <p><b>OPPOSE</b> LUC/Natural Capital approach</p> <p><b>OPPOSE</b> use of concept of "reasonable mixing" in the context of diffuse discharges. Not clear whether this amendments is intended to apply to point source discharges to surface water.</p>

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			<p><u>AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.</u></p> <p>AND AMEND Policy 1 AND/OR include a new Policy to enable establishment and operation of sub-catchment groups working through global consents to sustainably manage land and water resources, to be innovative, to share and move resources as required within environmental limits, to be flexible, to recognise and provide for biodiversity values, to adopt edge of field mitigation and to offset residual impacts.</p> <p>AND AMEND PPC1 to insert the nutrient allocation principles listed in Appendix 1 of the submission and apply these across the catchment.</p>	
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-11485	Oppose the provision with amendments	<p>AMEND Policy 1 to enable land uses which are less than or equal to 20 hectares, or which are leaching at or less than the 'sustainable level' (<i>Footnote: 'Sustainable level' can be defined as either a kg liveweight per ha relative to land use capability (LUC) or Nitrogen kg discharge rate per hectare (kgN/ha/year) which achieves the desired in-stream Nitrogen load</i>) to continue and provide them with flexibility to change farm systems or stocking rates up to the 'sustainable level'.</p> <p>AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.</p> <p>AND AMEND to ensure the allocation and management framework for Nitrogen promotes the efficient use of natural resources AND incentivises activities and behaviour change which promote the sustainable management of natural resources AND will achieve the Vision and Strategy AND incorporates the allocation principles set out under appendix 1 in the submission.</p> <p>AND AMEND PPC1 to manage or allocate Nitrogen based on:</p> <p>(a) 'flat rate per hectare' permitted threshold (where the sub-catchment load is divided by the total number of hectares in the sub-catchment and this amount is allocated as a Nitrogen discharge threshold to each hectare of land) for example 20kgN/ha/year; OR</p> <p>(b) Natural capital or land use suitability based allocation per hectare' where a sub-catchment Nitrogen load is attributed to land based on its</p>	<b>OPPOSE</b>

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			<p>underlying characteristics and factors (including productive capability using the Land Use Capability classification system). This approach should be used to determine the permitted baseline, and where required to stage reductions in Nitrogen discharges over time as per Table 1 below <i>(footnote: Categories and discharge numbers are indicative only and subject to change through Schedule 1 process as more evidence and data becomes available); AND</i></p> <p>c) Natural capital or land use suitability based threshold for the discharge of Nitrogen per hectare' that is used to determine where and when Council require additional regulatory standards or stricter activity status to reduce Nitrogen loss over time - based on calculating a sub-catchment Nitrogen load and focusing on priority areas where Nitrogen is over allocated and therefore reductions from land uses are required. For example as set out in Table 1.</p> <p>Table 1</p> <table border="1" data-bbox="645 791 1249 986"> <thead> <tr> <th colspan="8">Land Use Capability - Natural Capital</th> </tr> <tr> <th>Class</th> <th>I</th> <th>II</th> <th>III</th> <th>IV</th> <th>V</th> <th>VI</th> <th>VII</th> </tr> </thead> <tbody> <tr> <td>Year 1 (Kg/N/ha/year)</td> <td>30</td> <td>27</td> <td>24</td> <td>18</td> <td>16</td> <td>15</td> <td>8</td> </tr> <tr> <td>Year 5 (kgN/ha/year)</td> <td>27</td> <td>25</td> <td>21</td> <td>16</td> <td>13</td> <td>12</td> <td>8</td> </tr> </tbody> </table> <p>AND AMEND Policy 1 and Table 3.11-1 OR ADD a NEW Policy which sets out the:</p> <p>a) Current Nitrogen load <i>(footnote: Current Nitrogen load includes both the Allowable in-stream nitrate load to achieve current in-stream Nitrogen concentration and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</i></p> <p>b) Desired Nitrogen load <i>(footnote: Desired Nitrogen load includes both the Allowable in stream nitrate load to achieve the desired in-stream Nitrogen concentration, and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land)</i></p> <p>c) Nitrogen discharge rate/ha/year to achieve current Nitrogen load</p> <p>d) Nitrogen discharge rate/ha/year to achieve the desired Nitrogen load</p>	Land Use Capability - Natural Capital								Class	I	II	III	IV	V	VI	VII	Year 1 (Kg/N/ha/year)	30	27	24	18	16	15	8	Year 5 (kgN/ha/year)	27	25	21	16	13	12	8	
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			<p>AND AMEND PPC1 so that:</p> <p>f) activities which would cause the maximum catchment load to be exceeded are avoided</p> <p>g) In catchments which are already over allocated, PPC1 should avoid allocating any further Nitrogen</p> <p>h) In catchments which are already over allocated, PPC1 should put in place Methods (such as a 'sinking lid on the allocation') so that over time the over allocation is phased out.</p> <p>AND AMEND PPC1 to ensure that those activities and land uses which are contributing the most to the over allocated parameter bear the majority of the cost of reducing the over allocation</p> <p>AND AMEND Policy 1 (a) to ensure that low discharging land uses such as small scale (&lt;20kg N/ha) or low impact activities (those discharging at or below the sustainable level) are enabled to continue and are provided with flexibility to change farm systems and stocking rates up to the sustainable levels for the sub-catchment (Freshwater Management Unit).</p>	
<p>Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens</p>	<p>PC1-12575</p>	<p>Oppose the provision with amendments</p>	<p>AMEND Policy 1 so that management approaches are tailored to addressing water quality issues identified on a sub-catchment basis, and where the responsibility of addressing the impacts is apportioned to those land uses including point and non-point source discharges which have caused or contributed to any over allocation, and where improvements required over time are appropriate to the level of impact.</p> <p>AND AMEND Policy 1 AND/OR include a new Policy to enable establishment and operation of sub-catchment groups working through global consents to sustainably manage land and water resources, to be innovative, to share and move resources as required within environmental limits, to be flexible, to recognise and provide for biodiversity values, to adopt edge of field mitigation and to offset residual impacts.</p> <p>AND AMEND PPC1 and Policy 1 so that land use rules and management frameworks include both land use and ancillary discharge provisions (sections 9 and 15 Resource Management Act)</p> <p>AND AMEND PPC1 and Policy 1 to enable establishment of nutrient user groups within the same catchment as part of catchment collective groups</p> <p>AND enable transfer of nutrients (at a level not exceeding the desired in-stream nutrient load), where principles in Appendix A of the submission are met, precluding nutrient transfer when allocation is based on current or historic discharges AND transfer within nutrient user groups only occurs: within a sub-catchment or watershed; within an established sub-</p>	<p><b>SUPPORT</b> in relation to sub-catchment approach.</p> <p><b>OPPOSE</b> remaining points of submission</p>



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			<p>catchment programme that's based on fair allocation of a load; only pertains to the load which achieves the desired environmental outcome; results in improved economic outcomes and land use optimization.</p> <p>AND AMEND Policy 1 to apply Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p> <p>AND ADD new Policy 1A OR AMEND Policy 1 to give effect to Objective 1A and 1B with the intent of:</p> <p><u>"Where current water quality meets the relevant Table 3.11 - 1 water quality outcomes (interim targets or 80 year targets/limits) within each sub-catchment, water quality must be managed in a manner which ensures that the water quality targets/ limits continue to be met beyond the zone of reasonable mixing.</u></p> <p><u>Where Table 3.11-1 water quality targets/limits are not met, water quality within the sub-catchment must be managed in a manner which progressively improves existing water quality relevant to the parameter exceeded , in order to meet:</u></p> <p><u>(i) The water quality target/limit for the sub-catchment by 2096, and/or</u></p> <p><u>(ii) The relevant value that the water quality target/limit is designed to safeguard"</u></p>	
<p>Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens</p>	<p>PC1-12576</p>	<p>Oppose the provision with amendments</p>	<p>AMEND Policy 1 (a) as follows: "enabling activities with a low level of contaminant discharge to water bodies <del>provided these discharges do not increase-</del>"</p> <p>AND AMEND Policy 1 (b) as follows: "Requiring farming activities <del>with moderate to high levels of contaminant discharge to water bodies to reduce their discharges; and</del> which exceed the 'sustainable level' for the sub-catchment (Freshwater Management Unit) to progressively reduce contaminant discharges over time, where the reductions are proportionate to the level of over allocation within the sub-catchment and proportionate to the discharge level of the activity."</p>	<p><b>SUPPORT.</b></p>
<p>Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and</p>	<p>PC1-12577</p>	<p>Oppose the provision with amendments</p>	<p>AMEND Policy 1 (c) as follows: "progressively excluding cattle, horses, deer, and pigs from rivers, stream, drains, wetlands and lakes <u>on land up to 15 degrees slope, and where break fed on land above 15 degrees slope.</u>"</p> <p>AND AMEND PPC1 so intensively farmed animals are required to be excluded from all permanently flowing waterbodies, but enable flexibility</p>	<p><b>SUPPORT</b></p>

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microbial pathogens			for low intensity land uses or/and hill country farming AND focus management approaches for hill country on critical source management.	
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11487	Support the provision with amendments	AMEND Policy 2 so that management approaches are tailored to managing water quality on a sub-catchment basis. Reductions may not always be required AND AMEND to incentivise and support collaborative community groups working together to sustainably manage land and water resources and to implement a staged approach to achieving the Objective of PPC1, through long term global sub-catchment land use and discharge permits, including land use change AND AMEND PPC1 to adopt the recommendations released in the government's clean water document ( <i>New Zealand Government Clean Water (February 2017) Ministry for the Environment, ME 1293</i> ).	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12708	Support the provision with amendments	AND AMEND Policy 2 (e) as follows: "Requiring <del>stock exclusion</del> <u>the exclusion of stock from permanently flowing waterbodies on land up to 15 degrees slope, and stock when break fed on land with a slope exceeding 15 degrees slope,</u> to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12709	Support the provision with amendments	AMEND Policy 2 to reflect the amendments set out against Policy 1 which relate to the management of Nitrogen discharges and allocation, and which enable flexibility for low discharging land uses.	<b>OPPOSE</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12710	Support the provision with amendments	AMEND Policy 2(a) as follows: "Taking a tailored, risk based approach to define mitigation actions on the land <del>that will reduce</del> <u>to manage</u> diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens..." AND AMEND Policy 2 and PPC1 to ensure that management approaches for hill country are focused on critical source management with timeframes tailored through Farm Environment Plans.	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12711	Oppose the provision with amendments	DELETE Policy 2 (d) AND REPLACE with: " <u>where current water quality is over allocated such that the water quality outcome in the sub-catchment, as set out in Table 3.11-1 is not met, require reductions in the contaminant discharge to be proportionate to the amount of the current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water</u> "	<b>OPPOSE</b>

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			<p><u>quality improvement required in the sub-catchment, to provide for the values."</u>            AND AMEND Policy 2 to apply Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p>	
<p>Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future</p>	<p>PC1-11488</p>	<p>Support the provision with amendments</p>	<p>AMEND Policy 4 so that it enables small scale land uses (&lt;20ha), low intensity, and low discharging land uses to continue, to be flexible in their land use and their discharge of Nitrogen, and stocking rates, and to be established as set out under Policy 1.            AND AMEND to introduce permitted thresholds based on the 'sustainable level' for the sub-catchment or Freshwater Management Unit. The 'sustainable level' can be based on Nitrogen loss per/kg/ha/year or alternatively kg live weight per ha relative to land use capability. Nitrogen loss rates should be based on either a permitted activity threshold using an equal allocation for a sub-catchment (e.g. 20kgN/ha/year) or Natural Capital based allocation or activity status (e.g. LUC), and relate to sub-catchment or Freshwater Management Unit specific desired in-stream Nitrogen loads.            AND DELETE reference to future further reductions in contaminate discharges.            AND AMEND to recognise existing biodiversity values on private land and that further establishment and protection of biodiversity is enabled and incentivised (as Policy 17 does).</p>	<p><b>OPPOSE</b></p>
<p>Policy 5: Staged approach</p>	<p>PC1-11489</p>	<p>Support the provision with amendments</p>	<p>AMEND Policy 5 to give effect to the following intent.  <u>"Recognise that achieving the water quality attribute targets in Table 3.11-1 may require significant reductions in discharges from some land uses, in sub-catchments which are currently over allocated. As such timeframes will need to be staged over 80 years, to develop, while making a start on reducing discharges of Nitrogen, Phosphorus, sediment and microbial pathogens, and preparing for further reductions that will be required in subsequent regional plans. provide for investment in infrastructure, remediation, mitigation, innovation, and farm optimisation, and in recognition that achieving water quality restoration takes time due to lag phases between changes in land management approaches and establishment of on farm and edge of field mitigation and resultant water quality improvements."</u></p>	<p><b>OPPOSE</b> those parts of the submission which seek to introduce LUC/Natural Capital approach</p>

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			<p>AND AMEND to tailor management approaches to address the specific contaminate(s) of concern on a sub-catchment basis.</p> <p>AND DELETE reference to further reductions through subsequent regional plans.</p> <p>AND AMEND to give effect to Objective 3 and 4 as proposed through this submission.</p> <p>AND AMEND to enable the establishment and operation of sub-catchment groups working through long term global consents to sustainably manage land and water resources, to adopt a staged approach to addressing water quality over allocation where it exists within the sub-catchment, to be innovative, to share and move resources as required within desired environmental limits/targets, to be flexible, to recognise and provide for biodiversity values, and to adopt edge of field mitigation.</p> <p>AND AMEND Table 3.11-1 so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications.</p> <p>AND AMEND Policy 5 by extending timeframes to longer than 10 years, preferably 30 years.</p>	
<p>Policy 6: Restricting land use change</p>	<p>PC1-11490</p>	<p>Oppose the provision with amendments</p>	<p>AMEND Policy 6 as follows: <del>“Restricting land use change</del> <u>Restriction on intensive land uses and discharges to water...</u>”</p> <p>AND AMEND to enable land use activities including changes in land use where increases in contaminant discharges still enable sub-catchment outcomes for water quality to be met including the values.</p> <p>AND AMEND to enable changes in land use which occur within the sustainable level for the sub-catchment as set out in Policy 1.</p> <p>AND AMEND to take into account the degree to which land use is optimised in relation to the natural capital of soils, and sub-catchment water quality 80 year attributes targets (Table 3.11-1).</p> <p>AND AMEND to provide for increases in Nitrogen discharge where land use change will result in overall improvement in sustainable management and a decrease in soil loss, Phosphorus loss, management of microbial pathogens, and enhancement of biodiversity values.</p>	<p><b>OPPOSE</b> on the basis that the relief sought seeks to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.</p>
<p>Policy 7: Preparing for allocation in the future</p>	<p>PC1-11491</p>	<p>Support the provision with amendments</p>	<p>AMEND Policy 7 to make it a Method.</p> <p>AND AMEND Policy/Method 7 as follows:  <del>“Natural Resource Preparing for Allocation in the future</del>  <u>Prepare for further diffuse discharge reductions and any future property or enterprise level allocation of diffuse discharges</u></p>	<p><b>OPPOSE</b> on the basis that the relief sought seeks to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.</p>

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			<p>of Nitrogen, Phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the Policies and Methods in this chapter. To ensure this occurs, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'. Work with stakeholders to determine sub-catchment specific allocation of natural resources including the assimilative capacity of freshwater. The allocation approaches should apply: Any future allocation should consider the following principles:</p> <ul style="list-style-type: none"> <li>a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and</li> <li>b. Allowance for flexibility of development of Tangata Whenua ancestral land; and</li> <li>c. Minimise social disruption and costs in the transition to the 'land suitability' approach; and</li> <li>d. Future allocation decisions should take advantage of new data and knowledge."</li> </ul> <p>AND ADD the allocation principles in Appendix 1 of the submission and those set out in the general Section of the submission. AND ADD new clauses to take into account the degree to which land use is optimised to the natural capital of soils and assimilative capacity of water. AND AMEND to adopt submissions set out in relation to the management and allocation of Nitrogen.</p>	
Policy 8: Prioritised implementation	PC1-11492	Support the provision with amendments	<p>AMEND Policy 8 to require reductions of Nitrogen greater than the currently proposed 75th percentile. AND AMEND to introduce appropriate sub-catchment contaminant numerical limits to enable targeted and prioritised actions. AND AMEND to prioritise the establishment of catchment collaborative groups based on priority sub-catchments.</p>	<p><b>OPPOSE</b> submission point seeking to increase reductions below the 75<sup>th</sup> %ile.  <b>SUPPORT</b> the sub-catchment approach.</p>
Policy 9: Sub-catchment	PC1-11493	Support the provision with	<p>RETAIN Policy 9 AND AMEND to facilitate and support the establishment and operation of sub-catchment groups to manage water quality and biodiversity issues</p>	<p><b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.</p>

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(including edge of field) mitigation planning, co-ordination and funding		amendments	facing a sub-catchment, providing innovative and, where required, edge of field mitigation, and which facilitates flexible, viable businesses and communities, and enables transfer of resources such as nutrients within the assimilative capacity of soils and water, and at sustainable levels. AND AMEND to give effect to new collaborative catchment objectives. AND AMEND to incorporate Policy 17 provisions in relation to recognition, support and enhancement of biodiversity values. AND AMEND PPC1 to include a new Method which provides for Regional Council support of catchment groups and approaches to addressing complex land and water management issues, including sub-catchment specific studies, data collection, catchment group facilitation, development and funding of sub-catchment models which support catchment groups, decision making and consenting.	
3.11.4 Implementation methods	PC1-11494	Support the provision with amendments	AMEND 3.11.4 Implementation Methods in accordance with the changes sought to the Objectives, Policies, Methods, Rules and Schedules. AND AMEND PPC1 to include a new Method which provides for Regional Council support of catchment groups and approaches to addressing complex land and water management issues, including sub-catchment specific studies, data collection, catchment group facilitation, development and funding of sub-catchment models which support catchment groups, decision making and consenting.	<b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.
3.11.4.2 Certified Industry Scheme	PC1-11495	Support the provision with amendments	AMEND Method 3.11.4.2 and associated Schedules, Policies and Rules to expand criteria for certified industry schemes, auditing and reporting processes.	<b>SUPPORT</b>
3.11.4.3 Farm Environment Plans	PC1-11496	Support the provision with amendments	AMEND Method 3.11.4.3 in accordance with changes sought to Schedule 1. AND DELETE OR AMEND the requirement for a Certified Farm Environment Planner. AND AMEND to introduce greater prioritisation of where Farm Environment Plans are required. AND AMEND to provide a greater link to Farm Environment Plan priorities and empowering a sub-catchment approach between Methods 3.11.4.3 and 3.11.4.5.	<b>SUPPORT</b> in part, to the extent that the decision sought is consistent with the reasons for submission explained above.  <b>OPPOSE</b> deletion of requirement for a Certified Farm Environment Planner.

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3.11.4.5 Sub-catchment scale planning	PC1-11497	Support the provision with amendments	AMEND Method 3.11.4.5 to provide for managing contaminant loads at a sub-catchment level AND much more targeted and prioritised use of Farm Environment Plans to suit sub-catchment priorities. AND AMEND to provide for sub-catchment collectives or nutrient user groups to encourage and empower catchment communities working together to improve water quality.	<b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.
3.11.4.7 Information needs to support any future allocation	PC1-11498	Support the provision with amendments	AMEND Method 3.11.4.7 to empower an approach to managing nutrient discharges, and in particular Nitrogen discharges at a sub-catchment level, AND in accordance with amendments sort on the Objectives, Policies and Methods contained within the submission.	<b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-11499	Support the provision with amendments	AMEND Method 3.11.4.8 to introduce thresholds for the management of contaminants and in particular Nitrogen, that meet the changes sought in this submission, AND that are based on better linking sub-catchment contaminant loads to priority actions through resource consents and Farm Environment Plans.	<b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.
3.11.5 Rules	PC1-11500	Not stated	ADD a NEW discretionary activity Rule for situations where the standards and conditions of Rules 3.11.5.1 to 3.11.5.6 are not met. AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.	<b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-11501	Support the provision with amendments	AMEND Rule 3.11.5.1 to include a classification of small and low intensity farms up to 20 hectares, and to include enterprises being undertaken on more than 1 property. AND DELETE Rule 3.11.5.1 (3). AND DELETE Rule 3.11.5.1 (5).	<b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-11502	Oppose the provision with amendments	AMEND Rule 3.11.5.2 to give effect to PPC1 amended Objectives and Policies including Policy 1, Policy 2, and Policy 4 AND enable activities with lower contaminant discharges including nutrient discharges to continue OR to be established. AND AMEND Rule 3.11.5.2 as follows:	<b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.

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			<p>"The use of land for farming activities (<del>excluding commercial vegetable production</del>) and the associated diffuse discharge of Nitrogen, Phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water <del>where the property areas is greater than 4.1 hectares, and has more than 6 stock units per hectare or is used for arable cropping</del>, is a permitted activity subject to the following conditions..."</p> <p><u>AND DELETE Rule 3.11.5.2 (3) (a) to (e).</u>            AND DELETE Rule 3.11.5.2 (4) (b) (i).            AND AMEND Rule 3.11.5.2 (4) (ii) as follows:  <del>"15kgN/ha/year 20kgN/ha/year"</del> OR alternatively replace 20kgN/ha/year with the 'sustainable level' calculated in accordance with Policy 1 and Policy 2, OR adopt a permitted threshold for Nitrogen discharge based on land use capability as a proxy for land use suitability.            AND DELETE "grazed" from Rule 3.11.5.2 (4) (c).            AND AMEND Rule 3.11.5.2 (4) (d) to provide for some winter grazing of crops below a minimum area or with criteria contained within the Rule to reduce risk of loss from critical source areas.            AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards and or thresholds.            AND DELETE any standards or clauses which hold land uses to historic nutrient discharge levels or stocking rates.</p>	
<p>3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</p>	<p>PC1-11503</p>	<p>Oppose the provision with amendments</p>	<p>AMEND Rule 3.11.5.4 (1) as follows:  <del>"...and properties or enterprises with a Nitrogen Reference Point greater than the 75th 50th percentile Nitrogen leaching value that are also within a sub-catchment which is currently over allocated in relation to Nitrogen (Table 3.11-1 and 3.11-2);</del>            AND AMEND to include new standard that by 2096 the activity does not cause or contribute materially to an exceedance of the water quality 80 year targets for its specific sub- catchment as set out in Table 3.11-1.            AND AMEND Schedule 1 as set out in this submission.            AND AMEND Schedule C as set out in this submission.            AND AMEND timeframes for the requirement to complete and register Farm Environment Plans.            AND ADD under 'matters of control (ii) reference to the sub-catchment water quality outcomes and sub-catchment specific issues. Reductions of contaminant discharges may not always be required;</p>	<p><b>OPPOSE IN PART.</b></p> <p><b>SUPPORT</b> the relief sought to provide for consent duration of 35 years.</p> <p><b>OPPOSE</b> the remaining submission point(s).</p>



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			<p>AND AMEND matter of control clause (iii) as follows: The actions, timeframes and other measures to ensure that the diffuse discharge of Nitrogen from the property <del>or enterprise, as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified</del> does not cause or materially contribute to exceedance of the sub-catchment Nitrogen attributes/targets in Table 3.11-1 by 2096.</p> <p>AND DELETE reference to the 75th percentile in Rule 3.11.5.4 (iv) AND REPLACE with <u>“for catchments which are currently over allocated for Nitrogen, actions , timeframes, and other measures to ensure the diffuse discharge of Nitrogen is reduced over the term of consent proportionate to the level of over allocation and the contribution that activity makes to the over allocation. Over allocation to be phased out by 50 percent by 2047.”</u></p> <p>AND ADD reference to Nitrogen discharge limit(s) (based on an estimate or band for land use capability or suitability), as set out under Policy 1 AND require consideration of Nitrogen discharge reductions through the consent where sub-catchment discharge thresholds are exceeded.</p> <p>AND AMEND to enable land uses to discharge to a series of Nitrogen discharge thresholds based on a sub-catchment assessment of Land use capability, or suitability.</p> <p>AND AMEND to tailor environmental mitigation to critical source identification and management.</p> <p>AND AMEND to recognise and provide for existing biodiversity values and enhancement of biodiversity values (in accordance with Policy 17).</p> <p>AND AMEND to take into account the degree to which land use is optimised in relation to the natural capital of soils, and sub-catchment water quality 80 year attributes targets (Table 3.11-1).</p> <p>AND AMEND to enable consents to be granted for a term of 35 years.</p> <p>AND AMEND Rule 3.11.5.4 so that it gives effect to amended Policies 1 and 2 and including Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and requires the application of Best Practicable Option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p>	
3.11.5.6 Restricted	PC1-11504	Support the provision	AMEND Rule 3.11.5.6 to enable and facilitate sub-catchment collective groups and enterprises in sustainably managing land and water resources	<b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.

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Discretionary Activity Rule – The use of land for farming activities		with amendments	<p>to achieve the water quality attributes and targets in Table 3.11-1 by 2096.</p> <p>AND AMEND as follows:</p> <p>"Waikato Regional Council restricts its discretion over the following matters:</p> <ul style="list-style-type: none"> <li>i. Cumulative effects on water quality <del>of the catchment of the Waikato and Waipā Rivers in the relevant sub-catchment(s).</del></li> <li>ii. The diffuse discharge of Nitrogen, Phosphorus, sediment and microbial pathogens.</li> <li>iii. The need for and the content of a Farm Environment Plan.</li> <li>iv. The term of <del>the resource</del> consent.</li> <li>v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</li> <li>vi. The time frame and circumstances under which the consent conditions may be reviewed.</li> <li>vii. The matters addressed by Schedules A, B and C." <p>AND AMEND to add:</p> <ul style="list-style-type: none"> <li>a. Timing, and rate of reductions in contaminant discharges</li> <li>b. Compliance with Table 3.11-1 interim targets and 80 year water quality targets</li> <li>c. Compliance with any sub-catchment management plan prepared for the relevant sub-catchment</li> <li>d. The adoption of an adaptive management and mitigation planning approach to manage diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens</li> <li>e. Edge of field mitigation, remediation, and biodiversity enhancement (in accordance with Policy 7)</li> <li>f. The time frame and circumstances under which the consent conditions may be reviewed.</li> </ul> <p>AND AMEND so that it gives effect to amended Policies 1 and 2 and including Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and requires the application of Best Practicable Option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p> </li></ul>	
3.11.5.7 Non-Complying	PC1-11505	Support the provision with	AMEND Rule 3.11.5.7 so that the Rule does not apply to land use change where it does not exceed the sustainable Nitrogen discharge threshold (or limit) for the sub-catchment, or stocking rates.	<b>OPPOSE</b> except to the extent that the submission is consistent with the outcomes sought by The Land Tahī in relation to rule 3.11.5.7 and its reasons for further submission.

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Activity Rule – Land Use Change		amendments	AND AMEND so that there is the requirement where the change in land use results in discharges in exceedance of the sustainable discharge level, that those discharges have to be reduced overtime, and may not exceed the 50th percentile for that catchment.	
Schedule B - Nitrogen Reference Point	PC1-11506	Oppose the provision with amendments	AMEND Schedule B so it is consistent with 'Best Practice Data Input Standards' for the OVERSEER Model and reflects actual farm systems and operations. AND DELETE requirement for a Certified Farm Nutrient Advisor AND REPLACE with a Certified Nutrient Management Advisor. AND DELETE Schedule B Table 1 assumptions where they are inconsistent with 'Best Practice Data Input Standards' for Overseer. AND AMEND to ensure that actual stock weights are used and not the assumptions set out under definition of 'stock unit'. AND ADD a requirement for land owners to provide a summary of soil properties, including land use capability classes, to ensure blocks are developed and applied appropriately within Overseer, and in determination of farm optimisation within natural resource limits. AND AMEND to extend the requirement to provide a Nitrogen Reference Point to align with Priority one, two and three catchment requirements for Farm Environment Plans. AND AMEND Schedule B (f) to apply the Nitrogen Reference Point to the highest of the financial years from 2011-2016.	<b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.
Schedule C - Stock exclusion	PC1-11507	Oppose the provision	AMEND Schedule C to apply to land with a slope up to 15° (flat and rolling land). AND AMEND to exclude stock when break fed on land with a slope greater than 15 degrees. AND DELETE Schedule C (3) AND REPLACE with: " <u>Cattle, deer and pigs are able to enter water bodies for the purpose of crossing from one side to the other as long as they are being supervised and are actively driven across the water body in one continuous movement, where this occurs less frequently than once per week. Stock crossings used once or more per week, must use a livestock crossing structure.</u> "	<b>SUPPORT</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12366	Support the provision with amendments	RETAIN Schedule 1 (d) AND AMEND Schedule 1 (2) (c) to refer to key critical source areas only.	<b>OPPOSE</b>

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Schedule 1 - Requirements for Farm Environment Plans	PC1-12367	Support the provision with amendments	AMEND Schedule 1 (3) to include spatial mapping requirements from clauses 2 (c) (i), 2 (c) (ii), 2 (c) (iv), 2 (c) (v), 2 (d) (ii), 2 (d) (iv) and 2 (f) (i).	<b>SUPPORT</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12364	Support the provision with amendments	AMEND Schedule 1 (2) (ii) as follows: “for areas with a slope exceeding <del>25</del> <u>15</u> degrees and where stream fencing is impracticable, the provision of alternative mitigation measures.” AND DELETE Schedule 1 (f) (i). AND AMEND Schedule 1 (f) (ii) to apply irrespective of slope.	<b>SUPPORT</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12365	Support the provision with amendments	AMEND Schedule 1 (5) (a) to enable flexibility in Nitrogen discharges up to the sustainable Nitrogen discharge level, but where this is exceeded Nitrogen discharges shall not exceed the Nitrogen Reference Point. AND AMEND Schedule 1 (5) (b) so that where the Nitrogen Reference Point exceeds the sustainable Nitrogen discharge level, actions, timeframes and other measures are set out and implemented to ensure that Nitrogen discharge is reduced overtime in a manner and to the extent that corresponds with the level of water quality improvement required to achieve the water quality outcomes and which is proportionate to the level of discharge, i.e. those discharging the most will be required to reduce the most (15 percent of total discharge each 10 year period) AND AMEND Schedule 1 to ensure that land use activities are not able to increase Nitrogen discharge beyond either their Nitrogen Reference Point or the sustainable leaching level, whichever is the highest - default to non-complying Rule.	<b>OPPOSE</b> on the basis that the sustainable N discharge level is linked to a LUC/Natural Capital allocation approach.
Schedule 1 - Requirements for Farm Environment Plans	PC1-11508	Support the provision with amendments	AMEND Schedule 1 so farmers can identify the specific actions they will need to take through their Farm Environment Plan to address any water quality issues relevant within their sub-catchment. The Council must identify relevant water quality issues within the sub-catchment, as well as the associated mitigations that farmers should consider. This information must be provided to farmers before they are required to develop a Farm Environment Plan. AND DELETE requirement to be certified by a Certified Farm Environment Planner AND REPLACE with industry approved standard or developed in accordance with skills required to support the development of a Council approved Farm Environment Plan. AND AMEND to enable application of 'Best Practicable Option'.	<b>OPPOSE</b> submission point(s) which seek to implement a LUC/Natural Capital approach to management/allocation of nutrient discharges.

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<p>Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments</p>	<p>PC1-11158</p>	<p>Oppose the provision with amendments</p>	<p>AMEND Table 3.11-1 so that the numerical outcomes recognise and provide for the values under Section 3.11.1 Objective 1A.            AND AMEND numerical outcomes (limits/targets, including interim targets) at levels which give effect to the National Policy Statement for Freshwater Management (2014) and in particular Policies CA2 and CA3.            AND AMEND to consider the provision of economic well-being, including economic opportunities.            AND AMEND to provide for water quality below national bottom lines which results from natural processes and/or from the impacts of national and regionally significant infrastructure.            AND AMEND to adopt numerical limits that are appropriate to achieving desired outcomes and are applied at appropriate levels of flow that match the values.            AND AMEND numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli) AND REMOVE these parameters from Table 3.11-1.            AND AMEND as follows:  <u>"E.coli 260/100 ml &lt; 50th percentile applies 1 November to 30 April when the river is below medium flow:</u>  <u>E.coli 550/100 ml &lt; 20th percentile the concentration of E.coli must not exceed 550 per 100 ml year round when flow is at or below the 20th flow exceedance percentile (i.e. not in the top 20 percent of flows)</u>  <u>The visual clarity of the water measured as the horizontal sighting range of a black disc must equal or exceed [Table 3.11-1 numerical parameter given in meters] when the river is at or below medium flow (the 50th flow exceedance percentile)."</u>            AND AMEND so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications.            AND AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 years, for those parameters which are significantly over allocated now AND AMEND the interim targets so that they progressively reduce over allocation at a rate and scale which provides for people and community resilience including economic well-being.            AND AMEND Table 3.11-1 so that PPC1 provides a pathway for individuals and communities to work together to achieve the Vision and Strategy over the long term.</p>	<p><b>OPPOSE</b></p>

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			<p>AND AMEND Policy 1 and Table 3.11-1 OR ADD a NEW Policy which sets out the:</p> <p>a) Current Nitrogen load (<i>footnote: Current Nitrogen load includes both the Allowable in-stream nitrate load to achieve current in-stream Nitrogen concentration and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land</i>)</p> <p>b) Desired Nitrogen load (<i>footnote: Desired Nitrogen load includes both the Allowable in stream nitrate load to achieve the desired in-stream Nitrogen concentration, and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land</i>)</p> <p>c) Nitrogen discharge rate/ha/year to achieve current Nitrogen load</p> <p>d) Nitrogen discharge rate/ha/year to achieve the desired Nitrogen load</p> <p>AND AMEND Table 3.11-1 and PPC1 Objectives to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets. Freshwater Objectives would include values of freshwater such as cultural, ecological, primary production, commercial, and recreational and may include numerical parameters for periphyton, chlorophyll a, macroinvertebrate community indices (MCI) and sediment and clarity. AND AMEND Table 3.11-1 to include the allowable instream load and maximum allowable zone load (MAZL) for Nitrogen for all sub-catchments and Freshwater Management Units. Nitrogen loads should be provided which relate to: current instream Nitrogen concentrations and desired instream Nitrogen concentrations. The instream loads should form the basis of an allocation framework for Nitrogen, if allocation frameworks are deemed necessary, to assist with achievement of the Objectives of PPC1. AND AMEND Table 3.11-1 so that numerical parameters provide for the values of freshwater, including safeguarding the life supporting capacity of freshwater, cultural and primary production values, and meet the Objectives of PPC1. In particular, the E.coli and clarity numerical parameters (Freshwater Objectives) are to be amended so that they can take into account flow and background contaminant levels, natural events and regional and nationally significant infrastructure, and are commensurate with the level of pathogenic risk for contact recreation and cultural values. E.coli and clarity numerical parameters (Freshwater Objectives) should not apply during higher flow events (i.e. above 2x the medium flow), or during the flow recession curve, The approach adopted</p>	

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			<p>in the Horizons region is supported (see suggested wording for E.coli and visual clarity above). AND AMEND Table 3.11-1 following implementation of Policy CA2 such that it gives the effect to Policy CA2 (f) (iv) and (v) and Policy CA3 of the National Policy Statement for Freshwater Management 2014.</p>	
Definition - Stock unit	PC1-11509	Oppose the provision	<p>DELETE Definition – Stock unit AND REPLACE with a definition that applies the OVERSEER Model Best Practice Data Input Standards OR ensure that weights and stock units reflect actual weights and appropriate stock units for the region and are consistent between drystock operations and dairy operations.</p>	<b>SUPPORT</b>
Glossary of Terms	PC1-11510	Not stated	<p>ADD a NEW definition for ‘Nutrient user groups’ - a group of properties in multiple ownership, where the owners of those properties undertake farming activities and operate as a collective for the purposes of nutrient management. AND ADD a NEW definition for ‘Critical Source Area’ - a landscape feature like a gully, swale or a depression that accumulates runoff from an adjacent immediate area, and delivers it to surface waterways such as rivers and lakes, artificial waterways and field tiles; and areas which arise through land use activities and management approaches such as cultivation and winter grazing which result in contaminants being discharged from the activity and being delivered to surface waterways. AND ADD a NEW definition for ‘Best Practicable Option - Best Practicable option in relation to a discharge of a contaminant which may enter water, means the best Methods for preventing or minimising the adverse effects on the environment having regard, among other things, to - (a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and (b) the financial implications, and the effects on the environment, of that option when compared with other options; and (c) the current state of technical knowledge and the likelihood that the option can be successfully applied. AND ADD a NEW definition for ‘In stream nitrate concentration limits (mg/L)’ - the in-stream water quality concentrations required to achieve the identified water management Objective for the associated sub-catchment or Freshwater Management Unit. AND ADD a NEW definition for ‘Allowable in stream nitrate load (tonnes per year)’ - the allowable volume of nitrate-Nitrogen that can pass down</p>	<p><b>SUPPORT</b> the relief sought highlighted in <b>blue</b> <b>OPPOSE</b> in relation to matters highlighted in <b>green</b>.</p>

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			the river at a particular point as determined from the in-stream nitrate-Nitrogen concentration limit. AND ADD a NEW definition for 'Maximum allowable zone load (MAZL)' - the amount of Nitrogen that can be lost below the root zone within a defined water management zone as determined by the in-stream nitrate load limit (adjusted for attenuation between the root zone and the river) AND ADD a NEW definition for 'Measured in-stream nitrate load (tonnes per year)' - the amount of nitrate-Nitrogen measured (based on actual monitoring data) as passing down the river at a particular point.	



# DairyNZ

Submitter ID: 74050

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General	PC1-10159	Support the provision with amendments	RETAIN PPC1 subject to the decision sought in Attachment 1 of the submission AND AMEND PPC1 to provide for any consequential amendments that may be necessary to give effect to the decision sought in this submission AND AMEND to provide any alternative relief that will give effect to this submission, including, where specific relief is sought, words or phrases to similar effect.	
Full achievement of the Vision and Strategy will be intergenerational	PC1-10164	Support the provision with amendments	RETAIN the provisions of PPC1 that are related to the staged approach to achieving the Vision and Strategy. AND RETAIN the text referring to the overall intent of PPC1. AND AMEND to provide a sector neutral approach in the first paragraph of 'Reviewing progress toward achieving the Vision and Strategy' to read: "The overall intent of Chapter 3.11....of achieving the Vision and Strategy, with <del>on farm</del> <u>land based</u> actions carried out and point source discharges..."	<b>SUPPORT</b> submission point regarding amendment to include "land base actions".
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10168	Support the provision with amendments	AMEND Objective 3 to read: "Objective 3: <del>Ten percent</del> <u>Short-term</u> improvements in water quality as the first stage of <u>achieving Objective 1 restoration and protection of water quality for each sub-catchment and Freshwater Management Unit</u> /...Actions put in place and implemented by 2026... of the required change between <del>current</del> water quality in <u>2016</u> , and the 80-year.... the short term water quality attribute^ targets^ <u>for each monitoring site listed</u> in Table 3.11-1." AND AMEND Objective 3 to clarify that Table 3.11-1 is a list of existing water quality monitoring sites.	<b>SUPPORT</b>
Objective 4: People and	PC1-10193	Support the provision	AMEND Objective 4 to read: "Objective 4: People and community resilience/..."	<b>OPPOSE</b> to the extent that "people and communities" don't "undertake adaptive management". However, The Land Tahī supports the use of

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community resilience		with amendments	A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, and cultural well-being <u>and assist community resilience</u> , while:..."	adaptive management as a tool for nutrient management, within the context of a particular farming activity, based on a sub-catchment approach.
Reasons for adopting Objective 3	PC1-10189	Support the provision with amendments	AMEND Reasons for adopting Objective 3 to read: "Objective 3 sets short term <del>goals</del> <u>targets</u> for a 10-year period, to show the first step toward full achievement of water quality consistent with the Vision and Strategy. <u>As noted in the explanation to Table 3.11-1 on page 56, water quality targets are not intended to be used directly as receiving water compliance limits/standards.</u> "	<b>SUPPORT</b>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-12592	Support the provision with amendments	AMEND Policy 1 to read: "...d. <u>Analysing and reporting the effects of mitigation actions to demonstrate Objective 3 is achieved, and acknowledging time lags in the water and on the land.</u> "	<b>SUPPORT</b>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-10196	Support the provision with amendments	AMEND Policy 1 to read: "Policy 1: Manage diffuse <u>and point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens/ Te Kaupapa... a. Enabling activities with a low level <u>or a managed low risk</u> of contaminant discharge to water bodies provided those discharges do not increase; and b. Requiring farming activities <u>to be managed through a tailored, risk-based approach, including;</u> <u>i. each farm and enterprise and demonstrating achievement of industry-agreed good management practice, and;</u> <u>ii. pastoral farms with moderate to high levels of nitrogen leaching over a specified amount contaminant discharge to water bodies, or for to reduce their nitrogen discharges; and...</u> c. Progressively excluding cattle, horses, deer, pigs from rivers, streams, drains, wetlands and lakes; <u>and"</u>	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12741	Support the provision with amendments	RETAIN the first sentence of Policy 2 and clause (b) and (c). AND AMEND Policy 2 (a) to read: "a. Taking a tailored, risk based approach to define mitigation actions on the land <del>that will reduce</del> <u>for</u> diffuse discharges of nitrogen..." AND ADD a NEW clause (e) to read: " <u>Where sub-catchment plans do not exist, individual Farm Environment Plans shall ensure that that the risk of</u>	<b>SUPPORT</b>

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			<p><u>diffuse phosphorus, nitrogen, sediment, and microbial pathogens entering waterbodies is identified by suitably qualified and experienced people, and time-bound and monitored actions are put in place to address risks of phosphorus, sediment and microbial contaminants. For diffuse nitrogen discharges, Farm Environment Plans will:</u></p> <p><u>i. ensure that nitrogen losses stay within a five year rolling average, and</u></p> <p><u>ii. for farms above the 75th percentile value, nitrogen losses decrease to that value, and</u></p> <p><u>iii. for all other farms, nitrogen losses do not exceed the Nitrogen Reference Point."</u></p>	
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-10198	Support the provision with amendments	<p>AMEND Policy 2 (d) to read:</p> <p>"d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the <del>amount</del> <u>risk of current discharge leaving a property from overland flow or leaching below the root zone, as identified in farm environment plans entering waterbodies</u> (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment plan; and..."</p>	<b>SUPPORT</b>
Policy 6: Restricting land use change	PC1-10230	Support the provision with amendments	<p>AMEND Policy 6 to read:</p> <p>"Policy 6: Restricting land use change/ Te kaupapa... Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted.</p> <p>Land use change consent applications that demonstrate clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted.</p> <p><u>Land use changes will generally be approved, where the mitigations proposed in the Farm Environment Plan;</u></p> <p><u>a. do not increase the discharges of phosphorus, sediment and microbial contaminants, and</u></p> <p><u>b. can demonstrate there will be no increase in the nitrogen reference point."</u></p>	<b>SUPPORT</b>
Policy 7: Preparing for allocation in the future	PC1-10229	Support the provision with amendments	<p>RETAIN provisions of PPC1 that are focused on information and processes needed for plan reviews AND AMEND to ensure there is a focus on the course of action to fill information gaps before the review of PPC1.</p> <p>AND AMEND Policy 7 to read:</p> <p><u>"Identify and fill information gaps to prepare for further diffuse discharge reductions and any future property or enterprise-level allocation limits of</u></p>	<b>SUPPORT</b>

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			diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that <del>will</del> <u>may</u> be required by subsequent regional plans, <del>by implementing the policies and methods in this chapter.</del> To ensure this occurs, <u>research will be undertaken in partnership with technical and industry organisations, in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits. collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining "land suitability"</u> AND DELETE Policy 7 (a – d).	
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-10237	Support the provision with amendments	RETAIN Policy 9 AND AMEND to clarify that identifying spatial location of mitigations in sub-catchment plans, will inform what is required of dairy farmers in Farm Environment Plans. AND ADD a NEW clause (e) to read: <u>"e. Where landowners contribute to mitigations as set out in c – d., to recognise this contribution through funding assistance and formal and enduring mechanisms that give the community and the landowner confidence that improvements in water quality are achieved."</u>	<b>SUPPORT</b>
3.11.4 Implementation methods	PC1-10239	Support the provision	ADD a NEW method to read: <u>"Method 3.11.4.13 Research and dissemination of edge of field mitigations that reduce diffuse contaminants/... Waikato Regional Council will research and disseminate a guideline to assist Certified Farm Environment Planners, Waikato Regional Council and landowners choose effective edge of field mitigations that address the risk of discharges from an individual farm context and will reduce the diffuse discharge of nitrogen, phosphorus, sediment and microbial contaminants, by: a. Evaluating existing general guidelines b. Involving technical experts in soil conservation, riparian and wetland management, nutrient management and Overseer from council, industry and research organisations in the development of solutions</u>	<b>OPPOSE</b>  Uncertain and clause "c" is potentially <i>ultra vires</i> WRC's power vis-à-vis the RMA and PPC1/V1.

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			<p>c. <u>Develop a schedule that is linked to Rule 3.11.5.4 that describes acceptable mitigations such as constructed or natural wetlands that are not accounted for currently in Overseer.</u></p> <p>d. <u>Setting up processes to facilitate mutual understanding between landowners and technical experts."</u></p>	
3.11.4.7 Information needs to support any future allocation	PC1-10240	Support the provision with amendments	<p>AMEND Method 3.11.4.7 to read: "3.11.4.7 Information requirements to determine the need for <u>property-level limits on diffuse discharges and any future allocation/...</u> <u>Waikato Regional Council will take a broad-based and integrated approach to assessing existing information and new information gathered through PPC1. It will do this in partnership with other agencies and industries, commissioning research on the effects of property-level limits on waterbodies, and implications for individuals and communities, Gather information and commission appropriate scientific research to inform any future framework for the allocation of diffuse discharges including:</u></p> <p>a. Implementing processes that will support the setting of property or enterprise-level diffuse discharge limits in the future. b. Researching: i. The quantum of contaminants that can be discharged... ... iv. <u>Spatial variability in how land use and mitigations, and the effect of impounded water in hydro-dams affect water quality at a variety of scales, to analyse where mitigations can be put in place for the least cost to the regional community."</u></p>	<b>OPPOSE</b>
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-10241	Support the provision with amendments	<p>AMEND Method 3.11.4.8 to read: "3.11.4.8 Reviewing Chapter 3.11 and developing <u>options an allocation framework</u> for the next Regional Plan/..." AND AMEND 8a. to read: "Waikato Regional Council will: a. Develop <u>options to reduce discharges allocation frameworks for from</u> individual properties and..."</p>	<b>SUPPORT</b>
3.11.4.10 Accounting	PC1-10242	Support the provision with	<p>DELETE from Method 3.11.4.10 clause (d) AND AMEND Method 3.11.4.10 to read: "3.11.4.10 Accounting system and monitoring - <u>Freshwater Management Units/Te pūnaha kauta me te aroturuki"</u></p>	<b>SUPPORT</b>

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system and monitoring		amendments	AND RETAIN clauses (a - c).	
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-10243	Support the provision with amendments	<p>AMEND Method 3.11.4.11 to read:            "3.11.4.11 Accounting system and monitoring – Land activities that affect water Monitoring and evaluation of the implementation of Chapter 3.11/...</p> <p>Waikato Regional Council will:</p> <p>a. Review and report on the progress towards and achievement of the 80-year water quality objectives of Chapter 3.11.</p> <p>a.i <u>Set up a monitoring and accounting system for diffuse discharges that documents current contaminant loads of nitrogen, phosphorus, sediment and microbial pathogens, and expected future loads after mitigation actions are put in place and implemented.</u></p> <p>b. Research, <del>and</del> identify <u>and implement methods a programme of work to assess measure</u> actions at a sub-catchment, property and enterprise level, <del>and</del> <u>for</u> their contribution to reductions in the discharge of contaminants...</p> <p>c. ...</p> <p>d. ...</p> <p>e. <u>Prepare for plan reviews by working in partnership with industry to achieve a-d above, in order to gain an accurate assessment of all sources that contribute to contaminant loads from the land, and track changes in diffuse and point source discharges at the scale of individual landowners and businesses, and collate information on the functioning and success of any Certified Industry Scheme.</u>"</p>	<p><b>OPPOSE</b> reference to "land activities that affect water". Terminology is too uncertain.</p> <p><b>SUPPORT</b> proposed clause "a."</p>
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-10244	Support the provision with amendments	<p>AMEND Method 3.11.4.12 to read:            "3.11.4.12 Support research and dissemination of <del>best practice</del> guidelines to reduce diffuse discharges/...</p> <p>Waikato Regional Council will:</p> <p>a. Develop and disseminate <del>best management practice</del> guidelines for reducing the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens; and</p> <p>b. <u>Work with primary industry and support research into methods for reducing diffuse discharges of contaminants to water.</u>"</p>	<b>OPPOSE.</b> Guidelines should have a principled basis.
3.11.5.7 Non-Complying	PC1-10247	Support the provision with	<p>ADD an advice note to Rule 3.11.5.7 to read:  <u>"Advice note: Changes in land use described above where the resulting land use will not increase diffuse discharges of contaminant, (including that they do not exceed the property or enterprise's Nitrogen Reference</u></p>	<b>SUPPORT.</b> However, the rule and supporting policy should be amended to reflect the substance of the advice note.

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Activity Rule – Land Use Change		amendments	Point), will generally be granted. This will be able to be established at the time that the farm or enterprise has completed a Farm Environment Plan and are managing within their Nitrogen Reference Point."	
Schedule B - Nitrogen Reference Point	PC1-10254	Support the provision with amendments	AMEND Schedule B clauses c and d to read: "...c. The Nitrogen Reference Point must be calculated using the <del>current</del> <u>most recent version</u> of the OVERSEER® Model... d. The nitrogen Reference Point data... with the exceptions and inclusions set out in Schedule B Table 1. <u>When a new version of OVERSEER is issued, the Nitrogen Reference Point may be re-calculated using the latest version of that model. This recalculation should use the same data input file as was used to calculate the first Nitrogen Reference Point in clause a).</u> "	<b>SUPPORT</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12391	Support the provision with amendments	Schedule 1 - CLARIFY that the Farm Environment Plan allows alternative mitigations where it can be shown that these alternative mitigations achieve at least the same reduction of contaminants entering the water bodies as any standard provided for in PPC1.	<b>SUPPORT</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-10255	Support the provision with amendments	AMEND Schedule 1 paragraph 2 to read: "The Farm Environment Plan shall identify all <u>critical source areas</u> <del>sources</del> of sediment, nitrogen, phosphorus..." AND AMEND Schedule 2 (b. iii) by altering the provision to focus on managing critical source areas. AND AMEND to ensure that a 5m cultivation setback from water bodies in low risk areas is not necessary if critical source areas have been identified and mitigations put in place.	<b>SUPPORT</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-10188	Support the provision with amendments	AMEND the 4th paragraph of the explanation of table 3.11-1 (page 56) to read: "The achievement of the attribute targets in Table 3.11-1 will be determined through analysis of 5-yearly monitoring data. <u>Table 3.11-1 lists existing water quality monitoring sites. There is a monitoring site within each sub-catchment. However, the site does not necessarily represent all the surface water flowing from that sub-catchment, as monitoring sites are not all at the downstream confluence of the tributary and the main stem of the Waikato or Waipā River.</u> The variability in water... in the short term. <u>Therefore, Waikato Regional Council will rely on collating and reporting actions put in place, as set out in Policy 1(d), and Methods 3.11.4.10 and 11.</u> "	<b>SUPPORT</b>

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Definition - Certified Farm Environment Planner	PC1-10250	Oppose the provision with amendments	AMEND the Definition of Certified Farm Environment Planner to read: "Certified Farm Environment Planner: is a person or entity certified... c. <u>Has either completed training that demonstrates that they are competent to complete the sediment and microbial risk assessments and mitigation identification in Farm Environment Plans, or has</u> experience in soil conservation and sediment management and, d. <u>The Chief Executive Officer may limit the Certified Farm Environment Planner to particular farming systems where they have the necessary skills and training to complete Farm Environment Plans.</u> "	<b>OPPOSE.</b> Uncertain and potentially <i>ultra vires</i> the powers of WRC.
Definition - Certified Farm Nutrient Advisor	PC1-10251	Oppose the provision with amendments	AMEND the definition of Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient: is a person or entity certified... a. Has completed nutrient management training to <del>at least intermediate</del> <u>advanced</u> level, and..."	<b>SUPPORT</b>
Definition - Setback	PC1-10249	Oppose the provision with amendments	AMEND the definition of setback to read: "Setback: means the distance from the <u>top of the bank bed</u> of a river or lake, or margin of a wetland <u>and the activity specified in Chapter 3.11. (To assist interpretation of what is considered the top of banks of rivers, see Section 4.1 of this Plan).</u> "	<b>SUPPORT</b>



# Department of Conservation

Submitter ID: 71759

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	PC1-13149	Not stated	AMEND PPC1 to ensure further consequential or alternative relief to give effect to the relief sought in the submission is made.	<b>OPPOSE</b>
General	PC1-13150	Support the provision with amendments	<p>REINSTATE Map 3.11-1 as originally notified.            AND REINSTATE the text of Provision 3.11 (area covered) as originally notified.            AND REINSTATE Objective 6 and the reasons for adoption as originally notified.            AND REINSTATE Whangamarino Wetland as a priority area under Policy 8 as originally notified.            AND REINSTATE Policy 15 and AMEND Policy 15 as follows "<del>and make progress towards restoration</del>protect and restore the".            AND AMEND Policy 15 subsection (a). as follows "<del>reduce and minimise avoid</del>".            AND AMEND Policy 15 so that it refers to the short and long-term restoration of the Whangamarino wetland to achieve targets to:</p> <ul style="list-style-type: none"> <li>• reduce sediment deposition, including to the swamp, marsh, fen and bog wetland types</li> <li>• reduce phosphorus loads to the wetland</li> <li>• ensure water levels are ecologically appropriate in that they do not exacerbate water quality effects, and also protect critical habitats</li> <li>• ensure any impacts of the Lower Waikato/Waipā Flood Control Scheme are avoided, remedied or mitigated so as not to adversely affect the sustainable management of the Whangamarino wetland</li> <li>• promote the natural succession of the wetland system, allowing for natural peatland (bog) development (no further loss of bog).</li> </ul> <p>AND REINSTATE Method 3.11.4.4 as it relates to Whangamarino Wetland as originally notified, with amendments that provide for a separate method which requires a Whangamarino Wetland Catchment Management Plan to be developed within 2 years from the date of PPC1</p>	<b>OPPOSE</b>

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			<p>being made operative, and RETAIN aspects including active pest weed and fish management, support for research and testing, and support restoration programmes as originally notified.</p> <p>AND REINSTATE the content of Table 3.11-1 as originally notified.</p> <p>AND REINSTATE the content of Table 3.11-2 as originally notified.</p> <p>AND REINSTATE Map 3.11-2 as originally notified.</p> <p>AND REINSTATE Table 3.7 and any consequential amendments to the Waikato Regional Plan as set out in PPC1.</p> <p>AND ADD NEW implementation methods to achieve the targets for the proposed Whangamarino Wetland Freshwater Management Unit [refer to Appendix E and F of the Submission] as follows; investment in catchment wide programmes to reduce critical sediment sources, minimum fencing setbacks of 10m for all contributing streams/rivers, investment in collaborative stakeholder programme to reduce Lake Waikare bank erosion, mitigation strategy to address sediment, nitrogen and phosphorous from drains entering natural waterways in the Freshwater Management Unit, and a review of all consents that relate to the Lower Waikato Flood Control Scheme by 2020, to identify optimal approach to address water quality.</p> <p>AND ADD NEW objectives, policies and methods in PPC1 to appropriately recognise and provide for natural character values and the requirements under s6(a) of the Resource Management Act 1991.</p> <p>AND AMEND PPC1 to recognise the significance of those individual lakes, wetlands and rivers of regional, national or international significance that have high biodiversity/conservation value.</p>	
General	PC1-8090	Support the provision with amendments	<p>AMEND PPC1 by clearly stating the freshwater values, objectives and limits for each Freshwater Management Unit, AND identifying appropriate methods to achieve the limits (refer to diagram under point 36 of the submission)</p> <p>AND AMEND PPC1 to implement greater changes to the management of contaminant discharges in the short-term, through an allocation regime that recognises land type and achieves a greater short term improvement in water quality</p> <p>AND establish a separate Freshwater Management Unit (FMU) for the Whangamarino Wetland as per the map in Appendix D of the submission, AND include the attributes and values for the FMU described in Appendix E and F of the submission, AND develop an objective and policy framework to acknowledge the importance of the Whangamarino.</p>	<p><b>OPPOSE</b></p> <p>Decision requested lacks sufficient detail for Theland Tahi to determine what the consequences would be if the decision was allowed.</p>

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			<p>AND, with respect to all Freshwater Management Units, AMEND PPC1 to provide for an allocation regime that only permits the discharge of contaminants up to a level that ensures the limits and objectives for the freshwater management unit can be achieved. Where this level of contaminants has already been exceeded, the targets needs to be set with clear implementation methods to achieve them. The regime needs to take account the slope, soil type, drainage and geology of the land</p> <p>AND AMEND PPC1 to establish an efficient allocation regime as follows:</p> <ul style="list-style-type: none"> <li>• State the maximum catchment load of contaminants.</li> <li>• Allocate the maximum catchment load among land uses using a Land Use Capability (LUC) based approach whereby land type including slope, soil type, drainage and geology is the key determinant.</li> <li>• Seek to ensure that activities which would cause the maximum catchment load to be exceeded are avoided</li> <li>• Seek to ensure that in catchments that are already over-allocated, PPC1 establishes methods to phase out over-allocation over time.</li> </ul> <p>AND AMEND PPC1 to ensure that there is a reduction in turbidity in the Waikato Estuary, such that turbidity is not at an "unsatisfactory" level more than 30 per cent of the time</p> <p>AND AMEND PPC1 to include on-going monitoring and an adaptive approach to the management of the turbidity</p> <p>AND AMEND PPC1 to protect the significant values of wetlands as follows:</p> <ul style="list-style-type: none"> <li>• Adopt narrative objectives that relate to water quality</li> <li>• Establish a programme for benchmarking of wetland nutrients and sediment status and its relationship to ecosystem health (plants, fish, mahinga kai)</li> <li>• Establish wetland numeric targets by 2025 (based on attributes suggested in submitters Appendix G).</li> </ul>	

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			<p>AND AMEND to adopt lake attributes in Appendix I of the submission and prioritise lakes for management (highest priority lakes are suggested in Appendix H of the submission).</p> <p>AND ESTABLISH attributes, limits and methods for sediment, temperature, dissolved oxygen and Macro-invertebrate Community Index (MCI).</p> <p>AND ESTABLISH attributes, limits or targets for all contaminants specified in the Vision and Strategy (nutrients, faecal and sediment) for the whole of the Waipā catchment and all tributaries of the Waikato, lakes, wetlands and the coastal environment (refer submitter's Appendices A and B, and D to J).</p>	
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-8131	Support the provision with amendments	AMEND Section 3.11.1 to identify the values for each Freshwater Management Unit.	<b>OPPOSE</b>
Intrinsic values - Ecosystem health	PC1-8139	Support the provision with amendments	<p>EXPAND on the broadly defined Ecosystem Health value to effectively provide for ecological health, ecosystem processes and biological diversity at specific locations, including as a minimum additional values to recognise inanga spawning, native fish migration, biodiversity hotspots (eg areas that are particularly outstanding due to their high proportion of native species and their role as a native species 'refuge'), and threatened/at risk species.</p> <p>AND AMEND 4th bullet point to recognise that while wetlands are important for attenuation of natural flood events, artificial flood storage can have detrimental effects on ecosystem health</p> <p>AND AMEND the 4th bullet point to recognise that while wetlands do have a nutrient/cycling function, they also need clean freshwater to achieve ecosystem health</p> <p>AND ADD a NEW bullet point to protect and restore shallow lakes so they are dominated by submerged native aquatic plants</p> <p>AND ADD a NEW bullet point to ensure lakes exhibit good water quality and are resilient to environmental disturbance and are not algal dominated</p> <p>AND ADD a NEW bullet point to support diverse native species populations including freshwater fish, birds and invertebrates in lakes and wetlands</p> <p>AND ADD a NEW bullet point to ensure that the ecosystem health of wetlands exhibit low disturbance from sediment, nutrients and water level</p>	<b>OPPOSE</b>

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			change affecting water quality, are resilient to environmental disturbance and are dominated by native wetland vegetation AND ADD a NEW bullet point to ensure that the extent and ecological integrity of all wetlands is maintained and enhanced, providing for ecosystem services (water quality) and ecosystem health.	
Intrinsic values - Natural form and character	PC1-8152	Support the provision with amendments	RETAIN and AMEND the Intrinsic value 'Natural form and character' to include lakes, wetlands and the coastal environment as well as rivers. AND AMEND the attributes and characteristics of the Intrinsic value 'Natural form and character' to include natural elements, processes and patterns; biophysical, ecological, geological and geomorphological aspects; natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs; the natural movement of water and sediment including hydrological and fluvial processes; the natural darkness of the night sky (in the coastal environment); places or areas that are wild and scenic; a range of natural character from pristine to modified; and experiential attributes and their content or setting.	<b>OPPOSE</b>
Use values - Wai tapu	PC1-8532	Support the provision with amendments	AMEND the Use values - Wai tapu to be expanded to include lakes, wetlands and the coastal environment as well as rivers.	<b>OPPOSE</b>
Use values - Mahinga kai	PC1-8533	Support the provision with amendments	AMEND Use values - Mahinga kai to include lakes, wetlands and the coastal environment as well as rivers.	<b>OPPOSE</b>
Use values - Human health for recreation	PC1-8535	Support the provision with amendments	AMEND Use values - Human health for recreation to include lakes, wetlands and the coastal environment as well as rivers.	<b>OPPOSE</b>
Use values - Transport and tauranga waka	PC1-8540	Support the provision with amendments	AMEND Use values - Transport and Tauranga waka to include lakes, wetlands and the coastal environment as well as rivers.	<b>OPPOSE</b>

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3.11.2 Objectives	PC1-10521	Support the provision with amendments	<p>AMEND PPC1 to clearly identify freshwater objectives that recognise and provide for intrinsic values for each Freshwater Management Unit.</p> <p>AND AMEND PPC1 objectives so that they reflect a robust analysis under section 32 of the Resource Management Act.</p> <p>AND ADD a NEW objective which safeguards ecosystem health and the health of indigenous species.</p> <p>AND ADD a NEW objective that recognises and provides for the values of freshwater fish species identified in Appendix C of the submission [See submission].</p> <p>AND ADD a NEW objective relating to Whangamarino Wetland, and the significant values of all wetlands that achieves the following:</p> <ul style="list-style-type: none"> <li>• recognises the values and significance of the Whangamarino as a whole wetland system, comprising marsh, swamp, fen and bog wetland types.</li> <li>• gives effect to the National Policy Statement Freshwater Management in recognising and protecting the significant wetlands and overall quality of freshwater is improved.</li> </ul> <p>AND ADD a NEW objective which recognises the significant values of all wetlands.</p> <p>AND ADD a NEW objective which recognises that all sediments and nutrients in the region ultimately accumulate in the Waikato Estuary, and which seeks restoration of healthy ecosystems from the mountains to the sea, including in estuaries.</p>	<p><b>OPPOSE</b></p> <p>Submission it lacks sufficient detail for Theland Tahī to determine what the consequences would be if the decision was allowed.</p>
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10535	Support the provision with amendments	<p>AMEND Objective 1 to place a positive focus on water quality restoration and protection to give effect to the Vision and Strategy, through a reduction of the discharge of contaminants, including diffuse sources of nutrients and from erosion.</p>	<p><b>OPPOSE.</b> The submission point lacks sufficient detail for Theland Tahī to determine what the consequences would be if the decision was allowed.</p>

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Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-10537	Support the provision with amendments	AMEND Objective 2 to recognise the benefits to the environment from the restoration and protection of water quality in the Waikato and Waipā River catchments. AND DELETE the word 'continue' from the objective.	<b>OPPOSE</b>
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10540	Support the provision with amendments	<b>AMEND Objective 3 so that 10 year targets for water quality improvement be set for lakes using existing available expertise and models to prioritise those lakes to achieve a 20% improvement within 10 years.</b> AND AMEND PPC1 to include the management of discharges of contaminants from point sources.	<b>OPPOSE</b> first point (highlighted in green)
Objective 4: People and community resilience	PC1-10542	Support the provision with amendments	AMEND Objective 4 to remove the term 'continue'. AND AMEND the objective to remove uncertainty around 'further contaminant reductions' by implementing an allocation regime for contaminants based on current information and knowledge with the ability to amend this regime further information becomes available. AND AMEND clause (a) to require that at least intrinsic values are recognised and provided for. AND AMEND PPC1 to implement greater changes to the management of contaminant discharges in the short-term, through an allocation regime that recognises land type and achieves a greater short term improvement in water quality.	<b>OPPOSE</b>
3.11.3 Policies	PC1-10639	Support the provision with amendments	ADD NEW policies [and rules] to protect inanga spawning habitat.	<b>OPPOSE</b>

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Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-10643	Support the provision with amendments	AMEND Policy 1 to replace " <del>manage and require reductions</del> " with " <u>reduce</u> ". AND AMEND to provide clear definition of the terms low, moderate and high levels of contaminant discharge or replace these terms with other clearly defined terms.	<b>OPPOSE</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-10646	Support the provision with amendments	AMEND Policy 2 to provide clearer direction to landowners and PPC1 users by amending Policy 2 to read: " <del>Manage and require reductions in</del> <u>Reduce</u> sub-catchment wide diffuse discharges..."	<b>OPPOSE</b>
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-10653	Support the provision with amendments	AMEND Policy 3 to read as follows: " <del>Manage and require reductions in</del> <u>Reduce</u> diffuse discharges of nitrogen..." AND AMEND to provide clarity of the outcomes of the proposed wording 'reducing average contaminant discharges over time'. AND AMEND PPC1 to introduce a more efficient land-based allocation regime.	<b>OPPOSE</b>
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-10655	Support the provision with amendments	AMEND Policy 4 to provide clarity around the use of term cumulatively (ie the cumulative effects of each individual contaminant or of all contaminants together). AND AMEND to provide a definition for 'low discharging activities'. AND AMEND to provide greater specificity around the 'future' mitigation that is intended. AND AMEND to provide greater certainty about the future timeframe that is being referred to in the Policy.	<b>OPPOSE.</b> The submission lacks sufficient detail for Theland Tahi to determine what the consequences would be if the decision was allowed. However, general intent of the submission is supported in principle.
Policy 5: Staged approach	PC1-10661	Support the provision with amendments	RETAIN Policy 5. AND AMEND PPC1 to provide greater clarity about how water quality targets will be achieved. AND AMEND to implement a land-based allocation regime that allocates the discharge of contaminants to ensure ecosystem health and to ensure	<b>OPPOSE</b>



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			that the potential of natural resources are retained to meet the reasonably foreseeable needs of future generations.	
Policy 6: Restricting land use change	PC1-10664	Support the provision with amendments	AMEND Policy 6 to provide greater direction to decision makers when they are considering applications for a non-complying land use change under Rule 3.11.5.7. ALTERNATIVELY, CONSIDER introducing a Prohibited Activity rule in place of 3.11.5.7 to avoid adverse effects of land use change on water quality.	<b>OPPOSE</b>
Policy 7: Preparing for allocation in the future	PC1-10667	Support the provision with amendments	AMEND Policy 7 so that the criteria for identifying land suitability is used now to implement a land based allocation regime that achieves the purpose of the RMA by ensuring that the potential of natural and physical resources is sustained to meet the reasonably foreseeable needs of future generations. AND AMEND to read: "...the policies and methods in this chapter. <del>To ensure this occurs, collect information and undertake research to support this, including collecting information about current discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</del> <del>Any future allocation should consider the following principles:"</del> AND DELETE Bullet points (a), (b), (c) and (d) [NOTE that the submitter may have mistakenly requested that all of this be deleted from Policy 7, given that they also asked for Policy 7(b) and (d) to be amended]. Consequential relief is that the deleted text should be included as a method under section 3.11.4 [see submission point 10633]. AND AMEND clause (b) to clarify what is meant by flexibility of development of tangata whenua ancestral land and how this part of the policy will be achieved. AND AMEND clause (d) to include the term 'where appropriate' or wording with similar effect to ensure that new data and knowledge is used where it is relevant, reliable and accurate for the particular allocation being considered.	<b>OPPOSE</b>
Policy 8: Prioritised implementation	PC1-10670	Support the provision with amendments	AMEND Policy 8 in a way that would see all wetland and lake sub-catchments being included as Priority 1 in Table 3.11-2.	<b>OPPOSE</b>

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Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-10671	Support the provision with amendments	AMEND Policy 9 to clarify the support that the policy intends to provide for efficient and effective water quality improvements. AND AMEND to read: "...edge of field mitigation measures. Support measures that efficiently and effectively contribute to water quality improvements. this approach includes:..." AND AMEND to achieve greater clarification on what form engagement will take and a timeframe for when this can be expected to occur for each priority area category. AND REPLACE use of the word "mitigations" with "mitigation measures" in Policy 9. AND AMEND clause (c) to ensure that those mitigation measures with the greatest environmental outcomes are prioritised and acknowledging that this could require high cost options to achieve desired outcomes. AND AMEND clause (d) by replacing "a mitigation" with "mitigation measure(s)". AND AMEND clause (d) to achieve greater certainty around how this section will be achieved and the methodology that Council intends to apportion diffuse discharge reductions to each farming enterprise.	<b>OPPOSE</b>
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-10745	Support the provision with amendments	RETAIN Policy 16 AND AMEND Policy 16 and PPC1 to include a land-based allocation regime.	<b>OPPOSE</b> land-based allocation regime.
Policy 17: Considering the wider context of the Vision and Strategy	PC1-10746	Oppose the provision with amendments	AMEND Policy 17 to reflect the clear direction provided in higher level documents including the Resource Management Act, the National Policy Statement for Freshwater Management and the Vision and Strategy for Waikato and Waipā Rivers. AND DELETE all reference to the wording 'secondary benefit'.	<b>OPPOSE</b>
3.11.4 Implementation methods	PC1-10633	Support the provision with	ADD NEW Methods to achieve the new proposed objective [see submission point PC1-10521].	<b>OPPOSE</b>

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		amendments	<p>AND ADD a NEW Method which prioritises the capture of key information to inform the management of lakes with little or no recent water quality information e.g Te Otamanui Lagoon, Lake Rotongaroti, Lake Rotongaro, Lake Rotokaraka, Lake Hotoananga, Lake Pikopiko, Lake Komakoru, Lake Rotokaeo, Lake Opuatia.</p> <p>AND ADD a NEW method to prioritise further research on nutrient and sediment attenuation tools for use in lake catchments.</p> <p>AND ADD regulatory methods for private land in lake catchments where protection works on public land adjoining lakes has been completed, where the regulatory methods require fencing around waterbodies and the planting of vegetative buffers, together with compulsory implementation of farm management plans.</p> <p>AND ADD a NEW Method or Methods into PPC1 to actively reflect current best practice in relation to the protection of peat lakes. At a minimum the method or methods should focus on maintaining ground water levels over the summer periods, creating good buffer zones, and reducing cultivation on peat solids or establishing large setbacks from cultivation to reduce the effects of peat shrinkage on the lake ecosystem.</p> <p>AND ADD a NEW Method to ensure that the significant values of all wetlands are not impacted by elevated levels of nutrient and sediment by supporting:</p> <ul style="list-style-type: none"> <li>• fencing setbacks of 10m for all wetlands,</li> <li>• requirements that Farm Environment Plans identify critical wetland areas, and identify how elevated nutrients/sediment will be avoided or mitigated,</li> <li>• requirements that Farm Environment Plans to identify where existing wetland drainage can be restored to prevent the drying of wetlands,</li> <li>• benchmarking of wetland nutrient and sediment status by 2023, and</li> <li>• establishment of a research programme to determine the attenuation capacity of natural wetlands.</li> </ul> <p>AND ADD a NEW method to achieve the targets for the proposed Whangamarino wetland Freshwater Management Unit outlined in Appendix E and F of the submission, that supports:</p>	

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			<ul style="list-style-type: none"> <li>• Investment in catchment wide programmes to reduce critical sediment sources</li> <li>• Minimum fencing set-backs of 10 metres for all contributing streams/rivers</li> <li>• Investment in collaborative stakeholder programmes to reduce Lake Waikare bank erosion</li> <li>• development of a mitigation strategy to address sediment, nitrogen and phosphorus from drains entering natural waterways in the Freshwater Management Unit</li> <li>• A review of all consents that relate to the Lower Waikato Flood Control Scheme by 2020, to identify the optimal approach to address water quality</li> </ul> <p>AND ADD a NEW Method with the new text from Policy 7 '<u>To ensure this occurs, collect information and undertake research... should take advantage of new data and knowledge</u>' [NOTE that the submitter may have mistakenly requested that all of this be deleted from Policy 7, given that they also asked for Policy 7(b) and (d) to be amended].</p>	
3.11.4.5 Sub-catchment scale planning	PC1-10759	Support the provision with amendments	<p>AMEND Method 3.11.4.5 to provide greater clarity for plan users around when a sub-catchment plan will be required.</p> <p>AND AMEND Method 3.11.4.5 (a) to ensure that mitigation measures with the greatest environmental benefits be prioritised recognising that this could require high cost options to achieve desired outcomes.</p>	<b>OPPOSE</b> second point (highlighted in green).
3.11.4.7 Information needs to support any future allocation	PC1-10764	Support the provision with amendments	AMEND Method 3.11.4.7 to ensure the immediate introduction of a land-based allocation regime, which can be amended as further information becomes available.	<b>OPPOSE</b>
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for	PC1-10765	Support the provision with amendments	AMEND Method 3.11.4.8 to see the immediate introduction of an allocation regime that considers land type and can be amended as further information becomes available.	<b>OPPOSE</b>

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the next Regional Plan				
3.11.5 Rules	PC1-11054	Support the provision with amendments	<p>PUT ON HOLD the Rules [in section 3.11.5] until an evaluation is undertaken to illustrate whether the rules proposed are the most appropriate way to achieve the objectives. If the existing rules are determined not to be the most appropriate, replacement rules would need to be implemented in PPC1</p> <p>AND REVIEW the Permitted Activity Rules to ensure they do not authorise activities that would not achieve the standards in s70 RMA, AND ensure any rules for activities that do not meet these standards are controlled activities as a minimum</p> <p>AND AMEND the stock exclusion provisions in the Rules to require that sheep are excluded from outstanding water bodies, and that cattle, horses, deer and pigs are excluded from all water bodies, including ephemeral water bodies. This should also be reflected in Schedule C and throughout Chapter 3.11</p> <p>AND ADD additional rule provisions to protect inanga spawning habitat.</p>	<b>OPPOSE</b>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11056	Oppose the provision with amendments	No specific decision sought in terms of Rule 3.11.5.3's Certified Industry Schemes provisions.	<b>OPPOSE</b>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-11059	Support the provision	<p>RETAIN Rule 3.11.5.7 with stronger policy guidance to support its use.</p> <p>ALTERNATIVELY, CONSIDER a prohibited activity rule to replace Rule 3.11.5.7, as a mechanism to avoid adverse effects of land use change on water quality.</p>	<b>OPPOSE</b>
Schedule A - Registration with Waikato Regional Council	PC1-11060	Support the provision with amendments	<p>RETAIN Schedule A.</p> <p>AND AMEND Schedule A to require prompt information collection over a shorter period of time, verification of stocking numbers via reconciliations/receipts, updates to information required regularly (6 monthly) including on stocking numbers and land size (as a result of subdivision/amalgamation).</p>	<p><b>OPPOSE</b></p> <p>Submission point lacks sufficient detail for The Land Tahī to determine what the consequences would be if the decision was allowed.</p>

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Schedule C - Stock exclusion	PC1-11055	Support the provision with amendments	<p>AMEND Schedule C to require that sheep are excluded from outstanding water bodies, and that cattle, horses, deer and pigs are excluded from all water bodies, including ephemeral water bodies. This should also be reflected throughout Chapter 3.11.</p> <p>AND AMEND Schedule C to require that all new fencing alongside permanent rivers, lakes and outstanding waterbodies be setback at least 10m from the bed of the waterbody and wetlands. For intermittent rivers and wetlands a 5m setback for new fencing is sought.</p> <p>AND AMEND PPC1 permitted and controlled activity rules in accordance with these changes to Schedule C.</p>	<b>OPPOSE</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12393	Support the provision with amendments	<p>AND AMEND Schedule 1(2)(b)(iii) to require 10m fencing setbacks for cultivation from permanent rivers, lakes and outstanding waterbodies and 5m cultivation setbacks from intermittent rivers and wetlands. For peat lakes, a 20m setback for cultivation should be implemented.</p> <p>AND AMEND Schedule 1 to require that setbacks for grazing and cultivation on sloping land be evaluated in relation to soil type to ensure an appropriate setback distance is achieved (the Horizons Regional Council guideline is suggested as a useful start). A 20m setback for sloping land of 20 degrees or more could be appropriate.</p>	<b>OPPOSE</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12394	Support the provision with amendments	<p>AMEND Schedule 1 to provide that Farm Environment Plans recognise the potential role for wetlands to assist in the management of water quality and to recognise their significant values by (a) ensuring all wetlands, permanent and ephemeral are identified in Farm Environment Plans; (b) that the management of nutrients and sediment ensures that adverse effects on wetland systems and their values are avoided or mitigated; and (c) existing drainage of wetlands is stopped and any future drainage of wetlands is avoided.</p>	<b>OPPOSE</b>
3.11.6 List of Tables and Maps	PC1-11061	Support the provision with amendments	<p>AMEND the target in PPC1 for E.coli to '<u>260/100ml</u>' rather than the proposed 540/100ml.</p> <p>AND FURTHER INVESTIGATE the water quality effects (such as nitrate toxicity) on ecosystem health, particularly with respect to native fish and macroinvertebrates, and make changes to targets as appropriate. Refer to the submitter's Appendix B "Changes sought to trophic state and toxicity attributes by Proposed Plan Change 1" for more detail</p> <p>AND AMEND the 10-year and 80-year limits/targets to be more ambitious and have a stronger emphasis on ecosystem health to ensure that the Vision and Strategy is given effect to.</p>	<b>OPPOSE</b>

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			AND AMEND PPC1 to include interim 20-year targets to ensure future targets beyond the initial 10-year period that continues to work toward the longer term 80-year targets.	
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-10536	Support the provision with amendments	REINSTATE the withdrawn parts of Table 3.11-1. AND establish attributes, limits or targets for all contaminants specified in the Vision and Strategy (nutrients, faecal and sediment) for the whole of the Waipā catchment and all tributaries of the Waikato, lakes, wetlands and the coastal environment (refer submitter's Appendices A and B, and D to I). AND AMEND the headings of Table 3.11-1 to provide dates for when targets are to be met. AND AMEND to include interim 20-year targets to sit alongside the 10-year targets and 80-year targets. A 20 per cent improvement in water quality over 20 years is recommended. AND RAISE water quality targets for lakes, so that lake water quality is enhanced, to safeguard ecosystem health and life supporting capacity of lakes, and to ensure that 'long term restoration and protection of water quality' is achieved. AND INSERT attribute targets for Pungarehu Canal/Stream to Table 3.11-1. AND INSERT targets for suspended sediment and deposited fine sediment in Table 3.11-1. AND AMEND Table 3.11-1 to recognise and identify the values of outstanding freshwater bodies (in discussion with the Department of Conservation) and as a minimum, these outstanding freshwater bodies should include the Waikato River including the river mouth and delta, the Whangamarino wetland, the Waitomo Caves/River, the Waikato Peat lakes and Lake Rotokotuku. AND FURTHER INVESTIGATE the water quality effects (such as nitrate toxicity) on ecosystem health, particularly with respect to native fish and macroinvertebrates, and make changes to targets as appropriate. Refer to specific changes requested in the submitter's Appendix B "Changes sought to trophic state and toxicity attributes by Proposed Plan Change 1". AMEND Table 3.11-1 to include attributes for a Whangamarino Wetland Fresh Water Management Unit, as described in the submitter's Appendix E and F.	<b>OPPOSE</b>
Table 3.11-2: List of sub-	PC1-11067	Support the provision with	AMEND Table 3.11-2 so that all wetland and lake sub-catchments are included as Priority 1.	<b>OPPOSE</b>

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catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments		amendments	<p>AND AMEND Table 3.11-2 to recognise the existing works that have already been undertaken for lakes by way of lake restoration plans and farm environment/management plans, AND ensure that the Table reflects the need for their immediate implementation and enforcement [refer Appendix J of the submission - Existing Lakes Management and Planning].</p> <p>AND AMEND to insert Pungarehu Canal/Stream to Table 3.11-2 as Priority 1.</p> <p>AND AMEND Table 3.11-2 so that the identified lakes in Appendix H of the submission [see Appendix H of the submission] be actioned within 1-2 years of PPC1 being made operative, with the management of the remainder of the lakes being actioned within 5 years from the date of the PPC1 being made operative.</p> <p>AND review sub-catchments to ensure they are appropriate for the holistic management of individual lakes through individual Freshwater Management Units.</p>	
Additions to Glossary of Terms	PC1-10658	Support the provision with amendments	<p>ADD into the glossary a NEW definition for 'low discharging activities'</p> <p>AND ADD a NEW definition for 'regionally significant industry'.</p>	<b>OPPOSE.</b>



# Federated Farmers of New Zealand

Submitter ID: 74191

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
General	PC1-10862	Support the provision with amendments	<p>PUT ON HOLD PPC1, pending its withdrawal of orders of the High Court or if it is found to be incompatible with the Northern Area Plan Change AND PROCEED only if and when the Northern Area Plan Change reaches the same stage in its preparation as PPC1. And if and when merged with the Northern Area Plan Change, Proceed with PPC1 as notified, but subject to the amendments requested in this submission, and to refinements to be made to it by way of the further submissions process. AND REINSTATE Policy 15 (withdrawn), subject to refinement through the further submissions process.</p> <p>AND disregard the entire section 32 evaluation associated with PPC1 and undertake a further evaluation of the entire Proposal, as provided for in section 32AA of the Resource Management Act 1991.</p> <p>AND AMEND PPC1 as set out in this submission so it gives effect to the National Policy Statement for Freshwater Management.</p> <p>AND AMEND PPC1 as set out in this submission so as to give effect to the Waikato Regional Policy Statement: Te Tauāki Kaupapa here ā-Rohe.</p> <p>AND AMEND PPC1 so it puts in place no more than an interim set of 'good practice' requirements, pending the development of sub-catchment approach to addressing such water quality issues as do really exist in each Freshwater Management Unit.</p> <p>AND AMEND to better reflect that its principal provisions are strictly interim and that the region should ready itself to progress implementation of changes to the Regional Plan that need to be made in response to the NPS-FM.</p> <p>AND AMEND to address concern that PPC1 has been developed in the absence of all of the mandatory integrated river management plans.</p> <p>AND AMEND PPC1 so that normal farming activities in rural areas are permitted activities.</p> <p>AND AMEND PPC1 so it facilitates the ongoing both carrying out of existing activities and the establishment of new activities.</p> <p>AND AMEND PPC1 so that farmers are able to make changes to their land use, in response to factors such as market demand change, without requiring resource consent.</p>	<p><b>Refer to further submission on FFNZ submission on V1.</b></p>

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			<p>AND ENSURE that the objectives and policies in local authority planning instruments lead to rules that are minimal, understandable and workable.</p> <p>AND ENSURE that provisions in local authority plans are properly communicated to interested parties.</p> <p>AND ENSURE PPC1 pays sufficient attention to private property rights and to the legitimate expectations of the land owners of private land in the Waikato Region.</p> <p>AND ENSURE PPC1 provides for the needs of all the people of the region who engage in land use activities.</p> <p>AND ENSURE little weight is given by the Council to the work of the Collaborative Stakeholder Group when making decisions on submissions on PPC1.</p> <p>AND AMEND PPC1 so it takes a sub-catchment focus (identification and prioritisation of sub-catchments).</p> <p>AND AMEND PPC1 so information is available for farmers and other land users to understand and/or ground-truth their own situation and that of their own sub-catchment.</p> <p>AND AMEND PPC1 to include sub-catchment maps, along with monitoring points and information packs on each sub-catchment that shows the current state, what the targets are, and what PPC1 is expected to deliver.</p> <p>AND AMEND PPC1 so it forms a targeted and a pragmatic prioritised plan.</p> <p>AND AMEND PPC1 to recognise that all groups in society have a part to play in improving water quality and, where water quality is not stable or improving, should be prioritised by way of a whole of catchment approach, in which practical and economical solutions that all users and polluters pay.</p> <p>AND ENSURE that any approach to water quality issues, and nitrogen management issues in particular, is not a wasted effort or disproportionate to the results that might be achieved</p>	

# Fonterra Co-operative Group Ltd

Submitter ID: 74057

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	PC1-10451	Support the provision with amendments	<p>AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently throughout PPC1, differentiating clearly and consistently between:</p> <ol style="list-style-type: none"> <li>1. The long-term (80 year) desired outcomes and the short-term outcomes (being the freshwater objectives for the purpose of the National Policy Statement for Freshwater Management); and</li> <li>2. The concepts of freshwater objective, attribute state and a limit or target.</li> </ol> <p>AND AMEND all references to 'short term objectives' to read: "short term <u>freshwater</u> objectives"</p> <p>AND AMEND all references to 'long term freshwater objectives' to read: "long term <u>freshwater</u> objectives"</p> <p>AND make such other changes as necessary to AMEND reference to 'water quality attribute^ targets^' or 'water quality attribute^ limits^' to read "water quality attribute <u>states</u>" or, where the context requires, to Objective 1 and/or Objective 3.</p> <p>AND AMEND to ensure all amendments to both the English text and Māori translation.</p> <p>AND AMEND to provide for any consequential or alternative relief to give effect to the relief sought in the submission.</p> <p>AND AMEND, RETAIN and DELETE the provisions as set out in the submission.</p>	<b>SUPPORT</b>
Area covered by Chapter 3.11	PC1-11254	Support the provision with amendments	<p>AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently, differentiating clearly and consistently between; the long-term desired outcomes and the short-term outcomes; and the concepts of freshwater objective, attribute state and a limit or target.</p> <p>AND AMEND 3.11 Area covered by chapter 3.11 the 4th paragraph on page 11 to read: "FMUs are required by central government's National Policy Statement for Freshwater Management 2014. FMUs enable monitoring of progress</p>	<b>SUPPORT in part</b> , subject to final drafting.

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			<p>towards meeting <u>freshwater objectives developed to give effect to the National Policy Statement for Freshwater Management and long term desired water quality states developed to give effect to the Vision and Strategy targets and limits</u>."</p> <p>AND AMEND all references to 'short term objectives' to read: "short term <u>freshwater objectives</u>"</p> <p>AND AMEND all references to 'long term freshwater objectives' to read: "long term <u>freshwater objectives</u>"</p> <p>AND MAKE such other changes as necessary to AMEND reference to 'water quality attribute targets' or 'water quality attribute limits' to read "water quality attribute <u>states</u>" or, where the context requires, to Objective 1 and/or Objective 3.</p> <p>AND MAKE all amendments to both the English text and Māori translation.</p>	
Background and explanation	PC1-10449	Support the provision with amendments	<p>RETAIN in the Background and Explanation section that part of the explanation that sets out the overall strategy for reducing contaminant losses and ensure that all provisions are consistent with that strategy</p> <p>AND ADD additional wording at the end of the Background and Explanation section to read: "<u>This introductory and explanatory statement may assist the interpretation of Section 3.11 of the Plan.</u>"</p>	<b>OPPOSE</b>
Water quality and National Policy Statement for Freshwater Management	PC1-11255	Support the provision with amendments	<p>AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently, differentiating clearly and consistently between; the long-term outcomes and the short-term outcomes; and the concepts of freshwater objective, attribute state and a limit or target.</p> <p>AND AMEND all references to 'short term objectives' to read: "short term <u>freshwater objectives</u>"</p> <p>AND AMEND all references to 'long term freshwater objectives' to read: "long term <u>freshwater objectives</u>"</p> <p>AND ADD to the Water Quality and National Policy Statement for Freshwater Management Section (page 14) a final sentence at the end that reads: "<u>For the avoidance of doubt, for the purpose of the National Policy Statement for Freshwater Management, the freshwater objective of this plan is Objective 3.</u>"</p> <p>AND MAKE such other changes as necessary to AMEND reference to 'water quality attribute targets' or 'water quality attribute limits' to read "water quality attribute <u>states</u>" or, where the context requires, to Objective 1 and/or Objective 3</p> <p>AND MAKE all amendments to both the English text and Māori translation.</p>	<b>SUPPORT in part</b> , subject to final drafting.

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Full achievement of the Vision and Strategy will be intergenerational	PC1-11256	Support the provision with amendments	<p>AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently, differentiating between; the long-term desired outcomes and the short-term outcomes; and the concepts of freshwater objective, attribute state and a limit or target.</p> <p>AND AMEND all references to 'short term objectives' to read: "short term <u>freshwater</u> objectives"</p> <p>AND AMEND all references to 'long term freshwater objectives' to read: "long term <u>freshwater</u> objectives"</p> <p>AND AMEND 'Full achievement of the Vision and Strategy will be intergenerational' the last sentence of the second paragraph to read: "The staged approach also allows time for the innovation in technology and practices that will need to be developed to meet the <del>targets and limits</del> <u>long term water quality objectives</u> in subsequent regional plans to be developed."</p> <p>AND AMEND 'Full achievement of the Vision and Strategy will be intergenerational' the 6th paragraph to read: "Municipal and industrial point source dischargers will also be required to revise their discharges in light of the Vision and Strategy and the water quality objectives, <del>and sub-catchment limits and targets</del> that have been set."</p> <p>AND MAKE such other changes as necessary to AMEND reference to 'water quality attribute targets' or 'water quality attribute limits' to read "water quality attribute <u>states</u>" or, where the context requires, to Objective 1 and/or Objective 3.</p> <p>AND MAKE all amendments to both the English text and Māori translation.</p>	<b>SUPPORT in part</b> , subject to final drafting.
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-11258	Support the provision with amendments	<p>AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently, differentiating clearly and consistently between; the long-term desired outcomes and the short-term outcomes; and the concepts of freshwater objective, attribute state and a limit or target.</p> <p>AND AMEND all references to 'short term objectives' to read: "short term <u>freshwater</u> objectives"</p> <p>AND AMEND all references to 'long term freshwater objectives' to read: "long term <u>freshwater</u> objectives"</p> <p>AND AMEND 3.11.1 Values and uses the first paragraph read: "The National Policy Statement for Freshwater Management Policy CA2</p>	<b>SUPPORT in part</b> , subject to final drafting.

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			requires certain steps to be taken in the process of setting <del>limits</del> <sup>^</sup> <u>freshwater objectives.</u> " AND MAKE such other changes as necessary to AMEND reference to 'water quality attribute targets' or 'water quality attribute limits' to read "water quality attribute <u>states</u> " or, where the context requires, to Objective 1 and/or Objective 3. AND MAKE all amendments to both the English text and Māori translation.	
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10455	Support the provision with amendments	AMEND Objective 1 to read: "...By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in the <del>achievement of the restoration and protection, and where necessary restoration, of the 80-year</del> water quality to <u>achieve the 80 year</u> attribute <del>targets</del> <u>states</u> in Table 3.11-1."	<b>SUPPORT</b>
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-10457	Support the provision with amendments	AMEND Objective 2 to read: "Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment, <del>which</del> <u>and the restoration and protection is undertaken in a way and at a rate that enables the people and</u> communities to continue to provide for their social, economic and cultural well-being."	<b>SUPPORT</b>
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater	PC1-10459	Support the provision with amendments	AMEND Objective 3 to read: "...Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, <del>are sufficient to</del> achieve ten percent of the required change between current water quality and the <del>desired</del> 80-year water quality attribute <sup>^</sup> <del>targets</del> <u>states</u> in Table 3.11-1. A ten percent change towards the long term <u>desired</u> water quality <del>improvements</del> <u>states</u> is indicated by the short term water quality attribute <sup>^</sup> <del>targets</del> <u>states</u> in Table 3.11-1."	<b>SUPPORT</b>

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Management Unit				
Objective 4: People and community resilience	PC1-10468	Support the provision with amendments	AMEND Objective 4 to read: "...a) considering the values and uses identified in Section 3.11.1 when taking action to achieve Objectives 1 and 3 the attribute targets for the Waikato and Waipā Rivers in Table 11-1; and..."	<b>SUPPORT</b>
Reasons for adopting Objective 1	PC1-10622	Support the provision with amendments	AMEND the reasons for adopting the Objective 1 to read: "...Objective 1 sets a long term limits goal for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year desired water quality targets states, which result in improvements in water quality from the current state monitored in 2010-2014. The water quality states attributes listed in Table 3.11-1 that will be achieved by 2096 will be used to characterise the desired water quality of the different Freshwater Management Units when the effectiveness of the objective is assessed. Objective 1 gives effect to the Vision and Strategy."	<b>SUPPORT</b>
Reasons for adopting Objective 2	PC1-10623	Support the provision with amendments	AMEND the reasons for adopting Objective 2 to read: "...The full achievement of the Table 11-1 2096 desired water quality attribute states targets may require a potentially significant departure from how businesses and communities currently function, ..."	<b>SUPPORT</b>
Reasons for adopting Objective 3	PC1-10625	Support the provision with amendments	AMEND the reasons for adopting Objective 3 to read: "...at the time of consent renewal, guided by the targets and limits set in Objective 1 and Objective 3. Objective 3 is a freshwater objective for the purposes of the National Policy Statement for Freshwater Management."	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12759	Oppose the provision	REPLACE Policy 2 part d to read: "...d. Requiring Farm Environment Plans to identify the areas and activities representing diffuse discharge risks and the most effective way of managing those risks on the property or enterprise..."	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-10470	Oppose the provision	AMEND Policy 2 part a.to read: "...a. Taking a tailored, risk based approach: i. To define mitigation actions on the land that will reduce diffuse discharges of nitrogen, phosphorus... ii. To manage the diffuse discharge of nitrogen to:	<b>SUPPORT</b> , except OPPOSE the proposed 3 year rolling average.

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			<ul style="list-style-type: none"> <li>• <u>Ensure discharges do not exceed the Nitrogen Reference Point for the property of enterprise; and</u></li> <li>• <u>Avoid management practices that would result in significant inefficiency of nitrogen use; and</u></li> <li>• <u>Reduce on any property or enterprise whose Nitrogen Reference Point is above the 75th percentile nitrogen leaching value so that the discharge is less than or equal to the discharge of the 75th percentile nitrogen leaching value with the maximum three year rolling average to be specified in a resource consent or Farm Environment Plan..."</u></li> </ul>	
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-10471	Oppose the provision	<p>AMEND Policy 4 to read: "Policy 4: Enabling activities with lower discharges to continue or to be established <del>while signalling further change may be required in future...</del> <u>Manage sub-catchment wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new low discharging activities to continue provided that cumulatively the achievement of Objective 3 is not compromised.</u> <del>Activities and uses currently defined as low dischargers may in the future need to take mitigation actions that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens in order for Objective 1 to be met.</del></p> <p><u>Enable existing and new farming that individually and collectively make a minor contribution to contaminant loads and/or that pose a low risk of increased contaminant discharge because the activities:</u></p> <p><u>a. Occupy a small land area; and/or</u></p> <p><u>b. Have a low nitrogen discharge per hectare (and/or the land is not used for an intensive farming use);</u></p> <p><u>Provided that high risk diffuse discharge practices are avoided."</u></p> <p>AND ADD a NEW Policy 4A to read: "<u>Policy 4A: Signalling further change by lower discharging activities may be required in the future.</u></p> <p><u>Recognise that lower discharging activities may need to take additional mitigation actions to reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens after 2026 in order for Objective 1 to be met."</u></p>	<b>SUPPORT</b> except for proposed new Policy 4AB.



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			AND ADD a NEW Policy 4AB to read: " <u>Policy 4AB: Enabling farming activities managed in accordance with industry schemes. Enable existing farming activities that have a low risk of increased contaminant discharge for their farming type and/or a likelihood of diffuse discharge reductions over time because:</u> <u>a. They are part of an industry scheme designed to manage diffuse discharge risk; and</u> <u>b. In accordance with that industry scheme the diffuse nitrogen discharge by those properties whose Nitrogen Reference Point is above the 75th percentile nitrogen leaching value for the relevant freshwater management unit^.</u> "	
Policy 5: Staged approach	PC1-10472	Support the provision with amendments	AMEND Policy 5 to read: "...Recognise that achieving the <u>desired</u> water quality attribute^ <del>states targets</del> set out in Table 3.11-1 will need to be staged over 80 years, to minimise <u>adverse social and economic effects</u> <del>disruption</del> and allow for innovation and new practices to develop, while <del>making a start on</del> reducing discharges of nitrogen, phosphorus, sediment and microbial pathogens, <u>to achieve Objective 3</u> and preparing for further reductions that will be required in subsequent regional plans."	<b>SUPPORT</b>
Policy 6: Restricting land use change	PC1-10473	Oppose the provision	DELETE Policy 6 and REPLACE to read: "... <u>Manage the potential for increases in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens by generally only allowing land use change where it would:</u> <u>a. Not result in increased diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens; and/or</u> <u>b. Promote the implementation of Policy 16.</u> "	<b>SUPPORT</b>
Policy 7: Preparing for allocation in the future	PC1-10474	Oppose the provision with amendments	REPLACE Policy 7 to read: " <u>Policy 7: Preparing for enhanced future water quality management</u> <u>Gather information (including through modelling) and undertake research about discharges and contaminant loads in the Waikato and Waipā catchments to enable future policy making that can most effectively and efficiently achieve reductions in nitrogen, phosphorus, sediment and E.coli beyond those identified in Objective 3.</u> "	<b>SUPPORT</b>
Policy 10: Provide for point source discharges of regional significance	PC1-10598	Support the provision with amendments	AMEND Policy 10 to read: "Policy 10: Provide for Point Source Discharge <u>from activities</u> of regional significance/.... When deciding resource consent applications for Point Source Discharge of nitrogen, phosphorus, sediment and microbial pathogens to water or onto or into land, <u>subject to Policy 11 and Policy 12</u> , provide for the:..."	<b>SUPPORT</b> amendment to include "from activities" as this makes sense.

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3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-10492	Support the provision with amendments	<p>AMEND Rule 3.11.5.2 (4) b ii to read: "...b. The diffuse discharge of nitrogen from the property or enterprise does not exceed either:...whichever is the lesser, over the <u>effective hectares of the whole</u> property or enterprise assessed in accordance with Schedule B."</p> <p>AND ADD a NEW definition of 'effective hectares' to read:  <u>"Effective hectares: means the area of a property or enterprise as measured in hectares which is used for the regular grazing of animals or growing of crops or activities ancillary to those uses and which specifically excludes indigenous forest, plantation forest, closed canopy scrubland and protected wetlands."</u></p> <p>AND ADD a NEW definition of 'protected wetland' to read:  <u>"Protected wetland: for the purpose of the definition of 'effective hectares' means a wetland that is fenced to exclude stock or which is legally protected by a rule in a district or regional plan, condition of resource consent or other legally binding instrument such that it cannot be lawfully grazed, drained, cleared or otherwise modified without the consent of a local authority or third party and for which no such consent has been issued. This definition excludes any wetland constructed for the purpose of mitigating the effects of agricultural discharges on water quality."</u></p>	<p><b>OPPOSE</b></p>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-10496	Support the provision with amendments	<p>AMEND Rule 3.11.5.3 to read:</p> <p>"...2. A Nitrogen Reference Point is <del>produced</del> <u>calculated</u> for the property or enterprise in conformance with Schedule B <u>and provided to Waikato Regional Council within the period 1 September 2018 to 31 March 2019;</u> and</p> <p><u>3. The three-year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council;</u> and"</p> <p>[Bullet point 3 becomes bullet 4.]</p> <p>"4.5. The Certified Industry Scheme meets the <del>criteria</del> <u>standards</u> set out in Schedule 2 <u>and has been approved by the Chief Executive Officer of Waikato Regional Council;</u> and</p> <p>5.6. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council <u>as follows: a. By</u> 1 July 2020... <del>for properties or enterprises within Priority 1 sub- catchments listed in Table 3.11-2, and properties or enterprises with a</del></p>	<p><b>OPPOSE</b></p>

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			<p>Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</p> <p>b. By 1 July 2023 for properties or enterprises within Priority 2 sub-catchments listed in Table 3.11-2;</p> <p>c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and"</p> <p>AND RETAIN Conditions 6, 7 and 8 as notified (but renumbered as appropriate).</p>	
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-10500	Oppose the provision	<p>AMEND Rule 3.11.5.4 and reorder to read: "Rule 3.11.5.4 <del>2A</del> – <del>Controlled</del> <u>Permitted</u> Activity Rule – <u>Pre-2020</u> Farming activities <del>with a Farm Environment Plan</del> not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2, <u>until January 2020</u>, the use of land for farming activities... entering water is a permitted activity <del>until:</del>" AND DELETE Points Bullets 1,2 and 3. "Subject to the following conditions: 4<u>1</u>. The property is registered with the Waikato Regional Council in conformance with Schedule A; and 5<u>2</u>. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B <u>and provided to Waikato Regional Council within the period 1 September 2018 to 31 March 2019</u>; and <del>After the dates set out in 1), 2) and 3) above the use of land shall be a controlled activity (requiring resource consent), subject to the following standards and terms:</del> a. <del>A Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged by the dates specified in I-III below; and</del> b. <del>The property is registered with the Waikato Regional Council in conformance with Schedule A; and</del> c. <del>A Nitrogen Reference point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and</del> 3. <u>The three year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which</u></p>	<b>OPPOSE</b>

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			<p><u>the Nitrogen Reference Point is provided to the Waikato Regional Council; and</u></p> <p><u>4. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</u></p> <p>AND ADD a replacement Rule 3.11.5.4 as follows:  <u>"Rule 3.11.5.4 – Controlled Activity Rule – From 2020 farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2, from 1 January 2020, the use of land for farming activities (excluding commercial vegetable production) where that land use is not registered to a Certified Industry Scheme, and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a controlled activity subject to the following standards and terms:</u></p> <ol style="list-style-type: none"> <li><u>1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</u></li> <li><u>2. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent is lodged; and</u></li> <li><u>3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and</u></li> <li><u>4. Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and</u></li> <li><u>5. Annual records of the nitrogen leaching value are kept and submitted to the Waikato Regional Council by 1 July each year demonstrating that the three-year rolling average nitrogen leaching value as determined using the most recent version of OVERSEER is not, over the duration of the consent, increased beyond the property or enterprise's Nitrogen Reference Point.</u></li> </ol> <p><b><u>Matters of Control</u></b>  <u>Waikato Regional Council reserves control over the following matters:</u></p> <ol style="list-style-type: none"> <li><u>i. The content of the Farm Environment Plan, provided that the Farm Environment Plan is no less stringent than specified in Schedule 1.</u></li> <li><u>ii. The actions and timeframes for undertaking mitigation actions that maintain or reduce the diffuse discharges of phosphorus, sediment or microbial pathogens to water or to land where they may enter water.</u></li> </ol>	

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			<p>iii. <u>The three-year rolling average annual nitrogen loss rate (except that, in accordance with standard 5 no such nitrogen loss shall exceed the Nitrogen Reference Point).</u></p> <p>iv. <u>Compliance with Policy 2.</u></p> <p>v. <u>The duration of the consent.</u></p> <p>vi. <u>The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</u></p> <p>vii. <u>The timeframe and circumstances under which the consent conditions may be reviewed of the Farm Environment Plan shall be amended.</u></p> <p>viii. <u>Procedures for reviewing, amending and re-approving the Farm Environment Plan."</u></p>	
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	PC1-10505	Oppose the provision with amendments	<p>AMEND Rule 3.11.5.5 by separating the permitted and controlled parts of Rule 3.11.5.5 into two rules with the permitted activity rule making commercial vegetable production prior to 1 January 2020 a permitted activity subject to conditions that ensure that there is no expansion of the aggregate land area devoted to that use prior to that date.</p> <p>AND within the controlled activity rule, AMEND conditions f. and g. to read:</p> <p>"...f. the total area of land for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used for commercial vegetable production <u>in any single year</u> during the period 1 July 2006 to 20 June 2016; and</p> <p>g. where any <del>new</del> land is proposed to be used for commercial vegetable production <u>that has not been previously used for commercial vegetable production during the 1 July 2006 to 30 June 2026 period</u>, an equivalent area of land must be removed from commercial vegetable production in order to comply with standard and term f; and..."</p>	<b>OPPOSE</b>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-10506	Oppose the provision	<p>DELETE Rule 3.11.5.6 and REPLACE with a Rule that reads:</p> <p><u>"3.11.5.6 Discretionary Activity Rule – The use of land for farming activities</u> <u>The following activities are discretionary activities (requiring resource consent):</u></p> <p><u>1. The use of land for farming activities and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water that does not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 subject to the following standards and terms:</u></p>	<b>OPPOSE</b>

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			<p>a. <u>The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over the three-year period ending 30 June of the year preceding the year the application is made.</u></p> <p>2. <u>Any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā River catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:</u></p> <p>i. <u>Woody vegetation to farming activities; or</u>  ii. <u>Any livestock grazing other than dairy farming to dairy farming; or</u>  iii. <u>Arable cropping to dairy farming; or</u>  iv. <u>Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u></p> <p><u>Subject to the following standards and terms:</u></p> <p>a. <u>The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over:</u></p> <p>b. <u>Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C.</u></p> <p><u>NOTE: for the purposes of this rule, 'occurring' means a land use being undertaken and this phrase does not include changes in land use for which resource consent or certificates of compliance might have been held but no increased discharges of contaminants had commenced as at 22 October 2016."</u></p> <p>AND AMEND other parts of PPC1 as necessary to clarify that land use change within a property or enterprise (&gt;4.1 ha) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.</p>	
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-10513	Support the provision with amendments	<p>DELETE Rule 3.11.5.7 and REPLACE with a Rule that reads:  <u>"Rule 3.11.5.7 – Non-complying Activity Rule – The use of land for farming activities and land use change</u>  <u>The following activities are non-complying activities (requiring resource consent):</u>  <u>1. The use of land for farming activities and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water; and</u></p>	<b>OPPOSE</b>

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			<p><u>2. Any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise location in the Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:</u></p> <p><u>i. Woody vegetation to farming activities; or</u></p> <p><u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u></p> <p><u>iii. Arable cropping to dairy farming; or</u></p> <p><u>iv. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u></p> <p><u>That do not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 and is not a discretionary activity under Rule 3.11.5.6..."</u></p> <p>AND AMEND PPC1 as necessary to clarify that land use change within a property or enterprise (&gt;4.1 ha) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.</p>	
Schedule B - Nitrogen Reference Point	PC1-10517	Support the provision with amendments	<p>AMEND Schedule B Part c to read:</p> <p>"...c. The Nitrogen Reference Point must be calculated using the <del>current</del> <u>most recent version</u> of the OVERSEER Model (or any other model approved by the Chief Executive of the Waikato Regional Council)..."</p> <p>AND ADD a NEW Part eA of Schedule B to read:</p> <p><u>"...eA: Once a year, following the release of a new version of Overseer (or any other model approved by the Chief Executive of the Waikato Regional Council), the Nitrogen Reference Point will be recalculated by the Waikato Regional Council (or for those registered to a Certified Industry Scheme, by the Certified Industry Scheme provider) using the latest version of that model and same data input file as was used to calculate the Nitrogen Reference Point submitted to Council in accordance with part e of this Schedule. When such a recalculation occurs, the resulting leaching rate becomes the Nitrogen Reference Point for the purposes of Rules 3.11.5.2 to 3.11.5.7..."</u></p> <p>AND AMEND Table 1 setting used for 'missing data' as follows:</p> <p>"In the absence of Nitrogen Referencing information being provided, the Waikato Regional Council will use appropriate default numbers for any necessary inputs to the Overseer Model. <del>Such</del> <u>Such</u> default numbers will generally be around 75% of normal FMU average values <del>for those inputs</del> <u>for the particular farm system type but may be adjusted on the</u></p>	OPPOSE

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			<p><u>basis of farm production data which shall be provided in all cases where the complete suite of Nitrogen Referencing information is unavailable.</u>"</p> <p>AND REPLACE the setting that must be used in that cell corresponding to the 'Soil Description' line of Table 1 to read:</p> <p><u>"In any Farm Management Unit that has complete coverage of S Map, obtain soil description from the Link to S Map within Overseer.</u></p> <p><u>In any Farm Management Unit that does not have complete coverage of S Map use soil order from LRI 1:50,000 data or a soil map of the farm."</u></p>	
Schedule 1 - Requirements for Farm Environment Plans	PC1-12404	Support the provision with amendments	<p>AMEND Schedule 1 part 5 to read:</p> <p>"...5. A description of the following:</p> <p>a. <del>Actions, The property or enterprise's Nitrogen Reference Point timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by that is not to be exceeded by the five three-year rolling average annual nitrogen loss as determined by the use of the current most recent version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; or ..."</del></p>	<b>OPPOSE</b> the three year rolling average.
Schedule 1 - Requirements for Farm Environment Plans	PC1-10559	Support the provision with amendments	<p>AMEND Schedule 1 paragraph 5 to read:</p> <p>"This schedule applies to all farming activities, but it is acknowledged that some provisions will not be relevant to every farming activity.</p> <p><u>Any management plan required by a condition of any resource consent authorising industrial or other wastewater irrigation shall be deemed to be Farm Environment Plan for the purposes of this schedule, provided that the management plan addresses the relevant matters in Section A."</u></p> <p>AND ADD a NEW item 'g' to Section 2 (immediately above Section 3):</p> <p><u>"g. A description of any other wastewater irrigation or fertiliser management activities on the site including the use of fertilised replacements."</u></p>	<b>SUPPORT</b>
Additions to Glossary of Terms	PC1-10616	Support the provision	<p>ADD to the Glossary of terms a definition of regionally significant infrastructure to read:</p> <p><u>"Regionally Significant Infrastructure – means an economic activity based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u></p> <p><u>a. Dairy manufacturing sites;</u></p> <p><u>b. Meat processing plants;</u></p>	<p><b>OPPOSE</b> point highlighted in green.</p> <p><b>SUPPORT</b> otherwise.</p>



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			<p>c. Pulp and paper processing plants; and d. Mineral extraction activities." AND ADD a NEW definition of 'effective hectares' to read: "Effective hectares: means the area of a property or enterprise as measured in hectares which is used for the regular grazing of animals or growing of crops or activities ancillary to those uses and which specifically excludes indigenous forest, plantation forest, closed canopy scrubland and protected wetlands." AND ADD a NEW definition of 'protected wetland' to read: "Protected wetland: for the purpose of the definition of 'effective hectares' means a wetland that is fenced to exclude stock or which is legally protected by a rule in a district or regional plan, condition of resource consent or other legally binding instrument such that it cannot be lawfully grazed, drained, cleared or otherwise modified without the consent of a local authority or third party and for which no such consent has been issued. This definition excludes any wetland constructed for the purpose of mitigating the effects of agricultural discharges on water quality."</p>	
Definition - 75th percentile nitrogen leaching value	PC1-10573	Support the provision with amendments	<p>AMEND Glossary of terms definition of the 75th percentile nitrogen leaching value to read: "...are received by the Waikato Regional Council by 31 March 2019, as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato Regional Council website on or before 20 June 2019."</p>	<p><b>OPPOSE</b> on the basis that should the 75<sup>th</sup> %ile be retained as a method in PPC1/V1, Theland Tahī supports its determination at a sub-catchment level. In that regard, Theland Tahī supports the proposition that it is appropriate that there is certainty regarding the publication of what is considered the 75<sup>th</sup> %ile,</p>
Definition - Certified Industry Scheme	PC1-10583	Support the provision with amendments	<p>AMEND the Glossary of terms definition of Certified Industry Scheme to read: "Certified Industry Scheme: is a scheme that has been certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as meeting the assessment criteria and requirements standards set out in Schedule 2 of Chapter 3.11."</p>	<p><b>SUPPORT</b> subject to agreement on "standards" in Schedule 2.</p>
Definition - Five-year rolling average	PC1-10576	Support the provision with amendments	<p>AMEND the Glossary of terms definition of five-year rolling average to read: "Five Three-year rolling average: means the average of modelled nitrogen leaching losses predicted by OVERSEER from the most recent 5 3 years using the most recent version of OVERSEER to model each of the three years and the same input data for each of the three years as was used to first calculate the nitrogen leaching losses for that year."</p>	<p><b>OPPOSE</b></p>

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			AMEND Rules 3.11.5.2 to 3.11.5.6 as necessary to ensure data required for the calculation of the three year rolling average is collected from the date of decisions on PPC1 are issued.	
Discharges	PC1-13193	Support the provision with amendments	AMEND the text of Background and Explanation as follows: Discharges <del>associate with Farming Land Use</del> <u>in the Waikato and Waipā River Catchments</u> Chapter 3.11 addresses the use of land for farming in the Waikato and Waipā River catchments including associated diffuse <u>discharges of nitrogen, phosphorus, sediment and microbial pathogens. Chapter 3.11 also contains objectives and policies that apply to point source discharges to land and water in the Waikato and Waipā River catchments.</u>	<b>SUPPORT</b>

# Hancock Forest Management (NZ) Ltd

Submitter ID: 73724

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	PC1-8933	Oppose the provision with amendments	<p>AMEND PPC1 by adopting a best practicable option approach through consent conditions OR plan rules, as an interim approach</p> <p>AND AMEND to ensure that all diffuse sources eventually face discharge limits</p> <p>AND AMEND to recognise that low capital cost options can be implemented sooner than high capital cost items</p> <p>AND AMEND so that non-point source discharges are managed within the next ten years using a best practicable option approach as the foundation for regulation</p> <p>AND AMEND so that land use is not 'frozen'. Allow flexibility so that there can be a choice in terms of approach and mitigations</p> <p>AND AMEND to allow land use change as a restricted discretionary activity where the best practicable option is applied from the outset of the land use change</p> <p>AND AMEND so that the OVERSEER Model is part of a matrix approach</p> <p>AND AMEND so that third party approval processes are required to apply for resource consents to ensure transparency and accountability.</p> <p>AND AMEND, so that if an allocation regime is adopted, it is based on consistent foundation (such as LUC) treating like land alike.</p> <p>AND MAKE any other consequential amendments.</p>	<p><b>OPPOSE</b>, on the basis that Theland Tahī does not support a LUC/Natural Capital approach to any future allocation regime; AND subject to the definition of BPO for the purposes of the management of diffuse discharges.</p>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-5782	Oppose the provision	<p>DELETE Rule 3.11.5.7 AND REPLACE it with Best Practicable Option based rules that require those causing the adverse effects associated with their activities to avoid, remedy or mitigate those activities.</p>	<p><b>SUPPORT</b> in part subject to the details of the definition of the proposed BPO for the purposes of the management of diffuse discharges.</p>
Schedule B - Nitrogen Reference Point	PC1-5786	Oppose the provision	<p>DELETE Schedule B and reference to the Nitrogen Reference Point</p> <p>OR AMEND the approach such that Nitrogen Reference Points are used as an information gathering tool only.</p>	<p><b>SUPPORT</b> in part.</p>
Schedule 1 - Requirements for Farm Environment Plans	PC1-5789	Oppose the provision	<p>AMEND Schedule 1 by replacing reliance on Farm Environment Plans with a Best Practicable Options approach to be implemented immediately.</p> <p>OR AMEND, if Farm Environment Plans are retained, by expanding Schedule 1 to include specific and straight forward actions that are known to be viable and reduce contaminant loss.</p>	<p><b>OPPOSE</b> replacing FEPs.</p> <p><b>SUPPORT</b> in part, subject to the details of the definition of the proposed BPO for the purposes of the management of diffuse discharges.</p>

## Horticulture New Zealand (HortNZ)

Submitter ID: 73801

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
General	PC1-9899	Not stated	<p>AMEND PPC1 to acknowledge the effect on the grower community of water quantity decisions made in Variation 6 to the Waikato Regional Plan</p> <p>AND AMEND to acknowledge that Variation 6 transferred the cost of unauthorised takes and the discharges of these takes allowed; because authorisation of these takes provided for the degradation of water quality in the lower Waikato River</p> <p>AND AMEND to acknowledge that the resulting clawback of water quantity allocation post 2030 will reduce access to key mitigation of nutrient discharges</p> <p>AND AMEND to enable commercial vegetable growers to access water at best practice application rates to manage discharges of nutrients more effectively</p> <p>AND AMEND to ensure that the costs incurred by the grower community related to clawback of authorised freshwater abstractions and removal allocation bands are factored into the section 32 analysis for PPC1</p> <p>AND AMEND to ensure key elements of the Waikato Regional Policy Statement are given effect to, including the protection of ecosystem services arising from commercial vegetable production AND provide for continuance of a viable commercial production industry in the objectives, policies and methods</p> <p>AND AMEND to ensure existing commercial vegetable production rotations can be managed according to best practice growing principles by providing for the movement of commercial vegetable production within the Waikato River catchment</p> <p>AND AMEND to ensure that statutory methods, other than the non-complying activity land use change rules, are discharge controls, not section 9 RMA land use controls</p> <p>AND AMEND the section 32 analysis to recognise the effect of the Auckland planning regime on the availability of scarce cropping land</p> <p>AND AMEND to provide opportunities for commercial vegetable production on new sites in the Waikato River catchment as a restricted discretionary activity where it can be demonstrated there is an overall</p>	<p><b>SUPPORT</b> in part, subject to the reasons for submission explained above.</p>

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			reduction of contaminants AND assessment of application for a new commercial vegetable production should allow recognition for any reductions in bacterial contamination as a result of the conversion of land to commercial vegetable production AND if it can be demonstrated that the land use change results in a similar or lesser effect on the core values of the Vision and Strategy, an increase in discharges of nitrogen should be provided for. AND REINSTATE Objective 6. AND MAKE any consequential amendments.	
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-9945	Support the provision with amendments	AMEND Objective 3 to read: "... A ten percent change towards the long term water quality attribute improvements is indicated by the short term water quality attribute targets in Table 3.11-1 <u>or achievement of the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX.</u> " For the purpose of this relief the submitter has produced a 10-year Sub-catchment Load Target Table (Schedule 1C Table XX) and attached it to proposed relief as part of a new Schedule 1C. As an alternative where it is mentioned in this submission, it could be inserted as a new part of Table 3.11-1.	<b>SUPPORT</b> in part, subject to agreement on sub-catchment approach and the sub-catchment loads identified in proposed table Schedule 1C.
Objective 4: People and community resilience	PC1-10005	Oppose the provision with amendments	AMEND Objective 4 to read: "...a. considering the values and uses when taking action to achieve the attribute targets for the Waikato and Waipā Rivers in Table 3.11-1 <u>or achievement of the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX;</u> and b. recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1 <u>and</u> c. recognising that this plan change is transitional, to provide time to <u>develop the tools required to more efficiently allocate responsibility for achieving contaminant reductions targets in the long-term</u> <u>d. enabling the production of contaminant accounting frameworks that support robust measurement of progress to achieving the long-term and short-term target states for attributes and sub-catchment load limits by</u>	<b>SUPPORT</b> in part, subject to agreement on sub-catchment approach and the sub-catchment loads identified in proposed table Schedule 1C.  <b>OPPOSE</b> any decision which includes LUC approach in the context of "natural resource accounting" or other contaminant accounting frameworks.

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			<u>more accurately identifying property level responsibilities for contaminant reduction."</u>	
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-10009	Support the provision	RETAIN Objective 5.	
Reasons for adopting Objective 1	PC1-10012	Support the provision with amendments	AMEND the Reasons for adopting Objective 1 to read: "Objective 1 sets long term limits for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year water quality targets, which result in improvements in water quality from the current state monitored in 2010-2014. The water quality attributes listed in Table 3.11-1 (and/or the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX) that will be achieved by 2096 will be used to characterise the water quality of the different FMU's when the effectiveness of the objective is assessed. <u>There is benefit in providing flexibility to land managers seeking to achieve reductions collaboratively at a catchment or sub-catchment scale. Contaminant load targets are therefore set for sub-catchments to support achieving the Vision and Strategy."</u>	<b>SUPPORT</b> in part, subject to agreement on sub-catchment approach and the sub-catchment loads identified in proposed table Schedule 1C.
Reasons for adopting Objective 2	PC1-10015	Support the provision with amendments	AMEND the Reasons for adopting Objective 2 to read: "Objective 2 sets the long-term outcome for people and communities, recognising that restoration and protection of water quality will continue to support communities and the economy. The full achievement of the Table 11-1 2096 water quality attribute target may require a potentially significant departure from how businesses and communities currently function, and it is important to minimise <u>economic and</u> social disruption during this transition."	<b>SUPPORT</b>
Reasons for adopting Objective 3	PC1-10016	Support the provision with amendments	AMEND the Reasons for adopting Objective 3 to read: "Objective 3 sets short term goals for a 10 years period, to show the first step toward full achievement of water quality consistent with the Vision and Strategy. The effort required to make the first step may not fully reflected in water quality improvements that are measurable in the water in 10 years. For this reason, the achievement of the objective will rely on measurement and monitoring of actions taken on the land to reduce pressures on water quality. <u>A range of actions will be promoted including collaborative</u>	<b>SUPPORT</b> in part, subject to agreement on sub-catchment approach and the sub-catchment loads identified in proposed table Schedule 1C.

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			<p><u>approaches to managing discharges at a sub-catchment scale to achieve sub-catchment load limits.</u></p> <p>Point source discharges are currently managed through existing resource consents, and further action required to improve the quality of these discharges will occur on a case-by-case basis at the time of consent renewal, <u>guided by giving effect to</u> the targets and limits set in Objective 1."</p>	
Reasons for adopting Objective 4	PC1-10017	Support the provision with amendments	<p>AMEND the Reasons for adopting Objective 4 to read: "... Objective 4 seeks to minimise <u>economic and</u> social disruption in the short term, while encouraging preparation for possible future requirements." AND ADD the following statement: <u>"The consenting regime will manage to discharges from activities by managing the use. The regime is, therefore, a discharge consent regime under section 15 RMA not a land use consent regime under section 9 RMA."</u></p>	<b>OPPOSE.</b> Requires further consideration to determine best approach to drafting.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-10050	Support the provision with amendments	<p>AMEND Policy 1 to achieve the intent of the following revisions: "a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase; and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to <u>reduce the effect of their discharges through on-farm and/or off-farm actions;</u> <u>ba. Enabling collective action at a catchment scale by groups seeking to manage discharges as a single entity; and</u> <u>bb. Providing criteria for the approval of natural resource accounting systems used to enable catchment or sub-catchment based approaches;</u> <u>bc. Providing a table of ten-year sub-catchment load targets for the four contaminants (Schedule C Table XX),</u> c. Progressively excluding cattle, horses, deer and pigs from rivers, stream, drains wetlands and lakes."</p>	<b>OPPOSE</b> any decision which includes LUC approach in the context of "natural resource accounting" or other contaminant accounting frameworks.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-10051	Support the provision with amendments	<p>AMEND Policy 2 to read: "Manage and require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities on properties and enterprises by: a. Taking a tailored, risk based approach to define mitigation actions on the land that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm or Enterprise Environment Plan either associated with</p>	<b>SUPPORT</b> subject to agreement on sub-catchment approach and the sub-catchment loads identified in proposed table Schedule 1C

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			<p>a resource consent, or in specific requirements established by participation in a Certified Industry Scheme; and</p> <p>b. Requiring the same level of rigour in developing, monitoring and auditing of mitigation actions on the land that is set out in a Farm <u>or Enterprise</u> Environment Plan, whether it is established with a resource consent or through Certified Industry Schemes; and</p> <p>c. Establishing a Nitrogen Reference Point <u>or proxy</u> for <del>the a</del> property or enterprise that is <u>not part of a consented catchment collective managing a range of properties as a single group</u>; and</p> <p>d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions) <u>when assessed across all 4 contaminants</u>, and proportionate to the scale <u>tailored to ensure reductions are targeted at actions within the sub-catchments that will improve the values of freshwater specified within this plan</u>. Of improving values water quality improvements required in the sub-catchment; and</p> <p>e. Requiring stock exclusion to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."</p>	
Policy 6: Restricting land use change	PC1-10057	Support the provision with amendments	<p>AMEND Policy 6 to read: "Except as provided for in Policy 16, <del>land use change</del> consent applications <u>under Rule 3.11.5.7</u> that demonstrate <u>on the balance</u> an increase in diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted. <del>Land use change e</del> <u>Consent applications that demonstrate on the balance</u> clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted."</p>	<b>OPPOSE</b> on the basis that the decision sought may conflict with the reasons for submission explained above.
Policy 7: Preparing for allocation in the future	PC1-10070	Oppose the provision	<p>AMEND Policy 7 to read: "Any future allocation should consider the following principles: a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and b. Allowance for flexibility of development of tangata whenua ancestral land; and c. <del>Minimise social disruption and costs in the transition to the land</del></p>	<b>SUPPORT</b> in part.



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			<p><u>suitability' approach; and</u>  d. Future allocation decisions should take advantage of new data and knowledge. <u>And;</u>  e. <u>Having regard for the finite nature of High Class Soils</u>  f. <u>Incorporating the principle of 'polluter pays'; meaning that when assessed across the balance of contaminant discharges to water those having the greatest effect bear a proportionally greater cost of the transition."</u></p>	
Policy 9: Sub-catchment (including edge of field) mitigation planning, coordination and funding	PC1-10078	Support the provision with amendments	<p>AMEND Policy 9 to read:  "Policy 9: Sub-catchment (<del>including edge of field</del>) mitigation planning, coordination and funding/Te Kaupapa Here 9: Te whakarite mahi whakangāwari, mahi ngātahi me te pūtea mō te riu kōawāwa (tae atu ki ngā taitapa)  Take a prioritised and integrated approach to sub-catchment water quality management by undertaking sub-catchment planning, and use this planning to support actions including edge of field mitigation measures <u>and catchment collective responses</u>. Support measures that efficiently and effectively contribute to water quality improvements. This approach includes:  a. Engaging early with tangata whenua and with landowners, communities and potential funding partners in sub-catchments in line with the priority areas listed in Table 3.11-2; and  b. Assessing the reasons for current water quality and sources of contaminant discharge, at various scales in a sub-catchment; and  c. Encouraging cost-effective mitigations where they have the biggest effect on improving water quality; and  <u>da. Enable the collaborative management of discharges at a scale greater than a single farm and provide a consenting pathway for groups that form to take responsibility for contaminant reductions by implementing a combination of catchment and paddock scale mitigations that are able to be measured and reported.</u>  d. Allowing, where multiple farming enterprises contribute to a mitigation, for the resultant reduction in diffuse discharges to be apportioned to each enterprise in accordance with their respective contribution to the mitigation and their respective responsibility for the ongoing management of the mitigation.  <u>e. Provide for offsetting where it can be demonstrated there will be a</u></p>	<b>SUPPORT</b> in part.

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			<u>commensurate effect on the restoration of the health and well-being of the Waikato River."</u>	
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	PC1-10088	Support the provision with amendments	RETAIN Policy 11.	
3.11.4.5 Sub-catchment scale planning	PC1-10108	Support the provision with amendments	<p>AMEND Method 3.11.4.5:            "Waikato Regional Council will work with others to develop sub-catchment scale plans <u>and decision support tools</u> (where a catchment plan <u>or tool</u> does not already exist) where it has been shown to be required.            Sub-catchment scale planning will:</p> <p>a. Identify the causes of current water quality decline, identify cost-effective measures to bring about reductions in contaminant discharges, and coordinate the reductions required at a property, enterprise and sub-catchment scale (including recommendations for funding where there is a public benefit identified).</p> <p>b. Align works and services to reduce nitrogen, phosphorus, sediment and microbial pathogen discharges including riparian management, targeted reforestation, constructed wetlands, sediment traps and sediment detention bunds.</p> <p>c. Assess and determine effective and efficient placement of constructed wetlands at a sub-catchment scale to improve water quality.</p> <p>d. Support research that addresses the management of wetlands, including development of techniques to monitor ecological change and forecasting evolution of wetland characteristics resulting from existing land use in the wetland catchments.</p> <p>e. Integrate the regulatory requirements to fence waterways with the requirements for effective drainage scheme management.</p> <p>f Coordinate funding of mitigation work by those contributing to water quality degradation, in proportion to that contribution.</p> <p>g. Utilise public funds to support edge of field <u>or catchment scale</u> mitigations where those mitigations provide significant public benefit.</p> <p>h. In support of method 3.11.4.7, utilise (and coordinate the management</p>	<b>SUPPORT</b> in part, subject to the details of the definition of the proposed BPO for the purposes of the management of diffuse discharges and subject to agreement on sub-catchment approach and the sub-catchment loads identified in proposed table Schedule 1C.

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			<u>of) public funds to share the cost of constructing decision support tools meeting the criteria specified in Schedule 1C Table XX."</u>	
3.11.4.7 Information needs to support any future allocation	PC1-10110	Support the provision with amendments	AMEND Method 3.11.4.7 to read: "a. Implementing processes that will support the setting of property or enterprise-level diffuse discharge limits in the future. b. Researching <u>and making publicly available</u> : i. The quantum of contaminants that can be discharged at a sub-catchment and Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets <u>and/or sub-catchment load targets identified Schedule 1C Table XX</u> . ii. Methods to categorise and define 'land suitability'. iii. Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute targets <u>and/or sub-catchment load targets identified Schedule 1C Table XX</u> . <u>c. Prior to Jan 2019, by working with the Foundation of Arable Research, Horticulture New Zealand and The Pukekohe Vegetable Growers Association to develop a proxy nitrogen reference point for enterprises managing multiple properties and crops using a model or method approved by the Chief Executive of Waikato Regional Council."</u>	<b>SUPPORT</b> in part, subject to the details of the definition of the proposed BPO for the purposes of the management of diffuse discharges and subject to agreement on sub-catchment approach and the sub-catchment loads identified in proposed table Schedule 1C.
3.11.4.10 Accounting system and monitoring	PC1-10113	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "Waikato Regional Council will establish and operate a publicly available accounting system and monitoring in each Freshwater Management Unit, including: a. Collecting information on nitrogen, phosphorus, sediment and microbial pathogen levels in the respective fresh water bodies in each Freshwater Management Unit from: i. Council's existing river monitoring network; and ii. Sub-catchments that are currently unrepresented in the existing monitoring network; and iii. Lake Freshwater Management Units. b. Using the information collected to establish the baseline data for compiling a monitoring plan and to assess progress towards achieving the Table 11-1 water quality attribute targets and c. Using state of the environment monitoring data including biological monitoring tools such as the Macroinvertebrate Community Index to provide the basis for identifying and reporting on long-term trends; and <u>ca. Produce a framework model for the greater Waikato River and</u>	<b>SUPPORT</b> in part.

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			<p>surrounding land using the best available data, that can be adapted to include new decision support tools at the sub-catchment level.</p> <p>d. An information and accounting system for the diffuse discharges from properties and enterprises that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at a sub-catchment, enterprise or property scale."</p>	
3.11.5 Rules	PC1-10162	Support the provision	<p>ADD the following rule:  <u>"Rule 3.11.5.X - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective</u>  <u>The management of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens onto or into land by a catchment collective in circumstances which may result in those contaminants entering water is a restricted discretionary activity (requiring resource consent).</u>  <u>Waikato Regional Council restricts its discretion over the following matters:</u>  <u>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u>  <u>11. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u>  <u>iii. Achieving the contaminant load reduction targets specified for each for sub-catchment in Schedule 1C Table XX</u>  <u>iv. The matter set out in Schedule 1C Catchment Collectives.</u>  <u>v. The term of the resource consent. Minimum 15 years.</u>  <u>vi. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</u>  <u>vii. The timeframe and circumstances under which the consent conditions may be reviewed.</u>  <u>viii. The matters addressed by Schedules A and C and the Nitrogen Reference Point being:</u>  <u>1. In conformance with Schedule B; or</u>  <u>2. Determined through use of proxy farm systems to approximate the nitrogen reference for the catchment collective; or</u>  <u>3. Through modelling a series of collective mitigations that are estimated sufficient to meet the load limit targets, in accordance with the criteria in schedule 1C.</u>  <u>Notification:</u>  <u>Consent applications will be considered without notification, and without the need to obtain written approval of affected persons"</u></p>	<p><b>SUPPORT</b> in part, subject to agreement on sub-catchment approach and the sub-catchment loads identified in proposed table Schedule 1C</p>

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3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-10169	Oppose the provision with amendments	AMEND Rule 3.11.5.7(4) to read: "4. Any land use to commercial vegetable production <u>that cannot be provided for through Rule 3.11.5.5, 3.11.5.6(b), or 3.11.5.X except as provided for under standard and term g. of Rule 3.11.5.5</u> " Or AMEND Rule 3.11.5.7 (4) to read: "4. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5, <u>3.11.5.6 b, or 3.11.5.X</u> "	<b>OPPOSE</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-10215	Support the provision with amendments	ADD a NEW Schedule 1C to provide for sub-catchment scale solutions AND ADD a NEW Schedule 1C to read as follows: <u>"Schedule 1C - Requirements for a sub-catchment scale management plan applying to Rule 3.11.5.X iv - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective.</u> <u>A sub-catchment scale management plan (SSMP) shall be prepared in accordance with the requirements below.</u> <u>1) The (SSMP) must be approved by the Regional Council Chief Executive before an application under Rule 3.11.5.X can be granted by the Council.</u> <u>2) The SSMP must meet or exceed the expected reduction in discharges to freshwater that would be achieved through completing and implementing a farm or enterprise scale farm environment plan in accordance with Schedule 1 and Schedule 1b. The achievement in reduction of discharges must be comparable when considered over all of the properties and enterprises managed by the SSMP.</u> <u>3) The SSMP must be the responsibility of a legal entity that is accountable for achieving compliance with the conditions of a resource consent issued under Rule 3.11.5.X.</u> <u>4) The SSMP must be supported by a decision support tool that is able to be utilised as the accounting framework for the relevant sub-catchment. The decision support tool must:</u> <u>a) Calibrate discharges and hydrological flows to observed monitoring sites within the catchment. The calibration must achieve at least achieve a 'Satisfactory' criteria for a daily model with NSE - 0.6, % bias- +/- 25% and the decision support tool must be capable of continuous upgrade and improvement.</u> <u>b) Be capable of integrating with other sub-catchment, freshwater management unit and catchment scale accounting systems.</u> <u>c) Be able to measure mitigations for microbial, sediment, nitrogen and phosphorus discharges at all scales within the domain of the decision</u>	<b>SUPPORT</b> in part, subject to detail of drafting.

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			<p><u>support tool to a standard approved by peer review agent approved by the Chief Executive of the Regional Council.</u></p> <p><u>d) Be made available to the Council for use in assessing compliance with the load limit targets for the relevant sub-catchment listed in Schedule 1C Table XX.</u></p> <p><u>5) The SSMP must clearly identify how any specified consent condition will be complied with.</u></p> <p><u>6) The SSMP shall contain as a minimum:</u></p> <p><u>a) The name of the legal entity registered with the Waikato Regional Council. Information provided by the Council from registration between 1 Sep 2018 and 31 March 2019.</u></p> <p><u>b) A legal description of all properties and enterprises the legal entity described in Schedule 1C 3) above have legal authority to act on behalf of.</u></p> <p><u>c) A description of the nature of enterprises, farms and properties and the domain of the SSMP.</u></p> <p><u>d) An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the activities within the SSMP domain, and the priority of those identified risks, having regard to sub-catchment load targets in Schedule 1C Table XX below.</u></p> <p><u>e) A schedule of approved mitigation actions and target completion dates."</u></p> <p>AND ADD Schedule 1C Table XX referred to in the submission.</p>	
Additions to Glossary of Terms	PC1-10227	Support the provision with amendments	<p>ADD a NEW definition for Catchment Collective to read:  <u>"Definition - Catchment collective</u>  <u>Catchment collective: means a group of enterprises or properties in multiple ownership, where the owners of those enterprises or properties undertake farming activities and operate as a collective for the purposes of contaminant management."</u></p> <p>AND ADD a NEW definition for Certified Farm Environment Planner (Commercial Vegetable Production) to read:  <u>"Certified Farm Environment Planner (Commercial Vegetable Production)</u>  <u>Certified Farm Environment Planner (Commercial Vegetable Production): is a person or entity certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a Certified Farm Environment Planner (Commercial Vegetable Production) and has as a minimum the following qualifications and experience:</u></p> <p><u>a. Tertiary qualifications in agronomy or agricultural engineering</u>  <u>b. More than 15 years' experience working with commercial vegetable</u></p>	<b>SUPPORT</b> in part, subject to detail of drafting.

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			<p><u>cropping systems</u>  <u>c. A certificate of competence approved by the Waikato Regional Council relating to the relevant aspects of environmental farm plan assessment"</u>  AND ADD new definition for Sub-catchment Scale Management Plans to read:  "Sub-catchment Scale Management Plan (SSMP)  <u>Sub-catchment Scale Management Plan (SSMP): means a sub-catchment scale plan for that sets out actions and responsibilities for a Catchment Collective (representing all or part of a sub-catchment) for the purposes of contaminant management that meets or exceeds the expected reduction in discharge to freshwater that would otherwise be achieved through a Farm Environment Plan."</u></p>	
Definition - Certified Farm Nutrient Advisor	PC1-10235	Oppose the provision with amendments	<p>AMEND the definition of Certified Farm Nutrient Advisor to read:  "Certified Farm Nutrient Advisor: is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor and has the following <u>competencies qualifications and experience</u>:  a. Has <del>completed nutrient management training to at least intermediate level,</del> <u>sufficient agronomic knowledge to conduct the assessment of a budget for the farm or enterprise,</u> and  b. Has <del>experience in nutrient management planning the appropriate level of experience in the modelling tool utilised to develop the nutrient budget."</del></p>	<b>SUPPORT</b>
Definition - Enterprise	PC1-10232	Support the provision with amendments	<p>AMEND the definition of Enterprise/s to read:  "Enterprise/s: means one or more parcels of land <u>(or parts of parcels of land)</u> held in single or multiple ownership <u>to support the primary production activities undertaken</u> <del>principle land use or land which the principle land use is reliant upon,</del> and constitutes a single operating unit for the purposes of management. <del>An enterprise is considered to be within a sub-catchment if more than 50% of that enterprise is within the sub-catchment."</del></p>	<b>SUPPORT</b>

# Miraka Limited

Submitter ID: 73492

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
3.11 Waikato and Waipa River Catchments	PC1-8742	Oppose the provision	ADOPT Freshwater Management Units at the sub-catchment scale AND REPLACE the list of Freshwater Management Units on page 11 and in Map 3.11-1 with sub-catchment based Freshwater Management Units.	<b>SUPPORT</b>
Full achievement of the Vision and Strategy will be intergenerational	PC1-8759	Support the provision with amendments	RETAIN Full Achievement of the Vision and Strategy will be Intergenerational AND CLARIFY flexibility for Māori land (refer submission point 8829 re Policy 16 for further discussion) AND AMEND the second-to-last sentence of paragraph 8 so it reads: "This second stage will focus on land suitability and how land use impacts on water quality..." AND AMEND the last sentence to read: "Methods in Chapter 3.11 include the research and information to be developed to support <del>this</del> <u>the determination of a discharge allocation framework.</u> "	<b>SUPPORT</b> in part. Any discharge allocation framework will be the subject of a future plan change process.
Reviewing progress toward achieving the Vision and Strategy	PC1-8765	Support the provision with amendments	AMEND to clarify that second stage of discharge reductions in a future plan review be subject to full Schedule 1 RMA processes.	<b>SUPPORT</b>
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-8767	Support the provision with amendments	AMEND Objective 1 such that sub-catchments are Freshwater Management Units.	<b>SUPPORT in part</b> , subject to review and identification of appropriate sub-catchment boundaries
Objective 3: Short-term improvements in	PC1-8775	Support the provision with	AMEND to clarify how measurement and monitoring will be undertaken (such as with respect to the 10 per cent of the required change by 2016) AND AMEND to ensure that sub-catchments are identified as Freshwater Management Units.	<b>SUPPORT in part</b> , subject to review and identification of appropriate sub-catchment boundaries.



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water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit		amendments		
Reasons for adopting Objective 2	PC1-8907	Support the provision with amendments	AMEND the last sentence of Reasons for Adopting Objective 2 to read as follows: "... and it is important to minimise social disruption <u>and economic hardship</u> during this transition."	<b>SUPPORT</b>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-8810	Support the provision with amendments	AMEND Policy 1(b) to read: "Requiring <u>all farming activities to apply best management practices to mitigate the discharge of contaminants to water bodies.</u> "	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12840	Oppose the provision with amendments	AMEND Policy 2(d) to read as follows: "Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the <del>amount of current discharge</del> <u>difference between current practices and the application of Best Management Practices</u> (those <del>discharging more are currently not applying mitigations</del> expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and"	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-8811	Support the provision with amendments	AMEND Policy 2(b) to extend the parity of rigour of Farm Environment Plans to all farming sectors.	<b>SUPPORT</b>

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Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-8816	Oppose the provision with amendments	AMEND Policy 4 to enable activities with lower discharges to continue or to be established, but with the requirement that they include best management practices for the mitigation of contaminant discharges in Farm Environment Plans and implement such mitigation practices.	<b>SUPPORT</b>
Policy 5: Staged approach	PC1-8819	Support the provision with amendments	AMEND Policy 5 to read as follows: "... staged over 80 years to minimise social disruption <u>and economic hardship</u> and allow for innovation and new practices to develop..." AND AMEND reference to Table 11-1 to be Table " <u>3.11-1</u> "	<b>SUPPORT</b>
Policy 6: Restricting land use change	PC1-8820	Support the provision	RETAIN Policy 6.	<b>OPPOSE</b>
Policy 7: Preparing for allocation in the future	PC1-8821	Support the provision with amendments	AMEND Policy 7 wording to ensure that it is clear that the land suitability approach is not the starting point, but is one potential option subject to the Schedule 1 process once there is more detail for people to evaluate.	<b>SUPPORT in part.</b>
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-8823	Support the provision with amendments	ADD Policy 9(e) to read as follows: " <u>Providing Best Practice management guidelines and examples of cost-effective mitigations that have the biggest effect on improving water quality across a range of farming policies, land types and other biophysical factors, to be included in the Farm Environment Plans and applied on all properties and enterprises in the region.</u> "	<b>SUPPORT</b>
3.11.4.7 Information needs to support any future allocation	PC1-8870	Support the provision with amendments	AMEND Method 3.11.4.7(b)i to read as follows: "The quantum of contaminants that can be discharged at a sub-catchment <del>and</del> <u>or</u> Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets." AND AMEND Method 3.11.4.7(b)ii to read as follows : "Methods to categorise and define 'land suitability', <u>as one potential allocation framework</u> "	<b>SUPPORT</b>

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			AND ADD an Implementation Method 3.11.4.7(c) to read as follows: " <u>Disseminating the information and research results in such a way as to inform the public and facilitate Schedule 1 processes around future allocation frameworks.</u> "	
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-8891	Support the provision with amendments	AMEND Rule 3.11.5.3(5)(a)-(c) with a single 1 July 2020 date for all Farm Environment Plans to be prepared and provided AND REMOVE from Rule 3.11.5.3(5)(a) reference to the 75th percentile nitrogen leaching value.	<b>SUPPORT</b> in part.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-8892	Support the provision with amendments	AMEND Rule 3.11.5.4(1)-(3) with a single date for all properties and enterprises AND DELETE Matters of Control iv AND AMEND the Dates i-iii with a single 1 July 2020 date for all.	<b>SUPPORT</b> , in part.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-8894	Support the provision	RETAIN Rule 3.11.5.7	<b>OPPOSE</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12465	Support the provision with amendments	ADD to Schedule 1 a new clause to the effect that Waikato Regional Council will provide Best Management Practice guidelines for actions or measures to mitigate contaminant discharge in relation to a range of land uses, stock policies, land types and other biophysical factors, and that such mitigating actions or measures are to be included in Farm Environment Plans and implemented on all properties and enterprises across the region.	<b>SUPPORT</b> in part.
Schedule 1 - Requirements for Farm	PC1-8898	Oppose the provision with	DELETE Schedule 1(5)(b) AND ADD a new method where the Nitrogen Reference Point is considered relative to productivity.	<b>OPPOSE</b>

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Environment Plans		amendments		
Schedule 2 - Certification of Industry Schemes	PC1-8899	Support the provision	RETAIN Schedule 2.	<b>OPPOSE</b>
3.11.6 List of Tables and Maps	PC1-8900	Support the provision with amendments	AMEND Table 3.11-1 to provide attribute information at the sub-catchment scale.	<b>SUPPORT</b>
Additions to Glossary of Terms	PC1-8901	Support the provision with amendments	AMEND the Glossary of Terms to include the definition of 'property'.	<b>SUPPORT</b> , subject to relief sought regarding “enterprise” approach.
Definition - Edge of field mitigation	PC1-8903	Support the provision with amendments	AMEND to clarify the definition of edge of mitigation/s.	<b>SUPPORT</b>
Definition - Enterprise	PC1-8904	Support the provision	RETAIN the definition of enterprise.	<b>SUPPORT</b>
Definition - Nitrogen Reference Point	PC1-8905	Support the provision with amendments	AMEND to clarify the definition of Nitrogen Reference Point by including the specific version of the OVERSEER Model.	<b>SUPPORT</b>

## The Royal Forest and Bird Protection Society of New Zealand Incorporated

Submitter ID: 74122

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	PC1-8188	Not stated	AMEND PPC1 to reduce the timeframe for achieving ecosystem health, AND AMEND water quality objectives as set out in Table 1 (see submission) to ensure they provide for ecosystem health, AND AMEND to define with clarity good and best management practices, through the use of schedules which set these out in detail, AND AMEND to require that good management practice be achieved in the first instance and then best management practice if needed to achieve freshwater objectives, AND AMEND to clarify the requirement for the 75th percentile of dairy farmers being required to reduce by including it in policy, AND DELETE all reference to Certified Industry Schemes, AND DELETE all provisions relating to non-notification of resource consents.	<b>OPPOSE</b>
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-8190	Not stated	AMEND PPC1 to include Appendix 1 of the submission, which sets out appropriate freshwater objectives.	<b>OPPOSE</b>
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-8218	Support the provision with amendments	AMEND Objective 1 to read: " <u>Objective 1: The restoration and protection of water quality to achieve healthy rivers by 2050</u> <del>Long term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit</del> " AND RETAIN the explanation.	<b>OPPOSE</b>
Objective 2: Social, economic and	PC1-8220	Support the provision with amendments	AMEND Objective 2 to read: " <u>Objective 2: The restoration, protection and enhancement of water quality contributes to social, economic and</u> "	<b>OPPOSE</b>

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cultural wellbeing is maintained in the long term			<del>cultural well-being Social, economic and cultural well-being is maintained in the long term"</del>	
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-8221	Support the provision with amendments	AMEND Objective 3 to read: " <del>Objective 3: Immediate improvements are achieved in water quality in each sub-catchment and Freshwater Management Unit Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit"</del> AND AMEND the explanation to read: "Actions are put in place and implemented <del>by 2026 immediately</del> to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, <del>are sufficient to achieve ten percent of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1. A ten percent change towards the long-term water quality improvements is indicated by the short-term water quality attribute targets in Table 3.11-1"</del> "	<b>OPPOSE</b>
Objective 4: People and community resilience	PC1-8224	Oppose the provision with amendments	AMEND Objective 4 to read: <del>"A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural well-being in the short term while that requires:</del> a) <del>considering the values and uses when taking action to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens</del> to achieve the attribute targets for the Waikato and Waipā Rivers; b) Recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1".	<b>OPPOSE</b>
Reasons for adopting Objective 1	PC1-8228	Oppose the provision with amendments	AMEND the Reasons for adopting Objective 1 to reflect the changes sought for Objective 1.	<b>OPPOSE</b>
Reasons for adopting Objective 3	PC1-8230	Oppose the provision with amendments	AMEND Reasons for adopting Objective 3 to reflect the changes sought in Objective 3 ,	<b>OPPOSE</b>

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			AND AMEND to ensure that Council set dates for limits/targets in a rule to trigger a review of consents on a sub-catchment or Freshwater Management Unit basis.	
Reasons for adopting Objective 4	PC1-8233	Oppose the provision with amendments	AMEND Objective 4 to read: "A staged approach <del>to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural well-being in the short term while</del> that requires: a) <del>considering the values and uses when taking action to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens</del> to achieve the attribute targets for the Waikato and Waipā Rivers; b) Recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1".	<b>OPPOSE</b>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-8236	Support the provision with amendments	AMEND Policy 1 to clarify what 'low level of contaminant discharge' is.	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-8252	Oppose the provision with amendments	AMEND Policy 2 to read as follows: "Policy 2: <del>Tailored approach to r</del> Reducing diffuse discharges from farming activities. Manage and require reductions in sub-catchment wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities on properties and enterprises by: a. <del>Taking a tailored, risk-based approach to define mitigation actions on the land that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm Environment Plan either associated with a resource consent, or in specific requirements established by participation in a Certified Industry Scheme Requiring the 75th percentile of dairy farms to reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to below the 75th percentile level by 2026;</del>	<b>OPPOSE in part.</b>  <b>SUPPORT</b> points highlighted in green.

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			b. Requiring the same level of rigour in developing, monitoring and auditing of mitigation actions on the land that is set out in a Farm Environment Plan, whether it is established with a resource consent or through Certified Industry Schemes requiring all farming activities to operate using good management practice by 2019; c. where further reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are necessary, these are to be achieved by the use of best management practices; d. where further reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are necessary, these are: (i) proportionate to the amount of current discharge for the activity operating at best management practices (those discharging more are expected to make greater reductions); and (ii) proportionate to the scale of water quality improvement required in the sub-catchment; d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment; and e. mitigation actions required to meet the reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens needed to achieve the losses under Policy 2(b) are specified in a Farm Environment Plan; ef. establishing a Nitrogen Reference Point for the property or enterprise; and eg. requiring stock exclusion to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."	
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable	PC1-8207	Oppose the provision with amendments	ADD a permitted activity rule that gives effect to Policy 3, AND requires the creation of a Nitrogen Reference Point, AND requires that the information necessary to verify the conditions have been complied with on an ongoing basis AND AMEND to ensure that any increase in diffuse discharged of contaminants associated with commercial vegetable production is treated as a non-complying activity AND DELETE reference to a 'tailored approach'	<b>OPPOSE</b>



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production systems			AND DELETE Policy 3(f) AND AMEND to define good and best management practice in a schedule.	
Policy 5: Staged approach	PC1-8257	Oppose the provision with amendments	AMEND Policy 5 to read: "Recognise that achieving the water quality attribute targets set out in Table 3.11-1 will need to be staged over <del>80 years to minimise social disruption and allow for innovation and new practices to develop, while making a start on reducing discharges of nitrogen, phosphorus, sediment and microbial pathogens, and preparing for further reductions that will be required in subsequent regional plans</del> <u>35 years, requiring reductions immediately, and additional reduction in the medium to long term where these are necessary to achieve the targets.</u> "	<b>OPPOSE</b>
Policy 6: Restricting land use change	PC1-8258	Oppose the provision with amendments	AMEND Policy 6 to read: " <del>Except as provided for in Policy 16,</del> Land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens will <del>generally not be granted</del> <u>only be [granted] in exceptional circumstances.</u> Land use change consent applications that <del>demonstrate clear and enduring</del> <u>provide for</u> decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens <u>that will ensure that the water quality targets set out in Table [3].11-1 will generally be granted.</u> "	<b>OPPOSE</b>
Policy 7: Preparing for allocation in the future	PC1-8259	Support the provision with amendments	DELETE Policies 7(b) and (c).	<b>OPPOSE</b>
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-8253	Oppose the provision with amendments	AMEND to ensure that actions such as edge of field mitigation measures are included in rule standards, matters of control and discretion and Farm Environment Plans AND DELETE Policy 9(d).	<b>OPPOSE</b>
3.11.4.2 Certified	PC1-8210	Oppose the provision	DELETE all reference to Certified Industry Schemes from PPC1.	<b>OPPOSE</b>

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Industry Scheme				
3.11.4.6 Funding and implementation	PC1-8398	Support the provision	AMEND Method 3.11.4.6 to include further detail on priorities for council resourcing of implementation.	<b>SUPPORT</b> Relief sought will provide better certainty regarding funding and assistance regarding implementation
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-8414	Support the provision with amendments	AMEND PPC1 to include new schedules that outline good and best management practice and incorporate these into the rules.	<b>OPPOSE</b> Theland Tahī supports what it understands to be the intent of the first two submission points. However, due to the lack of specificity (i.e., proposed drafting), Theland Tahī opposes the submission point.
3.11.5 Rules	PC1-8194	Not stated	AMEND the rules to remove the ambiguity surrounding the 75th percentile AND include the 75th percentile requirement in the rules, not in Schedule 1, AND AMEND matters of control (ii) and (iii) and clause 5(a) of Schedule 1 to make it clear that reductions are expected in accordance with Objective 3 and Policy 2, AND AMEND to adopt require good management practices by all landowners, AND AMEND to ensure that where reductions beyond good management practices are needed to achieve water quality, the rules provide for best management practices.	<b>OPPOSE</b> Theland Tahī supports what it understands to be the intent of the first two submission points. However, due to the lack of specificity (i.e., proposed drafting), Theland Tahī opposes the submission point.
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-8423	Support the provision with amendments	AMEND Rule 3.11.5.1 to only apply to properties under 4.1 hectares OR AMEND Rule 3.11.5.1(5) to read as follows: " <del>For grazed land, the</del> The stocking rate of <u>any land being grazed, at any time, on the land</u> is less than 6 stock units per hectare <u>on the land being grazed at that time;</u> and"	<b>OPPOSE</b>
3.11.5.2 Permitted Activity Rule –	PC1-8425	Support the provision with amendments	AMEND Rule 3.11.5.2(3)(d) to ensure that landowners are required to provide Council with information regarding the land use activities that were occurring on 22 October 2016 and annually thereafter in a way that can be verified to meet the requirements of Rule 3.11.5.2(3)(b).	<b>OPPOSE</b>

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Other farming activities			AND AMEND to ensure that non-compliance with Rule 3.11.5.2(3) and (4) is a non-complying activity.	
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-8208	Oppose the provision with amendments	AMEND Rule 3.11.5.4 so that the permitted aspects are combined with Rule 3.11.5.3 AND AMEND to read as follows: " <u>Subject to Rule 3.11.5.6 and 3.11.5.7, except where the activity complies with as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land... is a permitted activity until controlled activity from:...</u> " AND AMEND to ensure that activities that do not comply with Rules 3.11.5.1, 3.11.5.2 and 3.11.5.4 after the catchment dates are non-complying activities AND DELETE Rule 3.11.5.4(d) AND AMEND the matters of control in Rule 3.11.5.4 to reflect Policy 3 AND AMEND to ensure that any increase in diffuse discharges of contaminants associated with commercial vegetable production is a non-complying activity AND DELETE references that provide for non-notification.	<b>OPPOSE</b>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-8213	Support the provision with amendments	AMEND Rule 3.11.5.6 to ensure that any increase in discharges from commercial vegetable production is a non-complying activity.	<b>OPPOSE</b>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-13115	Support the provision with amendments	Rule 3.11.5.6 - AMEND to ensure that non-compliance with Rule 3.11.5.2(3) and (4) is a non-complying activity AND DELETE references that provide for non-notification.	<b>OPPOSE</b>
3.11.5.7 Non-Complying Activity Rule –	PC1-8214	Support the provision with amendments	AMEND Rule 3.11.5.7 to ensure that any other activities that result in increased diffuse discharges are a non-complying activity. AND DELETE references that provide for non-notification.	<b>OPPOSE</b>

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Land Use Change				
Schedule A - Registration with Waikato Regional Council	PC1-8449	Support the provision with amendments	AMEND Schedule A to ensure that activities are operating at good or best management practice AND CLARIFY that Schedule A(5)(f) refers to those activities listed occurring at 22 October 2016.	<b>OPPOSE</b>
Schedule B - Nitrogen Reference Point	PC1-8451	Support the provision with amendments	AMEND Schedule B(b) to the average annual nitrogen loss, not the highest.	<b>OPPOSE</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-8201	Support the provision with amendments	AMEND Schedule 1(5)(a) to ensure that Farm Environment Plans provide for reductions, rather than maintaining the status quo.	<b>OPPOSE</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12539	Support the provision with amendments	AMEND Schedule 1 to include the following: a. Additional detail on irrigation management to identify irrigated areas on the property and/or a spatial risk map, and any soil moisture monitoring; d. Identification of any significant indigenous biodiversity, outstanding water bodies and sensitive receiving environments on or adjacent to the property.	<b>OPPOSE</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12538	Support the provision with amendments	AMEND Schedule 1 to include the following: b. Clear and specific objectives for land use/ farm management that Farm Environment Plans can be assessed against; c. A clear requirement to calculate and include a Nitrogen Reference Point in the Farm Environment Plan.	<b>OPPOSE</b>
Schedule 2 - Certification of Industry Schemes	PC1-8205	Oppose the provision	DELETE all reference to Certified Industry Schemes from PPC1.	<b>OPPOSE</b>
Definition - Best	PC1-8192	Support the provision with amendments	ADD a NEW Schedule XX that sets out the expectations for best management practice, including standards and measures that Council can enforce	<b>OPPOSE</b> Lacks certainty.

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management practice			<p>AND AMEND the definition for best management practice/s to read:  <del>"For the purposes of Chapter 3.11, means maximum feasible mitigation to reduce the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens from land use activities given current technology</del>  <u>Best management practice/s means the practices set out in Schedule XX"</u></p> <p>AND AMEND objectives and policies to ensure that all landowners have to achieve good management practices by 2019            AND AMEND to require the adoption of good management practice by all landowners and, if necessary work towards best management practice.</p>	
Definition - Certified Farm Environment Planner	PC1-8478	Support the provision with amendments	<p>REMOVE the term 'entity' from the definition of Certified Farm Environment Planner            AND ADD the following requirements:  <del>"a. five years' experience in the management of pastoral, horticultural or arable farm systems; and, is a current member of a professional institute that requires members to subscribe to a Code of Ethics, and has a procedure in place for dealing with complaints made against members; and</del>  <u>a. completed advanced training or a tertiary qualification in sustainable nutrient management (nitrogen and phosphorus) demonstrates to Waikato Regional Council proficiency in the auditing of Farm Environment Plans against the matters set out in Part X[c] of Schedule Y[7]."</u></p>	<p><b>OPPOSE.</b> It is not clear what relevance the “Code of Ethics” has to the qualification and why the number of years of experience is considered unnecessary. Same applies to qualifications. It should not be left to WRC to determine whether a person is “proficient” – a professional qualification is the starting point.</p>
Definition - Certified Farm Nutrient Advisor	PC1-8494	Oppose the provision with amendments	<p>AMEND the definition of Certified Farm Nutrient Advisor as follows:  <del>"is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor has the following qualifications and experience: means a person that holds a Certificate of Completion in Advanced Sustainable Nutrient Management in New Zealand Agriculture from Massey University:</del>  <u>a. Has completed nutrient management training to at least an intermediate level, and has been certified by the New Zealand Institute for Primary Industry Management as meeting the criteria for a 'Certified Dairy Farm System Consultant'; or</u>  <u>b. Has experience in nutrient management planning holds any other qualification, that has been approved by the Chief Executive of Waikato</u></p>	<p><b>OPPOSE.</b> It is not clear why the specific university from which a qualification is gained is relevant.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			<u>Regional Council has being an equivalent standard with respect to the knowledge and competencies required."</u>	
Definition - Cultivation	PC1-8678	Oppose the provision	DELETE (a)-(c) from the definition for cultivation.	<b>OPPOSE</b>
Definition - Dairy Farming	PC1-8685	Support the provision with amendments	AMEND the definition for dairy farming to ensure that all activities associated with dairy farming and those that occur outside the milking season are included.	<b>OPPOSE</b>
Definition - Good Management Practice	PC1-8193	Support the provision with amendments	AMEND the definition of good management practice/s to read: " <del>For the purposes of Chapter 3.11, means industry agreed and approved practices and actions undertaken on a property or enterprise that reduce or minimise the risk of contaminants entering a water body</del> <u>Means the practices set out in Schedule YY"</u> AND ADD a NEW Schedule YY to set out the expectations for good management practice including enforceable standards and measures AND AMEND to require the adoption of good management practice by all landowners and, if necessary work towards best management practice AND AMEND objectives and policies to ensure that all landowners have to achieve good management practices by 2019.	<b>OPPOSE</b>
Definition - Nitrogen Reference Point	PC1-8711	Support the provision with amendments	AMEND the definition for Nitrogen Reference Point to read as follows: " <del>Nitrogen Reference Point: The nitrogen loss number (units of kg N/ha/year) that is derived from an OVERSEER use protocol compliant OVERSEER file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm Nutrient Advisor, using the current version of the OVERSEER model (or another model approved by the Council) for the property or enterprise at the 'reference' point in time. Nitrogen baseline means:</del> <u>a. the discharge of nitrogen below the root zone, as modelled with OVERSEER (where the required data is inputted into the model in accordance OVERSEER Best Practice Data Input Standards) or an equivalent model approved by the Chief Executive of Waikato Regional Council, averaged over a 24 month consecutive period covering two financial years 2014/2015 and 2015/2016 except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016, and expressed in kg per hectare per annum; and</u>	<b>OPPOSE</b> "a." on the basis that the average should be taken for a period longer than 2 years; and that the "highest" N level should form the basis for the reference point. <b>SUPPORT</b> "b.", on the basis that use of the most up to date modelling is appropriate.

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			<u>b[c]. if OVERSEER is updated, the most recent version is to be used to recalculate the nitrogen baseline using the same input data for the same period as used in (a) above."</u>	
Definition - Offset	PC1-8719	Oppose the provision	DELETE the definition for offset/s.	<b>OPPOSE</b>
Definition - Point source discharge	PC1-8722	Support the provision with amendments	AMEND the definition for point source discharge/s to read: <del>"For the purposes of Chapter 3.11 means discharge from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems. Means a discharge from a specific and identifiable outlet onto or into land, a water body or the sea."</del>	<b>OPPOSE</b>
Consequential amendments to Waikato Regional Plan	PC1-8725	Support the provision	RETAIN with any amendments necessary to be consistent with the relief sought in the submission.	<b>OPPOSE</b> insofar as the consequential amendments are contrary to the reasons for further submission.

# Tuwharetoa Maori Trust Board

Submitter ID: 73356

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-10256	Support the provision with amendments	RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u> , discharges of nitrogen..."	<b>OPPOSE</b>
Policy 6: Restricting land use change	PC1-10297	Support the provision with amendments	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will <u>generally</u> not be granted. Land use change consent... that demonstrate <u>clear and enduring</u> identified and <u>sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants.</u> "	<b>OPPOSE</b>
Policy 7: Preparing for allocation in the future	PC1-10301	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime. ...</u> c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the <del>landscape</del> <u>within a sub-catchment</u> to attenuate contaminant loss; and..."	<b>SUPPORT</b>



Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
3.11.4 Implementation methods	PC1-10466	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u>	<b>SUPPORT</b> in part.
3.11.4.3 Farm Environment Plans	PC1-10392	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring <u>programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) <u>and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u>	<b>SUPPORT</b> in part.
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-10511	Support the provision	RETAIN Rule 3.11.5.7.	<b>OPPOSE</b>
Schedule B - Nitrogen Reference Point	PC1-10554	Support the provision with amendments	AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period</del> (specified in clause f)... f. The reference period is <u>an average of the five years between the five financial years spanning 2011/12 to 2015/16 (as consistent with the</u>	<b>OPPOSE</b> NRP should be based on highest not average. Reserve position on final drafting.

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			<p><del>five year rolling average in 5(a) in Schedule 1)the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable..."</del></p> <p>AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:</p> <ul style="list-style-type: none"> <li>(ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks on the farm by different classes of livestock."</u></li> </ul> <p>ADD to the third Column, the words: "<u>Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5.</u>"</p> <p>Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times.</u>"</p> <p>Third column, "<u>Accurate animal weights are difficult to obtain and prove but those operators who manage and collect verifiable weights should be able to use them.</u>"</p> <p>Soil description, second column, "<u>For dairy systems Use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available.</u>"</p> <p>ADD to the third column "To ensure consistency between areas... that don't <u>for the purposes of developing the Nitrogen Reference Point 75th percentile.</u>"</p>	
Schedule 1 - Requirements for Farm Environment Plans	PC1-10592	Support the provision with amendments	<p>AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain... 1.c. A list of land parcels which... i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) <del>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference, and ...</del> iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></p>	<b>SUPPORT</b> in part.

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			<p>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...</p> <p>a. A description of where and how...</p> <p>i. the <u>location and</u> provision of fencing and livestock...</p> <p>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</p> <p>c. A description of the critical source areas...</p> <p>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <del>from</del>to these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></p> <p>ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p> <p>f. A description of cultivation management...</p> <p>d. <u>Establishing and</u> maintaining appropriate buffers...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>a. The boundaries of the property <u>or enterprise (if different)</u>; and...</p> <p>4. A <u>detailed</u> description of the <u>following</u>:  <u>Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>5. A <u>detailed</u> description of the following:</p> <p>a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. A programme of works that sets out:</p> <p>a. <u>The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u></p> <p>i. <u>Record of inspection by Waikato Regional Council staff or;</u></p> <p>ii. <u>Record of inspection by Certified Industry Scheme staff; and</u></p> <p>iii. <u>Record of audit by independent third party accredited auditor.</u></p> <p>7. A version control table that sets out the date of any amendment to <u>the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u></p> <p>8. A declaration from the Certified Farm Environment Planner <u>confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."</u></p>	

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Schedule 2 - Certification of Industry Schemes	PC1-10620	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System</p> <p>The application must <u>clearly</u> demonstrate that the...</p> <p>a. <del>the achievement of</del> the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; and</p> <p>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p>35_ Has documented systems, processes, and...</p> <p>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management (<u>both spatial and temporal</u>)...</p> <p>d. ...</p> <p>e. Timely and <del>appropriate</del> <u>detailed reporting, including (but not limited to):</u></p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme;</u></p> <p><u>and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p>	<p><b>SUPPORT</b> in part.</p>

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			<p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. Internal quality control <u>and verification.</u></p> <p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced...</u></p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained ...</u></p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People The application must demonstrate...</p> <p>1. <del>These</del><u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. <u>Auditing of Farm Environment Plans - prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</u></p> <p>c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1." Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.</p>	
Definition - Enterprise	PC1-10629	Support the provision with amendments	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u> , and constitutes a single..."	<b>SUPPORT</b>

# Waikato and Waipa River Iwi

Submitter ID: 74035

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	PC1-13168	Not stated	RETAIN the general direction that is articulated through PPC1 AND RETAIN the increased controls on land use to 'hold the line' and prevent future land use intensification AND RETAIN the staged approach articulated through PPC1.	<b>OPPOSE</b>
General	PC1-13170	Not stated	No specific decision requested for PPC1, however, the submitter recognises that further plan changes will be required to achieve Te Ture Whaimana within 80 years. The submitter is clear that any future framework for the allocation of rights to discharge contaminants, will not be based on a pure grandparenting approach.	<b>SUPPORT</b> relief that any future framework for allocation of rights to discharge contaminants will not be based on a grandparenting approach.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-3245	Support the provision with amendments	RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: " <u>By 2096, at the latest, or sooner where practicable</u> , discharges of nitrogen..."	<b>OPPOSE</b>
Policy 6: Restricting land use change	PC1-3315	Support the provision with amendments	AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants.</u> "	<b>OPPOSE</b>
Policy 7: Preparing for	PC1-3320	Support the provision with amendments	AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be	<b>SUPPORT</b>

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allocation in the future			required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime.</u> ... c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> any new approach..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:.. c. the natural capacity of the <del>landscape</del> <u>within a sub-catchment</u> to attenuate contaminant loss; and..."	
3.11.4 Implementation methods	PC1-3519	Support the provision with amendments	ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a sub-catchment, property and enterprise level - to reducing the diffuse discharge of contaminants within the sub-catchment where property and/or enterprise is located."</u>	<b>SUPPORT</b> in part.
3.11.4.3 Farm Environment Plans	PC1-3409	Support the provision with amendments	AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>a standardised monitoring programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans."</u>	<b>SUPPORT</b> in part.
3.11.4.10 Accounting system and monitoring	PC1-3425	Support the provision with amendments	AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each..."	<b>SUPPORT</b> in part.

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			<p>c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for...</p> <p>d. <del>An information</del> <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u>"</p>	
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-3526	Support the provision	RETAIN Rule 3.11.5.7.	<b>OPPOSE</b>
Schedule B - Nitrogen Reference Point	PC1-3530	Support the provision with amendments	<p>AMEND Schedule B to read: "A property or enterprise with a...</p> <p>b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period (specified in clause f)...</p> <p>f. The reference period is an average of the five years between<u>the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1)</u>the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable..."</p> <p>AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:</p> <ul style="list-style-type: none"> <li>• (ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks on the farm by different classes of livestock.</u>"</li> </ul> <p>ADD to the third Column, the words: "<u>Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5.</u>"</p> <p>Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times.</u>"</p>	<b>OPPOSE</b> NRP should be based on highest not average.



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			<p>Third column, "<u>Accurate animal weights are difficult to obtain and prove but those operators who manage and collect verifiable weights should be able to use them.</u>"</p> <p>Soil description, second column, "<u>For dairy systems Use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available.</u>"</p> <p>ADD to the third column "To ensure consistency between areas... that don't <u>for the purposes of developing the Nitrogen Reference Point 75th percentile.</u>"</p>	
Schedule 1 - Requirements for Farm Environment Plans	PC1-3563	Support the provision with amendments	<p>AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...</p> <p>1.c. A list of land parcels which...</p> <p>i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</p> <p>iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></p> <p>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...</p> <p>a. A description of where and how...</p> <p>i. the <u>location and</u> provision of fencing and livestock...</p> <p>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</p> <p>c. A description of the critical source areas...</p> <p>i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses from<u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></p> <p>ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p> <p>f. A description of cultivation management...</p> <p>d. <u>Establishing and</u> maintaining appropriate buffers...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>a. The boundaries of the property <u>or enterprise (if different)</u>; and...</p> <p>4. A <u>detailed</u> description of the <u>following</u>: <u>Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will</u></p>	SUPPORT in part.

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			<p><u>be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>5. A <u>detailed</u> description of the following:</p> <p>a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. A <u>programme of works</u> that sets out:</p> <p>a. <u>The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u></p> <p>i. <u>Record of inspection by Waikato Regional Council staff or;</u></p> <p>ii. <u>Record of inspection by Certified Industry Scheme staff; and</u></p> <p>iii. <u>Record of audit by independent third party accredited auditor.</u></p> <p>7. <u>A version control table that sets out the date of any amendment to the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u></p> <p>8. <u>A declaration from the Certified Farm Environment Planner confirming the best available and most accurate information was used for the promulgation and design of mitigation actions."</u></p>	
Schedule 2 - Certification of Industry Schemes	PC1-3668	Support the provision with amendments	<p>AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System</p> <p>The application must <u>clearly demonstrate</u> that the...</p> <p>a. <del>the achievement of</del> the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></p> <p>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management (<u>including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</p> <p>4. Has the appropriate resources to achieve its function and responsibilities under 1(a), <u>including monitoring, auditing and reporting.</u></p> <p>5. Has documented systems, processes, and...</p>	<b>SUPPORT</b> in part.

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			<p>a. Competent and consistent performance in <u>preparing robust Farm Environment Plans preparation, including implementation, and auditing and monitoring.</u></p> <p>b. Effective internal monitoring of performance, <u>including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. Robust data management <u>(both spatial and temporal)</u>...</p> <p>d. ...</p> <p>e. Timely and <del>appropriate</del> <u>detailed reporting, including (but not limited to):</u></p> <p>i. <u>progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p>ii. <u>current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p>g. <u>Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. Internal quality control <u>and verification.</u></p> <p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced</u>...</p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained</u> ...</p> <p>k. ...</p> <p>l. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People</p> <p>The application must demonstrate...</p> <p>1. <del>Those</del> <u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners suitably qualified and experienced.</u></p> <p>2. Auditing of Farm Environment Plans - <u>prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors and independent of the Farm...</u></p>	

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			c. Farm Environment Plans The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1." Or AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.	
Definition - Enterprise	PC1-3674	Support the provision with amendments	AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u> , and constitutes a single..."	<b>SUPPORT</b>

# Waikato Dairy Leaders Group

Submitter ID: 74049

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
Policy 6: Restricting land use change	PC1-11011	Support the provision with amendments	RETAIN Policy 6 guidance for Non-Complying consent applications to increase discharges leaving a property.	<b>OPPOSE</b>
Policy 7: Preparing for allocation in the future	PC1-10944	Support the provision with amendments	RETAIN the provisions of PPC1 that are proactive in anticipating the sorts of information needed to reduce contaminant reductions and achieve Objective 1 AND AMEND Policy 7 to read: " <u>Identify and fill information gaps</u> to prepare for further diffuse discharge reductions and <del>any</del> future property or enterprise-level <del>allocation limits</del> of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that <del>will</del> <u>may</u> be required by subsequent regional plans, <del>by implementing the policies and methods in this chapter.</del> To ensure this occurs, <u>research will be undertaken in partnership with technical and industry organisations in a manner that allows people and communities to understand the social, environmental, cultural and economic implications of the current plan, and engage in debate about any future limits.</u> <del>collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</del> " AND RETAIN wording in PPC1 that subsequent plan changes will be subject to the full public process of the RMA First Schedule, and will enable all those within the Waipā and Waikato River catchments to fully participate.	<b>SUPPORT in part.</b>
Policy 16: Flexibility for development of land returned under Te Tiriti o	PC1-11013	Support the provision with amendments	RETAIN policy guidance for Non-Complying consent applications to change land use on tangata whenua ancestral land AND RETAIN the provision that farm management and mitigation practices on the changed land use apply the most up to date technology and knowledge to minimise contaminant discharge	<b>SUPPORT in part.</b>

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Waitangi settlements and multiple owned Māori land			AND AMEND to provide that any application for land use change on tangata whenua ancestral lands demonstrate that the resulting land use has as low environmental footprint as practicable.	
3.11.4.7 Information needs to support any future allocation	PC1-11009	Support the provision with amendments	AMEND Method 3.11.4.7 to set out a programme of work to provide an accurate assessment of all sources that contribute to the load of contaminant from the land and to track changes in diffuse and point source discharges as a result of actions required by PPC1.	<b>SUPPORT in part.</b>
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-11010	Support the provision with amendments	AMEND Method 3.11.4.8 to set out a programme of work to provide an accurate assessment of all sources that contribute to the load of contaminant from the land and to track changes in diffuse and point source discharges as a result of actions required by PPC1 AND AMEND to require an analysis of frameworks to manage both point source and diffuse discharges of contaminants.	<b>SUPPORT in part.</b>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11026	Support the provision	RETAIN the Permitted Activity status of Rule 3.11.5.3 AND RETAIN the intent to require a Farm Environment Plan that is tailored to each individual farm, from farmers who have signed up to a Certified Industry Scheme AND AMEND to ensure Rule 3.11.5.3 has the same rigour of requirements as Rule 3.11.5.4, including the development, monitoring and enforcement of the Farm Environment Plan.	<b>SUPPORT in part</b>
3.11.5.4 Controlled Activity Rule – Farming activities with a	PC1-11028	Support the provision	RETAIN the Rule 3.11.5.4 Controlled Activity status where farmers are assured of gaining consent, which will be subject to appropriate conditions AND RETAIN the intent to require a Farm Environment Plan that is tailored to each individual farm	<b>SUPPORT in part</b>

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Farm Environment Plan not under a Certified Industry Scheme			AND AMEND to ensure Rule 3.11.5.4 has the same rigour of requirements as Rule 3.11.5.3, including the development, monitoring and enforcement of the Farm Environment Plan.	

# Waikato Regional Council

Submitter ID: 72890

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-2997	Support the provision	RETAIN Policy 2 AND AMEND Policy 2 to make it explicit that those dischargers who exceed the 75th percentile nitrogen leaching value, must reduce their nitrogen losses to the 75th percentile.	<b>OPPOSE</b>
Policy 6: Restricting land use change	PC1-3005	Support the provision with amendments	AMEND Policy 6 to read: "Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens <u>compared with what was occurring at 22 October 2016</u> , will generally not be granted. Land use change consent applications that demonstrate clear and enduring decreases in <del>existing</del> diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>compared with what was occurring at 22 October 2016</u> , will generally be granted."	<b>OPPOSE</b>
3.11.4 Implementation methods	PC1-3101	Support the provision	AMEND 3.11.4 the provisions related to nitrogen management so that the methods can be implemented. AND AMEND the provisions related to commercial vegetable production so that the methods can be implemented.	<b>OPPOSE</b> Lack of certainty re: proposed drafting.
3.11.4.5 Sub-catchment scale planning	PC1-3106	Support the provision with amendments	AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with others to develop ... where it has been shown to be required. Sub-catchment scale planning <del>will</del> <u>may</u> ..." AND AMEND Method 3.11.4.5 (e) to read: "Integrate the regulatory requirements to fence waterways water bodies with the requirements for effective drainage scheme management." AND DELETE Method 3.11.4.5 (f) in its entirety. AND REPLACE Method 3.11.4.5 (f) with: " <u>Develop funding models for sub-catchment planning processes and mitigation actions where an individual's contribution to funding is proportional to their contribution to sub-catchment contaminant discharges.</u> "	<b>OPPOSE</b>
3.11.4.8 Reviewing Chapter 3.11 and	PC1-3111	Support the provision with amendments	AMEND Method 3.11.4.8 (b) to read: "Use this to inform future changes... to meet the <u>water quality attribute</u> ^ targets^ in <u>Table 3.11-1</u> <del>the Objectives</del> "	<b>OPPOSE</b>



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developing an allocation framework for the next Regional Plan				
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	PC1-3115	Support the provision with amendments	AMEND Rule 3.11.5.1 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1 AND AMEND 3.11.5.1 (4) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>(unless the enterprise has a total area of less than or equal to 4.1 hectares); or</u> " AND AMEND 3.11.5.1 (7) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>(unless the enterprise has a total area of less than or equal to 20 hectares)"</u> AND AMEND 3.11.5.1(2) to read: " <u>The use of land for farming activities</u> <del>cattle, horses, deer and pigs are excluded from water bodies in conformance with</del> <u>complies</u> with Schedule C; and" AND AMEND 3.11.5.1(1) to read: "The property <u>(if greater than 2 hectares)</u> is registered with the Waikato Regional Council <del>in conformance</del> <u>shall comply</u> with Schedule A; and"	<b>OPPOSE</b>
3.11.5.2 Permitted Activity Rule – Other farming activities	PC1-3117	Support the provision with amendments	AMEND Rule 3.11.5.2 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1 AND AMEND Rule 3.11.5.2 (2) to read: " <del>Cattle, horses, deer and pigs are excluded from water bodies in conformance</del> <u>The use of land for farming activities complies</u> with schedule C and Conditions 3(e) and 4(e) of this rule; and" AND AMEND Rule 3.11.5.2 (3) (a) to read: "The farming activities do not form part of an enterprise being undertaken on more than one property <u>(unless the enterprise has a total area of less than or equal to 20 hectares); and</u> " AND AMEND Rule 3.11.5.2(4)(b)(ii) so that the reference to the nitrogen threshold (15 kgN/ha/yr) is deleted and replaced with a suitable land use intensity proxy	<b>OPPOSE</b>

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			<p>AND AMEND Rule 3.11.5.2 (3)(b)(i) to read "...used for grazing livestock, the <u>annual</u> stocking rate of the land is no greater than the stocking rate of the land <del>at</del> <u>in the 12 months prior to</u> 22 October 2016. <u>Where the land was not used for livestock grazing in the 12 months prior to 22 October 2016 the land use shall have the same or lower diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens as the land use at 22 October 2016; or"</u></p> <p>AND AMEND Rule 3.11.5.2(e) to clarify that the measurement for calculating the distance requirements for fencing are based on horizontal distances</p> <p>AND AMEND Rule 3.11.5.2 (5) to read: "For all properties greater than 4.1 hectares, from 31 March 2019, in addition to the requirements of Schedule A, the following information must be provided <u>on request</u> to the Waikato Regional Council <del>by 1 September each year."</del></p>	
<p>3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme</p>	<p>PC1-3420</p>	<p>Support the provision with amendments</p>	<p>AMEND Rule 3.11.5.4 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1</p> <p>AND AMEND Rule 3.11.5.4 to include a specific requirement that land users must farm such that when their farming activities are modelled in OVERSEER®, the Overseer nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property</p> <p>AND AMEND to introduce provisions throughout PPC1 to enable the reassignment of Nitrogen Reference Point entitlements between properties when new land is incorporated into a property</p> <p>AND DELETE all references in PPC1 to the '5 year rolling average' (Rule 3.11.5.4 and Schedule 1)</p> <p>AND MAKE any consequential amendments to delete the definition in the Glossary in Part C</p> <p>AND AMEND to use the Nitrogen Reference Point as a yardstick to indicate the relative amount of nitrogen being lost from a property</p> <p>AND AMEND Rule 3.11.5.4(iii) to read: "The actions, timeframes and other...the property or enterprise's Nitrogen Reference Point, <del>unless other suitable mitigations are specified."</del></p> <p>OR alternatively</p> <p>AMEND Rule 3.11.5.4(iii) and Schedule 1 to provide more clarity regarding how the discretion available in this provision, should be exercised</p>	<p><b>SUPPORT</b> the intent of the submission point regarding the need to address how NRP is to be treated when properties are subdivided, sold , sold in part, or leased to third parties (i.e., subject to property transaction):</p> <p><i>AND AMEND to introduce provisions throughout PPC1 to enable the reassignment of Nitrogen Reference Point entitlements between properties when new land is incorporated into a property</i></p> <p>However, Theland Tahī reserves its position in respect of the detailed drafting which will be required to give effect to this relief.</p> <p><b>OPPOSE</b> remaining submission points.</p>

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			<p>AND AMEND Rule 3.11.5.4(5) to require compliance with the Nitrogen Reference Point in the period during which the property owner is permitted under this rule</p> <p>AND AMEND to require compliance with Schedule B</p> <p>AND AMEND Rule 3.11.5.4 and Schedule B to delete the ability for an enterprise to hold a Nitrogen Reference Point and restrict the Nitrogen Reference Point to exist only in association with a particular parcel or property</p> <p>AND AMEND Rule 3.11.5.4 to provide for a more refined staging of resource consent applications over each of the three year period in each priority order but remain with the priority order in Table 3.11-2</p> <p>AND AMEND Rule 3.11.5.4(5)(c) to read: "A Nitrogen Reference Point has been produced for the property <del>or enterprise in conformance to comply</del> with Schedule B and <del>is has been</del> provided to the Waikato Regional Council <del>at the time the resource consent application is lodged..</del>"</p> <p>AND AMEND Rule 3.11.5.4(4) to add a new item to read: "<u>The use of land for farming activities complies with Schedule C.</u>"</p> <p>AND AMEND Rule 3.11.5.4(5)(d) to read: "<u>The use of land for farming activities</u><del>attle, horses, deer and pigs are excluded from water bodies in conformance with</del><u>complies</u> with Schedule C."</p> <p>AND AMEND Rule 3.11.5.4 to re-number 4 and 5 to become a. and b. and remove the indent on the paragraph starting with 'after the dates...'</p>	
<p>3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities</p>	<p>PC1-3477</p>	<p>Support the provision with amendments</p>	<p>AMEND Rule 3.11.5.6 by adding a new matter over which Council reserves its discretion to read: "<u>viii. Consistency with the Objectives and Policies of the Waikato Regional Plan or proposed regional plan.</u>"</p>	<p><b>OPPOSE.</b> This matter of discretion is so broad that, in effect, the activity status becomes discretionary.</p>
<p>3.11.5.7 Non- Complying Activity Rule – Land Use Change</p>	<p>PC1-3480</p>	<p>Support the provision with amendments</p>	<p>AMEND Rule 3.11.5.7 to read: "<del>Notwithstanding any other rule in the Plan</del><u>Except as authorised under rules 3.11.5.1, 3.11.5.2, 3.11.5.3 and 3.11.5.4</u> any of the following changes..."</p> <p>OR alternatively</p> <p>AMEND Rule 3.11.5.7 to exclude from its scope, changes of land use that occur within properties or enterprises as existing at the date of notification of the Plan</p>	<p><b>OPPOSE</b></p>

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			<p>AND AMEND Rule 3.11.5.7 (4) to read: "Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5 <u>or a consent granted under Rule 3.11.5.6.</u>"</p> <p>AND AMEND Rule 3.11.5.7: Notification to read: "Consent applications will be considered without notification,... will be lower than that from the <del>existing land use</del> <u>land use as at 22 October 2016.</u>"</p> <p>AND AMEND Rule 3.11.5.7 to read: "Notwithstanding any other rule in this plan, any of the following changes in the <u>ongoing</u> use... property or enterprise <u>and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens on or into land in circumstances which may result in those contaminants entering water</u> located in the Waikato and Waipā River catchments..."</p> <p>AND AMEND Rule 3.11.5.7(2) to read: "Any <del>livestock grazing other than dairy farming</del> <u>land use, except for commercial vegetable production to dairy farming:</u>"</p> <p>AND DELETE Rule 3.11.5.7(3) in its entirety.</p>	
Schedule B - Nitrogen Reference Point	PC1-3553	Support the provision	<p>AMEND Schedule B to remove the ability for an enterprise to hold a Nitrogen Reference Point, and restrict the Nitrogen Reference Point to exist only in association with a particular parcel or property.</p> <p>AND AMEND to clarify whether it is the current, intended, or previous land use that determines the appropriate nitrogen reference period to use.</p> <p>AND AMEND clause a. to read: "The Nitrogen Reference Point must be <del>calculated</del> <u>approved</u> by a Certified Farm Nutrient Advisor..."</p> <p>AND AMEND clause b. to read: "The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single <u>financial year (being 12 consecutive months)</u> within the reference..."</p> <p>AND AMEND clause d. to read: "...and where the OVERSEER® Model is used, it must be calculated using the Overseer® Best Practice Data input standards <del>2016</del> <u>that relate to the version of the Overseer® model being used</u>, with the exceptions and inclusions set out in schedule B table 1."</p> <p>AND AMEND clause f. to read: "The <del>Nitrogen Reference</del> <u>Period</u> is the two... <u>except where the primary land use is for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016 or such lesser, relevant period if the land was used for commercial vegetable production during only part of that period.</u>"</p> <p>AND AMEND Schedule B clause g. to read: "...</p> <p>i. <del>Stock numbers as recorded in annual accounts together with stock</del></p>	<p><b>OPPOSE</b></p> <p>The land Tahi supports what it understands to be the intent of the first two submission points. However, due to the lack of specificity (i.e., proposed drafting), The land Tahi <b>OPPOSES</b> the submission points.</p> <p>The land Tahi also supports the general intent of the proposed amendments to Schedule B and <b>SUPPORTS</b> the balance of the relief sought.</p>

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			<p><del>sale and purchase invoice</del>Records of stock numbers and stock classes, births and deaths, stock movement on and off the property, <u>grazing records and transport records</u>;</p> <p>ii. Dairy production data;</p> <p>iii. <del>Invoices for fertiliser applied to the land</del>Records of fertiliser type and amount, application rates and fertiliser placement records;</p> <p>iv. <del>Invoices for</del>Records of feed supplements and amount sold or purchased, <u>and records of supplements grown and fed on farm</u>;</p> <p>v. Water use records for irrigation (to be averaged over 3 years or longer) in order to determine irrigation application rates <u>mm/ha/month per irrigated block, and proof of areas irrigated (for Overseer® block setup)</u>;</p> <p>vi. <u>Records of crops grown on the land and grazed including area and yield, and including cultivation and sowing records where available; and</u></p> <p>vii. <u>A map detailing the location and area of land used for effluent irrigation</u>;</p> <p>viii. <del>iii</del> Horticulture crop diaries and NZGAP records.</p> <p>ix. <u>Soil test data – including anion storage capacity</u></p> <p>x. <u>A map detailing the property boundaries, areas including block (management) areas and retired areas, and the total area of non-productive areas; and</u></p> <p>xi. <u>Certificate of title and legal description.</u>"</p> <p>AND ADD an advice note to read: "<u>Advice note: For the avoidance of doubt, financial information contained within the above records may be redacted (blacked out) prior to it being provided to Waikato Regional Council.</u>"</p> <p>AND AMEND Schedule B Table 1 by deleting the existing Table 1 and replace with the new Table 1 in Appendix A to the submission.</p> <p>AND AMEND Schedule B clause d to read: "...with the <u>settings that must be used complying with exceptions and inclusions set out in Schedule B Table 1. Where another approved model is used, it will conform to the data input standards as approved by the Chief Executive of the Waikato Regional Council.</u>"</p>	
Schedule 1 - Requirements for Farm	PC1-3575	Support the provision with amendments	<p>DELETE Schedule 1 references to the 5 year rolling average and instead measure compliance based on whether the proposed mitigation actions listed in a Farm Environment Plans are completed.</p> <p>AND AMEND Schedule 1 clause 2 (e) to read: "A description of nutrient management practices including... using the model OVERSEER® in</p>	<b>OPPOSE</b>

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Environment Plans			<p>accordance with the OVERSEER® <u>data input standards and Table 1: Schedule Base protocols</u> , or using any other model or method approved ...."</p> <p>AND AMEND Schedule 1: Vegetable growing minimum standards Row 5 of the table Soil/Phosphorus to read: "As a minimum by block: an <del>approved</del> erosion and sediment control plan <del>constructed</del> <u>compiled by the Certified Farm Environment Planner</u> in accordance with the Erosion and Sediment Control Guidelines for Vegetable Production June 2014"</p> <p>AND AMEND Schedule 1 clause 5(a) to read: "Actions, timeframes and other measures.... or enterprise's Nitrogen Reference Point <del>unless other suitable mitigations are specified.</del>"</p> <p>OR AMEND 3.11.5.4(iii) and Schedule 1 to provide more clarity regarding how the discretion available in this provision, should be exercised.</p>	
Additions to Glossary of Terms	PC1-3666	Support the provision with amendments	<p>ADD a NEW definition to the Glossary of Terms to read "<u>Current version of OVERSEER® is the version of the Overseer® Model with the most recent release date.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Period to read: "<u>...is a property's or enterprise's 2014/15 and 2015/16 financial years, except for properties or enterprises where the principle land use is commercial vegetable production, in which case the nitrogen reference period is the period commencing with the property's or enterprise's 2006/7 financial year and ending with its 2015/16 financial year.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Period Data to read: "<u>is the set of verified OVERSEER input parameters for each of the financial years of the nitrogen reference period.</u>"</p> <p>AND ADD to the Glossary of Terms a new definition for Nitrogen Reference Point Data to read: "<u>is the verified Overseer input parameters for the single financial year of the nitrogen reference period that when modelled in the version of Overseer current at 1 April 2019 results in the highest nitrogen leaching rate.</u>"</p> <p>AND ADD to the Glossary of Terms in Chapter 3.11 a specific definition for urban properties.</p> <p>AND ADD a NEW definition to the Glossary of Terms for Wetland to read: "For the purposes of Chapter 3.11 includes permanently or intermittently wet areas, shallow water, and land water margins that</p>	<p><b>SUPPORT IN PART</b>, reserving position on final detailed drafting.</p>

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			support a natural ecosystem of plants and animals that are adapted to wet conditions."	
Definition - 75th percentile nitrogen leaching value	PC1-3664	Support the provision with amendments	AMEND the Glossary definition of 75th percentile nitrogen leaching value to clarify the method for calculating the 75th percentile. AND AMEND to include in the definition that this calculation will be undertaken once at a single point in time. AND AMEND the Glossary definition of 75th percentile nitrogen leaching value to clarify that a 75th percentile nitrogen leaching value will only be established for each of the four riverine Freshwater Management Units, and will apply to any lake catchments within each riverine Freshwater Management Unit.	<b>OPPOSE</b>
Definition - Best management practice	PC1-3665	Support the provision with amendments	AMEND the Glossary definition of best management practice to make it clear that the term includes mitigation that can also be achieved through changes to management practices.	<b>SUPPORT</b>
Definition - Edge of field mitigation	PC1-3667	Support the provision with amendments	AMEND the Glossary definition of Edge of field mitigation/s to clarify which actions or technologies will be considered for funding in Method 3.11.4.5(g). AND AMEND to clarify the definition of edge of field in the definition section.	<b>SUPPORT IN PART</b>
Definition - Enterprise	PC1-3671	Support the provision with amendments	AMEND the Glossary definition of Enterprise to clarify the scope and nature of an enterprise. AND AMEND the definition of Enterprise to read: " <u>for the purposes of Chapter 3.11</u> , means one or more parcels..." AND DELETE the words " <del>principle</del> " and replace with " <u>principal</u> ".	<b>OPPOSE.</b> It is not clear what is intended in relation to amending the definition of "Enterprise" to "clarify the scope and nature of an enterprise". <b>OPPOSE</b> submission point in its entirety.
Definition - Nitrogen Reference Point	PC1-3673	Support the provision with amendments	AMEND the Glossary definition of Nitrogen Reference Point to read: " <del>The nitrogen loss number (units of kg N/ha/year) that is derived from an OVERSEER use protocol compliant OVERSEER® file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm Nutrient Advisor, using the current version of the OVERSEER® model (or another model approved by the Council) for the property or enterprise at the "reference" point in time.</del> is: <u>1) For commercial vegetable production, the average nitrogen leaching rate (in kilograms of nitrogen per hectare per year) predicted by modelling the nitrogen reference period data in the current version of OVERSEER®.</u>	<b>OPPOSE</b> While Theland Tahī is generally supportive of the relief sought, in the absence of detailed drafting, Theland Tahī opposes the submission.

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			<p>2) <u>For all other land uses, the nitrogen leaching rate (in kilograms of nitrogen per hectare per year) predicted by modelling the Nitrogen Reference Point data in the current version of Overseer®.</u>                      AND AMEND the Glossary definition of Nitrogen Reference Point, to include changes that result from the incorporation of new land into a property and which are approved by the Council.</p>	



# Wairakei Pastoral Ltd

Submitter ID: 74095

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	PC1-11406	Support the provision with amendments	<p>The specific provisions be amended or deleted or retained or substituted as sought in Appendices A, B, C, and D attached to the submission (requested changes are also summarised in separate submission summary points under the relevant plan sections) AND MAKE alternative, consequential or further relief that may be required to promote sustainable management or give effect to the submission</p> <p>AND ADD a NEW Schedule 2 to read:</p> <p><b>"Schedule 2: Requirements for a Sub-catchment management plan</b></p> <p><u>The purpose of a Sub-catchment management plan is to identify the current water quality in a sub-catchment (within Table 3.11-2), whether water quality is required to be maintained, protected or restored, and methods to achieve the relevant outcome required.</u></p> <p><u>In the Waikato and Waipā River Catchments, water quality outcomes and values have been determined through the Vision and Strategy. Sub-catchment-management plans will take a proactive, prioritised and integrated 'whole of sub-catchment' approach to managing each sub-catchment's land and water, identify specific issues and include actions to:</u></p> <ul style="list-style-type: none"> <li>• <u>Maintain or improve water quality;</u></li> <li>• <u>Conserve soil;</u></li> <li>• <u>Restore and protect important biodiversity habitats;</u></li> <li>• <u>Meet iwi aspirations for the Waikato River.</u></li> </ul> <p><u>Sub-catchment management plans are prepared by an enterprise and are intended to provide clear guidance including management actions for the preparation of Farm Environment Plans (as required by Schedule 1).</u></p> <p><u>A Sub-catchment management plan shall as a minimum:</u></p> <ol style="list-style-type: none"> <li>a) <u>Identify the current water quality and water quality issues at a sub-catchment level that need to be managed to achieve the Objectives to be met;</u></li> <li>b) <u>Provide details of any Decision Support Tools required to measure, model, and predict discharges from individual properties and</u></li> </ol>	<p><b>SUPPORT in part</b> (including in relation to proposed additional schedules), subject to final drafting, numerics and mapping.</p>

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			<p><u>enterprises within the sub-catchment, and how they can be related to the Table 3.11-1 freshwater objectives;</u></p> <p><u>c) Establish the principles for allocation (consistent with Policy 7) of an input load based nutrient cap at the refined sub-catchment level through the development of a relationship between land use suitability and the Table 3.11-1 water quality attribute targets for the sub-catchment;</u></p> <p><u>d) Provide for the management of nitrogen, phosphorus, sediment and microbial pathogen losses in the sub-catchment through mitigation measures to be undertaken by the consent holder to ensure that the actual or potential environmental effects of carrying out the allowed land use change (including any effects from subsequent farming activities) meet Objectives 1 and 3;</u></p> <p><u>e) Provide direction for the preparation and independent auditing of Farm Environment Plans to ensure farming activities operate at Good Management Practice (GMP) levels or better and other mitigation options;</u></p> <p><u>f) Provide an adaptive management approach (consistent with Schedule 3) to monitor and respond to actual or potential adverse effects of the land use change on the environment (including any effects from subsequent farming activities) and associated diffuse discharges;</u></p> <p><u>g) Provide independent validation for the predictive performance and accuracy of any Decision Support Tool;</u></p> <p><u>h) Provide direction for how any proposed land use changes are to be carried out in stages;</u></p> <p><u>i) Include a robust monitoring programme (real-time, reporting of contaminant losses in a suitable digital format) designed to monitor the actual or potential environmental effects of carrying out the land use change (including any effects from subsequent farming activities) over a period of 25 years from the grant of consent;</u></p> <p><u>j) Require annual monitoring and mitigation reports to be prepared by the consent holder and submitted to the Waikato Regional Council (in accordance with consent conditions preferred by the enterprise) within the period of three months after each anniversary of the grant of consent"</u></p> <p>ADD a NEW Schedule 3 to read:                      "Schedule 3: Adaptive Management Approach</p>	

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			<p><u>The purpose of an Adaptive Management Approach is to allow a flexible approach to the management of natural resources and to apply a learning cycle for each decision making step. Adaptive management is underpinned by predictive modelling to test a range of hypothetical options for their relative impacts on the current state.</u></p> <p><u>A management process is then informed by the stepwise learning from changes in state modelling against the predicted outcomes. This allows informed or guided decisions rather than random exercises. Adaptive management is often required when complex ecological systems are being managed and management decisions cannot wait for final research results.</u></p> <p><u>To achieve the Vision and Strategy for maintaining, protecting and restoring the health and well-being of the Waikato River (through Objectives 1 and 3), management at a sub-catchment level is required. To meaningfully reduce input loads and meet the water quality targets, a range of mitigation actions will be required, reinforced where appropriate by Decision Support Tools.</u></p> <p><u>An Adaptive Management Approach is required to ensure that mitigations and predictions do not lead to unintended consequences for the environment and communities, or delay vital actions from being taken to achieve the objectives. Such consequences may lead to financial costs for a community and a loss of confidence in mitigation actions. However, because predictive analysis is carried out by modelling, an Adaptive Management Approach will need to allow for adjustment of the speed at which mitigation tools are used in terms of their actual effect on water bodies. Thus depending on the available data, properties and enterprises may need to adapt their programme by accelerating or decelerating the use of mitigation depending on the monitoring results. Consent conditions should therefore provide the flexibility to achieve these outcomes.</u></p> <p><u>When preparing a Sub-catchment management plan (or Farm Environmental Plan) the plan should include the following features of adaptive management (where appropriate):</u></p> <p><u>a) The existing environment is established by robust baseline monitoring;</u></p> <p><u>b) The extent of the environmental risk (including the gravity of the consequences if the risk is realised) is tested by the Decision Support Tools;</u></p>	

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			<p>c) <u>Effects that might arise can be remedied before they become irreversible;</u>  d) <u>The plan(s) provide for effective monitoring of adverse effects using appropriate indicators;</u>  e) <u>Thresholds are set to trigger remedial action(s) before the effects become overly damaging;</u>  f) <u>Where advanced mitigation is undertaken, it is staged and plans require certain criteria to be met before the next stage can proceed;</u>  g) <u>Where land use change is undertaken, it is staged and any management plans require certain criteria to be met before the next stage can proceed; and</u>  h) <u>There is a real ability to remove all or some of the land development that has occurred if the monitoring results demonstrate criteria are not met."</u></p> <p>ADD a NEW Schedule 4 to read:  <u>"Schedule 4: Farm Mitigations for Catchment Management</u>  <u>The objective is to get every farm performing at Good Management Practice (GMP) level as a starting point. It is appropriate that GMP is implemented, and these are considered necessary before any additional mitigation can be provided.</u>  <u>The mitigation tools should be chosen by the relevant property or enterprise as to which is both practical and economic as part of either a Farm Environmental Plan or a Sub-catchment management plan.</u>  <u>The scheduled mitigations can be used in limiting the amount of each of the four key contaminants (in the input loads for land use management) from becoming discharges to groundwater and water bodies in the Waikato River system.</u>  <u>Mitigation of effects to water bodies of the four key contaminants from agricultural land have been divided based on whether they are modelled in OVERSEER or APSIM or SPASMO.</u>  <u>Many management and mitigation practices serve the benefit of reducing effects for a range of contaminants, and may be included in more than one table. For example, riparian planting can reduce sediment, phosphorus and pathogens from entering water bodies.</u>  <u>The summary tables below identify management and mitigation tools, and indicate if they can be incorporated into OVERSEER, or APSIM or SPASMO as appropriate.</u>  <u>Microbial Pathogens</u></p>	

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			<p><u>The objective of limiting the numbers of pathogens directly affecting the water is to reduce the number of animals depositing urine and faeces into water bodies either directly or indirectly by across ground transfer.</u></p> <p><u>Phosphorus (P)</u></p> <p><u>The objective of limiting the amount of P is to limit the amount which is left on the surface of the soil which is then available to be washed directly into the water bodies and to limit the amount of soil which can be washed directly into the water bodies carrying P with it.</u></p> <p><u>Nitrogen (N)</u></p> <p><u>Nitrogen is transported from below the root zone through the soil to water bodies. The objective of limiting the amount of leaching through the soil profile is to limit the amount of N within the root zone that is then able to be washed through by excess moisture. The amount of excess N within the root zone comes from the application of N fertilisers and from the high concentration of N in the urine of cattle. The prime time when leaching occurs is during the winter months when the soil profile is full of moisture. Therefore, some of the following mitigation techniques are aimed at reducing the total amount of N in the soil while some are designed to reduce the amount of N in the soil during the late autumn and winter period.</u></p> <p><u>Sediment</u></p> <p><u>Sediment carries with it phosphorus and other compounds that can have a negative effect on aquatic life and appearance (colour/clarity) of the water body. The objective of applying good management practice is to reduce the amount of sediment entering waterways that will have a negative effect on aquatic life, appearance, and recreational use."</u></p> <p>REFER to Appendix B of the submission for the accompanying tables which describe mitigation actions to manage each contaminant.</p> <p>AND MAKE alternative, consequential or further relief that may be required to promote sustainable management or give effect to the submission.</p>	
General	PC1-13165	Not stated	ADD to PPC1, that the stretch of the Waikato River catchment between the Lake Taupo control gates and Ohaaki-Ohakuri should be typified as a 'river'.	<b>SUPPORT</b>
General	PC1-13166	Not stated	AMEND PPC1 so objectives, policies and methods (including rules) designed for managing water quality in the stretch of the Waikato River above Ohaaki-Ohakuri are focused on "maintaining" overall freshwater quality in the sub-catchment.	<b>SUPPORT</b>

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General	PC1-13167	Not stated	No decision for PPC1 requested however, the submitter supports a sub-catchment based approach.	<b>SUPPORT</b>
Map 3.11-1: Map of the Waikato and Waipa River catchments, showing Freshwater Management Units	PC1-11253	Support the provision with amendments	AMEND Map 3.11-1 by subdividing Sub-catchment 66 into Sub-catchments 66A and 66B as illustrated in Appendix D of the submission AND AMEND Table 3.11-1 accordingly.	<b>SUPPORT</b>
Water quality and National Policy Statement for Freshwater Management	PC1-11257	Support the provision with amendments	AMEND the second paragraph of Water Quality and National Policy Statement for Freshwater Management to read: "... The CSG concluded that ( <u>generally</u> ) from a water quality point of view, over-allocation has occurred <u>within the FMU's while in some water bodies current water quality is high. Some</u> water bodies in the Waikato and Waipā River catchments are <u>therefore</u> not able to assimilate further discharges..."	<b>SUPPORT</b>
Full achievement of the Vision and Strategy will be intergenerational	PC1-11259	Support the provision with amendments	AMEND the first paragraph of the Full Achievement of the Vision and Strategy will be Intergenerational section to read: "...The 80-year timeframe recognises the <del>potential</del> 'innovation gap' that means full achievement of water quality requires technologies or practices that <del>are may</del> not <del>yet be</del> available or economically feasible. In addition, the current understanding is that achieving water quality restoration requires <del>a considerable amount</del> of land to be changed from land uses with moderate and high intensity of discharges to and use with lower discharges (e.g. through <del>reforestation</del> <u>mitigation</u> ) <u>within high-risk sub-catchments. Whereas in other sub-catchments it will be more appropriate to focus on applying mitigation methods via consent conditions, rather than simply preventing land use change.</u> " AND AMEND paragraph 4 and associated bullet points to read: "The ' <u>Stage 1</u> ' approach to reducing contaminant losses from pastoral farm land implemented by Chapter 3.11 requires: ... <ul style="list-style-type: none"> <li>a property <u>or enterprise</u> scale nitrogen reference point to be established by modelling current nutrient losses from each</li> </ul>	<b>SUPPORT</b>

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			<p>property <u>or enterprise</u>, with nor property <u>or enterprise</u> being allowed to exceed its reference point in the future and higher dischargers being required to reduce their nutrient losses; <u>or</u></p> <ul style="list-style-type: none"> <li>• <u>the introduction of a refined sub-catchment based nitrogen cap.</u>"</li> </ul> <p>AND AMEND paragraph 8 to read: "In the short term (<u>i.e. Stage 1 = 10 years</u>), land use change from tree cover to animal grazing ... will be constrained (<u>but not prohibited</u>). Provision has been made for some flexibility of land use for Māori land ... These constraints on land use change are interim until a future plan change introduces a second stage (<u>i.e. 10-80 years</u>), where further reductions in discharges..."</p> <p>AND AMEND PPC1 to consistently refer to 'property or enterprise' throughout [as opposed to just 'property'].</p>	
3.11.1 Values and uses for the Waikato and Waipa Rivers	PC1-11260	Support the provision with amendments	AMEND PPC1 to insert links (via explanatory text or advice notes) between section 3.11.1 and subsequent sections to explain the specific relationship between particular values and uses and particular freshwater objectives (ie policies and rules).	<b>SUPPORT</b>
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-11261	Support the provision with amendments	AMEND Objective 1 to read: "Objective 1: Long-term <u>maintenance</u> , restoration and/or protection of water quality <u>as relevant</u> for each sub-catchment and Freshwater Management Unit... By 2096, <u>the management of</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens..."	<b>SUPPORT</b>
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	PC1-11262	Support the provision with amendments	AMEND Objective 2 to read: "Objective 2: Social, economic and cultural well-being is <u>recognised and</u> maintained in the long term... Waikato and Waipā communities and their economy <u>experience measurable</u> benefits from the <u>maintenance</u> , restoration and/or protection <u>as relevant</u> of water quality in the Waikato River catchment..."	<b>SUPPORT</b>

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Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	PC1-11265	Support the provision with amendments	AMEND Objective 3 to read: "Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens are sufficient to achieve <u>an overall</u> ten percent of the required change between current water quality and the 80-year water quality attribute targets in Table 3.11-1. A ten per cent change towards the long term water quality improvements is indicated by the short term water quality attribute targets in Table 3.11-1 <u>within each sub-catchment.</u> "	<b>SUPPORT</b>
Objective 4: People and community resilience	PC1-11266	Support the provision with amendments	AMEND Objective 4 to read: "A staged approach to change enables people and communities to undertake adaptive management to continue to provide for their social, economic and cultural well-being <del>in the short term</del> while:..."	<b>SUPPORT</b>
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	PC1-11267	Support the provision	RETAIN Objective 5 as notified or amended by similar wording to like effect.	<b>SUPPORT</b>
Reasons for adopting Objective 3	PC1-11270	Support the provision with amendments	AMEND the Reasons for Adopting Objective 3 to read: "Point source discharges are currently managed through <u>permitted activity rules and</u> existing resource consents, and further action required to improve the quality of these discharges will occur on a case-by-case basis at the time of consent renewal ( <u>where relevant</u> ), guided by the targets and time limits set in Objective 1."	<b>SUPPORT</b>
Reasons for adopting Objective 4	PC1-11271	Support the provision with amendments	AMEND the Reasons for Adopting Objective 4 by adding the following paragraph: " <u>Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change will provide a key method (alongside participation in any</u>	<b>SUPPORT</b>



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			<u>relevant Certified Industry Schemes) for achieving clear and enduring improvements in water quality."</u>	
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-11272	Support the provision with amendments	AMEND Policy 1 to read: "Manage and require <u>maintenance and/or</u> reductions <u>as relevant</u> in sub-catchment wide discharges of nitrogen, phosphorus, sediment and microbial pathogens, by:..." AND AMEND Policy 1 by adding a new final paragraph: " <u>Encouraging enterprises to apply for sub-catchment management resource consents for farming activities and commercial vegetable production, associated diffuse discharges, and land use change.</u> "	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-11273	Support the provision with amendments	DELETE paragraph (b) from Policy 2.	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	PC1-12956	Support the provision with amendments	AMEND Policy 2 to renumber paragraph (c) as (b) AND ADD a NEW paragraph (c) to read: " <u>Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change; and</u> " AND REPLACE paragraph (d) with the following: " <u>Where an adaptive management and mitigation approach for sub-catchment management is developed, assess and calculate risk-based input loads for each contaminant at a refined sub-catchment level. The input loads will be proportional to the Objective 1 freshwater objectives related to nitrogen, phosphorus, sediment and microbial pathogens for the surface waters that each refined sub-catchment is connected to. The input load for nitrogen will replace the Nitrogen Reference Point where an enterprise based consent for sub-catchment management is sought, proportional to the properties or enterprises collectively managed under existing Nitrogen Reference Point(s) values; and</u> " AND AMEND to renumber paragraph (e) as (f) AND ADD a NEW paragraph (e) to read: " <u>Identifying mitigation actions that are to be set out to achieve Objectives 1 and 3 and implemented within either a sub-catchment management plan; Farm Environment Plan; an associated resource</u>	<b>SUPPORT</b>

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			<u>consent; or in specific requirements established by participation in any relevant Certified Industry Scheme; and"</u> AND ADD a NEW paragraph (g) to read: <u>"Enterprises that reduce nitrogen, phosphorus, sediment and microbial pathogens are enabled."</u>	
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	PC1-11277	Support the provision with amendments	AMEND Policy 3(d) to read: "A 10% decrease in the diffuse discharge of nitrogen <u>during Stage 1</u> and a tailored <del>reduction</del> <u>approach</u> in the diffuse discharge of phosphorus, sediment and microbial pathogens is achieved across the sector through the implementation of Best or Good Management Practices; and"	<b>SUPPORT</b>
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	PC1-11344	Support the provision with amendments	ADD the following paragraph to Policy 4: " <u>Enabling enterprises to apply for sub-catchment management resource consent applications which include lower discharges from farming activities and commercial vegetable production, associated diffuse discharges, and land use change, will provide a key method (alongside participation in any relevant Certified Industry Schemes) for achieving clear and enduring improvements in water quality in order to meet (inter alia) Objectives 1 and 3 while allowing existing activities to continue and enabling new activities to be established."</u>	<b>SUPPORT</b>
Policy 5: Staged approach	PC1-11345	Support the provision with amendments	ADD the following to Policy 5: " <u>Ensuring that resource consent applications for farming activities and land use change include an appropriate assessment of risk and uncertainty based on sound adaptive management criteria.</u> <u>Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, will provide a key method (alongside participation in any relevant Certified Industry Schemes) for implementing a staged approach to achievement the freshwater objectives In Table 3.11 -1."</u>	<b>SUPPORT in part.</b>
Policy 6: Restricting land use change	PC1-11346	Support the provision with amendments	AMEND Policy 6 to read: "a. Except as provided for in Policy 16... b. Land use change consent applications that demonstrate <del>clear and enduring decreases in existing diffuse discharges or nitrogen,</del>	<b>SUPPORT in part, subject to final drafting.</b>

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			<p><del>phosphorus, sediment or microbial pathogens</del> <u>how the freshwater objectives in Objective 3 and Table 3.11 -1 can be achieved</u> will generally be granted.</p> <p><u>c. Sub-catchment land use change consent applications will generally be granted where:</u></p> <p><u>i. It is made by an enterprise for properties in a sub-catchment following a collaborative process to seek participation from all stakeholders with an interest in the land area in any sub-catchment.</u></p> <p><u>ii. It is supported by an adaptive management and mitigation approach for the sub-catchment which determines the suitability of the land for development including the risk of contaminant discharges from that land and the sensitivity of the receiving water bodies.</u></p> <p><u>iii. The enterprise has prepared a Sub-catchment Management Plan in accordance with the criteria set out in [new] Schedule 2 of Chapter 3.11 with actions which demonstrate how the enterprise will achieve Objective 3 and specifically the Table 3.11-1 freshwater objectives."</u></p>	
Policy 7: Preparing for allocation in the future	PC1-11347	Support the provision with amendments	<p>AMEND Policy 7 to read:</p> <p><b>"Preparing for allocation in the future</b></p> <p><del>Through the Stage 1 period, engage with key stakeholders and resource users to determine a sub-catchment approach to actively manage</del> <u>Prepare for further</u> diffuse discharge reductions and any future property or enterprise-level allocation of diffuse discharges <u>for adoption into enterprise based sub-catchment management consents of nitrogen phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the policies and methods in this chapter. To ensure this occurs support this engagement, Waikato Regional Council will collect information and undertake research to support this,</u> including collecting information about current discharges, developing appropriate <del>modelling tools</del> <u>adaptive management and mitigation approaches (including Decision Support Tools)</u> to estimate contaminant discharges, <del>and researching</del> <u>the spatial variability of land use...that will assist in defining 'land suitability' for allocation.</u></p> <p>...</p> <p><del>d. Future allocation decisions should take advantage of new data and knowledge.</del></p> <p><u>d. Allow the flexibility for discharges to move between uses and increase incentives for efficient land use; and</u></p> <p><u>e. Apply an equitable base allocation in standardised amounts for</u></p>	SUPPORT

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			<p>discharges to land, that is a proportion of the available resource; and  f. <u>The ability to respond to changing environmental circumstances; and</u>  g. <u>In accordance with Te Mana o Te Wai</u>  <u>Encourage enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change - where an adaptive management and mitigation approach for the sub-catchment provides information and monitoring results that can define 'land suitability' consistent with the principles for allocation during the current plan period."</u></p>	
Policy 8: Prioritised implementation	PC1-11348	Support the provision with amendments	<p>ADD the following paragraph to Policy 8: "<u>Providing for enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, in advance of the priority dates and events in Rule 3.11.5.4 and Table 3.11-2 will positively assist in achieving a tailored approach to sub-catchment mitigation and implementing Policies 2 and 9."</u></p>	<b>SUPPORT</b>
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-11349	Support the provision with amendments	<p>ADD the following paragraph to Policy 9: "<u>Encouraging enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, will provide a key method (alongside participation in any relevant Certified Industry Schemes) for achieving clear and enduring improvements in water quality by implementing adaptive management and mitigation measures In accordance with Policy 6(c)."</u></p>	<b>SUPPORT</b>
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land	PC1-11355	Support the provision with amendments	<p>AMEND Policy 16 to read:  "<del>Best</del><u>Adaptive Management and mitigation approaches for the sub-catchment are developed and implemented to support the management practice actions for nitrogen, phosphorus, sediment and microbial pathogens for the proposed new type of land use; and..."</u></p>	<b>SUPPORT in part</b>

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3.11.4.3 Farm Environment Plans	PC1-11359	Oppose the provision with amendments	AMEND Method 3.11.4.3 to read: " <del>Waikato Regional Council will prepare parameters and minimum requirements for the development of a certification process for professionals to develop, certify and monitor Farm Environment Plans in a consistent approach across the region. A Farm Environment Plan will be prepared by a certified and appropriately qualified or experienced person as per the requirements... in order to bring about reductions in the discharges of those contaminants. Waikato Regional Council will develop guidance for risk assessments, auditing and compiling Farm Environment Plans. ... (independent of the farmer and Certified Farm Environment Planner/Plan author) and monitoring will be required.</del> "	<b>SUPPORT</b>
3.11.4.5 Sub-catchment scale planning	PC1-11361	Support the provision with amendments	ADD a NEW paragraph (b) to Method 3.11.4.5 to read: " <u>Resource consent applications should adopt an adaptive management and mitigation approach for the sub-catchment for modelling and measuring diffuse discharges from individual properties, enterprises and sub-catchments in relation to current and proposed land used, biophysical properties, and the climate and natural capacity of the landscape to attenuate contaminant losses.</u> " AND AMEND to renumber paragraphs (b)-(g) as (c)-(h) AND ADD a NEW paragraph (i) to read: " <u>In the interim, providing for enterprises to apply for sub-catchment management resource consent applications for farming activities and commercial vegetable production, associated diffuse discharges, and land use change, in advance of the priority dates and events in Rule 3.11.5.4 and Table 3.11-2 will positively assist in achieving a tailored approach to sub-catchment mitigation and implementing Policies 2 and 9.</u> "	<b>SUPPORT.</b>
3.11.4.7 Information needs to support any future allocation	PC1-11364	Support the provision with amendments	AMEND Method 3.11.4.7 to read: " <u>3.11.4.7 Adopting an adaptive management and mitigation approach for sub-catchments for information needs to support any future allocation of diffuse discharges</u> Gather information and commission appropriate scientific research to inform <u>the development and implementation of any future a framework</u> for the allocation of diffuse discharges including: a. Implementing processes that will support the <u>development of an adaptive management and mitigation approach for the setting of property or enterprise-level diffuse discharge limits in the future each sub-catchment.</u> "	<b>SUPPORT.</b>

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3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	PC1-11365	Support the provision with amendments	AMEND Method 3.11.4.8 to read: "a...knowledge and technology at the time; <del>and</del> <u>b. Monitor and review any adaptive management and mitigation approach for the sub-catchment developed to determine a discharge allocation regime for the relevant sub-catchment as part of Stage 1; and</u> <u>c.b.</u> Use this to inform..."	<b>SUPPORT</b>
3.11.4.10 Accounting system and monitoring	PC1-11367	Support the provision with amendments	AMEND Method 3.11.4.10(d) to read: "An information and accounting system for the diffuse discharges from properties and enterprises that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at an enterprise or property scale <u>or sub-catchment level.</u> "	<b>SUPPORT</b>
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	PC1-11368	Support the provision with amendments	AMEND Method 3.11.4.11 to read: "b. Research and identify methods <u>including an adaptive management and mitigation planning approach developed for the relevant sub-catchment</u> to measure actions at a sub-catchment, property and enterprise level, and their contribution to reduction in the discharge of contaminants. ... d. Collate data on the number of land use resource consents issued under the rules of this chapter, the number of Farm Environment Plans completed, compliance with the actions listed in Farm Environment Plans, Nitrogen Reference Points for properties and enterprises, <del>and</del> nitrogen discharge data reported under Farm Environment Plans, <u>and the actions for discharge allocation for the relevant sub-catchment.</u> e. Work with industry to collate information on the functioning and success of any <del>Certified Industry Scheme</del> <u>adaptive management and mitigation approach developed by an enterprise.</u> "	<b>SUPPORT</b>
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	PC1-11369	Support the provision with amendments	AMEND Method 3.11.4.12 to read: "3.11.4.12 Support research and dissemination of <del>best-good</del> practice guidelines to reduce diffuse discharges... a. Develop and disseminate <del>best-good</del> management practice guidelines for reducing the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens; and..."	<b>SUPPORT</b>

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3.11.5 Rules	PC1-11382	Support the provision	<p>ADD a NEW Rule 3.11.5.8 to read:  <u>"Rule 3.11.5.8 - Permitted Activity Rule - Transfer of Discharge Permits pertaining to the merger of properties or enterprises to form an enterprise or to the split or break-up of an enterprise in the same sub-catchment</u>  <u>The transfer of part or all of any resource consent for farming activities or commercial vegetable production and the associated diffuse discharge of contaminants granted pursuant to Rules 3.11.5.4 , 3.11.5.5 or 3.11.5.6 to another property or enterprise for another site is a permitted activity subject to the following conditions:</u>  <u>1. The transfer does not worsen the actual or potential effect of any discharges on the environment; and</u>  <u>2. The transfer does not result in any discharges that contravene a national environmental standard; and</u>  <u>3. Both sites are in the same sub-catchment; and</u>  <u>4. Written notice of the transfer is given to Waikato Regional Council; and</u>  <u>5. A Farm Environment Plan or a sub-catchment management plan (as relevant) has been prepared in accordance with Schedule 1 or [new] Schedule 2 by the transferee."</u>  AND ADD a NEW Rule 3.11.5.9 to read:  <u>"Rule 3.11.5.9 - Controlled Activity Rule - Transfer of Discharge Permits pertaining to the merger of properties or enterprises to form an enterprise or to the split or break-up of an enterprise in the same Freshwater Management Unit</u>  <u>The transfer of part or all of any resource consent for farming activities or commercial vegetable production and the associated diffuse discharge of contaminants granted pursuant to Rules 3.11.5.4, 3.11.5.5 or 3.11.5.6 to another property or enterprise for another site is a <b>controlled [activity]</b> subject to the following conditions:</u>  <u>1. The transfer does not worsen the actual or potential effect of any discharges on the environment; and</u>  <u>2. The transfer does not result in any discharges that contravene a national environmental standard; and</u>  <u>3. Both sites are in the same Freshwater Management Unit as defined by this Plan; and</u>  <u>4. Written notice of the transfer is given to Waikato Regional Council; and</u></p>	<b>SUPPORT in part, subject to final drafting.</b>

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			<u>5. A Farm Environment Plan or a Sub-catchment management plan (as relevant) has been prepared in accordance with Schedule 1 or [new] Schedule 2 by the transferee."</u>	
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	PC1-11372	Oppose the provision	DELETE Rule 3.11.5.3 or prepare a variation or plan change to incorporate any Certified Industry Scheme in to the Waikato Regional Plan by reference AND MAKE consequential amendments to PPC1 to insert the words " <u>any relevant</u> " before any reference to 'Certified Industry Scheme/s'.	<b>OPPOSE in part.</b>  Theland Tahī is supportive of the concept of the Certified Industry Scheme. However, it shares the submitter's concern regarding the certainty and <i>vires</i> of the provisions in PPC1/V1 as currently drafted.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	PC1-11374	Support the provision with amendments	AMEND Rule 3.11.5.4 to read: "Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) where the land is not registered to a <u>relevant</u> Certified Industry Scheme... is a permitted activity until <u>the point in time or event (whichever occurs first) specified below:</u> <u>1. Resource consent is granted to an enterprise for sub-catchment land use change and farming activities and associated diffuse discharges in conformance with Policy 6(c);"</u> AND AMEND to renumber the subsequent points accordingly.	<b>SUPPORT</b>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	PC1-11378	Support the provision with amendments	AMEND Rule 3.11.5.6 to read: "Rule 3.11.5.6 Restricted Discretionary activity rule - the use of land for farming activities <u>A. The use of land by an enterprise for sub-catchment farming activities and the associated diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a <b>restricted discretionary activity</b> (requiring resource consent) subject to the following requirements:</u> <u>A Sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.</u> <u>Waikato Regional Council restricts its discretion under Rule 3.11.5.6.A over the following matters:</u> <u>i. Conformance with Policy 6(c);</u> <u>ii. Cumulative effects on water quality in the relevant sub-catchment(s);</u>	<b>SUPPORT in part, subject to final drafting.</b>



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			<p>iii. <u>The content of the <b>Sub-catchment management plan</b> prepared for the relevant sub-catchment by the relevant enterprise in accordance with the requirements of [new] <b>Schedule 2</b>;</u></p> <p>iv. <u>The need for and content of a Farm Environmental Plan;</u></p> <p>v. <u>The adoption of an adaptive management and mitigation approach to manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens;</u></p> <p>vi. <u>The term of the resource consent having regard to Policy 13;</u></p> <p>vii. <u>The timeframe and circumstances under which the consent conditions may be reviewed.</u></p> <p><u>B. The use of land for farming activities that does not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 ...</u>  <u>Waikato Regional Council restricts its discretion under Rule 3.11.5.6.B over the following matters:</u>  ...iv. <u>The term of the resource consent having regard to Policy 13....</u></p> <p><u>C. The use of land for farming activities and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water that does not comply with the conditions, standards or terms of Rules 3.11.5.6.A or 3.11.5.6.B is a <b>discretionary activity</b> (requiring resource consent) subject to the following requirements:</u>  <u>A Sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.</u></p> <p><u>Notification:</u>  Consent applications under Rules 3.11.5.6.A, 3.11.5.6.B, and 3.11.5.6.C will be considered without notification, and without the need to obtain written approval of affected persons.</p> <p><u>Advisory note:</u>  <u>The assessment of any applications under these rules shall take into account the matters identified in Policies 6(b) and 10-13 of Section 3.11.3."</u></p>	
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-11379	Support the provision with amendments	<p>AMEND Rule 3.11.5.7 to read:  <u>"A. Any of the following sub-catchment changes in the use of land by an enterprise from that which was occurring at 22 October 2016 within the subject land area:</u>  <u>1. Woody vegetation to farming activities; or</u></p>	<b>SUPPORT, subject to final drafting.</b>

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			<p>2. Any livestock grazing other than dairy farming to dairy farming; or  3. Arable cropping to dairy farming  <u>is a <b>restricted discretionary activity</b> (requiring resource consent) subject to the following requirements:</u>  A sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.  <u>Waikato Regional Council restricts its discretion over the following matters:</u>  i. Conformance with Policy 6(c);  ii. The content of the <b>sub-catchment management plan</b> prepared for the sub-catchment by the relevant enterprise in accordance with the <u>requirements of [ new] <b>Schedule 2</b>;</u>  iii. The need for and content of a Farm Environmental Plan;  iv. The adoption of an <u>adaptive management and mitigation approach to manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens;</u>  v. The term of the resource consent having regard to Policy 13;  vi. The timeframe and circumstances under which the consent conditions may be reviewed.</p> <p>B. Any changes in the use of land that enables the development of <u>tangata whenua ancestral lands in conformity with Policies 6(a) and 16 is a restricted <b>discretionary activity/discretionary activity</b> (requiring resource consent).</u></p> <p>C. Any sub-catchment changes in the use of land by an enterprise from <u>that which was occurring at 22 October 2016 within the subject land area that does not conform with the matters in Rule 3.11.5.7.A, where prior to 1 July 2026 the change exceeds a total of 20 hectares, is a <b>discretionary activity</b> (requiring resource consent) subject to the following requirements:</u>  A Sub-catchment management plan (prepared in accordance with [new] Schedule 2) is to be provided to the Waikato Regional Council at the time when the resource consent application is lodged.</p> <p><b>Notification</b>  <u>Consent applications under Rules 3.11.5.7.A, 3.11.5.7.B, and 3.11.5.7.C will be considered without notification, and without the need to obtain written approval of affected persons.</u></p>	

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			<del>D. Notwithstanding any other rule in this Plan, Except as provided for in Rules 3.11.5.7.A, 3.11.5.7.B and 3.11.5.7.C any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:...</del>	
Schedule B - Nitrogen Reference Point	PC1-11384	Support the provision with amendments	AMEND Schedule B(c) to read: "The Nitrogen Reference Point must be calculated using <u>either</u> the current version of the OVERSEER <u>or</u> the <u>APSIM or the SPASMO model</u> <del>(or any other model approved by the Chief Executive of the Waikato Regional Council).</del> " AND AMEND Schedule B(d) to read: "The Nitrogen Reference Point data shall comprise the electronic output file from <u>either</u> the OVERSEER <u>or</u> the <u>APSIM or the SPASMO Model</u> <del>or other approved model</del> , and where the OVERSEER Model is used, it must be calculated using the OVERSEER Best Practice Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B Table 1." AND AMEND Schedule B(f) to read: "There reference period is the two financial years covering 2014/2015 and 2015/2016 ( <u>including any currently planned or consented future land use</u> ), except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016."	<b>SUPPORT in part.</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-11389	Support the provision with amendments	AMEND Schedule 1(2)(e) to read: "A description of nutrient management practices including a nutrient budget for the farm enterprise calculated using <u>either</u> the <del>model</del> <u>current version of the OVERSEER or the APSIM or the SPASMO Model</u> in accordance with the <del>OVERSEER-relevant</del> use protocols, <del>or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council.</del> " AND AMEND Schedule 1(5)(a) to read: "Actions, timeframes and other measures...as determined by the use of <u>either</u> the current version of <u>the OVERSEER or the APSIM or the SPASMO Model</u> , does not increase beyond the property or enterprise's Nitrogen Reference Point ( <u>as calculated in accordance with paragraph (f) of Schedule B</u> ), unless other suitable mitigations are specified; or"	<b>SUPPORT</b>
Schedule 1 - Requirements for Farm	PC1-12546	Support the provision with amendments	AMEND Schedule 1 to consistently refer to a 'property or enterprise' throughout AND AMEND all references to 'Certified Industry Schemes' to read " <u>any relevant</u> Certified Industry Scheme".	<b>SUPPORT</b>

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Environment Plans				
Schedule 1 - Requirements for Farm Environment Plans	PC1-12547	Support the provision with amendments	ADD a NEW Schedule 1(6) to read: " <u>Farm Environment Plans will be subject to review within the period of 6 months following the preparation of any relevant Sub-catchment management plan pertaining to a property or enterprise to ensure that Farm Environment Plans are not inconsistent with relevant Sub-catchment management plans.</u> "	<b>SUPPORT</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	PC1-11391	Oppose the provision with amendments	AMEND PPC1 to use consistent cross-referencing to the freshwater objectives in the National Policy Statement for Freshwater 2014. AND AMEND Table 3.11-1 to include a new first column which identifies and links the sub-catchment name with the relevant sub-catchment number as shown in Appendix C of the submission. AND AMEND to substitute the short-term and long-term numerical freshwater objectives for sub-catchments 56, 58, 59, 62, 65, 66B, 72, 73 and 74 with the alternative freshwater objectives in Appendix C of the submission. AND AMEND to insert an additional row to provide freshwater objectives for sub-catchment 66A (Tahorakuri) as shown in Appendix C of the submission.	<b>SUPPORT</b>
Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments	PC1-11395	Support the provision with amendments	DELETE from Table 3.11-2 the row pertaining to sub-catchment 66 AND ADD two new rows to list sub-catchments 66A (Tahorakuri) and 66B (Ohakuri) as priority 3 sub-catchments.	<b>SUPPORT</b>
Map 3.11-2: Map of the Waikato and Waipa River catchments, showing sub-catchments	PC1-11396	Support the provision with amendments	AMEND Map 3.11-2 to show the subdivision of sub-catchments 66 into sub-catchments 66A (Tahorakuri) and 66B (Ohakuri), as shown in Appendix D of the submission) and coloured appropriately to reflect their priority level.	<b>SUPPORT</b>
Additions to Glossary of Terms	PC1-11400	Support the provision with amendments	ADD a NEW definition for 'adaptive management' to read: " <u>Adaptive management means the approach to avoiding, remedying or mitigating any actual or potential adverse effects on the environment that</u>	<b>SUPPORT, subject to final drafting.</b>

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			<p><u>addresses risk or uncertainty arising from consented sub-catchment-wide land use change and farming activities and associated contaminant discharges carried out by an enterprise as detailed in Schedule 3, namely:</u></p> <p>a) <u>The need for good baseline information about the receiving environment;</u></p> <p>b) <u>Whether consent conditions provide for effective monitoring of adverse effects using appropriate indicators;</u></p> <p>c) <u>That thresholds are set to trigger remedial action before the effects become overly damaging; and</u></p> <p>d) <u>That any effects that might arise can be remedied before they become irreversible."</u></p> <p>AND ADD a NEW definition for 'Decision Support Tool' to read: "<u>Decision Support Tool means an information and accounting framework that can be used to assist with analysis and decision making processes within an enterprise (or property) that supports the management of diffuse discharges from properties of nitrogen, phosphorus, sediment and microbial pathogens at a sub-catchment scale.</u>"</p> <p>AND ADD a NEW definition for 'mitigation measures' to read: "<u>Mitigation measures means the measures (as detailed in Schedule 4) to be undertaken by an enterprise to ensure that the actual effects of carrying out sub-catchment-wide land use change and farming activities and associated contaminant discharges are within the scope of the AEE that accompanied the original resource consent application.</u>"</p> <p>AND ADD a NEW definition for 'sub-catchment management plan' to read: "<u>Sub-catchment management plan means a plan for the relevant part of a PPC1 sub-catchment (Map 3.11-2) prepared following a collaborative process involving iwi and other stakeholders, that identifies water quality issues and principles and management actions (including Decision Support Tools) required to manage these issues.</u>"</p> <p>AND AMEND the definition for 'point source discharges' to read: "<b>Point-source discharge:</b> For the purposes of Chapters 3.5 and 3.11, means <u>discharges associated with farming land use, and discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems.</u>"</p> <p>AND ADD 3 NEW schedules (as set out in Appendix B of the submission) to give effect to the above definitions.</p>	

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
Definition - Point source discharge	PC1-13141	Support the provision with amendments	AMEND the definition for 'point source discharges' to read: " <b>Point-source discharge:</b> For the purposes of Chapters 3.5 and 3.11, means <u>discharges associated with farming land use, and</u> discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems."	<b>SUPPORT</b>

# Wairarapa Moana Incorporation

Submitter ID: 72480

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
3.11 Waikato and Waipa River Catchments	PC1-2073	Oppose the provision with amendments	REPLACE 'land suitability' references with 'new allocation or management regime to be determined by a full Schedule 1 Resource Management Act process before the next stage of Healthy Rivers Wai Ora [PPC1] is implemented'.	<b>SUPPORT</b>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	PC1-2084	Support the provision with amendments	REPLACE Policy 1(b) with the following: " <u>Requiring all farming activities to apply Best Management Practices to mitigate the discharge of all contaminants to water bodies (nitrogen, phosphorus, sediment and microbial pathogens).</u> "	<b>SUPPORT</b>
Policy 6: Restricting land use change	PC1-2111	Support the provision	RETAIN Policy 6.	<b>OPPOSE</b>
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	PC1-2115	Support the provision with amendments	ADD to Policy 9 a provision 'e' to read as follows: " <u>Providing Best Practice Management guidelines and examples of cost effective mitigations that have the biggest effect on improving water quality across a range of farming policies, land types and other biophysical factors, to be included in Farm Environment Plans and applied on properties and enterprises in the region.</u> "	<b>SUPPORT</b>
3.11.4.3 Farm Environment Plans	PC1-2125	Support the provision	AMEND Method 3.11.4.3 to provide Best Practice Management Guidelines and mitigations that apply to a range of farming practices, land types and other biophysical factors so that they can be included in Farm Environment Plans and applied across all properties and enterprises within the region.	<b>SUPPORT</b>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm	PC1-2141	Oppose the provision with amendments	AMEND the implementation date for Farm Environment Plans for all sub-catchments to 1st July 2020 and amend dates accordingly in Rule 3.11.5.3(5)(b) and (5)(c). AND DELETE reference to the 75th percentile nitrogen leaching value.	<b>SUPPORT</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
Environment Plan under a Certified Industry Scheme				
3.11.5.7 Non-Complying Activity Rule – Land Use Change	PC1-2144	Support the provision	RETAIN Rule 3.11.5.7 as proposed.	<b>OPPOSE</b>
Schedule B - Nitrogen Reference Point	PC1-2146	Oppose the provision with amendments	AMEND Schedule B to incorporate the Nitrogen Reference Point and use in Farm Environment Plans as a Best Practice Management Tool. AND develop protocols for the use of actual input data for the OVERSEER Model. AND CLARIFY how new versions of Overseer will be handled and which version Schedule B is based on.	<b>SUPPORT</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-2148	Support the provision with amendments	DELETE reference to the 75th percentile nitrogen leaching value. AND DELETE reference to land capability from Schedule 1(2)(d).	<b>SUPPORT in part.</b>
Schedule 1 - Requirements for Farm Environment Plans	PC1-12548	Support the provision with amendments	Schedule 1 - ADD a clause to ensure that Waikato Regional Council will provide Best Managements Practice guidelines for actions or measures to mitigate contaminant discharge in relation to a range of land uses, stock policies, land types and other biophysical factors and that such mitigating actions or measures are to be included in Farm Environment Plans and implemented on all properties across the region.	<b>SUPPORT</b>
3.11.6 List of Tables and Maps	PC1-2155	Oppose the provision with amendments	AMEND Table 3.11-1 to provide attribute information at sub-catchment scale. AND REPLACE Map 3.11-1 with a new Map 3.11-2 AND REPLACE Map 3.11-2 with new sub-catchments that align with the physical attributes of the land.	<b>SUPPORT in part.</b>
Map 3.11-2: Map of the Waikato and Waipa River catchments, showing sub-catchments	PC1-2071	Oppose the provision with amendments	AMEND Map 3.11-2 so that FMU's are based on sub-catchments that are grouped according to their physical attributes.	<b>SUPPORT in part.</b>



Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
Additions to Glossary of Terms	PC1-2159	Oppose the provision with amendments	ADD a definition of 'property' to read as follows: " <u>One contiguous block of land owned by one common owner.</u> " AND ADD a definition of 'common owner' to read as follows: " <u>100% ownership.</u> " AND ADD a definition for the version of the OVERSEER Model that will be used to calculate the Nitrogen Reference Point and future versions. Define past, current and future.	<b>OPPOSE</b> Drafting of this definition needs to be considered in more detail.

## Appendix 4

# **FURTHER SUBMISSION OF THELAND TAHI FARM GROUP LIMITED (“THELAND TAHI”)**

**ON DECISIONS REQUESTED IN RELATION TO VARIATION 1 (“V1”) TO THE PROPOSED  
WAIKATO REGIONAL PLAN CHANGE 1 (“PPC1”): WAIKATO AND WAIPĀ RIVER CATCHMENTS.**

**This submission is made pursuant to clause 8 of Schedule 1 to the Resource Management Act 1991 (“RMA”) on the basis that Theland Tahī has an interest in PPC1/V1 greater than the interest that the general public has.**

**17 September 2018**

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## Auckland/Waikato Fish and Game and Eastern Region Fish and Game

Submitter ID: 74085

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	V1PC1-390	Not stated	Except as modified in this submission, all of the submitter's original submission points on PPC1 are sought for the geographical area covered by V1.	<b>Theland Tahī's position on the submitter's original submission is detailed in its further submission on PPC1 which is set out in the previous section.</b>
General	V1PC1-1548	Oppose with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11007, except as modified by their V1 submission: [REMOVE the forestry exclusion in the existing Regional Plan Rule 5.1.4.14.6 and 7 and require a 10 metre buffer for ephemeral streams, perennial streams, wetlands and lakes AND AMEND to ensure that no more than 50 per cent of a catchment or sub-catchment is harvested in a 10-year period unless 20 metre buffers are used on perennial streams, wetlands, and lakes to protect the downstream environment during harvest AND AMEND to ensure that any area of forestry that is harvested (other than firebreaks, tracks, landing sites) must be planted or replanted to protect from erosion and nutrient loss as soon as practicable and no later than 14 months from the date of the harvesting Note also the submitter's Decisions Requested with respect to forest harvesting in the Part B, 5.1.5 q Submission Summary Point 11016 AND ADD a NEW Schedule D for buffer requirements as provided in the table in Appendix 1 of the submission (page 64) AND ADD a NEW Schedule E that includes a 30% short term change as per the table in Appendix 1 of the submission (page 65) AND AMEND 3.7.7 Table of Wetlands in the Waikato Region to list all wetlands in the Waikato and Waipā catchments for Rule 3.7.4.6 AND AMEND to include the entire Waikato catchment in notification of PPC1, including the withdrawn area and all elements of PPC1 pertaining to the withdrawn area AND AMEND to give effect to the following points:</p> <ol style="list-style-type: none"> <li>1. That PC1 gives effect to Part 2 of the Resource Management Act 1991;</li> <li>2. That PC1 gives effect to the New Zealand Coastal Policy Statement 2010 and the National Policy Statement - Freshwater Management 2014;</li> </ol>	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
			<ol style="list-style-type: none"> <li>3. That PC1 gives effect to the Waikato Regional Policy Statement 2016;</li> <li>4. That the Auckland/Waikato and Eastern Sports Fish and Game Bird Management Plans are had regard to;</li> <li>5. That PC1 gives effect to the Vision and Strategy;</li> <li>6. That all remaining wetland habitats, particularly the Whangamarino wetland are recognised as significant and protected from further degradation and loss, and that their significant values including game bird values are protected, and the creation of new wetland habitats is facilitated;</li> <li>7. That the heightened significance of the Whangamarino wetland complex is recognised by way of a specific FMU, with the inclusion of appropriate attributes and targets in appropriate sites;</li> <li>8. That the objectives of PC1 and numerical attribute targets in Tables 3. 11-1 are capable of establishing a trajectory of improvement in water quality as measured through regular review periods to ensure that the water quality objectives of the Vision and Strategy are achieved in 80 years;</li> <li>9. That the objectives of PC1 and numerical attribute targets and limits are sufficient to safeguard life supporting capacity, ecosystem health and processes of fresh water, provide for the habitat of trout and indigenous fish, provide for primary contact recreation and cultural values including mahinga kai, and recognise and protect the natural character of rivers, lakes and wetlands;</li> <li>10. That Tables 3.11-1 includes appropriate attributes including limits and targets, which provide for the life supporting capacity, ecosystem health and processes, of fresh water, provide for the habitat of trout and indigenous fish, provide for primary contact recreation and cultural values including mahinga kai, and recognise and protect the natural character of rivers, lakes and wetlands. This includes the introduction of additional freshwater attributes as limits and targets, such as nitrate-nitrogen, phosphorus, and ecosystem health as measured through the macroinvertebrate community index (MCI) and other appropriate measures;</li> </ol>	

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
			<ol style="list-style-type: none"> <li>11. That Tables 3.11-1 includes appropriate attributes to enable an accurate characterisation of water quality and ecosystem health and therefore enable regular reviews to assess the effectiveness of the provisions of the plan and progress towards its objectives, policies, limits, and targets;</li> <li>12. That discharge rules, including those for diffuse discharges ancillary to land use activities meet the requirements of s70 RMA, administrative law requirements, and relevant planning considerations;</li> <li>13. That values, objectives, policies and methods (including rules) ensure that land is managed sustainably to achieve freshwater objectives, including the maintenance of water quality and where degraded, its improvement overtime;</li> <li>14. That Farm Environment Plans are placed into an appropriate and transparent framework of review and accountability;</li> <li>15. The inclusion of regulations which ensure that point and non-point discharges are managed and allocated within science-defined limits and that the property or enterprise-level allocation of discharges within these limits is equitable and consistent, efficient and effective, occurs as part of a trajectory of water quality improvement, and promotes sustainable management;</li> <li>16. That in at- or under-allocated sub-catchments (where freshwater objectives and targets are met but not exceeded), land use and ancillary discharge activities are regulated to ensure that at a minimum, that water quality is maintained;</li> <li>17. That in sub-catchments approaching, or at full allocation, and in over-allocated sub-catchments (where freshwater objectives and targets are currently being exceeded), land use and ancillary discharge activities are regulated to ensure that sub-catchments are placed on a trajectory of improvement;</li> <li>18. That nitrogen leaching limits and targets within catchments are established based on known water quality requirements for ecosystem health and then allocated back to land based on the natural capacity of soil, using a land suitability approach such as Land Use Capability (LUC) or similar alternative;</li> <li>19. That any required percentage reductions in nutrient loss or leaching utilise farm system economic analysis to assist in</li> </ol>	

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			<p>determining the extent of possible reductions at the farm, catchment, and regional scale;</p> <p>20. That nutrient transfer or trading regimes are provided in order to enable leaching reductions to be achieved at least cost and with maximum flexibility of resource use (to enable economic benefits to be maximised from the available resource) in cases where the required outcome and targets for that catchment cannot be met with natural carrying capacity based allocation systems or where communities choose this system of allocation;</p> <p>21. That provisions are included in the Plan to preserve the natural character of the coastal environment, wetlands, lakes and rivers and their margins and the protection of them from inappropriate subdivision, use and development;</p> <p>22. The inclusion of objectives, policies and methods (including rules) that holistically address sediment discharge and include diffuse sediment discharge from farming activities;</p> <p>23. That the implementation methods (including rules) are sufficient to achieve the objectives of PC1;</p> <p>24. Any further relief which addresses the issues raised by this submission and any consequential amendments.</p> <p>AND AMEND to include re-inclusion of the entire Waikato catchment in notification of PC1 including the withdrawn area and all elements of PC1 pertaining to the withdrawn area</p> <p>The submitter has stated that the s32 report is flawed and lists reasons relating to the development of the plan change, the scenario modelling outputs, the methods for making reductions, catchment wide rules and output limits for nitrogen discharge, but has not requested a specific decision in response.</p> <p>With respect to the s32 report, the submitter disagrees that the proposed rules are the most appropriate, efficient and effective provisions to achieve the objectives of the proposed plan and the purpose of the RMA and considers that alternative methods (including rules) to achieve these are necessary if the objectives are to be met.]</p>	
Intrinsic values - Ecosystem health	V1PC1-1554	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10768, except as modified by their V1 submission:                      [AMEND the intrinsic value Ecosystem health to add a new bullet point to come first, to read:</p>	<p><b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME'S ORIGINAL SUBMISSION ON PPC1.</b></p>

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			"Freshwater standards are set to achieve ecosystem health".]	
Intrinsic values - Natural form and character	V1PC1-215	Support with amendments	AMEND Intrinsic Values - Natural Form and Character so the narrative description of the values includes wetlands AND ADD a NEW 3rd bullet point to read: ' <u>Wetlands provide opportunity for people to experience wilderness.</u> '	OPPOSE
Intrinsic values - Natural form and character	V1PC1-1555	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10769, except as modified by their V1 submission: [AMEND the intrinsic value Natural form and character to include the appearance of water, including colour and clarity.]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
Use values - Mahinga kai	V1PC1-219	Support with amendments	AMEND Use Values - Mahinga Kai, narrative description to include wetlands and lakes. AND AMEND the second bullet point to read as follows: 'The rivers, <u>lakes and wetlands</u> provide for freshwater game and introduced kai species.'	OPPOSE
Use values - Mahinga kai	V1PC1-1556	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10770, except as modified by their V1 submission: [AMEND the use value Mahinga kai to specifically include fisheries AND AMEND to include brown and rainbow trout as sports fish of interest to anglers AND AMEND to include the Macroinvertebrate Community Index as an indicator to ensure the primary food supply of the ecosystem is considered.]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
Use values - Human health for recreation	V1PC1-1557	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10787, except as modified by their V1 submission: [AMEND the use value Human health for recreation to include the use of rivers, lakes and wetlands for recreational hunting and angling.]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
3.11.2 Objectives	V1PC1-1558	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10790, except as modified by their V1 submission: [ADD a NEW Objective to read: " <u>New Objective: Restoration and protection of ecosystem health</u> <u>Ecosystem health is achieved in Waikato rivers, lakes and wetlands within 80 years as a result of staged reductions in point and non-point source discharges.</u> " AND ADD a NEW Objective to read: " <u>New Objective: Classification, Maintenance and Enhancement of Significant Wetlands</u> <u>a) All wetlands within the Waikato and Waipā catchments are assessed and added to Table 3.7.7 of the parent plan.</u> <u>b) Wetlands within the Waikato and Waipā catchments are maintained or</u>	OPPOSE  Lack of certainty as to what constitutes a wetland. Introduces potentially onerous requirements for farmers.



Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			<u>enhanced to protect their ecosystems, including hydrological functioning and extent."</u> ]	
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	V1PC1-1559	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10806, except as modified by their V1 submission: [AMEND Table 3.11-1 so that 80 year attributes and targets are consistent with ecosystem health measures and achieving healthy freshwater ecosystems AND AMEND to include a range of attribute targets for all sites and sub-catchments that provide a clear linkage and assessment and measurement chain from the desired freshwater outcome to required reductions in nutrient loss from land by way of an allocation system AND AMEND to include appropriate sites for every sub-catchment AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2 AND AMEND Table 3.11-1 to add missing targets and limits, including ecosystem health based limits and targets AND AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages 66 to 69).]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	V1PC1-1560	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10809, except as modified by their V1 submission: [AMEND the heading of Objective 3 to read: "Short-term improvements in water quality in the first stage of restoration and protection water quality for each sub-catchment and Freshwater Management Unit <u>as required by the Vision and Strategy</u> " AND AMEND the explanatory narrative to read: "Actions put in place and implemented by 2036 to reduce discharges of nitrogen, phosphorous, sediment and microbial pathogens, have achieved thirty percent of the required change between current water quality and the 80 year water quality attribute targets in Table 3.11-1 <u>once this Plan has been operative for 20 years.</u> " AND AMEND to define and refine short term targets AND AMEND Table 3.11-1 to include short-term attribute targets for all sites AND AMEND Table 3.11-1 to include a range of attributes and attribute targets that enable an accurate characterisation of water quality and ecosystem health AND that ensure freshwater resources are sustainably managed, provide for the habitat of trout and indigenous fish and the	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			significant values of wetlands, AND that measure progress toward outcomes and enable reviews to assess the effectiveness of PPC1 AND AMEND the Table 3.11-1 numerical 80-year targets to give effect to the water quality objectives of the Vision and Strategy AND AMEND Table 3.11-1 to adopt the relief sought in Appendix 1 of the submission (pages 66 to 69) for rivers and streams, and add appropriate indicators for lakes and wetlands.]	
3.11.3 Policies	V1PC1-1547	Oppose with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10833, except as modified by their V1 submission: [RETAIN, DELETE or AMEND 3.11.3 Policies to ensure they will, individually and collectively, direct how the objectives (as retained or amended by the submission) are to be achieved AND ADD new policies to ensure they will, individually and collectively, be capable of implementing the objectives.]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	V1PC1-1561	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10875, except as modified by their V1 submission: [AMEND Policy 1 to read: "...a. Enabling, through permitted activity rules, activities with a low level of contaminant discharge to water bodies provided those discharges do not increase <u>and adverse effects, including cumulative effects, are avoided</u> ; and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce their discharges <u>so as to avoid adverse effects, including cumulative effects, through the use of resource consents</u> ; and ... <u>d. Allocating diffuse discharges to land based on science defined limits and targets, and progressively phasing out the over-allocation of contaminant discharges over time; and...</u> "]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	V1PC1-1590	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-12569, except as modified by their V1 submission: [AMEND Policy 1 to read: "...e. <u>Progressively increasing riparian buffering of rivers, streams, drains, wetlands and lakes.</u> "]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.

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Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-1562	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10876, except as modified by their V1 submission: [AMEND Policy 2 to ensure consistency with the amendments sought in Appendix 1 of this submission AND AMEND Policy 2(d) to read: "d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be <del>proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment in accordance with the short and long term targets in Table 3.11-1, the sub-catchment reduction targets and timeframes in Table 3.11-2, and the sub-catchment nitrogen leaching requirements in Schedule E;</del> and..." ]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-1591	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-12692, except as modified by their V1 submission: [AND AMEND Policy 2(a) to read: "a. Taking a tailored, risk based approach to define mitigation actions on the land <del>that will reduce</del> which will achieve required reductions specified in this plan in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm Environment Plan <del>either associated with as part of a resource consent; or in specific requirements established by participations in a Certified Industry Scheme;</del> " AND DELETE Policy 2(b).]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-1592	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-12693, except as modified by their V1 submission: [ADD a NEW clause (f) to Policy 2 to read: "f. <u>Promoting the use of riparian buffers to avoid sediment discharge.</u> "]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	V1PC1-1563	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10877, except as modified by their V1 submission: [AMEND Policy 3 to ensure consistency with the amendments sought in Appendix 1 of this submission AND AMEND Policy 3(a) to read: "a. Flexibility is provided to undertake crop rotations on changing parcels of land for commercial vegetable production, while reducing average contaminant discharges over time, <u>and while avoiding significant adverse effects;</u> and..."	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>

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			<p>AND AMEND Policy 3(e) to read:            "e. Identified mitigation actions are set out and implemented within timeframes specified in either a Farm Environment Plan <del>and associated as part of a resource consent, or in specific requirements established by participation in a Certified Industry Scheme...</del>"</p> <p>AND AMEND Policy 3(g) to read:            "g. <u>Requiring</u> the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be <del>proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment in accordance with the short and long term targets in Table 3.11-1, the sub-catchment reduction targets and timeframes in Table 3.11-2, and the sub-catchment nitrogen leaching requirements in Schedule E;</del> and..."</p> <p>AND ADD a NEW clause (h) to Policy 3 to read:            "Promoting and incentivising the use of riparian buffers to avoid sediment discharge."]</p>	
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	V1PC1-1564	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10878, except as modified by their V1 submission:            [AMEND Policy 4 to read:            "Manage sub-catchment wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new low discharging activities to continue provided that achievement of Objective 3 is not compromised <u>and significant adverse effects are avoided...</u>"]</p>	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
Policy 5: Staged approach	V1PC1-335	Support with amendments	<p>RETAIN the V1 amendment to Policy 5.            AND AMEND Policy 5 to clarify that reductions will be required in sub-catchments that are over-allocated.            AND CLARIFY that in some sub-catchments these will be significant and require planning for a range of actions, not limited to innovation and development of new practices.            AND AMEND to recognise that lag times between on-land changes and changes in water quality must be provided for within the 80 year time frame.</p>	<p>Theland Tahī supports the concept of the "Staged Approach". However, it <b>OPPOSES</b> the submission, particularly on the basis that the implications of the relief sought are not clear due to the absence of proposed drafting.</p>

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Policy 6: Restricting land use change	V1PC1-251	Support with amendments	AMEND Policy 6 so that it provides appropriate direction to land owners and decision makers applying Rule 3.11.5.7. AND AMEND to ensure that the cumulative effects of a proposed land use change are considered in addition to any improvement from current discharge levels. AND AMEND to read: '...Land use change consent applications that demonstrate clear <del>and</del> enduring, and meaningful decreases in the diffuse discharge of nitrogen, phosphorous, sediment or microbial pathogens will generally be granted considered only after assessing the cumulative effects of the whole activity for which consent is sought, against the limits and targets in Table 3.11-1.'	<b>OPPOSE</b>
Policy 6: Restricting land use change	V1PC1-1565	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10879, except as modified by their V1 submission: [AMEND Policy 6 to read: "... Land use change consent applications that demonstrate clear <del>and</del> enduring and meaningful decreases in existing diffuse discharges..."]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
Policy 7: Preparing for allocation in the future	V1PC1-1566	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10880, except as modified by their V1 submission: [AMEND PPC1 to define and include the schedule in Appendix 1 of this submission which shows the allocation status of nutrient loads in sub-catchments AND AMEND to ensure that farming activities comply with a nitrogen leaching rate which is based on allocating the total allowable load of nitrogen for the sub-catchment on the basis of either a flat per hectare allocation of nitrogen leaching (~15khN/ha/yr), or a nitrogen leaching allowance per hectare based on an allocation defined by natural carrying capacity AND AMEND to enable users undertaking farming activities to manage discharges allocated on a sub-catchment level to make further reductions in the future, including provision for trading of contaminant loss rates in the same sub-catchment.]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
Policy 11: Application of Best Practicable Option and mitigation or	V1PC1-1567	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10887, except as modified by their V1 submission: [AMEND Policy 11 to read: "...Where <del>it is not practicable to avoid or mitigate all adverse effects</del> all adverse effects cannot be reasonable avoided, they should be mitigated, and where they cannot reasonably be mitigated, an offset	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>

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offset of effects to point source discharges			<p>measure <del>may</del><u>should</u> be proposed in an alternative location or locations to the point of discharge... provided that the:</p> <p>a. Primary discharge does not result in any significant <u>or</u> toxic adverse effects at the point of discharge location; and</p> <p>...</p> <p>d. Offset measure <del>remains in place for the duration of the consent and</del> is secured by consent condition <u>and, if necessary, a bond in order to ensure it is achieved and maintained in the long term preferably in perpetuity;</u> <u>and</u></p> <p>e. Offset measure results in a <u>predicted net decrease of the contaminant in the receiving environment.</u>"]</p>	
Policy 12: Additional considerations for point source discharges in relation to water quality targets	V1PC1-1568	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10888, except as modified by their V1 submission: [REMOVE the word 'Additional' from the Policy 12 title AND REPLACE Policy 12 with the following: "<u>Impose conditions and discharge standards on point source discharges to ensure that the reduction targets and timeframes in Tables 3.11-1 and 3.11-2, and the sub-catchment nitrogen leaching reductions in Schedule E, can be met, based on a consideration of the contribution made by the discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads, and having regard to:</u></p> <p><u>a. The relative proportion of nitrogen, phosphorus, sediment and microbial pathogens that the particular point source discharge contributes to the catchment; and</u></p> <p><u>b. Whether it is appropriate to stage future mitigation actions to allow investment costs to meet the water quality targets specified above to be spread over time.</u></p> <p><u>c. The need to favour caution and environmental protection where the information available is uncertain or inadequate.</u>"]</p>	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
Policy 13: Point sources consent duration	V1PC1-1542	Oppose	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10900, except as modified by their V1 submission: [DELETE Policy 13 OR AMEND to read: <b>"Point source consent duration</b> When determining an appropriate duration for any point source consent granted consider the following matters:</p> <p>a. <u>Alternative methods of discharge, technology improvements or other changed circumstances that may arise in the future; A consent term</u></p>	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.

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			<p>exceeding 25 years, where the applicant demonstrates the approaches set out in Policies 11 and 12 will be met; and</p> <p>aa. <u>The sensitivity of the receiving environment and the adequacy/certainty of information that is available; and</u></p> <p>ab. <u>The applicant's past record of responsiveness to adverse effects including past technology upgrades undertaken to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment or microbial pathogens within the previous consent term and their success; and</u></p> <p>b. The magnitude and significance of the investment made or proposed to be made in contaminant reduction measures and any resultant improvements in the receiving water quality;</p> <p>c. The need to provide appropriate certainty of investment where <u>substantial</u> contaminant reduction measures are proposed (including investment in treatment plant upgrades or land based application technology)."</p> <p>AND AMEND to include guidance on consent term for diffuse discharges which should be aligned with sub-catchment progress review timeframes as specified in Table 3.11-2.]</p>	
Policy 17: Considering the wider context of the Vision and Strategy	V1PC1-1543	Oppose	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10906, except as modified by their V1 submission: [AMEND Policy 17 to remove the functioning of ecosystems and wetland values, and the enhancement of biodiversity OR AMEND to clarify that these are primary considerations/values integral to Chapter 3.11.]</p>	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
3.11.4 Implementation methods	V1PC1-1544	Oppose	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10910, except as modified by their V1 submission: [RETAIN, DELETE or AMEND 3.11.4 Methods to ensure they will, individually and collectively, direct how the objectives (as retained or amended by the submission) are to be achieved AND ADD NEW methods to ensure that they will, individually or collectively, be capable of implementing the objectives AND ADD a NEW method to read:</p> <p><b><u>"3.11.4.x Initiate allocation of diffuse discharges:</u></b>  <u>The Waikato Regional Council will initiate a framework for the allocation of diffuse discharges including reductions in nitrogen load according to specified timeframes for reductions by sub-catchment. The Waikato Regional Council will:</u></p> <p>a. <u>Use science-based limits for the total allowable load of a contaminant</u></p>	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>

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			<p><u>for sub-catchment which will meet the water quality objectives of the plan;</u></p> <p><u>b. Implement contaminant leaching rates for diffuse discharges from properties and enterprises by allocating to limits, targets and timeframes;</u></p> <p><u>c. Quantify nitrogen load reductions based on over-allocation of nitrogen beyond the science-based limit for sub-catchments; and</u></p> <p><u>d. Define timeframes for sub-catchment nitrogen load reductions to be made." ]</u></p>	
3.11.4.2 Certified Industry Scheme	V1PC1-1545	Oppose	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10911, except as modified by their V1 submission: [DELETE Method 3.11.4.2.]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
3.11.4.3 Farm Environment Plans	V1PC1-1570	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10912, except as modified by their V1 submission: [AMEND Method 3.11.4.3 to read: "... A Farm Environment Plan will be prepared by a certified person as per the requirements outlined in Schedule 1, and will assess the risk of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens and specify actions to reduce those risks in order to bring about reductions in the discharges of those contaminants <u>which ensure that targets and limits for sub-catchments are being met as required by consent documents...."</u> ]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
3.11.4.5 Sub-catchment scale planning	V1PC1-1572	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10933, except as modified by their V1 submission: [AMEND Method 3.11.4.5 to include provision for trading of contaminant loss rates between enterprises or properties in the same sub-catchment where the reductions required cannot be achieved whilst maintaining profitability on-farm AND AMEND to include the potential for collective consents to minimise the regulatory burden, as well as enable management to occur across multiple properties or landholdings.]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
3.11.4.6 Funding and implementation	V1PC1-1573	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10941, except as modified by their V1 submission: [AMEND Method 3.11.4.6 to add a new clause (c) to read: " <u>c. Source funding discharge reductions by way of an environmental consumptive rate based on the sensitivity of the receiving environment and degree of risk within a sub-catchment rather than a general rate."</u> ]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
3.11.4.7 Information	V1PC1-1574	Support with	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10959, except as modified by their V1 submission:	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.



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needs to support any future allocation		amendments	[AMEND Method 3.11.4.7 to read: <b>"3.11.4.7 Information needs to support any <u>current and future</u> allocation.</b> Gather information and commission appropriate scientific research to inform any <u>current and future</u> framework for the allocation of diffuse discharge including: a. Implementing processes that will support the <u>revision</u> and setting of property or enterprise-level diffuse discharge limits <u>now and</u> in the future to support sub-catchment reviews..."]	
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	V1PC1-1575	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10962, except as modified by their V1 submission: [AMEND Method 3.11.4.8 as follows: <b>"3.11.4.8 Reviewing Chapter 3.11 and refining and developing an allocation framework for the next Regional Plan</b> Waikato Regional Council will: a. Refine and review discharge and allocation frameworks as part of the <u>rolling review of sub-catchment performance</u> <del>Develop discharge allocation frameworks for individual properties and enterprises based on information collected under Method 3.11.4.7, taking into account the best available data, knowledge and technology at the time; and...</del> "]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	V1PC1-1576	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10987, except as modified by their V1 submission: [AMEND Method 3.11.4.11(a) to read: "a. Review and report on the progress towards and achievement of the <del>80</del> <u>year</u> water quality objectives of Chapter 3.11 according to amended Table 3.11-1."]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
3.11.5 Rules	V1PC1-1582	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11003, except as modified by their V1 submission: [ADD a NEW Rule to read: <b>"3.11.5.9 Prohibited Activity Rule - The discharge of sediment from <u>disturbed land to water without a buffer</u></b> <b>Rule 3.11.5.9 Prohibited Activity Rule - The discharge of sediment from <u>disturbed land to water without a buffer</u></b> <u>Except where authorised by consent or any other rule in this plan, any discharge of sediment without mitigation from disturbed land to a waterway in Schedule C is a prohibited activity.</u> "]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
3.11.5.2 Permitted Activity	V1PC1-1577	Support with	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10997, except as modified by their V1 submission:	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>

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Rule – Other farming activities		amendments	[DELETE Rule 3.11.5.2(4)(b)(i) AND AMEND Rule 3.11.5.2.(4)(b)(ii) to read: "15kg nitrogen/hectare/year, <del>whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B;</del> and" AND DELETE Rule 3.11.5.2(4)(c) AND AMEND Rule 3.11.5.2.(4)(e)(i) to read: "There shall be no cultivation within 5 metres of the bed of the waterbody <u>and/or the defined buffer sizes in Schedule D, whichever is the greater;</u> and"]	
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	V1PC1-1546	Oppose	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10998, except as modified by their V1 submission: [DELETE Rule 3.11.5.3.]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME'S ORIGINAL SUBMISSION ON PPC1.</b>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	V1PC1-1578	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10999, except as modified by their V1 submission: [AMEND Rule 3.11.5.4 to read: <b>"3.11.5.4 Controlled Activity Rule - Farming activities including multiple farms with a Farm Environment Plan <del>not under a Certified Industry Scheme</del></b> <b>Rule 3.11.5.4 Controlled Activity Rule - Farming activities with a Farm Environment Plan <del>not under a Certified Industry Scheme</del></b> Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2 the use of land for farming activities (excluding commercial vegetable production) <del>where that land use is not registers to a Certified Industry Scheme,</del> and the associated diffuse discharge ... is a permitted activity until: 1. 1 January 2020 for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, <del>and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</del> ... 5. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME'S ORIGINAL SUBMISSION ON PPC1.</b>

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			<p>After the dates set out in 1), 2) and 3) above the use of land <u>and associated discharges</u> shall be a controlled activity (requiring resource consent), <del>subject to</del> <u>provided it complies with</u> the following standards and terms:</p> <p>a. A Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council <del>at the time as part of</del> the resource consent application <del>is lodged</del>, <u>which must be lodged by</u> the dates specified in I-III below; and</p> <p>...</p> <p>e. <u>Nitrogen Discharges from the properties meets the targets and timeframes set out in Schedule E, as assessed by the Regional Council under the methodology contained in Scheduled B (including Updated Nitrogen Leaching Assessments).</u></p> <p><b>Matters of Control:</b>  Waikato Regional Council reserves control over the following matters:</p> <p>i. The content of the Farm Environment Plan, <u>which in any event must be in accordance with Schedule 1.</u></p> <p><u>i1. Buffers, as specified in Schedule D.</u></p> <p>...</p> <p>iii. The actions, timeframes and other measures to determine the diffuse discharge of nitrogen from the property or enterprise, <u>in accordance with Schedule B</u> <del>as measured by the five year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprises Nitrogen Reference Point, unless other suitable measures are specified. to ensure that nitrogen discharge is reduced to or maintained at the level specified in Schedule E or the level authorised by any nitrogen discharge rights if a trading scheme is operative within the catchment.</del></p> <p><del>iv. Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026.</del></p> <p>...</p> <p>vi. The monitoring, record keeping, reporting and information provision, <u>including public information provision</u>, requirements for the holder of the resource consent to demonstrate and/or monitor compliance <del>with the Farm Environment Plan.</del></p>	

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			<p>vii. The timeframe and circumstances under which the consent conditions may be reviewed <del>or the Farm Environment Plan shall be amended.</del></p> <p>viii. Procedures for reviewing, amending and <del>re-certifying re-approving the Farm Environment Plan</del> the resource consent including:</p> <p><u>a) Periodic reviews in accordance with the sub-catchment progress review timeframes as specified in Table 3.11-2.</u></p> <p><u>b) Reviews, initiated by the consent holder under section 128 on the purchase or sale of any nitrogen discharge rights under any operative catchment nitrogen trading scheme, in order to change the level of discharge authorised by the consent in clause iii.</u></p> <p><b>Dates:</b></p> <p><del>I. For Priority 1 sub-catchments, and properties with a Nitrogen Reference Point of greater than 75th percentile nitrogen leaching values, by 1 July 2020</del></p> <p>...</p> <p><del>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.</del></p> <p><u>Reviews will be subject to limited or public notification based on progress against the sub-catchment progress review targets and timeframes specified in Table 3.11-2."</u></p>	
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	V1PC1-1579	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11000, except as modified by their V1 submission:</p> <p>[AMEND Rule 3.11.5.5 to read:</p> <p>"The use of land for commercial vegetable production and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water, is a permitted activity until 1 January 2020, from which date it shall be a controlled activity (requiring resource consent) <u>subject to provided</u> the following standards and terms <u>are complied with:</u></p> <p>...</p> <p><del>d. The land use is registered to a Certified Industry Scheme; and</del></p> <p>...</p> <p>h. A Farm Environment Plan for the property or enterprise prepared in conformance with Schedule 1 and approved by a Certified Farm Environment Planner is provided to the Waikato Regional Council <del>at the time as part of</del> the resource consent application <u>is lodged.</u></p> <p>i. Nitrogen discharge from the properties meets the targets and</p>	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>

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			<p><u>timeframes set out in Schedule E, as assessed by the Regional Council under the methodology contained in Schedule B (including Updated Nitrogen Leaching Assessments).</u></p> <p><b>Matters of Control:</b> Waikato Regional Council reserves control over the following matters:</p> <p>i. The content of the Farm Environment Plans <u>which in any event must be in accordance with Schedule 1.</u></p> <p><u>i1. Buffers, as specified in Schedule D.</u></p> <p>...</p> <p>iv. The actions and timeframes to ensure the diffuse discharge of nitrogen <u>does not increase beyond the property or enterprises Nitrogen Reference Point is reduced to or maintained at a level specified in Schedule E or any operative nitrogen trading scheme.</u></p> <p>...</p> <p>vi. The monitoring, record keeping, reporting and information provision, <u>including public information provision, requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</u></p> <p>...</p> <p>viii. Procedures for reviewing, amending and <del>re-certifying-re-approving the Farm Environment Plan</del> <u>the resource consent including:</u></p> <p><u>a) Periodic reviews in accordance with the sub-catchment review timeframes as specified in Table 3.11-2</u></p> <p><u>b) Reviews, initiated by the consent holders under section 128 on the purchase of sale of any nitrogen discharge rights under any operative catchment nitrogen trading scheme, in order to change the level of discharge authorised by this consent in clause iii.</u></p> <p><del>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.</del> <u>Reviews will be subject to limited or public notification based on progress against the sub-catchment review targets and timeframes specified in Table 3.11-2."</u></p>	
3.11.5.6 Restricted Discretionary Activity Rule – The use of land	V1PC1-1580	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11001, except as modified by their V1 submission: [AMEND Rule 3.11.5.6 to read: <b>"3.11.5.6 Restricted Discretionary Non Complying Activity Rule - The use of land for farming activities</b></p>	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME'S ORIGINAL SUBMISSION ON PPC1.</b>

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for farming activities			<p><b>Rule 3.11.5.6 <del>Restricted Discretionary</del> Non Complying Activity Rule - The use of land for farming activities</b></p> <p>The use of land for farming activities that does not comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a <del>restricted discretionary</del> <u>non-complying</u> activity (requiring resource consent).</p> <p>Waikato Regional Council <del>restricts its discretion over</del> <u>will consider</u> the following matters:</p> <p>i. <del>Cumulative Effects</del> <u>on water quality of the catchment of the Waikato and Waipā Rivers, including cumulative effects and the extent to which the limits and targets in Schedule E are achieved.</u></p> <p>...</p> <p>Notification: Consent applications will be considered <del>without</del> <u>without limited or public notification, and without the need to obtain written approval of affected persons.</u>"]</p>	
3.11.5.7 Non-Complying Activity Rule – Land Use Change	V1PC1-1581	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11002, except as modified by their V1 submission:</p> <p>[AMEND the notification section of Rule 3.11.5.7 to read:</p> <p>"Notification: Consent applications will be considered <del>without limited or public notification, and without the need to obtain written approval of affected persons, subject to the Council being satisfied that the loss of contaminants from the proposed land use will be lower than that from the existing land use.</del>"]</p>	REFER TO FURTHER SUBMISSION ON FISH&GAME'S ORIGINAL SUBMISSION ON PPC1.
Schedule B - Nitrogen Reference Point	V1PC1-1539	Not stated	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11021, except as modified by their V1 submission:</p> <p>[AMEND Schedule B to read:</p> <p><b>"Schedule B - Nitrogen Reference Point and Updated Leaching Assessments/Te Āpitianga B - Te tohu ā-hauota</b></p> <p>A property or enterprise with a cumulative area greater than 20 hectares (or any property or enterprise used for commercial vegetable production) must have a Nitrogen Reference Point calculated as follows. <u>Upon consent review, assessments of leaching may need to be recalculated, and the methodology for the calculation of Updated Leaching Assessments is provided as well:</u></p> <p>a. The Nitrogen Reference Point <u>or Updated Leaching Assessment</u> must be calculated by a Certified Farm Nutrient Advisor to determine the amount</p>	REFER TO FURTHER SUBMISSION ON FISH&GAME'S ORIGINAL SUBMISSION ON PPC1.

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			<p>of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point or <u>Updated Leaching Assessment</u> shall be determined through the Rule 3.11.5.7 consent process.</p> <p>b. The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period specified in clause f), except for commercial vegetable production in which case the Nitrogen Reference Point shall be the average annual nitrogen leaching loss during the reference period. <u>The Updated Leaching Assessment will be the rolling average of all years within a review period.</u></p> <p>c. The Nitrogen Reference Point or <u>Updated Leaching Assessment</u> must be calculated using the current version of the OVERSEER Model (or any other model approved by the Chief Executive of the Waikato Regional Council).</p> <p>d. The Nitrogen Reference Point or <u>Updated Leaching Assessment</u> data shall comprise the electronic output file from the OVERSEER or other approved model...</p> <p>...</p> <p>f. The reference period is the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June 2016. <u>For Updated Leaching Assessments, the period is stated in Table 3.11-2 for that sub-catchment.</u></p> <p>g. The following records (where relevant to the land use undertaken on the property or enterprise) must be retained and provided to Waikato Regional Council <del>at its request</del> <u>as part of the nitrogen leaching assessment:</u></p> <p>...</p> <p>h. <u>Where changes to OVERSEER (or another model approved by the Chief Executive) results in a higher nitrogen discharge modelled for the same OVERSEER input file on any particular property or properties, then the consent holder will be required to modify inputs in order to continue meet the level stated on the consent based on the new version of the model (or new model) unless and until all consents in the sub-catchment are reviewed under the sub-catchment review timeframes as specified in Table 3.11-2.</u></p>	

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			Table 1: Data input methodology for ensuring consistency of Nitrogen Reference Point <u>or Updated Leaching Assessment</u> data using the OVERSEER® Model"]	
Schedule C - Stock exclusion	V1PC1-1540	Not stated	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11022, except as modified by their V1 submission: [AMEND Schedule C(1) to read: "The water bodies must be fenced to exclude cattle, horses, deer and pigs, unless those animals are prevented from entering the bed of the water body by a stock proof natural barrier, <u>including constructed barriers</u> , formed by topography or vegetation."]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-278	Support with amendments	RETAIN Table 3.11-1. AND AMEND to include attributes, limits and targets as set out in Appendix 2 [attached to full submission]. AND ENSURE the amendments are consistent with other relief sought by the submission AND the thresholds listed in Appendix 1 [attached to the submission].	<b>OPPOSE</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-287	Support with amendments	AMEND Table 3.11-1 to include Dissolved Inorganic Nitrogen, Dissolved Reactive Phosphorous and Periphyton attributes with limits and targets consistent with the swimmable, healthy and food gathering goals of the Vision and Strategy in the Waipā River and tributaries. AND AMEND to ensure that limits and targets for trophic state attributes reflect the same desired ecosystem health state for each site.	<b>OPPOSE</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-289	Support with amendments	AMEND Table 3.11-1 so that Nitrate is managed for ecosystem health, based on critical concentration thresholds in rivers, instead of toxicity. AND AMEND so that limits and targets for toxicity attributes reflect the same desired ecosystem health state for each site and are consistent across all attributes.	<b>OPPOSE</b>



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Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-293	Support with amendments	AMEND Table 3.11-1 to include a clarity target/limit at the Mercer Bridge site. AND AMEND Table 3.11-1 so that clarity short and long term limits and targets are set according to specific values like ecosystem health, swimming and mahinga kai/fishing values. AND AMEND to include a clarity limit/target of 2m for Trout fishing values in the Waikato River main stem. AND AMEND to include a clarity limit/target of 3.75-5m for Trout spawning and significant Trout fisheries.	<b>OPPOSE</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-299	Support with amendments	AMEND Table 3.11-1 to include NEW attributes with numeric limits and targets consistent with the swimmable, healthy and food gathering goals of the Vision and Strategy. AND AMEND to include Nitrate and Dissolved Reactive Phosphorous (DRP) attributes, with limits as set out in Appendix 1 [attached to full submission]. AND AMEND to include Observed/expected Macroinvertebrate Community Index (MCI) (the fraction of current MCI divided by the predicted reference MCI to account for natural spatial variation) with limits as set out in Appendix 1. AND AMEND to include deposited sediment and Periphyton in hard bottomed streams (using a relative measure to account specific characteristics of streams in the catchment). AND ADD an Estuary Trophic Index for the Waikato River Estuary, in the Port Waikato sub-catchment.	<b>OPPOSE</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-1583	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11004, except as modified by their V1 submission: [AMEND Table 3.11-1 so that 80-year attributes and targets are consistent with ecosystem health measures and achieving healthy freshwater ecosystems AND AMEND the numerical 80-year targets to give effect to the water quality objectives of the Vision and Strategy AND AMEND Table 3.11-1 to include a range of attribute targets for all sites and sub-catchments that provide a clear linkage and assessment and measurement chain from the desired freshwater outcome to required reductions in nutrient loss from land by way of an allocation system AND AMEND to include attribute targets that enable an accurate characterisation of water quality and ecosystem health AND that ensure freshwater resources are sustainably managed, provide for the habitat of	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>

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			trout and indigenous fish and the significant values of wetlands, AND that measure progress toward outcomes and enable reviews to assess the effectiveness of PPC1 AND AMEND to include appropriate sites for every sub-catchment AND AMEND to define and refine short-term attribute targets for all sites AND AMEND the explanatory narrative to read: " <u>Actions put in place and implemented by 2036 to reduce discharges of nitrogen, phosphorous, sediment and microbial pathogens, have achieved thirty percent of the required change between current water quality and the 80 year water quality attribute targets in Table 3.11-1 once this Plan has been operative for 20 years.</u> " AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2 AND AMEND Table 3.11-1 to adopt the amendments sought for rivers and streams, and add appropriate indicators for lakes and wetlands, as detailed in the table in Appendix 1 of the submission (pages 66 to 69).]	
Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments	V1PC1-1584	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11005, except as modified by their V1 submission: [AMEND Table 3.11-2 to adopt the amendments sought in the table in Appendix 1 of the submission (pages 69 to 74) AND AMEND to ensure clear linkages between Tables 3.11-1 and Table 3.11-2.]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
Additions to Glossary of Terms	V1PC1-1593	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-13134, except as modified by their V1 submission: [RETAIN, DELETE, OR AMEND terms in Part C to ensure that they will, individually and collectively, give effect to substantive amendments sought and enable objectives, as retained or amended by the Fish and Game submission, are to be achieved.]	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>
Definition - 75th percentile nitrogen leaching value	V1PC1-379	Oppose with amendments	RETAIN the original time-frames in Definition - 75th percentile nitrogen leaching value where possible OR AMEND Definition - 75th percentile nitrogen leaching value to be consistent with Schedule B(e).	<b>OPPOSE</b>
Definition - Livestock crossing structure	V1PC1-1586	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11017, except as modified by their V1 submission: [AMEND Definition - Livestock crossing structure with detailed specifications of the structure required, which rely on the risk factors for	<b>REFER TO FURTHER SUBMISSION ON FISH&amp;GAME's ORIGINAL SUBMISSION ON PPC1.</b>

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			adverse effects arising including the type of stock crossing, the land use, and the frequency of use AND AMEND to ensure it does not include structures which require livestock to pass through the flow of the water, such as submerged in-stream platforms.]	
Definition - Offset	V1PC1-1587	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11018, except as modified by their V1 submission: [AMEND Definition - Offset/s to read: "Offset/s: For the purpose of Chapter 3.11 means for a specific contaminant/s a <u>measurable conservation</u> action that reduces <u>the intensity, extent and/or duration of residual adverse effects of that contaminant on water quality and achieves conservation outcomes above and beyond that which would have been achieved if the offset had not taken place.</u> "]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
Consequential amendments to Waikato Regional Plan	V1PC1-1588	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11019, except as modified by their V1 submission: [RETAIN, DELETE or AMEND provisions in Consequential amendments to Waikato Regional Plan to ensure they will, individually and collectively, give effect to substantive amendments sought by the submission and enable objectives to be achieved. AND RETAIN, DELETE or AMEND provisions to ensure that inconsistencies are resolved and that the more stringent provision prevails.]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.
Management of Water Resources	V1PC1-1589	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11020, except as modified by their V1 submission: [AMEND the consequential amendment to Water Management Classes 3.2.4.1(e) to read: ".... apply to a water body as well as policies in Section 3.11.3 for waterbodies in the Waikato and Waipā River catchments, when making decisions.... the same issue and are inconsistent particular regard...."]	REFER TO FURTHER SUBMISSION ON FISH&GAME's ORIGINAL SUBMISSION ON PPC1.

# Beef + Lamb New Zealand Limited

Submitter ID: 73369

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General	V1PC1-566	Not stated	APPLY submission points 1-47 and the specific submission points under section 3 of the submitter's PPC1 submission and the relief sought to V1.	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
General	V1PC1-625	Not stated	PROVIDE for full compensation to those that are required to make large scale land use changes. (V1)	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
General	V1PC1-1702	Not stated	WITHDRAW V1 and PPC1 in its current form.	<b>SUPPORT</b>
General	V1PC1-1703	Not stated	AMEND V1 and PPC1 and re-notify inclusive of amended stock exclusion policies and methods that are the same as the proposed national regulations. AMEND policies and methods requiring the exclusion of stock from water and adopt methods that are set out in the national regulation for exclusion of stock from waterbodies.	<b>SUPPORT AND REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
General	V1PC1-1704	Not stated	No specific decision requested for V1, however the submission considers that the NPSFM has not been given effect to, in particular: <ul style="list-style-type: none"> <li>• There is a lack of clarity around what is considered to be a freshwater objective, limit or target and a failure to establish freshwater objectives and attributes.</li> <li>• The freshwater objectives established in V1 do not reflect values of freshwater including national values and do not recognise regional and local circumstances, as is required by Objective CA1, Policy CA2 or Policy CA3 of the NPSFM.</li> <li>• V1 provides for higher discharges to continue at their historic rate, even though this will not give effect to the NPSFM or the Vision and Strategy.</li> <li>• Table 3.11-1 is contrary to the NPSFM.</li> </ul> AND AMEND V1 and PPC1 and re-notify inclusive of the establishment of numerical water quality outcomes which provide for the ecological health of freshwater, as well as economic and social well-being of communities, rather than as a reflection of water quality present in 1863 as is currently reflected in the 80 year water quality outcomes in Table 3-11.1.	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>

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			<p>AND AMEND to give effect to the RMA and the NPSFM, and in particular ensure consistency with the objectives and policies under section C(a) National Objectives Framework.</p> <p>AND AMEND so that when formulating freshwater objectives and limits (including Table 3.11-1), the economic well-being, including productive economic opportunities, are provided for within the context of environmental objectives, attributes and limits.</p>	
General	V1PC1-1705	Not stated	<p>No specific decision requested for V1, however the submission is concerned that the section 32 analysis is inadequate.</p> <p>AND UNDERTAKE a s32 analysis on the alternative methods and rules proposed in this submission.</p>	<p><b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ'S ORIGINAL SUBMISSION ON PPC1</b></p>
General	V1PC1-1706	Not stated	<p>AMEND V1 and PPC1 and re-notify inclusive of an amended and strengthened sub-catchment approach.</p> <p>AND AMEND V1 and PPC1 and re-notify inclusive of modified objectives, policies, rules and methods applying to the management of nitrogen.</p> <p>AND DELETE policies and methods including rules applying to managing nitrogen discharges.</p> <p>AND AMEND to include an alternative nitrogen management and allocation method, in accordance with the submission and with the following principles [see the 14 principles outlined on page 12-14 of the full submission] for the allocation of nutrients.</p> <p>AND AMEND to adopt Land Use Capability as a proxy for natural capital as an allocation approach within V 1 and PPC1 now.</p> <p>AND DELETE all references in V1 and PPC1 to Land Use Suitability (LUS) (including Policy 2 and 7, Rules 3.11.5.2 to 3.11.5.7, Schedule B and all other areas in PC1 which refer to the Nitrogen Reference Point).</p> <p>AND AMEND so that N discharge/leaching standards/allocations are established based not on existing use and discharge profiles, but on the underlying natural capacity of soils and within the assimilative capacity of water.</p> <p>AND AMEND so that allocation methods achieve the limits and targets set by proposed V1 and PPC1 and the Objectives of the plan.</p> <p>AND AMEND PPC1 and V1 to apply Land Use Capability (LUC) as the allocation approach rather than grandparenting low leaching land uses to their NRP.</p> <p>AND AMEND so that nitrogen loads are allocated within (sub) catchments in such a way that there is an equitable allocation of total catchment</p>	<p><b>SUPPORT in part</b>, in relation to an enhanced sub-catchment approach and subject to <b>detailed drafting/amendments</b>.</p> <p><b>OPPOSE</b> balance of the relief including that which seeks to introduce N allocation and N allocation based on Land Use Capability and/or Natural Capital approach and allocation based on Land Use Capability and/or Natural Capital approach and allocation/transfer regime which is based on the same; and reference to limits and targets set by PPC1 and the Objectives of PPC1.</p>

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			<p>nitrogen load to all users/activities who may wish to use the available resource.</p> <p>AND AMEND to establish a nutrient transfer regime for nutrient user groups within sub-catchments, where catchment loads and limits have been established but only where any allocation methods are not based on current discharges (NRP) or land use. Transfer regimes are to enable nitrogen loss reductions to be achieved at least cost and to enable and encourage maximum efficiency and flexibility of resource use and to optimise economic benefits. Nutrient transfer systems must meet the following conditions:</p> <ul style="list-style-type: none"> <li>• The initial allocation system meets all of the allocation principles;</li> <li>• Only occurs within a sub-catchment or watershed and only within a nutrient user/Catchment Collective Groups;</li> <li>• The transferable portion of the resource (e.g. nitrogen) only pertains to the load which achieves the desired environmental outcomes; and</li> <li>• Result in improved economic outcomes and land use optimisation.</li> </ul> <p>AND AMEND so that water quality outcomes below environmental limits which is caused by naturally occurring processes, or is due to the impacts of regionally or nationally significant infrastructure is provided for.</p> <p>AND AMEND so that objectives, policies, methods and rules, are included which facilitate and support the establishment and operation of (sub) catchment collective groups to manage water quality and biodiversity issues facing a catchment.</p> <p>AND AMEND so that objectives, policies and methods support innovative and, where required, edge of field mitigation which facilitates flexible, viable businesses and encourages communities to work together to identify, understand and act collectively to improve water quality.</p> <p>AND AMEND so that regulatory methods are tailored to address the environmental issues specific to a sub-catchment or watershed and that land use.</p>	
General	V1PC1-1707	Not stated	AMEND V1 land use (including “farming”) methods and rules to include ancillary discharges (s9 and s15 RMA)	<b>OPPOSE</b>

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			AND AMEND land use and ancillary discharge activity rules so that they are holistic, in that they apply to the farming operation and systems rather than taking a single activity focus. AND AMEND land use and ancillary discharge activity rules to meet the requirements of s70 RMA, and relevant planning considerations.	
General	V1PC1-1709	Not stated	ADD provisions which ensure that the life supporting capacity of water, soil, and ecosystems are safeguarded. (V1) AND ADD provisions which ensure that freshwater resource use (assimilative capacity) is necessary, reasonable and efficient.	<b>SUPPORT IN PART</b>
General	V1PC1-1710	Not stated	AMEND so that methods, including rules, are put in place now to achieve the policies and objectives of the Plan, give effect to the RMA, and the NPSFM. (V1) AND AMEND to incorporate management frameworks into proposed V1 now which provide for land use and discharge permits to be consented for up to 35 years as is provided for under section 123(d) RMA.	<b>OPPOSE</b>
General	V1PC1-1711	Not stated	AMEND so that in over allocated catchments (where numerical water quality limits are currently being exceeded) land use and ancillary discharge activities that have caused or contributed to the over allocation, are managed to discharge standards which are set to progressively decline over time to ensure that discharges are reduced to meet the receiving water numerical limits/targets and achieve the Vision and Strategy for the Waikato River and the NPSFM. (V1)	<b>OPPOSE</b>
General	V1PC1-1726	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-13152: [WITHDRAW PPC1 in its current form.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
General	V1PC1-1727	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-13153: [AMEND PPC1 and re-notify inclusive of amended stock exclusion policies and methods that are the same as the proposed national regulations AND AMEND policies and methods requiring the exclusion of stock from water and adopt methods that are set out in the national regulation for exclusion of stock from waterbodies.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
General	V1PC1-1728	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-13154: [No specific decision requested for PPC1, however the submission considers that the NPSFM has not been given effect to, in particular:	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1 The land Tahiri reserves its position in respect of detailed drafting/amendments.</b>

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			<ul style="list-style-type: none"> <li>• There is a lack of clarity around what is considered to be a freshwater objective, limit or target and a failure to establish freshwater objectives and attributes.</li> <li>• The freshwater objectives established in PPC1 do not reflect values of freshwater including national values and do not recognise regional and local circumstances, as is required by Objective CA1, Policy CA2 or Policy CA3 of the NPSFM.</li> <li>• PPC1 provides for higher discharges to continue at their historic rate, even though this will not give effect to the NPSFM or the Vision and Strategy.</li> <li>• Table 3.11-1 is contrary to the NPSFM.</li> </ul> <p>AND AMEND to give effect to the RMA and the NPSFM, and in particular ensure consistency with the objectives and policies under section C(a) National Objectives Framework.</p> <p>AND AMEND so that when formulating freshwater objectives and limits (including Table 3.11-1), the economic well-being, including productive economic opportunities, are provided for within the context of environmental objectives, attributes and limits.]</p>	
General	V1PC1-1729	Not stated	<p>APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-:</p> <p>[The submission is concerned that the section 32 analysis:</p> <ul style="list-style-type: none"> <li>• Does not adequately assess costs, benefits and alternatives.</li> <li>• Does not comply with the RMA.</li> <li>• In some cases has failed to assess provisions</li> <li>• Fails to show PPC1 will achieve the improvements required by the Vision and Strategy</li> <li>• Fails to assess the efficiency and effectiveness of PPC1</li> <li>• Fails to assess the economic implications.</li> </ul> <p>[refer to further detail in paragraph 12-22 of the submission]</p>	<p><b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1.</b></p>
General	V1PC1-1730	Not stated	<p>APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-13156:</p>	<p><b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b></p>



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			<p>[AMEND PPC1 and re-notify inclusive of an amended and strengthened sub-catchment approach.</p> <p>AND AMEND PPC1 and re-notify inclusive of modified objectives, policies, rules and methods applying to the management of nitrogen.</p> <p>AND DELETE policies and methods including rules applying to managing nitrogen discharges.</p> <p>AND AMEND to include an alternative nitrogen management and allocation method, in accordance with the submission and with the following principles [see the 14 principles in the full submission] for the allocation of nutrients.</p> <p>AND AMEND so that N discharge/leaching standards/allocations are established based not on existing use and discharge profiles, but on the underlying natural capacity of soils and within the assimilative capacity of water.</p> <p>AND AMEND so that allocation methods achieve the limits and targets set by PPC1 and the Objectives of the plan.</p> <p>AND AMEND so that nitrogen loads are allocated within (sub) catchments in such a way that there is an equitable allocation of total catchment nitrogen load to all users/activities who may wish to use the available resource.</p> <p>AND AMEND to establish a nutrient transfer regime for nutrient user groups within sub-catchments, where catchment loads and limits have been established but only where any allocation methods are not based on current discharges (NRP) or land use. Transfer regimes are to enable nitrogen loss reductions to be achieved at least cost and to enable and encourage maximum efficiency and flexibility of resource use and to optimise economic benefits. Nutrient transfer systems must meet the following conditions:</p> <ul style="list-style-type: none"> <li>● The initial allocation system meets all of the allocation principles;</li> <li>● Only occurs within a sub-catchment or watershed and only within a nutrient user/Catchment Collective Groups;</li> <li>● The transferable portion of the resource (e.g. nitrogen) only pertains to the load which achieves the desired environmental outcomes; and</li> </ul>	<p><b>(SUPPORT sub-catchment approach and OPPOSE LUC/Natural Capital approach.)</b></p>

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			<ul style="list-style-type: none"> <li>Result in improved economic outcomes and land use optimisation.</li> </ul> <p>AND AMEND so that water quality outcomes below environmental limits which is caused by naturally occurring processes, or is due to the impacts of regionally or nationally significant infrastructure is provided for.</p> <p>AND AMEND so that objectives, policies, methods and rules, are included which facilitate and support the establishment and operation of (sub) catchment collective groups to manage water quality and biodiversity issues facing a catchment.</p> <p>AND AMEND so that objectives, policies and methods support innovative and, where required, edge of field mitigation which facilitates flexible, viable businesses and encourages communities to work together to identify, understand and act collectively to improve water quality.</p> <p>AND AMEND so that regulatory methods are tailored to address the environmental issues specific to a sub-catchment or watershed and that land use.]</p>	
General	V1PC1-1731	Not stated	APPLY to V1 the decision requested in accordance with the submitter’s PPC1 submission PC1-13157: [AMEND in PPC1 land use (including “farming”) methods and rules to include ancillary discharges (s9 and s15 RMA) AND AMEND land use and ancillary discharge activity rules so that they are holistic, in that they apply to the farming operation and systems rather than taking a single activity focus. AND AMEND land use and ancillary discharge activity rules to meet the requirements of s70 RMA, and relevant planning considerations.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
General	V1PC1-1732	Not stated	APPLY to V1 the decision requested in accordance with the submitter’s PPC1 submission PC1-13158: [AMEND in PPC1 the land use and ancillary discharges (including nitrogen management or allocation) objectives, policies, methods and rules to recognise and provide for drystock sector farming operations including the matters identified in paragraph 39(i)-(ix) of the full submission.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
General	V1PC1-1733	Not stated	APPLY to V1 the decision requested in accordance with the submitter’s PPC1 submission PC1-13159: [ADD provisions to PPC1 which ensure that the life supporting capacity of water, soil, and ecosystems are safeguarded. AND ADD provisions which ensure that freshwater resource use (assimilative capacity) is necessary, reasonable and efficient.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>

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General	V1PC1-1734	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-13160: [AMEND PPC1 so that methods, including rules, are put in place now to achieve the policies and objectives of the Plan, give effect to the RMA, and the NPSFM. AND AMEND to incorporate management frameworks into proposed V1 now which provide for land use and discharge permits to be consented for up to 35 years as is provided for under section 123(d) RMA.]	REFER TO FURTHER SUBMISSION ON B&LNZ's ORIGINAL SUBMISSION ON PPC1
General	V1PC1-1735	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-13161: [AMEND PPC1 so that in over allocated catchments (where numerical water quality limits are currently being exceeded) land use and ancillary discharge activities that have caused or contributed to the over allocation, are managed to discharge standards which are set to progressively decline over time to ensure that discharges are reduced to meet the receiving water numerical limits/targets and achieve the Vision and Strategy for the Waikato River and the NPSFM.]	REFER TO FURTHER SUBMISSION ON B&LNZ's ORIGINAL SUBMISSION ON PPC1
General	V1PC1-1736	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-13162: [AMEND PPC1 to provide for such other or further relief as addresses the issues raised by this submission.]	REFER TO FURTHER SUBMISSION ON B&LNZ's ORIGINAL SUBMISSION ON PPC1
General	V1PC1-1737	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-13151: [PROVIDE in PPC1 for full compensation to those that are required to make large scale land use changes.]	REFER TO FURTHER SUBMISSION ON B&LNZ's ORIGINAL SUBMISSION ON PPC1
Full achievement of the Vision and Strategy will be intergenerational	V1PC1-1654	Oppose with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11146: [AMEND 3.11 - Full achievement of the Vision and Strategy will be intergenerational, so that it explicitly recognises the role sub-catchment groups will have in achieving the Vision and Strategy. AND AMEND paragraph one, sentences three and four, to give effect to the intent as follows: " The 80-year timeframe recognises the 'innovation gap' that means full achievement of water quality <u>outcomes set under Table 3.11-1 may require significant reductions in discharges from some land uses, in sub-catchments which are currently over allocated. As such, timeframes should provide for investment in infrastructure, remediation, mitigation, innovation, and farm optimisation.</u> <del>requires technologies or practices that</del>	REFER TO FURTHER SUBMISSION ON B&LNZ's ORIGINAL SUBMISSION ON PPC1

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			<p><del>are not yet available or economically feasible.</del> In addition, the current understanding is that <u>achieving water quality restoration takes time due to lag phases between changes in land management approaches and establishment of on farm and edge of field mitigation (for example slope stabilisation, critical source management, wetland creation and enhancement, and establishment of riparian vegetation) and resultant water quality improvements.</u> <del>requires a considerable amount of land to be changed from land uses with moderate and high intensity of discharges to land use with lower discharges (e.g. through reforestation).</del>"</p> <p>AND AMEND bullet points on page 15 by adding a new bullet point, as follows:</p> <p><u>" taking a targeted and risked based approach to managing land and water resources which is focused on sub-catchments and which ensures that:</u></p> <p><u>(i) water quality is managed to ensure that:</u></p> <p><u>(a) water quality is maintained in those rivers and lakes where the existing water quality is at a level sufficient to support the Values in Section 3.11.1 Objective 1A</u></p> <p><u>(b) water quality is enhanced in those rivers and lakes where the existing water quality is not at a level sufficient to support the Values in Section 3.11.1 Objective 1A, so that the values are supported by 2097;</u></p> <p><u>(c) accelerated eutrophication and sedimentation of lakes in the catchment is prevented or minimised"</u></p> <p>AND DELETE bullet point three in relation to the Nitrogen Reference Point and holding land uses to this historic discharge rate.</p> <p>AND AMEND bullet point five, to give effect to the intent as follows:</p> <p><u>"Waikato Regional Council to incentivise, enable, and support sub-catchment approaches to sustainable land and water management, and adoption of edge of field mitigation where required. Regulatory, non-regulatory, and financial instruments are provided to enable and support communities working together in their watershed (sub-catchments) to address <del>develop approaches outside the Rule framework that both point source and diffuse losses of contaminants to water, allow contaminant loss risk factors to be assessed at a sub-catchment level,</del> and implement mitigations that look beyond individual farm property boundaries to identify the most cost-effective and influential solutions."</u></p> <p>AND AMEND Section 3.11 to reflect the outcomes sought in this submission.]</p>	

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3.11.1 Values and uses for the Waikato and Waipa Rivers	V1PC1-1655	Oppose with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11149 for 3.11.1 Values and uses: [AMEND PPC1 by incorporating the values within PPC1 as Objectives, and providing express links between these values and subsequent Sections of PPC1 to explain the relationship between particular values and uses and the desired water quality outcomes (Freshwater Objectives). AND AMEND to include a new Objective 1A OR AMEND existing Objectives to give effect to the following intent: <u>"Water Management Values: Surface water bodies are managed in a manner which safeguards their life supporting capacity and recognises and provides for the Values in Section 3.11.1."]</u>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
3.11.1 Values and uses for the Waikato and Waipa Rivers	V1PC1-1714	Support with amendments	RETAIN the relief set out in the submission to PPC1. AND RETAIN the values incorporated through V1.	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
3.11.2 Objectives	V1PC1-1656	Oppose with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11150: [AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which establish Freshwater Objectives based on the values of freshwater including cultural, recreational, and ecological values, along with consumptive values (ability to assimilate pollution, food production, and forestry). AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which change Table 3.11-1 numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli), and remove these parameters from Table 3.11-1 and instead hold as numerical freshwater Objectives. AND AMEND 3.11.2 Objectives AND ADD as required new Objectives which recognise and provide for the establishment and operation of collaborative sub-catchment groups, both through regulatory and non-regulatory methods, in sustainably managing water quality and biodiversity issues facing a catchment, providing innovative and where required edge of field mitigation and which facilitates flexible, viable businesses and communities, and enables sustainable management of resources such as nutrients within the assimilative capacity of soils and water, to achieve the Vision and Strategy for the Waikato River.	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>

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			<p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure resource use is efficient including through establishment of nitrogen allocation frameworks if nitrogen is required to be allocated.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure that resource use takes into account the natural capital of soils including the natural productive potential of soils (for example Land Use Capability), climate, geology, and assimilative capacity of water.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which provide for the economic and social well-being of people and communities, people and community resilience, adaptive management, and sub-catchment approaches lead by communities.</p> <p>AND AMEND 3.11.2 Objectives AND ADD as required NEW Objectives which ensure that limits and targets are set appropriately and enable the economic and social well-being of people and communities and ensure that they are resilient, vibrant, and future proofed.</p> <p>AND AMEND PPC1 so that it adopts and truly encourages and empowers a sub-catchment approach to managing land use and water quality, tailored to the specific issues faced by the sub-catchment , and with appropriate time frames for achievement of its interim targets and long term Objectives.</p> <p>AND AMEND PPC1 to provide communities and individuals with certainty in relation to what will be required of them to enable sound business, succession, and investment decisions to be made, including investment into environmental mitigation.</p> <p>AND AMEND Objective 4 OR ADD a NEW Objective to give effect to the following intent:  <u>"People and community resilience / Te Whaingā 4: Te manawa piharau o te tangata me te hapori, and the achievement of the Vision and Strategy for the Waikato River.</u>  <u>Communities working together to sustainably manage land and water resources within their sub-catchments, to protect the values for freshwater, to maintain and where degraded improve water quality, and to protect and restore biodiversity, for generations to come."</u></p> <p>AND AMEND Table 3.11-1 and PPC1 Objectives to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets. Freshwater Objectives would include values of freshwater such as cultural, ecological, primary production, commercial, and recreational and may</p>	

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			include numerical parameters for periphyton, chlorophyll a, macroinvertebrate community indices (MCI) and sediment and clarity.]	
3.11.2 Objectives	V1PC1-1715	Oppose with amendments	<p>RETAIN the decision requested as set out in the submission on PPC1.</p> <p>AND AMEND 3.11.2 Objectives (Objective 6 and reasons for adopting objective 1, 4 and 6) ADD as required NEW Objectives which establish Freshwater Objectives based on the values of freshwater including cultural, recreational, and ecological values, along with consumptive values (ability to assimilate pollution, food production, and forestry).</p> <p>AND AMEND 3.11.2 Objectives (Objective 6 and reasons for adopting objective 1, 4 and 6) ADD as required NEW Objectives which change Table 3.11-1 numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli), and remove these parameters from Table 3.11-1 and instead hold as numerical freshwater Objectives.</p> <p>AND AMEND 3.11.2 Objectives (Objective 6 and reasons for adopting objective 1, 4 and 6) AND ADD as required new Objectives which recognise and provide for the establishment and operation of collaborative sub-catchment groups, both through regulatory and non-regulatory methods, in sustainably managing water quality and biodiversity issues facing a catchment, providing innovative and where required edge of field mitigation and which facilitates flexible, viable businesses and communities, and enables sustainable management of resources such as nutrients within the assimilative capacity of soils and water, to achieve the Vision and Strategy for the Waikato River.</p> <p>AND AMEND 3.11.2 Objectives (Objective 6 and reasons for adopting objective 1, 4 and 6) AND ADD as required NEW Objectives which ensure resource use is efficient including through establishment of nitrogen allocation frameworks if nitrogen is required to be allocated.</p> <p>AND AMEND 3.11.2 Objectives (Objective 6 and reasons for adopting objective 1, 4 and 6) AND ADD as required NEW Objectives which ensure that resource use takes into account the natural capital of soils including the natural productive potential of soils (for example Land Use Capability), climate, geology, and assimilative capacity of water.</p> <p>AND AMEND 3.11.2 Objectives (Objective 6 and reasons for adopting objective 1, 4 and 6) AND ADD as required NEW Objectives which provide for the economic and social well-being of people and communities.</p> <p>AND AMEND 3.11.2 Objectives (Objective 6 and reasons for adopting objective 1, 4 and 6) AND ADD as required NEW Objectives which ensure</p>	<p><b>OPPOSE</b></p> <p><b>AND: REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b></p>

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			<p>that limits and targets are set appropriately and enable the economic and social well-being of people and communities and ensure that they are resilient, vibrant, and future proofed.</p> <p>AND AMEND Table 3.11-1 and PPC1 Objectives to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets.</p>	
<p>Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit</p>	<p>V1PC1-1657</p>	<p>Oppose with amendments</p>	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11154: [AMEND Objective 1 AND/OR ADD new Objectives to give effect to the following intent: "Objective 1A Water management Values: Surface water bodies are managed in a manner which safe guards their life supporting capacity and recognises and provides for the Values in Section 3.11.1. Objective 1B Targeted and risk based approach to managing land and water resources which is focused on sub-catchments: (ii) water quality is managed to ensure that: (a) water quality is maintained in those rivers and lakes where the existing water quality is at a level sufficient to support the Values in Section 3.11.1 Objective 1A (b) water quality is enhanced in those rivers and lakes where the existing water quality is not at a level sufficient to support the Values in Section 3.11.1 Objective 1A, so that the values are supported by 2097; (c) accelerated eutrophication and sedimentation of lakes in the catchment is prevented or minimised."]</p>	<p><b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b></p>
<p>Objective 2: Social, economic and cultural wellbeing is maintained in the long term</p>	<p>V1PC1-1659</p>	<p>Oppose with amendments</p>	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11233: [AMEND Objective 2 so that it is made explicit that the Objective is to enable people and communities to continue to provide for their social, economic, and cultural well-being, to be resilient and vibrant, and to provide for future generations. AND AMEND Objective 2 to give effect to the following intent: "Social, economic and cultural well-being is recognised and maintained in the long term/Te Whaingā 2: Ka whakaōngia tenoranga a-pāpori, a-ohanga, a-ahurea hoki i nga tauroa. Management of land and water resources within the Waikato River Catchment recognises and provides for Waikato and Waipā communities and their economic and social well-being, vibrancy and resilience."]</p>	<p><b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b></p>



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Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	V1PC1-1660	Oppose with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11482: [AMEND Objective 3 so that it provides for and enables management approaches tailored to the sub-catchment unit or waterbody and which specifically focus on the issues identified for that waterbody (i.e. in some catchments it may be Nitrogen but in others it may be sediment). AND DELETE reference to 10 percent of the required change. AND AMEND Table 3.11-1 so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications. AND AMEND Objective 3 by extending timeframes to longer than 10 years, preferably 30 years.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
Objective 4: People and community resilience	V1PC1-1651	Oppose	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11483: [ADD a NEW Objective to PPC1 which provides for people and community resilience, adaptive management, and sub-catchment approaches led by communities. AND DELETE from Objective 4 reference to the staged approach and future plan changes including increasing stringency in land use controls and requirements AND REPLACE with adaptive management Objectives and Policies. AND AMEND Objective 4 OR ADD a new Objective to PPC1 to give effect to the following intent: "People and community resilience / Te Whaingā 4: Te manawa piharau o te tangata me te hapori, <u>and the achievement of the Vision and Strategy for the Waikato River.</u> <u>Communities working together to sustainably manage land and water resources within their sub-catchments, to protect the values for freshwater, to maintain and where degraded improve water quality, and to protect and restore biodiversity, for generations to come.</u> " AND AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 years, for those parameters which are significantly over allocated now AND AMEND the interim targets so that they progressively reduce over allocation at a rate and scale which provides for people and community resilience including economic well-being.	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>

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			AND AMEND Table 3.11-1 and Objective 4 so that PPC1 provides a pathway for individuals and communities to work together to achieve the Vision and Strategy over the long term.]	
3.11.3 Policies	V1PC1-1648	Not stated	APPLY decision to V1 requested in accordance with the submitter’s PPC1 submission PC1-11484: [ADD new Policy 1A OR AMEND Policy 1 to give effect to Objective 1A and 1B with the intent of: <u>“Where current water quality meets the relevant Table 3.11 - 1 water quality outcomes (interim targets or 80 year targets/limits) within each sub-catchment, water quality must be managed in a manner which ensures that the water quality targets/ limits continue to be met beyond the zone of reasonable mixing.</u> <u>Where Table 3.11-1 water quality targets/limits are not met, water quality within the sub-catchment must be managed in a manner which progressively improves existing water quality relevant to the parameter exceeded , in order to meet:</u> (i) <u>The water quality target/limit for the sub-catchment by 2096, and/or</u> (ii) <u>The relevant value that the water quality target/limit is designed to safeguard”</u> <u>AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.</u> AND AMEND Policy 1 AND/OR include a new Policy to enable establishment and operation of sub-catchment groups working through global consents to sustainably manage land and water resources, to be innovative, to share and move resources as required within environmental limits, to be flexible, to recognise and provide for biodiversity values, to adopt edge of field mitigation and to offset residual impacts. AND AMEND PPC1 to insert the nutrient allocation principles listed in Appendix 1 of the submission and apply these across the catchment.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and	V1PC1-1661	Oppose with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11485: [AMEND Policy 1 to enable land uses which are less than or equal to 20 hectares, or which are leaching at or less than the 'sustainable level' (Footnote: ‘Sustainable level’ can be defined as either a kg liveweight per ha relative to land use capability (LUC) or Nitrogen kg discharge rate	<b>OPPOSE AND REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>

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microbial pathogens			<p><i>per hectare (kgN/ha/year) which achieves the desired in-stream Nitrogen load) to continue and provide them with flexibility to change farm systems or stocking rates up to the 'sustainable level'.</i></p> <p>AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.</p> <p>AND AMEND to ensure the allocation and management framework for Nitrogen promotes the efficient use of natural resources AND incentivises activities and behaviour change which promote the sustainable management of natural resources AND will achieve the Vision and Strategy AND incorporates the allocation principles set out under appendix 1 in the submission.</p> <p>AND AMEND PPC1 to manage or allocate Nitrogen based on:</p> <p>(a) 'flat rate per hectare' permitted threshold (where the sub-catchment load is divided by the total number of hectares in the sub-catchment and this amount is allocated as a Nitrogen discharge threshold to each hectare of land) for example 20kgN/ha/year; OR</p> <p>(b) Natural capital or land use suitability based allocation per hectare' where a sub-catchment Nitrogen load is attributed to land based on its underlying characteristics and factors (including productive capability using the Land Use Capability classification system). This approach should be used to determine the permitted baseline, and where required to stage reductions in Nitrogen discharges over time as per Table 1 below <i>(footnote: Categories and discharge numbers are indicative only and subject to change through Schedule 1 process as more evidence and data becomes available);</i> AND</p> <p>c) Natural capital or land use suitability based threshold for the discharge of Nitrogen per hectare' that is used to determine where and when Council require additional regulatory standards or stricter activity status to reduce Nitrogen loss over time - based on calculating a sub-catchment Nitrogen load and focusing on priority areas where Nitrogen is over allocated and therefore reductions from land uses are required. For example as set out in Table 1.</p> <p>Table 1 Land Use Capability - Natural Capital</p>	

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			<table border="1" data-bbox="645 308 1249 464"> <thead> <tr> <th>Class</th> <th>I</th> <th>II</th> <th>III</th> <th>IV</th> <th>V</th> <th>VI</th> <th>VII</th> </tr> </thead> <tbody> <tr> <td>Year 1 (Kg/N/ha/year)</td> <td>30</td> <td>27</td> <td>24</td> <td>18</td> <td>16</td> <td>15</td> <td>8</td> </tr> <tr> <td>Year 5 (kgN/ha/year)</td> <td>27</td> <td>25</td> <td>21</td> <td>16</td> <td>13</td> <td>12</td> <td>8</td> </tr> </tbody> </table> <p data-bbox="645 499 1368 1374">                     AND AMEND Policy 1 and Table 3.11-1 OR ADD a NEW Policy which sets out the:                      a) Current Nitrogen load (<i>footnote: Current Nitrogen load includes both the Allowable in-stream nitrate load to achieve current in-stream Nitrogen concentration and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land</i>)                      b) Desired Nitrogen load (<i>footnote: Desired Nitrogen load includes both the Allowable in stream nitrate load to achieve the desired in-stream Nitrogen concentration, and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land</i>)                      c) Nitrogen discharge rate/ha/year to achieve current Nitrogen load                      d) Nitrogen discharge rate/ha/year to achieve the desired Nitrogen load                      AND AMEND PPC1 so that:                      f) activities which would cause the maximum catchment load to be exceeded are avoided                      g) In catchments which are already over allocated, PPC1 should avoid allocating any further Nitrogen                      h) In catchments which are already over allocated, PPC1 should put in place Methods (such as a 'sinking lid on the allocation') so that over time the over allocation is phased out.                      AND AMEND PPC1 to ensure that those activities and land uses which are contributing the most to the over allocated parameter bear the majority of the cost of reducing the over allocation                      AND AMEND Policy 1 (a) to ensure that low discharging land uses such as small scale (&lt;20kg N/ha) or low impact activities (those discharging at or below the sustainable level) are enabled to continue and are provided with flexibility to change farm systems and stocking rates up to the sustainable levels for the sub-catchment (Freshwater Management Unit).]                 </p>	Class	I	II	III	IV	V	VI	VII	Year 1 (Kg/N/ha/year)	30	27	24	18	16	15	8	Year 5 (kgN/ha/year)	27	25	21	16	13	12	8	
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Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	V1PC1-1667	Oppose with amendments	<p>APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-12575:</p> <p>[AMEND Policy 1 so that management approaches are tailored to addressing water quality issues identified on a sub-catchment basis, and where the responsibility of addressing the impacts is apportioned to those land uses including point and non-point source discharges which have caused or contributed to any over allocation, and where improvements required over time are appropriate to the level of impact.</p> <p>AND AMEND Policy 1 AND/OR include a new Policy to enable establishment and operation of sub-catchment groups working through global consents to sustainably manage land and water resources, to be innovative, to share and move resources as required within environmental limits, to be flexible, to recognise and provide for biodiversity values, to adopt edge of field mitigation and to offset residual impacts.</p> <p>AND AMEND PPC1 and Policy 1 so that land use rules and management frameworks include both land use and ancillary discharge provisions (sections 9 and 15 Resource Management Act)</p> <p>AND AMEND PPC1 and Policy 1 to enable establishment of nutrient user groups within the same catchment as part of catchment collective groups AND enable transfer of nutrients (at a level not exceeding the desired in-stream nutrient load), where principles in Appendix A of the submission are met, precluding nutrient transfer when allocation is based on current or historic discharges AND transfer within nutrient user groups only occurs: within a sub-catchment or watershed; within an established sub-catchment programme that's based on fair allocation of a load; only pertains to the load which achieves the desired environmental outcome; results in improved economic outcomes and land use optimization.</p> <p>AND AMEND Policy 1 to apply Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.</p> <p>AND ADD new Policy 1A OR AMEND Policy 1 to give effect to Objective 1A and 1B with the intent of:</p> <p><u>“Where current water quality meets the relevant Table 3.11 - 1 water quality outcomes (interim targets or 80 year targets/limits) within each sub-catchment, water quality must be managed in a manner which</u></p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>

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			<p><u>ensures that the water quality targets/ limits continue to be met beyond the zone of reasonable mixing.</u>  <u>Where Table 3.11-1 water quality targets/limits are not met, water quality within the sub-catchment must be managed in a manner which progressively improves existing water quality relevant to the parameter exceeded , in order to meet:</u>  <u>(i) The water quality target/limit for the sub-catchment by 2096, and/or</u>  <u>(ii) The relevant value that the water quality target/limit is designed to safeguard”]</u></p>	
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	V1PC1-1668	Oppose with amendments	<p>APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-12576:  [AMEND Policy 1 (a) as follows: “enabling activities with a low level of contaminant discharge to water bodies <del>provided these discharges do not increase-</del>”  AND AMEND Policy 1 (b) as follows: “Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to <del>reduce their discharges; and which exceed the 'sustainable level' for the sub-catchment (Freshwater Management Unit) to progressively reduce</del> <u>contaminant discharges over time, where the reductions are proportionate to the level of over allocation within the sub-catchment and proportionate to the discharge level of the activity.”]</u></p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	V1PC1-1669	Oppose with amendments	<p>APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-12577:  [AMEND Policy 1 (c) as follows: “progressively excluding cattle, horses, deer, and pigs from rivers, stream, drains, wetlands and lakes <u>on land up to 15 degrees slope, and where break fed on land above 15 degrees slope.”</u>  AND AMEND PPC1 so intensively farmed animals are required to be excluded from all permanently flowing waterbodies, but enable flexibility for low intensity land uses or/and hill country farming AND focus management approaches for hill country on critical source management.]</p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-1670	Oppose with amendments	<p>APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-12711:  [DELETE Policy 2 (d) AND REPLACE with:  <u>“where current water quality is over allocated such that the water quality outcome in the sub-catchment, as set out in Table 3.11-1 is not met, require reductions in the contaminant discharge to be proportionate to the amount of the current discharge (those discharging more are expected</u></p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>

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			<p><u>to make greater reductions), and proportionate to the scale of water quality improvement required in the sub-catchment, to provide for the values."</u></p> <p>AND AMEND Policy 2 to apply Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and require the application of best practicable option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.]</p>	
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-1671	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11487:</p> <p>[AMEND Policy 2 so that management approaches are tailored to managing water quality on a sub-catchment basis. Reductions may not always be required</p> <p>AND AMEND to incentivise and support collaborative community groups working together to sustainably manage land and water resources and to implement a staged approach to achieving the Objective of PPC1, through long term global sub-catchment land use and discharge permits, including land use change</p> <p>AND AMEND PPC1 to adopt the recommendations released in the government's clean water document (<i>New Zealand Government Clean Water (February 2017) Ministry for the Environment, ME 1293</i>).]</p>	REFER TO FURTHER SUBMISSION ON B&LNZ's ORIGINAL SUBMISSION ON PPC1
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-1691	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12708:</p> <p>[AND AMEND Policy 2 (e) as follows:</p> <p>"Requiring <del>stock exclusion</del> <u>the exclusion of stock from permanently flowing waterbodies on land up to 15 degrees slope, and stock when break fed on land with a slope exceeding 15 degrees slope,</u> to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026."]</p>	REFER TO FURTHER SUBMISSION ON B&LNZ's ORIGINAL SUBMISSION ON PPC1
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-1693	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12709:</p> <p>[AMEND Policy 2 to reflect the amendments set out against Policy 1 which relate to the management of Nitrogen discharges and allocation, and which enable flexibility for low discharging land uses.]</p>	REFER TO FURTHER SUBMISSION ON B&LNZ's ORIGINAL SUBMISSION ON PPC1
Policy 2: Tailored approach to	V1PC1-1694	Support with	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12710:</p>	REFER TO FURTHER SUBMISSION ON B&LNZ's ORIGINAL SUBMISSION ON PPC1

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reducing diffuse discharges from farming activities		amendments	[AMEND Policy 2(a) as follows: "Taking a tailored, risk based approach to define mitigation actions on the land <del>that will reduce</del> to manage diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens..." AND AMEND Policy 2 and PPC1 to ensure that management approaches for hill country are focused on critical source management with timeframes tailored through Farm Environment Plans.]	
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	V1PC1-1672	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11488: [AMEND Policy 4 so that it enables small scale land uses (<20ha), low intensity, and low discharging land uses to continue, to be flexible in their land use and their discharge of Nitrogen, and stocking rates, and to be established as set out under Policy 1. AND AMEND to introduce permitted thresholds based on the 'sustainable level' for the sub-catchment or Freshwater Management Unit. The 'sustainable level' can be based on Nitrogen loss per/kg/ha/year or alternatively kg live weight per ha relative to land use capability. Nitrogen loss rates should be based on either a permitted activity threshold using an equal allocation for a sub-catchment (e.g. 20kgN/ha/year) or Natural Capital based allocation or activity status (e.g. LUC), and relate to sub-catchment or Freshwater Management Unit specific desired in-stream Nitrogen loads. AND DELETE reference to future further reductions in contaminate discharges. AND AMEND to recognise existing biodiversity values on private land and that further establishment and protection of biodiversity is enabled and incentivised (as Policy 17 does).]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
Policy 5: Staged approach	V1PC1-1673	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11489: [AMEND Policy 5 to give effect to the following intent. "Recognise that achieving the water quality attribute targets in Table 3.11-1 may require significant reductions in discharges from some land uses, in <u>sub-catchments which are currently over allocated. As such timeframes will need to be staged over 80 years, to develop, while making a start on reducing discharges of Nitrogen, Phosphorus, sediment and microbial pathogens, and preparing for further reductions that will be required in subsequent regional plans. provide for investment in infrastructure, remediation, mitigation, innovation, and farm optimisation, and in recognition that achieving water quality restoration takes time due</u>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>



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			<p><del>to lag phases between changes in land management approaches and establishment of on farm and edge of field mitigation and resultant water quality improvements."</del></p> <p>AND AMEND to tailor management approaches to address the specific contaminate(s) of concern on a sub-catchment basis.</p> <p>AND DELETE reference to further reductions through subsequent regional plans.</p> <p>AND AMEND to give effect to Objective 3 and 4 as proposed through this submission.</p> <p>AND AMEND to enable the establishment and operation of sub-catchment groups working through long term global consents to sustainably manage land and water resources, to adopt a staged approach to addressing water quality over allocation where it exists within the sub-catchment, to be innovative, to share and move resources as required within desired environmental limits/targets, to be flexible, to recognise and provide for biodiversity values, and to adopt edge of field mitigation.</p> <p>AND AMEND Table 3.11-1 so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications.</p> <p>AND AMEND Policy 5 by extending timeframes to longer than 10 years, preferably 30 years.]</p>	
<p>Policy 6: Restricting land use change</p>	<p>V1PC1-1662</p>	<p>Oppose with amendments</p>	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11490:</p> <p>[AMEND Policy 6 as follows: "<del>Restricting land use change</del> <u>Restriction on intensive land uses and discharges to water...</u>"</p> <p>AND AMEND to enable land use activities including changes in land use where increases in contaminant discharges still enable sub-catchment outcomes for water quality to be met including the values.</p> <p>AND AMEND to enable changes in land use which occur within the sustainable level for the sub-catchment as set out in Policy 1.</p> <p>AND AMEND to take into account the degree to which land use is optimised in relation to the natural capital of soils, and sub-catchment water quality 80 year attributes targets (Table 3.11-1).</p> <p>AND AMEND to provide for increases in Nitrogen discharge where land use change will result in overall improvement in sustainable management and a decrease in soil loss, Phosphorus loss, management of microbial pathogens, and enhancement of biodiversity values.]</p>	<p><b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b></p>

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Policy 7: Preparing for allocation in the future	V1PC1-1674	Support with amendments	<p>APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11491:                      [AMEND Policy 7 to make it a Method.                      AND AMEND Policy/Method 7 as follows:                      “Natural Resource <del>Preparing for</del>Allocation in the future  <del>Prepare for further diffuse discharge reductions and any future property or enterprise level allocation of diffuse discharges</del>                      of Nitrogen, Phosphorus, sediment and microbial pathogens that will be required by subsequent regional plans, by implementing the Policies and Methods in this chapter. To ensure this occurs, collect information and undertake research to support this, including collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges, and researching the spatial variability of land use and contaminant losses and the effect of contaminant discharges in different parts of the catchment that will assist in defining ‘land suitability’.  <del>Work with stakeholders to determine sub-catchment specific allocation of natural resources including the assimilative capacity of freshwater. The allocation approaches should apply;</del>  <del>Any future allocation should consider the following principles:</del>                      a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and                      b. Allowance for flexibility of development of Tangata Whenua ancestral land; and                      c. Minimise social disruption and costs in the transition to the ‘land suitability’ approach; and                      d. Future allocation decisions should take advantage of new data and knowledge.”                      AND ADD the allocation principles in Appendix 1 of the submission and those set out in the general Section of the submission.                      AND ADD new clauses to take into account the degree to which land use is optimised to the natural capital of soils and assimilative capacity of water.                      AND AMEND to adopt submissions set out in relation to the management and allocation of Nitrogen.]</p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>

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Policy 8: Prioritised implementation	V1PC1-1675	Support with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11492: [AMEND Policy 8 to require reductions of Nitrogen greater than the currently proposed 75th percentile. AND AMEND to introduce appropriate sub-catchment contaminant numerical limits to enable targeted and prioritised actions. AND AMEND to prioritise the establishment of catchment collaborative groups based on priority sub-catchments.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	V1PC1-1676	Support with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11493: [RETAIN Policy 9 AND AMEND to facilitate and support the establishment and operation of sub-catchment groups to manage water quality and biodiversity issues facing a sub-catchment, providing innovative and, where required, edge of field mitigation, and which facilitates flexible, viable businesses and communities, and enables transfer of resources such as nutrients within the assimilative capacity of soils and water, and at sustainable levels. AND AMEND to give effect to new collaborative catchment objectives. AND AMEND to incorporate Policy 17 provisions in relation to recognition, support and enhancement of biodiversity values. AND AMEND PPC1 to include a new Method which provides for Regional Council support of catchment groups and approaches to addressing complex land and water management issues, including sub-catchment specific studies, data collection, catchment group facilitation, development and funding of sub-catchment models which support catchment groups, decision making and consenting.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
3.11.4 Implementation methods	V1PC1-1677	Support with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11494: [AMEND 3.11.4 Implementation Methods in accordance with the changes sought to the Objectives, Policies, Methods, Rules and Schedules. AND AMEND PPC1 to include a new Method which provides for Regional Council support of catchment groups and approaches to addressing complex land and water management issues, including sub-catchment specific studies, data collection, catchment group facilitation, development and funding of sub-catchment models which support catchment groups, decision making and consenting.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.2 Certified Industry Scheme	V1PC1-1678	Support with	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11495:	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>

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		amendments	[AMEND Method 3.11.4.2 and associated Schedules, Policies and Rules to expand criteria for certified industry schemes, auditing and reporting processes.]	
3.11.4.3 Farm Environment Plans	V1PC1-1679	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11496: [AMEND Method 3.11.4.3 in accordance with changes sought to Schedule 1. AND DELETE OR AMEND the requirement for a Certified Farm Environment Planner. AND AMEND to introduce greater prioritisation of where Farm Environment Plans are required. AND AMEND to provide a greater link to Farm Environment Plan priorities and empowering a sub-catchment approach between Methods 3.11.4.3 and 3.11.4.5.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.5 Sub-catchment scale planning	V1PC1-1680	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11497: [AMEND Method 3.11.4.5 to provide for managing contaminant loads at a sub-catchment level AND much more targeted and prioritised use of Farm Environment Plans to suit sub-catchment priorities. AND AMEND to provide for sub-catchment collectives or nutrient user groups to encourage and empower catchment communities working together to improve water quality.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.7 Information needs to support any future allocation	V1PC1-1681	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11498: [AMEND Method 3.11.4.7 to empower an approach to managing nutrient discharges, and in particular Nitrogen discharges at a sub-catchment level, AND in accordance with amendments sort on the Objectives, Policies and Methods contained within the submission.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	V1PC1-1682	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11499: [AMEND Method 3.11.4.8 to introduce thresholds for the management of contaminants and in particular Nitrogen, that meet the changes sought in this submission, AND that are based on better linking sub-catchment contaminant loads to priority actions through resource consents and Farm Environment Plans.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>

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3.11.5 Rules	V1PC1-1649	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-11500: [ADD a NEW discretionary activity Rule for situations where the standards and conditions of Rules 3.11.5.1 to 3.11.5.6 are not met. AND IF Nitrogen is to be allocated through PPC1 THEN AMEND PPC1 through either amending existing Policies (such as Policy 1) and Rules (such as 3.11.5.1 to 3.11.5.7) OR including a new Policy and associated Rules which sets out how Nitrogen will be allocated and discharges managed.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	V1PC1-1683	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11501: [AMEND Rule 3.11.5.1 to include a classification of small and low intensity farms up to 20 hectares, and to include enterprises being undertaken on more than 1 property. AND DELETE Rule 3.11.5.1 (3). AND DELETE Rule 3.11.5.1 (5).]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
3.11.5.2 Permitted Activity Rule – Other farming activities	V1PC1-1663	Oppose with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11502: [AMEND Rule 3.11.5.2 to give effect to PPC1 amended Objectives and Policies including Policy 1, Policy 2, and Policy 4 AND enable activities with lower contaminant discharges including nutrient discharges to continue OR to be established. AND AMEND Rule 3.11.5.2 as follows: "The use of land for farming activities ( <del>excluding commercial vegetable production</del> ) and the associated diffuse discharge of Nitrogen, Phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water <del>where the property area is greater than 4.1 hectares, and has more than 6 stock units per hectare or is used for arable cropping</del> , is a permitted activity subject to the following conditions..." <u>AND DELETE Rule 3.11.5.2 (3) (a) to (e).</u> AND DELETE Rule 3.11.5.2 (4) (b) (i). AND AMEND Rule 3.11.5.2 (4) (ii) as follows: " <del>15kg N/ha/year</del> <b>20kgN/ha/year</b> " OR alternatively replace 20kgN/ha/year with the 'sustainable level' calculated in accordance with Policy 1 and Policy 2, OR adopt a permitted threshold for Nitrogen discharge based on land use capability as a proxy for land use suitability. AND DELETE " <del>grazed</del> " from Rule 3.11.5.2 (4) (c).	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>

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			AND AMEND Rule 3.11.5.2 (4) (d) to provide for some winter grazing of crops below a minimum area or with criteria contained within the Rule to reduce risk of loss from critical source areas. AND AMEND to enable flexibility in land use, discharges, and stocking rates up to these standards and or thresholds. AND DELETE any standards or clauses which hold land uses to historic nutrient discharge levels or stocking rates.]	
3.11.5.2 Permitted Activity Rule – Other farming activities	V1PC1-1718	Support with amendments	RETAIN the decisions requested for Rule 3.11.5.2 as set out in the PPC1 submission. AND AMEND to create further flexibility through FEP provisions.	<b>SUPPORT in part</b> in relation to flexibility through FEP provisions. <b>AND REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	V1PC1-1719	Support with amendments	RETAIN the decisions requested for Rule 3.11.5.3 as set out in the PPC1 submission. [no submission in PPC1 to Rule 3.11.5.3] AND AMEND to create further flexibility through FEP provisions.	<b>SUPPORT in part,</b> in relation to flexibility through FEP provisions. <b>AND REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	V1PC1-1664	Oppose with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11503: [AMEND Rule 3.11.5.4 (1) as follows: “...and properties or enterprises with a Nitrogen Reference Point greater than the <del>75th</del> <u>50th</u> percentile Nitrogen leaching value <u>that are also within a sub-catchment which is currently over allocated in relation to Nitrogen (Table 3.11-1 and 3.11-2);</u> AND AMEND to include new standard that by 2096 the activity does not cause or contribute materially to an exceedance of the water quality 80 year targets for its specific sub- catchment as set out in Table 3.11-1. AND AMEND Schedule 1 as set out in this submission. AND AMEND Schedule C as set out in this submission. AND AMEND timeframes for the requirement to complete and register Farm Environment Plans. AND ADD under 'matters of control (ii) reference to the sub-catchment water quality outcomes and sub-catchment specific issues. Reductions of contaminant discharges may not always be required;	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>

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			<p>AND AMEND matter of control clause (iii) as follows: The actions, timeframes and other measures to ensure that the diffuse discharge of Nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified does not cause or materially contribute to exceedance of the sub-catchment Nitrogen attributes/targets in Table 3.11-1 by 2096.</p> <p>AND DELETE reference to the 75th percentile in Rule 3.11.5.4 (iv) AND REPLACE with <u>"for catchments which are currently over allocated for Nitrogen, actions , timeframes, and other measures to ensure the diffuse discharge of Nitrogen is reduced over the term of consent proportionate to the level of over allocation and the contribution that activity makes to the over allocation. Over allocation to be phased out by 50 percent by 2047."</u></p> <p>AND ADD reference to Nitrogen discharge limit(s) (based on an estimate or band for land use capability or suitability), as set out under Policy 1 AND require consideration of Nitrogen discharge reductions through the consent where sub-catchment discharge thresholds are exceeded.</p> <p>AND AMEND to enable land uses to discharge to a series of Nitrogen discharge thresholds based on a sub-catchment assessment of Land use capability, or suitability.</p> <p>AND AMEND to tailor environmental mitigation to critical source identification and management.</p> <p>AND AMEND to recognise and provide for existing biodiversity values and enhancement of biodiversity values (in accordance with Policy 17).</p> <p>AND AMEND to take into account the degree to which land use is optimised in relation to the natural capital of soils, and sub-catchment water quality 80 year attributes targets (Table 3.11-1).</p> <p>AND AMEND to enable consents to be granted for a term of 35 years.</p> <p>AND AMEND Rule 3.11.5.4 so that it gives effect to amended Policies 1 and 2 and including Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and requires the application of Best Practicable Option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.]</p>	
3.11.5.4 Controlled	V1PC1-1720	Support with	RETAIN the decisions requested for Rule 3.11.5.4 as set out in the PPC1 submission.	<b>SUPPORT in part</b> , in relation to flexibility through FEP provisions. <b>AND</b>

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Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme		amendments	AND AMEND to create further flexibility through FEP provisions.	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	V1PC1-1721	Support with amendments	RETAIN the decisions requested for Rule 3.11.5.5 as set out in the PPC1 submission. [no submission in PPC1 to Rule 3.11.5.5] AND AMEND to create further flexibility through FEP provisions.	<b>SUPPORT in part</b> , in relation to flexibility through FEP provisions. <b>AND</b> <b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	V1PC1-1684	Support with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11504: [AMEND Rule 3.11.5.6 to enable and facilitate sub-catchment collective groups and enterprises in sustainably managing land and water resources to achieve the water quality attributes and targets in Table 3.11-1 by 2096. AND AMEND as follows: "Waikato Regional Council restricts its discretion over the following matters: i. Cumulative effects on water quality <del>of the catchment of the Waikato and Waipā Rivers in the relevant sub-catchment(s).</del> ii. The diffuse discharge of Nitrogen, Phosphorus, sediment and microbial pathogens. iii. The need for and the content of a Farm Environment Plan. iv. The term of <del>the resource</del> consent. v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent. vi. The time frame and circumstances under which the consent conditions may be reviewed. vii. The matters addressed by Schedules A, B and C." AND AMEND to add: a. Timing, and rate of reductions in contaminant discharges	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>



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			b. Compliance with Table 3.11-1 interim targets and 80 year water quality targets c. Compliance with any sub-catchment management plan prepared for the relevant sub-catchment d. The adoption of an adaptive management and mitigation planning approach to manage diffuse discharges of Nitrogen, Phosphorus, sediment and microbial pathogens e. Edge of field mitigation, remediation, and biodiversity enhancement (in accordance with Policy 7) f. The time frame and circumstances under which the consent conditions may be reviewed. AND AMEND so that it gives effect to amended Policies 1 and 2 and including Policy 12 clauses (a), (b) and (c), and Policy 13 (a), (b), and (c), and requires the application of Best Practicable Option to avoid, remedy, or mitigate adverse effects of a discharge (either directly or indirectly to freshwater) where the discharge may cause or contribute to a freshwater attribute being exceeded, through resource consents.]	
3.11.5.7 Non-Complying Activity Rule – Land Use Change	V1PC1-1685	Support with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11505: [AMEND Rule 3.11.5.7 so that the Rule does not apply to land use change where it does not exceed the sustainable Nitrogen discharge threshold (or limit) for the sub-catchment, or stocking rates. AND AMEND so that there is the requirement where the change in land use results in discharges in exceedance of the sustainable discharge level, that those discharges have to be reduced overtime, and may not exceed the 50th percentile for that catchment.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
Schedule A - Registration with Waikato Regional Council	V1PC1-1722	Support with amendments	RETAIN the decisions requested for Schedule A as set out in the PPC1 submission. [no submission in PPC1 to Schedule A] AND AMEND to create further flexibility through FEP provisions.	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>
Schedule B - Nitrogen Reference Point	V1PC1-1665	Oppose with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-11506: [AMEND Schedule B so it is consistent with 'Best Practice Data Input Standards' for the OVERSEER Model and reflects actual farm systems and operations. AND DELETE requirement for a Certified Farm Nutrient Advisor AND REPLACE with a Certified Nutrient Management Advisor.	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ’s ORIGINAL SUBMISSION ON PPC1</b>

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			<p>AND DELETE Schedule B Table 1 assumptions where they are inconsistent with 'Best Practice Data Input Standards' for Overseer.</p> <p>AND AMEND to ensure that actual stock weights are used and not the assumptions set out under definition of 'stock unit'.</p> <p>AND ADD a requirement for land owners to provide a summary of soil properties, including land use capability classes, to ensure blocks are developed and applied appropriately within Overseer, and in determination of farm optimisation within natural resource limits.</p> <p>AND AMEND to extend the requirement to provide a Nitrogen Reference Point to align with Priority one, two and three catchment requirements for Farm Environment Plans.</p> <p>AND AMEND Schedule B (f) to apply the Nitrogen Reference Point to the highest of the financial years from 2011-2016.]</p>	
Schedule B - Nitrogen Reference Point	V1PC1-1723	Support with amendments	<p>RETAIN the decisions requested for Schedule B as set out in the PPC1 submission.</p> <p>AND AMEND to create further flexibility through FEP provisions.</p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
Schedule C - Stock exclusion	V1PC1-1652	Oppose	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11507:</p> <p>[AMEND Schedule C to apply to land with a slope up to 15° (flat and rolling land).</p> <p>AND AMEND to exclude stock when break fed on land with a slope greater than 15 degrees.</p> <p>AND DELETE Schedule C (3) AND REPLACE with: "<u>Cattle, deer and pigs are able to enter water bodies for the purpose of crossing from one side to the other as long as they are being supervised and are actively driven across the water body in one continuous movement, where this occurs less frequently than once per week. Stock crossings used once or more per week, must use a livestock crossing structure.</u>"]</p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
Schedule C - Stock exclusion	V1PC1-1713	Not stated	<p>AMEND V1 and PPC1 and re-notify inclusive of amended stock exclusion policies and methods that are the same as the proposed national regulations.</p> <p>AMEND policies and methods requiring the exclusion of stock from water and adopt methods that are set out in the national regulation for exclusion of stock from waterbodies.</p>	<b>SUPPORT in part, to the extent that the decision sought is consistent with the reasons for submission explained above.</b>
Schedule 1 - Requirements for Farm	V1PC1-1686	Support with	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11508:</p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>

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Environment Plans		amendments	<p>[AMEND Schedule 1 so farmers can identify the specific actions they will need to take through their Farm Environment Plan to address any water quality issues relevant within their sub-catchment. The Council must identify relevant water quality issues within the sub-catchment, as well as the associated mitigations that farmers should consider. This information must be provided to farmers before they are required to develop a Farm Environment Plan.</p> <p>AND DELETE requirement to be certified by a Certified Farm Environment Planner AND REPLACE with industry approved standard or developed in accordance with skills required to support the development of a Council approved Farm Environment Plan.</p> <p>AND AMEND to enable application of 'Best Practicable Option'.]</p>	
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-1687	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12364:</p> <p>[AMEND Schedule 1 (2) (ii) as follows: "for areas with a slope exceeding <del>25</del>15 degrees and where stream fencing is impracticable, the provision of alternative mitigation measures."</p> <p>AND DELETE Schedule 1 (f) (i).</p> <p>AND AMEND Schedule 1 (f) (ii) to apply irrespective of slope.]</p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-1688	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12365:</p> <p>[AMEND Schedule 1 (5) (a) to enable flexibility in Nitrogen discharges up to the sustainable Nitrogen discharge level, but where this is exceeded Nitrogen discharges shall not exceed the Nitrogen Reference Point.</p> <p>AND AMEND Schedule 1 (5) (b) so that where the Nitrogen Reference Point exceeds the sustainable Nitrogen discharge level, actions, timeframes and other measures are set out and implemented to ensure that Nitrogen discharge is reduced overtime in a manner and to the extent that corresponds with the level of water quality improvement required to achieve the water quality outcomes and which is proportionate to the level of discharge, i.e. those discharging the most will be required to reduce the most (15 percent of total discharge each 10 year period)</p> <p>AND AMEND Schedule 1 to ensure that land use activities are not able to increase Nitrogen discharge beyond either their Nitrogen Reference Point or the sustainable leaching level, whichever is the highest - default to non-complying Rule.]</p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
Schedule 1 - Requirements for	V1PC1-1689	Support with	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12366:</p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>

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Farm Environment Plans		amendments	[RETAIN Schedule 1 (d) AND AMEND Schedule 1 (2) (c) to refer to key critical source areas only.]	
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-1690	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12367: [AMEND Schedule 1 (3) to include spatial mapping requirements from clauses 2 (c) (i), 2 (c) (ii), 2 (c) (iv), 2 (c) (v), 2 (d) (ii), 2 (d) (iv) and 2 (f) (i).]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-675	Oppose with amendments	<p>RETAIN the decision requested as set out in the submission to PPC1 [see submission point 1658].</p> <p>AND AMEND Table 3.11-1 to make a clear distinction between what are freshwater objectives, attribute, limits and targets.</p> <p>AMEND Table 3.11-1 to include both the allowable in-stream load and maximum allowable zone load for nitrogen for all sub-catchments and Freshwater Management Units.</p> <p>AND AMEND to ensure nitrogen loads are provided which related to the current in-stream nitrogen concentrations and the desired in-stream nitrogen concentrations.</p> <p>AND AMEND to ensure the nitrogen in-stream concentrations are set at levels which provide for the ecological health of freshwater and sustainable management of natural resources.</p> <p>AND AMEND to adopt numerical limits that are appropriate to achieving desired outcomes and are applied at appropriate levels of flow that match the values, rather than levels reflective of 1863.</p> <p>AMEND Table 3.11-1 to include the MCI, nitrogen and phosphorus in-stream concentrations as set out in the table on page 17 and 21 of the submission.</p> <p>AND AMEND Table 3.11-1 to ensure the numerical outcomes recognise and provide for the values in 3.11.1 and objectives in 3.11.2.</p> <p>AND AMEND Table 3.11-1 so that numerical parameters provide for the values of freshwater, including safeguarding the life supporting capacity of freshwater, cultural and primary production values, and meet the Objectives of PPC1. In particular, the E.coli and clarity numerical parameters (Freshwater Objectives) are to be amended so that they can take into account flow and background contaminant levels, natural events and regional and nationally significant infrastructure, and are commensurate with the level of pathogenic risk for contact recreation and</p>	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>

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			<p>cultural values. E.coli and clarity numerical parameters (Freshwater Objectives) should not apply during higher flow events (i.e. above 2x the medium flow), or during the flow recession curve, The approach adopted in the Horizons region is supported (see suggested wording for E.coli and visual clarity above).</p> <p>AND AMEND to adopt the approach taken by Horizons Regional Council: <u>"E.coli 260/100 ml &lt; 50th percentile applies 1 November to 30 April when the river is below medium flow:</u>  <u>E.coli 550/100 ml &lt; 20th percentile the concentration of E.coli must not exceed 550 per 100 ml year round when flow is at or below the 20th flow exceedance percentile (i.e. not in the top 20 percent of flows)</u>  <u>The visual clarity of the water measured as the horizontal sighting range of a black disc must equal or exceed [Table 3.11-1 numerical parameter given in meters] when the river is at or below medium flow (the 50th flow exceedance percentile)."</u></p> <p>AND AMEND Table 3.11-1 following implementation of Policy CA2 such that it gives the effect to Policy CA2 (f) (iv) and (v) and Policy CA3 of the NPSFM.</p> <p>AND AMEND to set numerical outcomes (limits/targets, including interim targets) at levels which give effect to the NPSFM. In particular Policies CA2 and CA3.</p> <p>AND AMEND to consider the provision of economic well-being, including economic opportunities.</p> <p>AND AMEND to provide for water quality below national bottom lines which results from natural processes and the impacts of nationally and regionally significant infrastructure.</p> <p>AND AMEND Table 3.11-1 numerical water quality targets to freshwater objectives as appropriate (i.e. chlorophyll a, clarity, E. coli) and remove these parameters from Table 3.11-1 and hold as numerical objectives.</p>	
<p>Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments</p>	<p>V1PC1-1658</p>	<p>Oppose with amendments</p>	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11158:  [AMEND Table 3.11-1 so that the numerical outcomes recognise and provide for the values under Section 3.11.1 Objective 1A.  AND AMEND numerical outcomes (limits/targets, including interim targets) at levels which give effect to the National Policy Statement for Freshwater Management (2014) and in particular Policies CA2 and CA3.  AND AMEND to consider the provision of economic well-being, including economic opportunities.</p>	<p><b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b></p>

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			<p>AND AMEND to provide for water quality below national bottom lines which results from natural processes and/or from the impacts of national and regionally significant infrastructure.</p> <p>AND AMEND to adopt numerical limits that are appropriate to achieving desired outcomes and are applied at appropriate levels of flow that match the values.</p> <p>AND AMEND numerical water quality targets to Freshwater Objectives as appropriate (i.e. chlorophyll a, clarity, E.coli) AND REMOVE these parameters from Table 3.11-1.</p> <p>AND AMEND as follows:  <u>"E.coli 260/100 ml &lt; 50th percentile applies 1 November to 30 April when the river is below medium flow:</u>  <u>E.coli 550/100 ml &lt; 20th percentile the concentration of E.coli must not exceed 550 per 100 ml year round when flow is at or below the 20th flow exceedance percentile (i.e. not in the top 20 percent of flows)</u>  <u>The visual clarity of the water measured as the horizontal sighting range of a black disc must equal or exceed [Table 3.11-1 numerical parameter given in meters] when the river is at or below medium flow (the 50th flow exceedance percentile)."</u></p> <p>AND AMEND so that the interim targets and timeframes recognise and provide for the Economic and Social well-being of people and communities including implications for actions, investments, ongoing management changes and any social, cultural or economic implications.</p> <p>AND AMEND Table 3.11-1 interim targets so that they apply at a longer time frame such as 30 years, for those parameters which are significantly over allocated now AND AMEND the interim targets so that they progressively reduce over allocation at a rate and scale which provides for people and community resilience including economic well-being.</p> <p>AND AMEND Table 3.11-1 so that PPC1 provides a pathway for individuals and communities to work together to achieve the Vision and Strategy over the long term.</p> <p>AND AMEND Policy 1 and Table 3.11-1 OR ADD a NEW Policy which sets out the:</p> <p>a) Current Nitrogen load (<i>footnote: Current Nitrogen load includes both the Allowable in-stream nitrate load to achieve current in-stream Nitrogen concentration and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land</i>)</p>	

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			<p>b) Desired Nitrogen load (<i>footnote: Desired Nitrogen load includes both the Allowable in stream nitrate load to achieve the desired in-stream Nitrogen concentration, and the Maximum Allowable Zone Load (MAZL) which accounts for attenuation and provides the load that can be allocated to land</i>)</p> <p>c) Nitrogen discharge rate/ha/year to achieve current Nitrogen load</p> <p>d) Nitrogen discharge rate/ha/year to achieve the desired Nitrogen load</p> <p>AND AMEND Table 3.11-1 and PPC1 Objectives to make a clear distinction between what are Freshwater Objectives, Attributes, limits and targets. Freshwater Objectives would include values of freshwater such as cultural, ecological, primary production, commercial, and recreational and may include numerical parameters for periphyton, chlorophyll a, macroinvertebrate community indices (MCI) and sediment and clarity. AND AMEND Table 3.11-1 to include the allowable instream load and maximum allowable zone load (MAZL) for Nitrogen for all sub-catchments and Freshwater Management Units. Nitrogen loads should be provided which relate to: current instream Nitrogen concentrations and desired instream Nitrogen concentrations. The instream loads should form the basis of an allocation framework for Nitrogen, if allocation frameworks are deemed necessary, to assist with achievement of the Objectives of PPC1. AND AMEND Table 3.11-1 so that numerical parameters provide for the values of freshwater, including safeguarding the life supporting capacity of freshwater, cultural and primary production values, and meet the Objectives of PPC1. In particular, the E.coli and clarity numerical parameters (Freshwater Objectives) are to be amended so that they can take into account flow and background contaminant levels, natural events and regional and nationally significant infrastructure, and are commensurate with the level of pathogenic risk for contact recreation and cultural values. E.coli and clarity numerical parameters (Freshwater Objectives) should not apply during higher flow events (i.e. above 2x the medium flow), or during the flow recession curve, The approach adopted in the Horizons region is supported (see suggested wording for E.coli and visual clarity above).</p> <p>AND AMEND Table 3.11-1 following implementation of Policy CA2 such that it gives the effect to Policy CA2 (f) (iv) and (v) and Policy CA3 of the National Policy Statement for Freshwater Management 2014.]</p>	

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Additions to Glossary of Terms	V1PC1-1724	Oppose	ADD a new definition to Additions to Glossary of Terms or AMEND an existing definition to 'effective exclusion: <u>Effectively barred from access to the beds of lakes and rivers, drains, and wetlands, through a natural barrier (such as a cliff or vegetation, a permanent fence, or new technologies such as a 'virtual' GPS fence, and stock management. Temporary fencing may be used.</u>	<b>SUPPORT. Provides practical and reasonable approach to stock exclusion and may assist to reduce costs of fencing where it is unnecessary in order to achieve the intended environmental outcome.</b>
Definition - Stock unit	V1PC1-1653	Oppose	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-11509: [DELETE Definition – Stock unit AND REPLACE with a definition that applies the OVERSEER Model Best Practice Data Input Standards OR ensure that weights and stock units reflect actual weights and appropriate stock units for the region and are consistent between drystock operations and dairy operations.]	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>
Glossary of Terms	V1PC1-1650	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-11510: [ADD a NEW definition for 'Nutrient user groups' - a group of properties in multiple ownership, where the owners of those properties undertake farming activities and operate as a collective for the purposes of nutrient management. AND ADD a NEW definition for 'Critical Source Area' - a landscape feature like a gully, swale or a depression that accumulates runoff from an adjacent immediate area, and delivers it to surface waterways such as rivers and lakes, artificial waterways and field tiles; and areas which arise through land use activities and management approaches such as cultivation and winter grazing which result in contaminants being discharged from the activity and being delivered to surface waterways. AND ADD a NEW definition for 'Best Practicable Option - Best Practicable option in relation to a discharge of a contaminant which may enter water, means the best Methods for preventing or minimising the adverse effects on the environment having regard, among other things, to - (a) the nature of the discharge or emission and the sensitivity of the receiving environment to adverse effects; and (b) the financial implications, and the effects on the environment, of that option when compared with other options; and (c) the current state of technical knowledge and the likelihood that the option can be successfully applied. AND ADD a NEW definition for 'In stream nitrate concentration limits (mg/L)' - the in-stream water quality concentrations required to achieve	<b>REFER TO FURTHER SUBMISSION ON B&amp;LNZ's ORIGINAL SUBMISSION ON PPC1</b>



Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
			<p>the identified water management Objective for the associated sub-catchment or Freshwater Management Unit.</p> <p>AND ADD a NEW definition for 'Allowable in stream nitrate load (tonnes per year)' - the allowable volume of nitrate-Nitrogen that can pass down the river at a particular point as determined from the in-stream nitrate-Nitrogen concentration limit.</p> <p>AND ADD a NEW definition for 'Maximum allowable zone load (MAZL)' - the amount of Nitrogen that can be lost below the root zone within a defined water management zone as determined by the in-stream nitrate load limit (adjusted for attenuation between the root zone and the river)</p> <p>AND ADD a NEW definition for 'Measured in-stream nitrate load (tonnes per year)' - the amount of nitrate-Nitrogen measured (based on actual monitoring data) as passing down the river at a particular point.]</p>	

## Department of Conservation

Submitter ID: 71759

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
General	V1PC1-397	Not stated	AMEND PPC1 to ensure further consequential or alternative relief to give effect to the relief sought in the submission is made.	
General	V1PC1-1698	Support with amendments	<p>AMEND PPC1 by clearly stating the freshwater values, objectives and limits for each Freshwater Management Unit, AND identifying appropriate methods to achieve the limits (refer to diagram under point 36 of the submission).</p> <p>AND AMEND PPC1 to implement greater changes to the management of contaminant discharges in the short-term, through an allocation regime that recognises land type and achieves a greater short term improvement in water quality.</p> <p>AND AMEND to establish a separate Freshwater Management Unit (FMU) for the Whangamarino Wetland as per the map in Appendix D of the submission, AND include the attributes and values for the FMU described in Appendix E and F of the submission, AND develop an objective and policy framework to acknowledge the importance of the Whangamarino.</p> <p>AND, with respect to all Freshwater Management Units, AMEND PPC1 to provide for an allocation regime that only permits the discharge of contaminants up to a level that ensures the limits and objectives for the freshwater management unit can be achieved. Where this level of contaminants has already been exceeded, the targets needs to be set with clear implementation methods to achieve them. The regime needs to take account the slope, soil type, drainage and geology of the land.</p> <p>AND AMEND PPC1 to establish an efficient allocation regime as follows:</p> <ul style="list-style-type: none"> <li>• State the maximum catchment load of contaminants.</li> <li>• Allocate the maximum catchment load among land uses using a Land Use Capability (LUC) based approach whereby land type including slope, soil type, drainage and geology is the key determinant.</li> <li>• Seek to ensure that activities which would cause the maximum catchment load to be exceeded are avoided</li> </ul>	<p><b>OPPOSE</b></p> <p><b>[REFER TO FURTHER SUBMISSION ON DOC ORIGINAL SUBMISSION ON PPC1]</b></p>

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			<ul style="list-style-type: none"> <li>• Seek to ensure that in catchments that are already over-allocated, PPC1 establishes methods to phase out over-allocation over time.</li> </ul> <p>AND AMEND PPC1 to ensure that there is a reduction in turbidity in the Waikato Estuary, such that turbidity is not at an "unsatisfactory" level more than 30 per cent of the time.</p> <p>AND AMEND PPC1 to include on-going monitoring and an adaptive approach to the management of the turbidity.</p> <p>AND AMEND PPC1 to protect the significant values of wetlands as follows:</p> <ul style="list-style-type: none"> <li>• Adopt narrative objectives that relate to water quality</li> <li>• Establish a programme for benchmarking of wetland nutrients and sediment status and its relationship to ecosystem health (plants, fish, mahinga kai)</li> <li>• Establish wetland numeric targets by 2025 (based on attributes suggested in submitters Appendix G).</li> </ul> <p>AND AMEND to adopt lake attributes in Appendix I of the submission and prioritise lakes for management (highest priority lakes are suggested in Appendix H of the submission).</p> <p>AND ESTABLISH attributes, limits and methods for sediment, temperature, dissolved oxygen and Macro-invertebrate Community Index (MCI).</p> <p>AND ESTABLISH attributes, limits or targets for all contaminants specified in the Vision and Strategy (nutrients, faecal and sediment) for the whole of the Waipā catchment and all tributaries of the Waikato, lakes, wetlands and the coastal environment (refer submitter's Appendices A and B, and D to J).</p> <p>[Note that Appendix A-J referred to above is attached to the Department of Conservation's full submission to PPC1]</p>	
3.11.2 Objectives	V1PC1-997	Support	<p>ADD a NEW objective or objectives that</p> <ul style="list-style-type: none"> <li>• recognise the value and significance of the whole Whangamarino Wetland, comprising marsh, swamp, fen and bog wetland types</li> <li>• recognises the significant values of all wetlands</li> </ul>	<p><b>OPPOSE</b></p> <p>Decision requested lacks sufficient detail for Theland Tahī to determine what the consequences would be if the decision was allowed.</p>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
			<ul style="list-style-type: none"> <li>• ensures significant values of wetlands are maintained and enhanced</li> <li>• recognises the importance of managing the concentration of contaminants and the quantity of water that is discharged into the wetland.</li> </ul> <p>AND AMEND Variation 1 to set targets for water quality in wetlands that take account of both natural and controlled flows.            AND AMEND Variation 1 to include methods to achieve the new objective/s [see submission points 406 and 407].            AND ADD a NEW objective which recognises that all sediments and nutrients in the region ultimately accumulate in the Waikato Estuary, and which seeks restoration of healthy ecosystems from the mountains to the sea, including in estuaries.</p>	
3.11.2 Objectives	V1PC1-1701	Not stated	ADD a NEW objective of V1 which recognises that all sediments and nutrients in the region ultimately accumulate in the Waikato Estuary, and which seeks restoration of healthy ecosystems from the mountains to the sea, including in estuaries.	<b>OPPOSE</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-1006	Support with amendments	RETAIN Table 3.11-1. AND establish attributes, limits or targets for all contaminants specified in the Vision and Strategy (nutrients, faecal and sediment) for the whole of the Waipā catchment and all tributaries of the Waikato, lakes, wetlands and the coastal environment (refer submitter's PC1 submission Appendices A and B, and D to J). AND AMEND the headings of Table 3.11-1 to provide dates for when targets are to be met. AND AMEND to include interim 20-year targets to sit alongside the 10-year targets and 80-year targets. A 20 per cent improvement in water quality over 20 years is recommended. AND AMEND to raise water quality targets for lakes, so that lake water quality is enhanced, to safeguard ecosystem health and life supporting capacity of lakes, and to ensure that 'long term restoration and protection of water quality' is achieved. AND ADD attribute targets for Pungarehu Canal/Stream to Table 3.11-1. AND AMEND to ensure all streams have numerical values. AND ADD targets for suspended sediment and deposited fine sediment in Table 3.11-1.	<b>OPPOSE</b>  <b>And</b> <b>[REFER TO FURTHER SUBMISSION ON DOC ORIGINAL SUBMISSION ON PPC1]</b>

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			<p>AND AMEND Table 3.11-1 to recognise and identify the values of outstanding freshwater bodies (in discussion with the Department of Conservation) and as a minimum, these outstanding freshwater bodies should include the Waikato River including the river mouth and delta, the Whangamarino wetland, the Waitomo Caves/River, the Waikato Peat lakes and Lake Rotokotuku.</p> <p>AMEND Table 3.11-1 to include attributes for a Whangamarino Wetland Fresh Water Management Unit, as described in the submitter's PC1 submission Appendix E and F.</p>	
<p>Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments</p>	<p>V1PC1-1008</p>	<p>Oppose with amendments</p>	<p>RETAIN Table 3.11-2</p> <p>AND AMEND Table 3.11-2 so that all wetland and lake sub-catchments are included as Priority 1.</p> <p>AND AMEND Table 3.11-2 to recognise the existing works that have already been undertaken for lakes by way of lake restoration plans and farm environment/management plans, AND ensure that the Table reflects the need for their immediate implementation and enforcement [refer Appendix J of the submission - Existing Lakes Management and Planning].</p> <p>AND AMEND to insert Pungarehu Canal/Stream to Table 3.11-2 as Priority 1.</p> <p>AND AMEND to ensure all streams have numerical values.</p>	<p><b>OPPOSE</b></p> <p><b>And</b></p> <p><b>[REFER TO FURTHER SUBMISSION ON DOC ORIGINAL SUBMISSION ON PPC1]</b></p>

## Federated Farmers of New Zealand

Submitter ID: 74191

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	V1PC1-778	Support	ADD a NEW schedule to provide for a simplified FEP to read: <u>'Schedule 1A - Requirements for Simplified Farm Environment Plans</u> <u>A Simplified Farm Environment Plan shall be prepared in accordance with the requirements set out below. The Simplified Farm Environment Plan shall be certified as meeting the requirements of Schedule 1A by a Certified Farm Environment Planner.</u> <u>The Simplified Farm Environment Plan must clearly identify how specified minimum standards will be complied with.</u> <u>The requirements set out below apply to all Simplified Farm Environment Plans.</u> <u>This schedule applies to all farming activities that require a Simplified Farm Environment Plan, but it is acknowledged that some provisions will not be relevant to every farming activity.</u> <u>Purpose of a Simplified Farm Environment Plan</u> <u>The purpose of a Simplified Farm Environment Plan is to identify the Most Practicable Action for the management of diffuse discharges from the farm enterprise of nitrogen, phosphorous, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water in order to assist with achieving the short term targets^ in Objective 3 or making progress towards the outcomes anticipated by the Vision &amp; Strategy referred to in Objective 1.</u> <u>For the purposes of a Simplified Farm Environment Plan, Most Practicable Action means the combination, priority and timing of actions to manage the discharge of contaminants from the farming enterprise that:</u> <u>a. recognises and provides for the characteristics of the sub-catchment within which the subject farming enterprise is located as set out in the relevant Sub-catchment Management Plan and Catchment Profile produced by Waikato Regional Council; and</u> <u>b. corresponds to the scale and significance of the risk from the discharge of each contaminant from the farming enterprise to the likely achievement of the short term targets^ in Objective 3 or the progression</u>	<b>SUPPORT</b> in part, subject to final drafting.

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			<p><u>towards the outcomes anticipated by the Vision &amp; Strategy referred to in Objective 1; and</u></p> <p><u>c. takes account of the relative contribution of the industry sector within which the farming enterprise belongs to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision &amp; Strategy referred to in Objective 1; and</u></p> <p><u>d. takes account of the resources reasonably available to the farming enterprise</u></p> <p><u>Content of a Simplified Farm Environment Plan</u></p> <p><u>To the extent that it is applicable to the particular farm enterprise, a Simplified Farm Environment Plan shall contain:</u></p> <ol style="list-style-type: none"> <li>1. <u>The property or enterprise details:</u> <ol style="list-style-type: none"> <li><u>(a) Full name, address and contact details (including email addresses and telephone numbers) of the person responsible for the property or enterprise.</u></li> <li><u>(b) Trading name (if applicable, where the owner is a company or other entity).</u></li> <li><u>(c) A list of land parcels which constitute the property or enterprise:</u> <ol style="list-style-type: none"> <li><u>(i) the physical address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and</u></li> <li><u>(ii) The legal description of each parcel of land.</u></li> </ol> </li> </ol> </li> <li>2. <u>Unless accompanied by a resource consent under Rule 3.11.5.4A, 3.11.5.6 or 3.11.5.7, information to demonstrate compliance with Schedule C (Stock Exclusion and Setbacks).</u></li> <li>3. <u>A description of the critical source areas from which diffuse discharges of sediment, nitrogen, phosphorus and microbial pathogens associated with the farm enterprise are lost, and identification of the Most Practicable Action including:</u> <ol style="list-style-type: none"> <li><u>(a) the identification of intermittent waterways, overland flow paths and areas prone to flooding and ponding within the critical source areas, and an assessment of the Most Practicable Action to manage risks from the critical source areas. Such actions could include appropriate stocking policy, stock exclusion and/or measures to detain floodwaters and settle</u></li> </ol> </li> </ol>	

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			<p><u>out or otherwise remove sediment, nitrogen, phosphorus and microbial pathogens (e.g. detention bunds, sediment traps, natural and constructed wetlands); and</u></p> <p><u>(b) the identification of actively eroding areas, erosion prone areas, and areas of bare soil within the critical source areas within the critical source areas, and an assessment of the Most Practicable Action for erosion and sediment control. Actions could include re-vegetation; and</u></p> <p><u>(c) an assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens from tracks and races and livestock crossing structures to waterways within the critical source areas, and an assessment of the Most Practicable Action to reduce these discharges. Actions could include cut-off drains, and shaping; and</u></p> <p><u>(d) the identification of areas where effluent accumulates including yards, races, livestock crossing structures, underpasses, stock camps, and feed-out areas within the critical source areas, and an assessment of the Most Practicable Action to reduce the risk of diffuse discharges of contaminants from these areas to groundwater or surface water; and</u></p> <p><u>(e) the identification of other ‘hotspots’ such as fertiliser, silage, compost, or effluent storage facilities, wash-water facilities, offal or refuse disposal pits, feeding or stock holding areas, and erosion or sediment loss from cultivation within the critical source areas, and an assessment of the Most Practicable Action to reduce the risk of diffuse discharges of contaminants from these areas to groundwater or surface water; and</u></p> <p><u>(f) a description of any systems for managing collected animal effluent and freshwater irrigation, including the Most Practicable Action to reduce the risk of contaminants from these areas or the use of these systems to groundwater or surface water.</u></p> <p>4. <u>For cultivation on land with slopes greater than 25o, assessment of the Most Practicable Action to mitigate any adverse effects of cultivation including through appropriate erosion and sediment controls for each paddock that will be cultivated including by:</u></p> <p><u>(a) assessing where overland flows enters and exits the paddock in rainfall events; and</u></p> <p><u>(b) identifying appropriate measures to divert overland flows from entering the cultivated paddock; and</u></p> <p><u>(c) identifying measures to trap sediment leaving the cultivated paddock in overland flows; and</u></p>	



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			<p><u>(d) maintaining appropriate buffers between cultivated areas and water bodies.</u></p> <p>5. <u>A spatial risk map(s) at a scale that clearly shows:</u>                      (a) <u>The boundaries of the property; and</u>                      (b) <u>The locations of the main land uses that occur on the property; and</u>                      (c) <u>The locations of existing and future mitigation actions to manage contaminant diffuse discharges; and</u>                      (d) <u>Any relevant internal property boundaries that relate to risks and mitigation actions described in this plan; and</u>                      (e) <u>The location of continually flowing rivers, streams, and drains and permanent lakes, ponds and wetlands; and</u>                      (f) <u>The location of riparian vegetation and fences adjacent to water bodies; and</u>                      (g) <u>The location of critical source areas for contaminants, as identified in 3 above.</u></p> <p>6. <u>A description of the actions that will be undertaken in response to any risks identified in the risk assessment in 3 and 4 above (having regard to their relative priority and timing) as well as where any mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>7. <u>Assessment of the risk of how known natural hazards and/or climate change may affect farming activities on the property, including commentary on how the occurrence of the known natural hazard could foreseeably alter the Most Practicable Actions outlined in the Simplified Farm Environment Plan.</u></p> <p>8. <u>A description of the actions that are intended to be undertaken in response to any risks identified in the Simplified Farm Environment Plan (having regard to their relative priority and significance) as well as where the time-bound actions are intended to be undertaken, and when and to what standard they are intended to be completed.</u></p> <p><u>Process for Amending and/or Reviewing a Simplified Farm Environment Plan</u>  <u>Simplified Farm Environment Plans can be amended and/or reviewed at the request of the farmer, or by way of review initiated by Waikato Regional Council in accordance with the process set out below.</u></p>	

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			<p><u>Triggers for amending/reviewing a Simplified Farm Environment Plan may include (but are not limited to)2:</u></p> <p><u>a) At the direction of Council; and</u></p> <p><u>b) Where there has been a material change in on farm risk or circumstances that would require changes to the mitigation actions within the Simplified Farm Environment Plan.</u></p> <p><u>Farmer Initiated Amendments</u>  <u>Farmer initiated amendments to a Simplified Farm Environment Plan must be approved by a Certified Farm Environment Planner (“CFEP”). Any amendments shall remain consistent with the overall purpose and intent of the relevant Simplified Farm Environment Plan, and be prepared in the manner set out previously in this Schedule without the need to apply for a change to consent condition under the RMA.</u></p> <p><u>e. Amendments to a Simplified Farm Environment Plan approved by a CFEP must be provided to Waikato Regional Council within 30 working days of the amendment being approved in writing by the CFEP. A copy of the latest approved version of a Simplified Farm Environment Plan for a farming activity shall be available from the Waikato Regional Council on-line portal at all times.</u></p> <p><u>Council Initiated reviews</u>  <u>Waikato Regional Council may every five (5) years after the date of approval of a Simplified Farm Environment Plan, serve notice on the Simplified Farm Environment Plan holder of its intention to review any or all of the content of the Simplified Farm Environment Plan for any of the following purposes:</u></p> <p><u>a. To address situations where the Simplified Farm Environment Plan actions are not achieving the intended environmental outcomes envisaged by the Simplified Farm Environment Plan.</u></p> <p><u>b. To address situations where environmental or other circumstances (e.g. technology) change and as result the Most Practical Actions set out in the Simplified Farm Environment Plan require review.</u></p> <p><u>The matters that require attention will be advised to the Simplified Farm Environment Plan holder in writing by Waikato Regional Council within 10 working days of the completion of the review. Upon receipt of such notification the Simplified Farm Environment Plan holder will engage a CFEP to prepare a new or amended Simplified Farm Environment Plan at the farmer’s cost to address matters identified in the review.</u></p> <p><u>Dispute Resolution</u></p>	

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			<p><u>Any dispute or difference arising out of or in relating the approval of or amendments to a Simplified Farm Environment Plan may be referred to mediation, a non-binding dispute resolution process in which an independent mediator facilitates negotiation between the parties.</u></p> <p><u>Mediation may be initiated by either party writing to the other party and identifying the dispute which is being suggested for mediation. The other party will either agree to proceed with mediation or agree to attend a preliminary meeting with the mediator to discuss whether mediation would be helpful in the circumstances.</u></p> <p><u>The parties will agree on a suitable person to act as mediator or will ask the Arbitrators’ and Mediators’ Institute of New Zealand Inc. to appoint a mediator. The mediation will be in accordance with the Mediation Protocol of the Arbitrators’ and Mediators’ Institute of New Zealand Inc.”</u></p> <p><u>The mediation shall be terminated by –</u></p> <p><u>(a) The signing of a settlement agreement by the parties; or</u></p> <p><u>(b) Notice to the parties by the mediator, after consultation with the parties, to the effect that further efforts at mediation are no longer justified; or</u></p> <p><u>(c) Notice by one or more of the parties to the mediator to the effect that further efforts at mediation are no longer justified; or</u></p> <p><u>(d) The expiry of sixty (60) working days from the mediator’s appointment, unless the parties expressly consent to an extension of this period.</u></p> <p><u>If no mediation is agreed to or if the mediation should be terminated as provided in (b), (c) or (d), any dispute or difference arising out of or relating to the approval of or amendments to a Simplified Farm Environment Plan, shall be referred to and finally resolved by arbitration in New Zealand in accordance with New Zealand law and the current Arbitration Protocol of the Arbitrators' and Mediators' Institute of New Zealand Inc. The arbitration shall be by one arbitrator to be agreed upon by the parties and if they should fail to agree within twenty-one (21) days, then to be appointed by the President of the Arbitrators' and Mediators' Institute of New Zealand Inc.</u></p> <p><u>[Footnote] 2Reference should be made to the Waikato Regional Council Farm Environment Plan Guidance Document for further information on the circumstances that may generate an amendment to a Simplified Farm Environment Plan.'</u></p>	
General	V1PC1-1500	Not stated	ACCEPT the entire submission made by Federated Farmers of New Zealand to V1, as a fundamental principle of natural justice the submission	<b>SUPPORT</b>

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			considers that the entire contents of Chapter 3.11, and not just the parts changed by V1, can be submitted on.	
Area covered by Chapter 3.11	V1PC1-93	Oppose with amendments	<p>AMEND the section 'Area covered by Chapter 3.11' to add the following sentence immediately after the FMU bullet points: "<u>Only the river FMUs are used for the purposes of calculating the dairy curve for the 75th percentile nitrogen value.</u>"</p> <p>AND AMEND the third paragraph to read: "FMUs enable monitoring of progress towards meeting targets and limits. <u>This will also occur at a sub-catchment level, with the sub-catchment identified in Map 3.11-2.</u>"</p> <p>AND AMEND 'Area covered by Chapter 3.11' to clarify the intention of FMUs and sub-catchments and how this gives effect to the NPSFM.</p> <p>AND AMEND to clarify the spatial unit for freshwater accounting and monitoring and ensure that it is a reasonable scale that provides for an indication of water quality and management issues.</p> <p>If the FMUs are used to calculate the dairy nitrogen curve as the basis for requiring those above the 75th percentile to reduce THEN AMEND the FMUs so that similar sub-catchments are aggregated.</p> <p>OR AMEND the FMUs to split the Upper Waikato FMU into two or more FMUs with similar geophysical and geographical features.</p> <p>OR AMEND the policy and rule framework to ensure that those have to reduce nitrogen are those with the highest discharges for the same biophysical and/or climate characteristics.</p>	<b>SUPPORT in part</b> , subject to final drafting.
Area covered by Chapter 3.11	V1PC1-99	Oppose with amendments	REVIEW the FMUs as part of the review of Chapter 3.11 in 10 years' time.	<b>SUPPORT</b>
Background and explanation	V1PC1-100	Oppose with amendments	AMEND the section 'Background and explanation' as required to give effect to the concerns raised or relief sought in the submission.	<b>SUPPORT in part</b> , subject to final drafting
Intrinsic values – Ancestry and History	V1PC1-103	Oppose with amendments	<p>DELETE the phrase 'wetlands and springs' from all parts of the section about values - Intrinsic values - Ancestry and History.</p> <p>OR AMEND the Primary Production, Commercial, Municipal and Industrial use values to include wetlands and springs.</p>	<b>SUPPORT</b>
Intrinsic values - Ecosystem health	V1PC1-104	Oppose with amendments	DELETE the word 'clean' from the first three bullet points of the Intrinsic value - Ecosystem Health.	<b>SUPPORT</b>
Use values - Mahinga kai	V1PC1-106	Oppose with amendments	<p>AMEND the first sentence of the Use Value - Mahinga Kai to read: 'The ability to access the Waikato and Waipā <u>Rivers</u> and their tributaries...'</p> <p>AND DELETE the last bullet point.</p>	<b>SUPPORT</b>

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Use values - Human health for recreation	V1PC1-108	Oppose with amendments	AMEND the Use value - Human health for recreation to read: ' <u>People are able to connect with the rivers through a range of activities such as swimming, waka, boating, fishing, mahinga kai and water-skiing. The rivers are a place to swim and undertake recreation activities in an environment that poses minimal risk to health.</u> ' AND AMEND the second bullet point to read: ' <u>An important value for the river is cleanliness; the rivers should be safe for people to swim in at times of the year and in the parts of the rivers suitable for swimming.</u> '	<b>SUPPORT</b>
Use values - Primary production	V1PC1-109	Support with amendments	AMEND the Use Value - Primary production to include the irrigation, cultivation and food production value from the NPSFM if the use value is not broad enough to include it. OR if the Intrinsic value - Ancestry and History is to include wetlands and springs THEN ADD 'wetlands and springs' to the primary production value.	<b>SUPPORT</b>
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	V1PC1-122	Oppose with amendments	AMEND Objective 1 to read: 'Objective 1: Long term <u>maintenance, restoration and/or</u> protection of water quality for sub-catchment and/or Freshwater Management Unit... <u>Manage By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water or to land in circumstances where it may enter water, for the purposes of assisting to achieve the water quality outcomes anticipated by the Vision &amp; Strategy and the values^ by 2096, result in achievement of the restoration and protection of the 80 year water quality attribute^ targets^ in Table 3.11-1.'</u> AND AMEND to make any consequential amendments to the Reasons for Adopting Objective 1 OR AMEND to develop a more realistic set of 80 year numeric attribute states that address the concerns raised by the submission. IF it is not clear that it is 'discharges' being 'managed' THEN AMEND to clarify this intention.	<b>SUPPORT in part</b> , subject to final drafting.
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	V1PC1-126	Oppose with amendments	AMEND Objective 2 to read: 'Objective 2: Social, economic and cultural well-being is <u>maintained provided for in the long term...</u> <u>Water quality in the Waikato River Catchment is Waikato and Waipā communities and their economy benefit from the maintained, restored and/or protected restoration and protection of water quality in the Waikato River catchment, which whilst enabling enables the people and communities to provide for their social, economic and cultural well-being.'</u> OR AMEND to merge Objectives 1 and 2 so that enabling people and communities to provide for their social, economic and cultural well-being	<b>SUPPORT in part</b> , subject to final drafting.

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			<p>is balanced with assisting to achieve the water quality outcomes anticipated by the Vision &amp; Strategy in 80 years. AND AMEND to make any consequential amendments to the Reasons for Adopting Objective 2.</p>	
<p>Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit</p>	<p>V1PC1-129</p>	<p>Oppose with amendments</p>	<p>AMEND Objective to read: 'Objective 3: Short-term improvements in water quality in the first stage of <u>maintenance</u>, restoration and/or protection of water quality... Actions <u>are identified put in place and implemented by 2026</u> to <u>reduce manage</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens to maintain, restore and/or protect water quality for <u>each sub-catchment and/or Freshwater Management Unit</u> and are sufficient to achieve ten per cent of the required change between current water quality and <u>achieving the water quality outcomes anticipated by the Vision &amp; Strategy and values^ the 80 year water quality attribute targets^ in Table 3.11-1</u>. A ten per cent change toward the long term water quality improvements is indicated by the short term water quality attribute^ targets^ in Table 3.11-1. AND AMEND to make any consequential amendments to the reasons for adopting Objective 3. OR AMEND the short term targets on Table 3.11-1 to achieve realistic and reliable targets based on reasonable assumptions that address the concerns raised in this submission. OR AMEND the short term targets in Table 3.11-1 so that they are based on the NOF bands as opposed to specific numbers.</p>	<p><b>SUPPORT in part</b>, subject to final drafting.</p>
<p>Objective 4: People and community resilience</p>	<p>V1PC1-143</p>	<p>Oppose with amendments</p>	<p>ADD a NEW paragraph (b) to Objective 4 to read: '<u>addressing information gaps and gaining an understanding of the current water state, water quality issues and he causes for each sub-catchment and the relationship with other sub-catchments; and</u>' AND AMEND Objective 4(b) to read: '<u>bc. recognizing that further contaminant reductions <del>will</del> may be required by subsequent regional plans...</u>' ADD a NEW paragraph (d) to Objective 4 to read: '<u>d. recognising and providing for flexibility in the implementation of on-farm management measures to respond to changes brought about by climatic events, natural hazards, economic conditions, health and safety, and animal welfare requirements.</u>' IF Table 3.11-1 is not amended as requested by the submission THEN AMEND Objective 4(a) to clarify that the intention is to achieve 10% of the</p>	<p><b>SUPPORT</b></p>

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			<p>journey towards the water quality outcomes contemplated by the Vision and Strategy and the values. AND AMEND to make any consequential changes to the Reasons for adopting Objective 4.</p>	
Reasons for adopting Objective 1	V1PC1-156	Oppose with amendments	<p>AMEND Reasons for adopting Objective 1 to read: '<u>Objective 1 confirms the water quality outcomes contemplated by the Vision and Strategy as the overarching goal. The timeframe for this is 80 years or 2096. The objective is to manage discharges of nitrogen, phosphorus and microbial pathogens to assist with achieving these outcomes. sets long term limits<sup>Δ</sup> for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80 year water quality targets<sup>Δ</sup>, which result in improvements in water quality from the current state monitored in 2010-2014. The water quality attributes<sup>Δ</sup> listed in Table 3.11-1 that will be achieved by 2096 will be used to characterize the water quality if the different FMUs when the effectiveness of the objective is assessed.</u> Objective 1 sets the overall context for what is to be achieved in terms of water quality improvements. There is not any hierarchy of Objectives 1 to 6.'</p> <p>AND AMEND to make any consequential changes.</p>	SUPPORT in part, subject to final drafting
Reasons for adopting Objective 2	V1PC1-157	Oppose with amendments	<p>AMEND Reasons for adopting Objective 2 to read: '<u>Objective 2 provides the context against which water quality improvements are sought. sets the long term outcome for people and communities, recognizing that restoration and protection of water quality will continue to support communities and the economy.</u> The full achievement of the <u>Vision and Strategy and water quality outcomes by 2096</u> <del>Table 11-1 2096 water quality attribute<sup>Δ</sup> targets<sup>Δ</sup></del> may require a potentially significant departure from how businesses and communities currently function, and it is important to minimize social disruption during this transition. <u>Throughout the water quality improvement journey, it is also important to enable people and communities to continue to provide for their social, economic and cultural well-being.</u>'</p> <p>AND AMEND to make any consequential changes.</p>	SUPPORT
Reasons for adopting Objective 3	V1PC1-158	Oppose with amendments	<p>AMEND the second paragraph of Reasons for adopting Objective 3 to read: '<u>Point source discharges are currently managed through existing resource consents... guided by the targets and limits set in Objective 1 as well as the sub-catchment and Freshwater Management Unit characteristics.</u>'</p> <p>AND AMEND to make any consequential changes.</p>	SUPPORT

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Reasons for adopting Objective 4	V1PC1-159	Oppose with amendments	DELETE the second paragraph from Reasons for adopting Objective 4. AND AMEND the last sentence to read: 'Objective 4 seeks to minimise social disruption in the short term, while <u>addressing information gaps, encouraging preparation for possible future requirements.</u> ' AND AMEND to make any consequential changes.	<b>SUPPORT</b>
3.11.3 Policies	V1PC1-172	Support	ADD a NEW Policy to read: ' <u>Policy 2A: Farm Environment Plans Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming enterprises by requiring the preparation of Farm Environment Plans that:</u> a. <u>are effective in managing diffuse discharges on farms; and</u> b. <u>are practical to implement; and</u> c. <u>are consistent in assessing risks from diffuse discharges in the manner set out in Schedule 1 or 1A; and</u> d. <u>set out a range of prioritised, tailored and practical mitigation actions that allows each farm to have tailored actions designed to fit the specific circumstances of the farming enterprise including soil, slope, climate and resources; and</u> e. <u>recognise and provide for existing programmes of actions in place to manage diffuse discharges from the farm; and</u> f. <u>are proportional in the mitigation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from the farming enterprise based on:</u> i. <u>the risk of contaminant loss from a property taking into account the scale and significance of the risk from the discharge of each contaminant from the farming enterprise to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision and Strategy referred to in Objective 1;</u> ii. <u>while recognising that flexibility in the delivery and nature of the tailored actions is necessary to accommodate changes to farming systems and address environmental risks brought about by factors such as seasonal fluctuation, unforeseeable events, health and safety obligations and animal welfare requirements.'</u>	<b>SUPPORT in part</b> , subject to final drafting.
3.11.3 Policies	V1PC1-175	Support	ADD a NEW policy to read: ' <u>Policy 2B: Review and amendment of Certified Farm Environment Plans</u> <u>Provide for review and amendment of a Certified Farm Environment Plan for a farming enterprise:</u> a. <u>recognising that flexibility is required to allow farm enterprises:</u>	<b>SUPPORT in part</b> , subject to final drafting



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			<p><u>i. to make changes to Certified Farm Environment Plan actions and/or management measures (including changes to timing or priority) that may not be provided for by a Certified Farm Environment Plan but are necessary to respond to changing circumstances, seasonal fluctuations, unforeseeable events, health and safety, and animal welfare requirements</u></p> <p><u>ii. while adopting the Most Practicable Action to manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens associated with the farming enterprise in order to assist with achieving the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision and Strategy and values^ referred to in Objective 1; and</u></p> <p><u>b. ensuring that amendments to a Certified Farm Environment Plan can be actioned without the need to lodge an application for a change to consent condition where the farming enterprise operates by way of resource consent under any of Rules 3.11.5.2A to 3.11.5.7.'</u></p>	
3.11.3 Policies	V1PC1-240	Support	<p>ADD a NEW policy to read: '<u>Policy 12 A: Additional considerations for diffuse discharges in relation to water quality targets</u></p> <p><u>Consider the contribution made by a diffuse discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads and the impact of that contribution on the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision and Strategy and values^ referred to in Objective 1, taking into account:</u></p> <p><u>a. the characteristics of the sub-catchment within which the subject farm enterprise is located as set out in the Catchment Profile and any sub-catchment management plan (including load reductions achieved through whole of sub-catchment actions); and</u></p> <p><u>b. the relative contribution of the industry sector within which the farming enterprise belongs to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision and Strategy and values^ in Objective 1; and</u></p> <p><u>c. the resources reasonably available to the farm enterprise; and</u></p> <p><u>d. investment in past on farm and edge of field contaminant mitigations including technology upgrades to model, monitor and reduce the discharge of nitrogen, phosphorus, sediment and microbial pathogens where those mitigations are already achieving a high level of contaminant reduction through the application of the Most Practicable Action.'</u></p>	<p><b>SUPPORT in part</b>, subject to final drafting</p>

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Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	V1PC1-162	Oppose with amendments	AMEND Policy 1 to read: 'Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens Manage and require reductions in sub-catchment <u>wide diffuse and point source discharges of nitrogen, phosphorus, sediment, and microbial pathogens to assist with achieving the short term water quality attribute targets in Table 3.11-1 by adopting Most Practicable Actions for diffuse discharges and Best Practicable Option for point source discharges.</u> ' AND DELETE paragraphs (a), (b) and (c) from Policy 1.	<b>SUPPORT</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-164	Oppose with amendments	AMEND Policy 2(a) to read: 'Taking a tailored, risk based approach to <u>identify the Most Practicable Actions to define mitigation actions on the land that will manage or</u> reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm Environment Plan <del>either associated with a resource consent, or in specific requirements established by participation in a Certified Industry Scheme;</del> and' AND AMEND Policy 2(d) to read: 'i. the amount of <u>the</u> current discharge (those discharging more <del>are</del> <u>may be</u> expected to make greater reductions) and <del>proportionate to</del> <u>ii. the relative contribution of the industry sector within which the farming enterprise belongs to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision and Strategy and values^ referred to in Objective 1; and</u> <u>iii. the characteristics of the sub-catchment within which the subject farm enterprise is located and</u> the scale of water quality improvement required in the sub-catchment; and' AND AMEND Policy 2(e) to read: 'Requiring stock exclusion <u>and setbacks in accordance with Schedule C</u> to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July <del>2026</del> <u>2028</u> .' OR AMEND the stock exclusion date to 3 years from the date that the FEP becomes operative. AND AMEND the date for assessing progress to a 10 year timeframe as opposed to 10 years from notification.	<b>SUPPORT in part</b> , subject to final drafting
Policy 4: Enabling activities with lower discharges to continue or to be established	V1PC1-188	Support with amendments	AMEND the final sentence of Policy 4 to read: '... reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens in order <u>to assist with making progress towards</u> <del>for</del> Objective 1 <del>to be met</del> .'	<b>SUPPORT</b>

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while signalling further change may be required in future				
Policy 5: Staged approach	V1PC1-193	Support with amendments	AMEND Policy 5 to read: 'Recognise that achieving the water quality <u>outcomes anticipated by the Vision and Strategy and values<sup>^</sup> attribute<sup>^</sup> targets<sup>^</sup> set out in Table 11-1</u> will need to be staged over 80 years ... while making a start on <u>managing and/or</u> reducing discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>at a sub-catchment level</u> , and preparing for <u>any</u> further reductions <u>or mitigations</u> that <del>will</del> <u>may</u> be required in subsequent regional plans.'	<b>SUPPORT</b>
Policy 6: Restricting land use change	V1PC1-194	Oppose	REPLACE Policy 6 with the following: ' <u>Policy 6: Restricted Discretionary and Discretionary Activities</u> <u>Grant consent to applications for farming activities that apply for consent under Rule 3.11.5.6 (Restricted Discretionary Activity) or Rule 3.11.5.7 (Discretionary Activity) that can demonstrate the following:</u> <u>a. The Most Practicable Actions to manage the discharge of nitrogen, phosphorus, sediment and microbial pathogens on a proportional basis will be implemented by the farm operator; and</u> <u>b. Monitoring, record keeping, reporting and information provision to the Waikato Regional Council by the consent holder will be undertaken in an efficient and effective manner; and</u> <u>c. Where consent is sought to allow an exceedance of permitted or controlled activity nitrogen limits that the risks associated with phosphorus, sediment and microbial pathogen discharges from the farming activity can be reasonably managed.'</u>	<b>SUPPORT</b>
Policy 7: Preparing for allocation in the future	V1PC1-224	Oppose with amendments	AMEND Policy 7 to read: 'Policy 7: Preparing for <del>allocation</del> in the future. Prepare for <u>potential</u> further diffuse discharge reductions <u>or mitigations</u> <del>and any future property or enterprise level allocation of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens that will</del> <u>may</u> be required by subsequent regional plans, by implementing the policies and methods in this chapter. To <u>assist with this</u> <del>ensure this occurs</del> , collect information and undertake research to support this is, including: <u>a. collecting information about current discharges, developing appropriate modelling tools to estimate contaminant discharges,'</u> AND ADD a NEW paragraph (b) to Policy 7 to read: ' <u>b. collating information obtained from the Catchment Profiles and sub-catchment</u>	<b>SUPPORT</b>

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			<p><u>management plans, models or data obtained through implementation of this Plan change, and'</u>            AND AMEND Policy 7 to read: '<u>c_ researching the spatial variability of land use and contaminant losses as well as the hydrological relationship between sub-catchments, ground and surface water and contaminant loss, and the effect of contaminant discharges in different parts of the catchment that will assist in defining 'land suitability'.</u>            AND ADD the following sentence after proposed paragraph (c): '<u>In preparing for the future, the Nitrogen Reference Point established under Policy 2(c) is not to be regarded as forming the basis of any allocation mechanism that may be adopted in the future.</u>            AND DELETE the sentence 'any future allocation should consider the following principles'.            AND DELETE the following paragraphs (a), (b), (c) and (d).            AND DELETE footnote 5.</p>	
Policy 8: Prioritised implementation	V1PC1-231	Support with amendments	<p>AMEND Policy 8(a) to read: 'Sub-catchments where there is a greater gap between the water quality targets^ in Objective 3± (Table 3.11-1) and current water quality; and'            OR AMEND priority sub-catchments in Table 3.11-2 to reflect distance from 10 year targets, not 80 year targets or not a ranking approach to prioritisation.</p>	<b>SUPPORT</b>
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	V1PC1-234	Support with amendments	<p>AMEND Policy 9(d) to read: 'Allowing, where multiple <del>farming enterprises</del><u>land uses</u> contribute to a mitigation, for the resultants reduction in <del>diffuse</del> discharges to be apportioned to each <del>enterprise</del><u>land use</u> in accordance with...'</p>	<b>SUPPORT in part</b> , subject to final drafting
Policy 16: Flexibility for development of land returned under Te Tiriti o Waitangi settlements and	V1PC1-249	Oppose	DELETE Policy 16.	<b>OPPOSE</b> in part. Theland Tahi understands that the basis for deleting this policy is that it proposes amendments to Policy 6 which will provide opportunity and flexibility for the development of iwi land.

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multiple owned Māori land				
3.11.4 Implementation methods	V1PC1-290	Support	<p>ADD a NEW method to read: '<u>3.11.4.5A Catchment Profiles</u> <u>Waikato Regional Council will develop Catchment Profiles for the sub-catchments listed in Table 3.11-2. Each Catchment Profile shall be developed and made publicly available a minimum of two years before the Farm Environment Plans in the sub-catchment(s) to which it relates are required to be provided to the Waikato Regional Council.</u> <u>A Catchment Profile shall contain all of the information relevant to water quality in a sub-catchment(s), including but not limited to:</u></p> <ul style="list-style-type: none"> <li><u>a. Sub-catchment targets and the current state for each contaminant in each sub-catchment.</u></li> <li><u>b. Sector and other (including pest and natural sources of contaminants) contributions toward sub-catchment targets.</u></li> <li><u>c. Consented discharges and takes in the sub-catchment.</u></li> <li><u>d. Any operative sub-catchment management plans.</u></li> <li><u>e. Information about adjoining/related catchments, relationships between sub-catchment or opportunities to coordinate with related sub-catchments.</u></li> <li><u>f. Any zones that the sub-catchment is divided into to represent farming systems or land uses (including activities generating point source discharges) of a consistent type (in terms of contaminant loss).</u></li> <li><u>g[f]. Information about hot spots or critical source areas within the sub-catchment including geophysical and climate characteristics e.g. rainfall or soil type, or historical events e.g. landslips.</u></li> <li><u>h[g]. Freshwater accounting system, monitoring plan and any other information generated pursuant to Methods 3.11.4.7 or 3.11.4.10.</u></li> </ul>	<b>SUPPORT</b> subject to final drafting.
3.11.4 Implementation methods	V1PC1-314	Support	<p>ADD a NEW Method to read: '<u>3.11.4.13 Calculation of 75th percentile</u> <u>In consultation and collaboration with industry and stakeholders, Waikato Regional Council will develop guidelines for how it will calculate the dairy nitrogen curve for the purposes of assessing the 75th percentile. This will include:</u></p> <ul style="list-style-type: none"> <li><u>a. How to accommodate and/or coordinate the date the nitrogen reference point data is received, the date the 75th percentile is calculated and the[n] communicated to the community.</u></li> <li><u>b. How to ensure that all nitrogen reference points are calculated in the same or comparable versions of Overseer, in order to obtain a robust estimate of the 75th percentile.</u></li> </ul>	<b>SUPPORT in part</b> , subject to final drafting

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			<p><u>c. How to ensure that the assessment against the 75th percentile for properties moving forward (e.g. to demonstrate reductions to the 75th percentile) will remain robust as Overseer versions change.</u>  <u>d[c]. The appropriate statistical basis for calculating the 75th percentile.</u>  <u>e[d]. Whether the River FMU is the appropriate spatial scale for calculating the 75th percentile.</u>  <u>f[e]. How the 75th percentile will be independently verified.'</u>                      OR AMEND to clarify in Schedule B how the 75th percentile is to be calculated to ensure transparency, consistency, fairness and robustness.                      OR AMEND Chapter 3.11 to provide for Overseer version changes AND ENSURE that there are no penalties due to a version change.</p>	
3.11.4.3 Farm Environment Plans	V1PC1-259	Support with amendments	<p>AMEND Method 3.11.4.3 to read: '...A Farm Environment Plan will be prepared by a certified person as per the requirements outlined in Schedule 1, and will <del>assess the risk</del> <u>identify the Most Practicable Actions for the management of</u> diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens.  <del>and specify actions to reduce those risks in order to bring about reductions in the discharges of those contaminants.</del>  <u>In consultation with stakeholders, including industry bodies, Waikato Regional Council will develop guidance for risk assessments, auditing and compiling Farm Environment Plans.</u>                      Waikato Regional Council will take <u>a pragmatic</u> and risk based approach to monitoring Farm Environment Plans, starting with more frequent monitoring and then moving to monitoring based on risk assessment, <u>and recognising that flexibility in the implementation of Farm Environment Plans is required in response to changing circumstances, seasonal fluctuations, unforeseeable events, health and safety and animal welfare requirements.</u> Robust third party audit (independent of the farmer and Certified Farm Environment Planner) and monitoring <del>will</del> <u>may</u> be required.'</p>	<b>SUPPORT in part</b> , subject to final drafting
3.11.4.5 Sub-catchment scale planning	V1PC1-266	Support with amendments	<p>AMEND Method 3.11.4.5 to read:                      'a. Identify the causes of current water quality decline, identify cost-effective measures to <u>address the causes of water quality decline</u> <del>bring about reductions in contaminant discharges,</del> and <u>where reductions in the discharges of contaminants are required,</u> coordinate <del>the</del> reductions <del>required</del> at a property, enterprise <u>(or multiple property scale)</u> and sub-catchment <u>(or multiple sub-catchment)</u> scale (including recommendations for funding where there is a public benefit identified).</p>	<b>SUPPORT in part</b> , subject to final drafting

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			<p>b. Align <del>works and services</del> and coordinate actions and works (including <u>edge of field work</u>) to <del>reduce</del> <u>manage</u> nitrogen, phosphorus, sediment and microbial pathogen discharges including riparian management, targeted reforestation, constructed wetlands, sediment traps and sediment detention bunds.</p> <p>c. <del>Identify and assess and determine</del> effective and efficient placement of constructed wetlands <u>and other edge of field works</u> at a sub-catchment scale to improve water quality.</p> <p>d. Support research that addresses the management of wetlands <u>and other edge of field works</u>, including development of techniques to monitor ecological change and forecasting evolution of wetland characteristics resulting from existing land use in the wetland catchments, <u>and other sub-catchment scale actions to improve water quality</u>.</p> <p>e. Integrate <u>and coordinate</u> the <del>regulatory requirements to fence</del> <u>fencing of waterways in accordance with Chapter 3.11</u> with the requirements for effective drainage scheme management <u>to ensure efficient and effective operation of drainage schemes</u>.</p> <p>f. Coordinate funding of <u>or contributions towards</u> mitigation work by <u>requesting</u> those contributing to water quality degradation <u>to contribute</u> in proportion to that contribution.</p> <p>g. Utilise public funds to support edge of field mitigations where those mitigations provide <del>significant</del> public benefit.'</p> <p>OR AMEND the method to adopt the same approach for rivers as that adopted for lakes in Method 3.11.4.4.</p>	
3.11.4.7 Information needs to support any future allocation	V1PC1-295	Oppose with amendments	<p>AMEND Method 3.11.4.7 to read: 'Information needs <del>to support any future allocation</del></p> <p>Gather information and commission appropriate scientific research to inform <del>any future framework for the allocation</del> <u>the management</u> of diffuse and point source discharges of nitrogen, phosphorus, sediment and microbial pathogen including:</p> <p>AND AMEND Method 3.11.4.7(a) to read: 'Implementing processes that will support <del>the setting of property or enterprise level diffuse</del> <u>management of discharges limits</u> in the future.'</p> <p>AND AMEND Method 3.11.4.7(b) to read: 'Researching:</p> <p>i. the quantum of contaminants that can be discharged at a sub-catchment and Freshwater Management Unit^ scale while meeting the Table 3.11-1 water quality attribute^ targets^ <u>(this will include understanding sub-catchment characteristics such as attenuation, ground water travel time,</u></p>	<b>SUPPORT in part</b> , subject to final drafting.

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			<p><u>sink, source and travel pathways, interaction or relationship between contaminants, and the impact of historical events e.g. landslips).</u></p> <p><u>ii. Whether the appropriate water attribute targets can be developed for 2096 or whether some interim targets or alternative approach is more appropriate. This will include an assessment as to whether these targets are consistent with the values^ and are likely to result in the Vision and Strategy being achieved.</u></p> <p><u>iii. Whether there are alternative actions that are consistent with the values^ and likely to achieve the Vision and Strategy that result in lower economic, social and cultural cost and disruption.</u></p> <p><u>ii. Methods to categorise and define 'land suitability'.</u></p> <p><u>iii. Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute^ targets^.</u></p>	
3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	V1PC1-300	Oppose with amendments	<p>AMEND the short title of Method 3.11.4.8 to read: 'Reviewing Chapter 3.11 and <del>an allocation</del> <u>discharge management</u> frameworks for the next Regional Plan'</p> <p>AND ADD a NEW paragraph (a) to Method 3.11.4.8 to read: '<u>Carry out a comprehensive review of Chapter 3.11, including the progress towards the 10 year targets and the Vision and Strategy and values, the mitigations the have been adopted by point source and diffuse discharge and the extent to which they have been implemented, the prioritisation of sub-catchments in Map 3.11-2 (and the extent to which that assisted with progress) and any other matters relevant to assessing the efficacy of Chapter 3.11 in achieving or assisting to achieve the Objectives of this chapter.</u>'</p> <p>OR AMEND to link with paragraph (a) of Method 3.11.4.11.</p> <p>AND AMEND Method 3.11.4.8(a) to read: '<u>b. In consultation with the community, identify and develop discharge <del>allocation</del> management frameworks for individual properties and enterprises based on information collected under Method 3.11.4.7 (and taking into account all contaminants and their sources and management at a sub-catchment, Freshwater Management Unit and/or property or enterprise level), taking into account the best available data, knowledge and technology at the time but clearly identifying uncertainties, assumptions and confidence levels; and'</u></p> <p>AND AMEND Method 3.11.4.8(b) to read: '<u>b.c. Use this to inform changes to the Waikato Regional Plan to manage discharges of nitrogen,</u></p>	<b>SUPPORT</b> , subject to final drafting



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			phosphorus, sediment and microbial pathogens <del>at a property or enterprise level to assist with achieving the Vision and Strategy and values^, meet the targets^ in the Objectives.'</del>	
3.11.4.10 Accounting system and monitoring	V1PC1-306	Support with amendments	AMEND Method 3.11.4.10 to read: 'Waikato Regional Council will establish and operate a publicly available accounting system and monitoring in each <u>sub-catchment and Freshwater Management Unit</u> ^, including: a. Collecting information on nitrogen, phosphorus, sediment and microbial pathogen levels in the respective fresh water bodies <u>and sub-catchments</u> in each Freshwater Management Unit^ from: ... b. Using the information collected to establish the baseline data for compiling a monitoring plan and assess progress towards achieving the <u>short term targets^ in Objective 3 and the outcomes anticipated by the Vision and Strategy and values^ in Objective 1 Table 11-1 water quality attribute^ targets^</u> ; and c. Using state of the environment monitoring data ... reporting on long-term trends; <del>and</del> d. An information and/or accounting system for <u>the point source and diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from properties and enterprises that could supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at an enterprise or property scale or at a sub-catchment or Freshwater Management Unit^ scale.'</u>	<b>SUPPORT</b> subject to final drafting.
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	V1PC1-308	Oppose with amendments	AMEND Method 3.11.4.11(a) to read: 'Review and report on the progress towards achievement of the <u>short term targets^ in Objective 3 (including the implications of prioritising sub-catchments in Table 3.11-2) and the progression towards the outcomes anticipated by the Vision and Strategy and values^ referred to in Objective 1 80-year water quality objectives of Chapter 3.11 (this will take into account all sources contributing towards water quality and all actions contributing towards improvement).'</u> AND AMEND Method 3.11.4.11(b) to read: 'Research and identify methods to measure actions at a sub-catchment, property and enterprise level, and their contribution to reductions in the <u>point source and diffuse discharge of contaminants.'</u> AND AMEND Method 3.11.4.11(d) to read: 'Collate data on the number of land use resource consents issued under the rules in the chapter, <u>the number of point source discharge consents issued under the Regional</u>	<b>SUPPORT in part</b> , subject to final drafting.

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			<p><u>Plan</u>, the number of Farm Environment Plans completed, compliance with the actions listed in <del>Farm Environment Plans</del> <u>point source and diffuse discharge consents</u>, Nitrogen Reference Points for properties and enterprises, and <u>any contaminant nitrogen</u> discharge data reported under Farm Environment Plans or resource consents.'</p>	
<p>3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges</p>	<p>V1PC1-312</p>	<p>Oppose with amendments</p>	<p>AMEND the short title or Method 3.11.4.12 to read: 'Support research and dissemination of <del>best</del><u>industry agreed good management</u> practice guidelines to reduce diffuse <u>and point source</u> discharges'            AND AMEND paragraph (a) to read: '<u>In consultation and collaboration with industry and stakeholders</u>, develop and disseminate <del>best</del><u>industry agreed good management</u> practice guidelines for reducing the diffuse <u>and point source</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens; and'            AND AMEND paragraph (b) to read: 'Support research into methods for reducing diffuse <u>and point source</u> discharges of contaminants to water.'            AND ADD a NEW paragraph (c) to Method 3.11.4.12 to read: '<u>c. In consultation and collaboration with industry and stakeholder</u>, develop and disseminate <u>guidelines for How Waikato Regional Council will consider applications to use models other than Overseer, how mitigations not recognised by Overseer will be recognised and provided for, how actual data may be used as an Overseer input (as opposed to defaults), circumstances for departure from Overseer parameter settings, how different input standards could be used for changes in the 2016 data input standards could be accommodated, and alternatives to provide for situations where data is missing.</u>'</p>	<p><b>SUPPORT in part</b>, subject to final drafting.</p>
<p>3.11.5 Rules</p>	<p>V1PC1-499</p>	<p>Support</p>	<p>ADD a NEW rule to read:  '<u>3.11.5.4A Controlled Activity Rule – The use of land for farming activities exceeding the Nitrogen Reference Point</u>  <u>Except as provided for in Rules 3.11.5.1 to 3.11.5.5, the use of land for farming activities (excluding commercial vegetable production) and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water, irrespective of whether or not the farming activity is registered to a Certified Industry Scheme where:</u>  <u>a. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</u></p>	<p><b>SUPPORT in part</b>, subject to final drafting.</p>

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			<p><u>b. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner is provided to the Waikato Regional Council; and</u></p> <p><u>c. A Nitrogen Reference Point has been produced for the property or enterprise in conformance with Schedule B and the diffuse discharge of nitrogen associated with the use of the land for farming activities will exceed the Nitrogen Reference Point; and</u></p> <p><u>d. The stock exclusion and setback requirements in Schedule C are and/or will be complied with; and</u></p> <p><u>e. The diffuse discharge of nitrogen from the property or enterprise does not exceed the 75th percentile nitrogen leaching value; and</u></p> <p><u>f. If the property is subdivided, a new Nitrogen Reference Point has been calculated for all of the lots created by the subdivision in conformance with Schedule B for each individual lot where the diffuse discharge of nitrogen associated with the use of the land for farming activities will exceed the Nitrogen Reference Point(s);</u></p> <p><u>is a Controlled Activity.</u></p> <p><u>Matters of Control</u>  <u>Waikato Regional Council reserves control over the following matters:</u></p> <ol style="list-style-type: none"> <li>1. <u>The level of nitrogen discharge form the site, or new sites in the case of a subdivided property.</u></li> <li>2. <u>The term of the resource consent.</u></li> <li>3. <u>The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</u></li> </ol> <p><u>Notification:</u>  <u>Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.'</u></p>	
3.11.5 Rules	V1PC1-570	Support	<p>ADD a NEW rule to read:  <u>'3.11.5.5A Controlled Activity Rule –Transfer of Commercial Vegetable Production Activity</u>  <u>The diffuse discharge of nitrogen, phosphorous, sediment and microbial pathogens from commercial vegetable production onto or into land in circumstances which may result in those contaminants entering water where that commercial vegetable production activity has been legally</u></p>	<p><b>SUPPORT in part</b>, subject to final drafting.</p>

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			<p><u>established on a parent property and is transferring the activity to a new property in the same sub-catchment shall be a controlled activity, subject to the following standards and terms:</u></p> <ol style="list-style-type: none"> <li>1. <u>The parent property and the new property are registered with the Waikato Regional Council in conformance with Schedule A, and</u></li> <li>2. <u>A Nitrogen Reference Point for the commercial vegetable production activity at the parent property has been calculated in conformance with Schedule B and the proposed commercial vegetable production activity at the new property is of an intensity and scale that does not result in the Nitrogen Reference Point value of the activity as undertaken at the parent property being exceeded, as measured by the five year rolling average annual nitrogen loss determined by the current version of OVERSEER®.</u></li> <li>3. <u>The use of the area of land on the new property for farming activities and the associated diffuse discharge of nitrogen, phosphorous, sediment and microbial pathogens onto or into that area of land in circumstances which may result in those contaminants entering water is ceased prior to the commencement of the commercial vegetable production activity on that same area of land.</u></li> <li>4. <u>A Farm Environment Plan for the property or enterprise prepared in conformance with Schedule 1 and approved by a Certified Farm Environment Planner is provided to the Waikato Regional Council at the time the resource consent application is lodged.</u></li> <li>5. <u>The use of land shall be undertaken generally in accordance with the actions and timeframes specified in the Farm Environment Plan.</u></li> </ol> <p><u>Matters of Control</u></p> <ol style="list-style-type: none"> <li>i. <u>The term of the resource consent.</u></li> <li>ii. <u>The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</u></li> </ol> <p><u>Notification:</u></p>	

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			<u>Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.'</u> OR AMEND Rule 3.11.5.5A to provide for the transfer within parts of sub-catchments or zones, or among a group of related sub-catchments AND/OR in the event that Rule 3.11.5.6 does not reasonably provide for an alternative land use to establish on the parent property after the commercial vegetable grower leaves, AMEND the policies, Rule 3.11.5.5A and/or Rule 3.11.5.6 so that it does.	
3.11.5 Rules	V1PC1-571	Support	ADD a NEW section, Information Requirements, before Rule 3.11.5.6 to read: ' <u>Information Requirements - Controlled Activities</u> <u>Applications for a Controlled Activity under either Rules 3.11.4, 3.11.4A 3.11.5.5 or 3.11.5.5A shall, at minimum, provide the following information:</u> <u>a. A Farm Environment Plan prepared in conformance with Schedule 1 along with evidence of approval of the Farm Environment Plan by a Certified Farm Environment Planner; and</u> <u>b. Evidence of the registration of the property with the Waikato Regional Council in conformance with Schedule A; and</u> <u>c. A Nitrogen Reference Point for the property or enterprise in conformance with Schedule B; and</u> <u>d. Information explaining how Schedule C will be complied with.'</u>	<b>SUPPORT in part</b> , subject to final drafting.
3.11.5 Rules	V1PC1-708	Support	ADD a NEW section to read: <u>'Information Requirements - Restricted Discretionary and Discretionary Activities</u> <u>Applications for a Restricted Discretionary Activity under Rule 3.11.5.6 or a Discretionary Activity under Rule 3.11.5.7 shall, at minimum, provide the following information:</u> <u>a. An analysis of the Most Practicable Actions to manage the discharge of nitrogen, phosphorous, sediment and microbial pathogens on a proportional basis that will be implemented by the operator of the farm enterprise; and</u> <u>b. A description of the monitoring, record keeping, reporting and information provision methods that will be implemented by the consent holder to ensure efficient and effective communication with the Waikato Regional Council on consent related matters; and</u> <u>c. Where consent is sought to allow an exceedance of permitted or controlled activity nitrogen limits, an analysis and description of how the risks associated with discharges from the farm enterprise of phosphorous,</u>	<b>SUPPORT in part</b> , subject to final drafting.

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			<p><u>sediment and microbial pathogen onto or into land in circumstances which may result in those contaminants entering water can be reasonably managed; and</u>  <u>d. Information setting out the value of existing investment in the farming enterprise to which the consent application relates.'</u></p>	
<p>3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities</p>	<p>V1PC1-327</p>	<p>Support with amendments</p>	<p>RETAIN Rule 3.11.5.1(1) on the basis that the submitter's proposed changes to Schedule A are accepted.            IF the amendments to Schedule A are not accepted THEN AMEND 3.11.5.1(1) to address its concerns.            DELETE and REPLACE Rule 3.11.5.1(2) with the following: '<u>The stock exclusion and setback requirements in Schedule C are and/or will be complied with; and</u>            AND AMEND Rule 3.11.5.1(4) to read: 'The farming activities do not form part of an enterprise being undertaken on more than one property <u>where the combined area is no greater than 4.1ha</u>; or'            AND AMEND Rule 3.11.5.1(5) to read: 'For grazed land, the stocking rate of land is less than <del>6</del>9 stock units per hectare; and'            OR AMEND to a reasonable stocking rate that adequately addresses likely water quality risks while providing for low intensity farms to operate under Rule 3.11.5.1.</p>	<p><b>SUPPORT</b> subject to final drafting.</p>
<p>3.11.5.2 Permitted Activity Rule – Other farming activities</p>	<p>V1PC1-338</p>	<p>Oppose with amendments</p>	<p>DELETE and REPLACE Rule 3.11.5.2(2) with the following: '<u>The stock exclusion and setback requirements in Schedule C are and/or will be complied with; and</u>            AND AMEND Rule 3.11.5.2(3)(b) to read: '<u>The land use has</u><del>Where the land is:</del>            i. <del>used for grazing livestock, the stocking rate of the land is no greater than the same stocking rate as it had on of the land at 22 October 2016 (where the land is used for grazing livestock);</del> or            ii. <del>not used for grazing livestock, the land use has the same or lower diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens as the land use at 22 October 2016 (irrespective of whether the land is used for grazing livestock);</del> and'            AND REPLACE Rule 3.11.5.2(3)(e) with the following: '<u>Upon request from the Council, the following information is provided to the Council, in respect of the 12 month period prior to the date of the request:</u>            i. Annual stock numbers; and            ii. Annual fertiliser use; and            iii. Annual brought in animal feed.'</p>	<p><b>SUPPORT</b> subject to final drafting.</p>

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			<p>AND AMEND Rule 3.11.5.2(4)(b) to read: 'The diffuse discharge of nitrogen from the property or enterprise does not exceed either:</p> <p>i. <del>the Nitrogen Reference Point; or</del></p> <p>ii. 15kg nitrogen/hectare/year;</p> <p><del>whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and'</del></p> <p>OR AMEND to adopt a permitted baseline for properties over 20 hectares that is not based on nitrogen but is based on a stocking rate of 16 stock units per hectare AND/OR a narrative about farm system types that captures low intensity farms and provides flexibility for their nitrogen to increase as a permitted activity.</p> <p>AND REPLACE Rule 3.11.5.2(4)(c) with the following: '<u>The stock exclusion and setback requirements in Schedule C are complied with'</u></p> <p>AND REPLACE Rule 3.11.5.2(4)(d) with the following: '<u>Upon request, evidence is provided to the Council demonstrating compliance with paragraph (b) as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER; and'</u></p> <p>AND REPLACE Rule 3.11.5.2(4)(e) with the following: '<u>A simplified Farm Environment Plan which has been prepared in accordance with Schedule 1A and has been approved by a Certified Farm Environment Planner is provided to Waikato Regional Council; and'</u></p> <p>AND ADD the following paragraphs to Rule 3.11.5.2(4): '<u>f. The use of land shall be undertaken generally in accordance with the actions and timeframes specified in the Simplified Farm Environment Plan; and</u></p> <p><u>g. The Simplified Farm Environment Plan may be amended in accordance with the procedure set out in Schedule 1A and the use of land shall thereafter be undertaken in accordance with the amended plan; and</u></p> <p><u>h. A copy of the Simplified Farm Environment Plan amended in accordance with condition g above shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment.'</u></p> <p>AND DELETE Rule 3.11.5.2(5).</p>	
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm	V1PC1-357	Support with amendments	<p>DELETE and REPLACE Rule 3.11.5.3(3) with the following: '<u>The stock exclusions and setback requirements in Schedule C are and/or will be complied with; and'</u></p> <p>AND AMEND Rule 3.11.5.3(5)(c) to read: '<u>By <del>1 July 2026</del> March 2028 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and'</u></p>	<p><b>SUPPORT</b> subject to final drafting.</p>

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Environment Plan under a Certified Industry Scheme			<p>AND/OR ENSURE that the time period available for implementation for FEPs is taken into account when reviewing Chapter 3.11.  OR AMEND all dates and timeframes to provide a reasonable opportunity to obtain a FEP (when the rules are operative) and a reasonable timeframe to assess 10 year progress.  AND ADD a NEW paragraph (6), (7) and (8) to Rule 3.11.5.3 to read:  <u>'6. The diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as determined by the use of the current version of OVERSEER®, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; and</u>  <u>7. Where the Nitrogen Reference Point exceeds the 75<sup>th</sup> percentile nitrogen leaching value, actions, timeframes and other measures are proposed in the Farm Environment Plan to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75<sup>th</sup> percentile nitrogen leaching value by 1 March 2028.</u>  <u>8. If the property is subdivided, a new Nitrogen Reference Point shall be calculated for all of the lots created by the subdivision in conformance with Schedule B for each individual lot.'</u>  AND AMEND rule 3.11.5.3(6) to read: '<del>6.9</del> The use of land shall be undertaken <u>generally</u> in accordance with the actions and timeframes specified in the Farm Environment Plan; and'  AND AMEND the numbering of paragraphs (7) and (8) to (10) and (11) respectively.</p>	
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	V1PC1-468	Oppose with amendments	<p>AMEND Rule 3.11.5.4 to read:</p> <ol style="list-style-type: none"> <li>1. <del>'1 January 2020 1 September 2021 1 March 2022</del> for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</li> <li>2. <del>1 January 2023 1 September 2024 1 March 2025</del> for properties or enterprises in Priority 2 sub-catchments listed in Table 3.11-2;</li> <li>3. <del>1 January 2026 1 March 2028</del> for properties or enterprises in Priority 3 sub-catchments listed in Table 3.11-2;'</li> </ol> <p>AND ADD the following NEW paragraphs to Rule 3.11.4.4(5) to read:  <u>'d. The diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as</u></p>	<b>SUPPORT</b> subject to final drafting



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			<p><u>determined by the use of the current version of OVERSEER®, does not increase beyond the property or enterprise’s Nitrogen Reference Point, unless other suitable mitigations are specified; and</u></p> <p><u>e. Where the Nitrogen Reference Point exceed the 75<sup>th</sup> percentile nitrogen leaching value, actions, timeframes and other measures are proposed to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75<sup>th</sup> percentile nitrogen leaching value by 1 July 2028; and'</u></p> <p><u>'f. If the property is subdivided, a new Nitrogen Reference Point shall be calculated for all of the lots created by the subdivision in conformance with Schedule B for each individual lot.'</u></p> <p><u>'e- g. The stock exclusion and setback requirements in Schedule C are complied with</u></p> <p><u>Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C.'</u></p> <p><u>'h. The use of land shall be undertaken generally in accordance with the actions and timeframes specified in the Farm Environment Plan; and</u></p> <p><u>i. The Farm Environment Plan provided under condition e. may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan; and</u></p> <p><u>j. A copy of the Farm Environment Plan amended in accordance with condition f. shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment.'</u></p> <p>AND DELETE the matters of control (i)-(iv).</p> <p>AND RETAIN matter of control (v).</p> <p>AND RETAIN AND AMEND matter of control (vi) to read: 'The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor <u>the use of land generally in accordance compliance</u> with the Farm Environment Plan.'</p> <p>AND DELETE matters of control (vii) and (viii).</p> <p>AND/OR AMEND the timeframe for assessing progress to 10 years.</p> <p>OR take into account the time period for implementation of FEP actions when assessing progress made at 2026.</p> <p>OR AMEND all dated and timeframes to provide a reasonable opportunity to obtain a FEP and a reasonable timeframe to assess 10 year progress.</p>	
3.11.5.6 Restricted Discretionary	V1PC1-572	Oppose with amendments	AMEND Rule 3.11.5.6 to read: 'The use of land for farming... terms of Rule 3.11.5.1 to 3.11.5.5A and the associated...'	<b>SUPPORT</b> subject to final drafting

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Activity Rule – The use of land for farming activities			<p>AND AMEND Rule 3.11.5.6(i) to read: '<u>Cumulative effects of the farm enterprise on water quality of the sub-catchment within which the farming activity occurs and, where relevant, the wider catchment of the Waikato and Waipā Rivers</u>'</p> <p>AND AMEND Rule 3.11.5.6(ii) to read:</p> <p>'ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens <u>from the farm enterprise, taking into account:</u></p> <p><u>(a) the relative proportion of nitrogen, phosphorus, sediment and microbial pathogens that the particular discharge contributes to the catchment load; and</u></p> <p><u>(b) the characteristics of the sub-catchment within which the subject farming enterprise is located as set out in the relevant Sub-catchment Management Plan and Catchment Profile produced by Waikato Regional Council; and</u></p> <p><u>(c) the scale and significance of the risk from each contaminant discharge to the achievement of the values and uses for the Waikato and Waipā Rivers;</u></p> <p><u>(d) the relative contribution of the industry sector within which the farming enterprise belongs to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision &amp; Strategy referred to in Objective 1; and</u></p> <p><u>(e) the resources reasonably available to the farming enterprise.'</u></p> <p>AND AMEND Rule 3.11.5.6.(iii) to read: '<u>The need for and content of a Farm Environment Plan including the significance of any failure to comply with Schedule 1 in the context of the matters listed in paragraph ii above.'</u></p> <p>AND ADD a new paragraph (vii) to read: '<u>If the property is subdivided, the Nitrogen Reference Point for all of the lots created by the subdivision by reference to the significance of any failure to comply with Schedule B for each individual lot in te context of the matters referred to in paragraph ii above.'</u></p> <p>AND AMEND Rule 3.11.5.6(vii) to read: '<u><del>viii</del>viii. The significance of any failure to address or comply with the matters addressed by <del>(contained in)</del> Schedules A, B and C, in the context of the matters listed in paragraph ii above.'</u></p>	
3.11.5.7 Non-Complying Activity Rule – Land Use Change	V1PC1-705	Oppose with amendments	AMEND Rule 3.11.5.7 to read: 'Rule 3.11.5.7 - <del>Non-Complying</del> Discretionary Activity Rule - Land Use Change ...	<b>SUPPORT in part.</b>

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			<p>...within a property or enterprise located in the Waikato and Waipā catchments, where <del>prior to 1 July 2026</del> the change exceeds a total of 4.1 hectares...</p> <p>is a <del>non-complying</del> <u>discretionary</u> activity (requiring resource consent) <del>until 1 July 2026.</del></p> <p>AND DELETE everything after the comma in the section 'notification'.</p>	
Schedule A - Registration with Waikato Regional Council	V1PC1-710	Support with amendments	<p>AMEND the size of properties required to register under Schedule A to 4.1 hectares.</p> <p>AND ADD a NEW paragraph at the end of Schedule A to read: '<u>The Waikato Regional Council will only use this information for the purposes establishing compliance with Waikato Regional plan rules and will not provide or disclose personal or confidential details collective under this Schedule to any third party.</u>'</p>	<b>SUPPORT</b>
Schedule B - Nitrogen Reference Point	V1PC1-717	Support with amendments	<p>AMEND Schedule B(a) to read: 'The Nitrogen Reference Point must be calculated by a Certified Farm Nutrient Advisor to <del>determine</del> <u>estimate</u> the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be <del>determined</del> <u>identified</u> through the Rule 3.11.5.7 consent process.'</p> <p>AND AMEND Schedule B(b) to read: 'The Nitrogen Reference Point ... during the reference period <u>(and where the property was not used for commercial vegetable growing during that entire period, it shall be the average annual nitrogen leaching for the period it was used for commercial vegetable growing and also within the period specified in clause f).</u>'</p> <p>OR AMEND to provide for all farming activities (including commercial vegetable production) to be measured as the highest annual nitrogen leaching loss in a single 12 month period.</p> <p>AND AMEND Schedule B(c) to read: 'The Nitrogen Reference Point must be calculated using the current version of the OVERSEER Model approved by the Chief Executive of the Waikato Regional Council <u>or an alternative model or OVERSEER versions approved by the Chief Executive of the Waikato Regional Council.</u>'</p> <p>OR AMEND PPC1 to set out the assessment criteria for consideration of alternative models to Overseer.</p> <p>OR AMEND to provide for Waikato Regional Council to develop guidelines or assessment criteria that sit outside PPC1.</p>	<b>SUPPORT</b>

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			<p>AND AMEND Schedule B(d) to read: 'The Nitrogen Reference Point data...OVERSEER Best Practice Data Input Standards 2016 <u>(unless approval is obtained from the Chief Executive of the Waikato Regional Council to use alternative standards)</u>, with the exceptions and inclusions set out in Schedule B Table 1.'</p> <p>OR AMEND the policies and methods to provide guidance and a reasonable basis for calculating the missing data where properties do not have sufficient data for the benchmark years.</p> <p>AND AMEND Schedule B(e) to read: 'The Nitrogen Reference Point <del>and the Nitrogen Reference Point data</del> must be provided to...'</p> <p>AND AMEND Schedule B(f) to read: 'The reference period is the <del>two</del>ten financial years covering <del>2014/2015 and 2005/2006</del> to 2015/2016...'</p> <p>AND AMEND Schedule B(g) to read: 'The following records (where relevant to the land use undertaken on the property or enterprise) must be retained <u>for a period of seven years</u> and provided to Waikato Regional Council at its request.'</p> <p>AND ADD a NEW paragraph (h) to Schedule B to read: '<u>The Nitrogen Reference Point must be calculated using the data input methodology contained in Table 1, except where reliable actual data is available that can be used in substitution for Overseer defaults or where approval is obtained from the Chief Executive of the Waikato Regional Council for deviation from the Overseer parameter setting.</u>'</p> <p>AND AMEND Table 1 to allow farmers to provide actual data where it is readily available.</p> <p>AND AMEND Schedule B to provide the option of deviating from the OVERSEER Model parameter setting where approval is obtained from Waikato Regional Council.</p> <p>AND AMEND the heading of the second column of Schedule B Table 1 to read: 'Setting that must be used <u>(unless otherwise provided for in Chapter 3.11)</u>.'</p> <p>AND AMEND the second column for the 'missing data' parameter to read: 'In the absence of Nitrogen Referencing information being provided the Waikato Regional Council will use the appropriate default numbers for any necessary inputs to the OVERSEER Model. <del>Where the default numbers are not available or are not a reasonable proxy for the farming activity, the activity will receive the average value for that input for the same farming activity in the same</del> <u>such default numbers will generally be around 75% of</u></p>	

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			<del>normal</del> Freshwater Management Unit <sup>^</sup> or sub-catchment average values for those inputs).	
Schedule C - Stock exclusion	V1PC1-758	Oppose with amendments	<p>AMEND Schedule C to read: 'Schedule C - Stock exclusion and setbacks The standards in Schedule C apply to all farming activities unless accompanied[s] by an FEP providing for alternative mitigations or accompanied by resource consent under Rule 3.11.5.6.'</p> <p>AND AMEND Schedule C to be in three parts titled 'A. Stock exclusion and setbacks', 'B. Dates' and 'C. Water bodies'.</p> <p>AMEND Schedule C to read: 'A. Stock exclusion and setbacks 1. On land that is grazed at a stocking rate equal to or exceeding 18 stock units per hectare, stock must be excluded and set back one metre from the water bodies listed in section C i. to iv. below as follows: Except as provided by Exclusions I. and II., stock must be excluded from the water bodies listed in i. to iv. below as follows:- <del>1-a.</del> The water bodies must be fenced to exclude cattle, horses, deer and pigs, unless those animals are prevented from entering the bed of the water body by a stock proof natural barrier formed by topography or vegetation. 2. New fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within one metre of the bed of the water body (excluding constructed wetlands). <del>3-b.</del> Livestock must not be permitted to enter onto or pass across the bed of the water body, except when using a livestock crossing structure. c. The following situations are excluded from clauses a. and b.: i. Where the entry onto or passing across the bed of the water body is by horses that are being ridden or led. ii. Where the entry onto or passing across the bed of the water body is by a feral animal. 2. Cultivation must be set back a minimum of 1m from the water bodies listed in section C i. to iv. below.'</p> <p>B. Dates <del>4-1.</del> For land use authorised under Rule 3.11.5.1 or for land use under 20ha and authorised under Rule 3.11.5.2, clauses A1 and A2 must be complied with: a. By 1 July <del>2023</del>2025 for properties and enterprises within Priority 1 sub-catchments listed in Table 3.11-2. b. By 1 July <del>2026</del>2028 for properties and enterprises within Priority 2 and Priority 3 sub-catchments listed in Table 3.11-2.</p>	SUPPORT in part.

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			<p><del>5.2.</del> For land use <u>over 20ha and authorised under Rule 3.11.5.2 or for land use authorised under Rules 3.11.5.3, 3.11.5.4, <u>3.11.5.4A</u>, or 3.11.5.5 or 3.11.5.5A</u>, clauses <u>A1</u> and <u>A2</u> must be complied with by the date and in the manner specified in the property's or enterprise's Farm Environment Plan or Simplified Farm Environment Plan, which shall be within 3 years following the dates by which a Farm Environment Plan or Simplified Farm Environment Plan must be provided to the Council, or in any case no later than 1 July <del>2026</del><u>2028</u>.</p> <p><u>C. Water bodies</u>  Water bodies from which cattle, horses, deer and pigs must be excluded or from which <u>cultivation setbacks apply</u>:</p> <p>i. Any river that continually contains surface water <u>and is wider than one metre and deeper than 30cm</u>.</p> <p>ii. Any drain that continually contains surface water <u>and is wider than one metre and deeper than 30cm</u>.</p> <p>iii. Any <u>significant</u> wetland, <del>including</del> <u>excluding</u> a constructed wetland</p> <p>iv. Any lake <u>that is greater than 1ha in area</u>.</p> <p><u>Exclusions:-</u>  The following situations are excluded from clauses <u>A1</u> and <u>A2</u>:-</p> <p>I. <del>Where the entry onto or passing across the bed of the water body is by horses that are being ridden or led.</del></p> <p>II. <del>Where the entry onto or passing across the bed of the water body is by a feral animal.</del></p>	
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-766	Oppose with amendments	<p>AMEND Schedule 1 to read:</p> <p>A Farm Environment Plan shall be prepared in accordance with the requirements <del>of A set out</del> below. The Farm Environment Plan shall be certified as meeting the requirements of A Schedule 1 by a Certified Farm Environment Planner.</p> <p><del>The Farm Environment Plan shall identify all sources of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants.</del></p> <p>The Farm Environment Plan must clearly identify how specified minimum standards will be complied with.</p> <p>The requirements set out <del>in A</del> <u>below</u> apply to all Farm Environment Plans, including those prepared within a Certified Industry Scheme.</p>	<b>SUPPORT in part</b> subject to final drafting.

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			<p>This schedule applies to all farming activities <u>that require a Farm Environment Plan</u>, but it is acknowledged that some provisions will not be relevant to every farming activity.</p> <p><b><u>Purpose of a Farm Environment Plan</u></b></p> <p><u>The purpose of a Farm Environment Plan is to identify the Most Practicable Action for the management of diffuse discharges from the farm enterprise of nitrogen, phosphorous, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water in order to assist with achieving the short term targets^ in Objective 3 or making progress towards the outcomes anticipated by the Vision &amp; Strategy and the values^ referred to in Objective 1.</u></p> <p><u>For the purposes of a Farm Environment Plan, Most Practicable Action means the combination, priority and timing of actions to manage the discharge of contaminants from the farm enterprise that:</u></p> <p><u>a. recognises and provides for the characteristics of the sub-catchment within which the subject farming enterprise is located as set out in the relevant Sub-catchment Management Plan and Catchment Profile produced by Waikato Regional Council; and</u></p> <p><u>b. corresponds to the scale and significance of the risk from the discharge of each contaminant from the farm enterprise to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision &amp; Strategy and values^ referred to in Objective 1; and</u></p> <p><u>c. takes account of the relative contribution of the industry sector within which the farm enterprise belongs to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision &amp; Strategy referred to in Objective 1; and</u></p> <p><u>d. takes account of the resources reasonably available to the farm enterprise</u></p> <p><b><u>Content of a Farm Environment Plan</u></b></p> <p><u>To the extent that it is applicable to the particular farm enterprise, a Farm Environment Plan shall contain:</u></p> <p><u>A. Farm Environment Plans shall contain as a minimum:-</u></p> <p>1. The property or enterprise details:</p> <p>(a) Full name, address and contact details (including email addresses and telephone numbers) of the person responsible for the property or enterprise.</p>	

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			<p>(b) Trading name (if applicable, where the owner is a company or other entity).</p> <p>(c) A list of land parcels which constitute the property or enterprise:</p> <p>(i) the physical address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and</p> <p>(ii) The legal description of each parcel of land.</p> <p><u>2. Unless accompanied by a resource consent under Rule 3.11.5.4A, 3.11.5.6 or 3.11.5.7, or in the case of Schedule C appropriately addressed by an alternative mechanism as part of the assessment in paragraph 3, information to demonstrate compliance with Schedule B (Nitrogen Reference Point) and Schedule C (Stock Exclusion and Setbacks).</u></p> <p><del>2. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks, having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include (where relevant to the particular land use):</del></p> <p><del>(a) A description of where and how stock shall be excluded from water bodies for stock exclusion including:</del></p> <p><del>(i) the provision of fencing and livestock crossing structures to achieve compliance with Schedule C; and</del></p> <p><del>(ii) for areas with a slope exceeding 25 mitigation measures; and where stream fencing is impracticable, the provision of alternative</del></p> <p><del>(b) A description of setbacks and riparian management, including:</del></p> <p><del>(i) The management of water body margins including how damage to the bed and margins of water bodies, and the direct input of contaminants will be avoided, and how riparian margin settling and filtering will be provided for; and</del></p> <p><del>(ii) Where practicable the provision of minimum grazing setbacks from water bodies for stock exclusion of 1 metre for land with a slope of less than 15 and 3 metres for land with a slope between 15 and 25; and</del></p> <p><del>(iii) The provision of minimum cultivation setbacks of 5 metres.</del></p> <p><del>(c) 3. A description of the critical source areas from which diffuse discharges of sediment, nitrogen, phosphorus and microbial pathogens associated with the farm enterprise are lost, and identification of the Most Practicable Action including:</del></p>	



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			<p><del>(i)</del> (a) the identification of <u>any</u> intermittent waterways, overland flow paths and areas prone to flooding and ponding <u>within the critical source areas</u>, and an assessment of <del>opportunities to minimise losses from these areas through</del> <u>the Most Practicable Action to manage any risks from the critical source areas</u>. Such actions could include appropriate stocking policy, stock exclusion and/or measures to detain floodwaters and settle out or otherwise remove sediment, nitrogen, phosphorus and microbial pathogens (e.g. detention bunds, sediment traps, natural and constructed wetlands); and</p> <p><del>(ii)</del> (b) the identification of <u>any</u> actively eroding areas, erosion prone areas, and areas of bare soil within the critical source areas <u>within the critical source areas</u>, as well as <u>any erosion or sediment loss from cultivation within the critical source areas</u>, and <del>appropriate measures an assessment of the Most Practicable Action any</del> <u>for erosion and sediment control. and Actions could include re-vegetation</u>; and</p> <p><del>(iii)</del> (c) an assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens from <u>any</u> tracks and races and livestock crossing structures to waterways <u>within the critical source areas</u>, and <del>the identification of appropriate measures to minimise an</del> <u>assessment of the Most Practicable Action to reduce any of these discharges. Actions could include (e.g. cut-off drains, and shaping)</u>; and</p> <p><del>(iv)</del> (d) the identification of <u>any</u> areas where effluent accumulates including yards, races, livestock crossing structures, underpasses, stock camps, and feed-out areas <u>within the critical source areas</u>, and <del>appropriate measures to minimise the risk of an assessment of the Most Practicable Action to reduce any risk of</del> <u>diffuse discharges of contaminants from these areas to groundwater or surface water</u>; and</p> <p><del>(v)</del> (e) the identification of <u>any</u> other 'hotspots' such as fertiliser, silage, compost, or effluent storage facilities, wash-water facilities, offal or refuse disposal pits, <del>and</del> <u>feeding or stock holding areas</u>, and <del>the appropriate measures to minimise an assessment of the Most Practicable Action to</del> <u>reduce the risk of diffuse discharges of any contaminants from these areas to groundwater or surface water; and</u></p> <p><u>(f) a description of any systems for managing collected animal effluent and freshwater irrigation, including the Most Practicable Action to reduce any risk of contaminants from these areas or the use of these systems to groundwater or surface water.</u></p>	

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			<p><del>(d) An assessment of appropriate land use and grazing management for specific areas on the farm in order to maintain and improve the physical and biological condition of soils and minimise the diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens to water bodies, including:</del></p> <p><del>(i) matching land use to land capability; and</del></p> <p><del>(ii) identifying areas not suitable for grazing; and</del></p> <p><del>(iii) stocking policy to maintain soil condition and pasture cover; and</del></p> <p><del>(iv) the appropriate location and management of winter forage crops; and</del></p> <p><del>(v) suitable management practices for strip grazing.</del></p> <p><del>(e) A description of nutrient management practices including a nutrient budget for the farm enterprise calculated using the model OVERSEER in accordance with the OVERSEER use protocols, or using any other model or method approved by the Chief Executive Officer of Waikato Regional Council.</del></p> <p><del>(f) A description of cultivation management, including:</del></p> <p><del>(i) The identification of slopes over 15 and how cultivation on them will be avoided; unless contaminant discharges to water bodies from that cultivation can be avoided; and</del></p> <p><u>4. For cultivation on land with slopes greater than 25°, assessment of the Most Practicable Action to mitigate any</u> <del>(ii) How the adverse effects of cultivation on slopes of less than 15 degrees will be mitigated including</del> through appropriate erosion and sediment controls for each paddock that will be cultivated including by:</p> <p><del>(a) assessing where overland flows enters and exits the paddock in rainfall events; and</del></p> <p><del>(b) identifying appropriate measures to divert overland flows from entering the cultivated paddock; and</del></p> <p><del>(c) identifying measures to trap sediment leaving the cultivated paddock in overland flows; and</del></p> <p><del>(d) maintaining appropriate buffers between cultivated areas and water bodies (minimum 5m setback).</del></p> <p><del>(e) A description of collected animal effluent management including how the risks associated with the operation of effluent systems will be managed to minimise contaminant discharges to groundwater or surface water.</del></p>	

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			<p><del>(f)</del> A description of freshwater irrigation management including how contaminant loss arising from the irrigation system to groundwater or surface water will be minimised.</p> <p><del>3</del> <u>5</u>. A spatial risk map(s) at a scale that clearly shows:</p> <p>(a) The boundaries of the property; and</p> <p>(b) The locations of the main land uses<del>(6)</del> that occur on the property; and</p> <p>...</p> <p>(g) The location of critical source areas for contaminants, as identified in <del>2</del> <u>(e)</u> <u>3</u> above.</p> <p><del>4</del> A description of the actions that will be undertaken in response to the risks identified in the risk assessment in <del>2</del> above (having regard to their relative priority) as well as where the mandatory time bound actions will be undertaken, and when and to what standard they will be completed.</p> <p><u>6. Assessment of the risk of how known natural hazards and/or climate change may affect farming activities on the property, including commentary on how the occurrence of the known natural hazard could foreseeably alter the Most Practicable Actions outlined in the Farm Environment Plan.</u></p> <p><u>5.7. A description of the following:</u></p> <p><u>(a) actions that are intended to be undertaken in response to any risks identified in the Farm Environment Plan (having regard to their relative priority and significance) as well as where the time-bound actions are intended to be undertaken, and when and to what standard they are intended to be completed; and</u></p> <p><del>(a)</del> (b) Actions, timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by the five-year rolling average annual nitrogen loss as determined by the use of the <del>current</del> version of OVERSEER <u>current at the time at the time of preparation of the Farm Environment Plan</u> does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified <u>or consent is obtained under Rule 3.5.11.4A or 3.5.11.6 or 3.5.11.7;</u> or</p> <p><del>(b)</del> (c) Where the Nitrogen Reference Point exceeds the 75<sup>th</sup> percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75<sup>th</sup> nitrogen leaching value by 1 July <del>2026</del> <u>2028</u>, except in the case of Rule 3.11.5.5, <u>Rule 3.11.5.6 or Rule 3.11.5.7.</u></p> <p><b>Vegetable growing minimum standards</b></p>	

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			<p>Farm environment plans required under Rule 3.11.5.5 or 3.11.5.5A shall, in addition to the matters set out above, ensure the following matters are addressed</p> <p>...</p> <p><b>Process for Amending and/or Reviewing a Farm Environment Plan</b>  <u>Farm Environment Plans can be amended and/or reviewed at the request of the farmer, or by way of review initiated by Waikato Regional Council in accordance with the process set out below.</u>  <u>Triggers for amending/reviewing a Farm Environment Plan may include (but are not limited to)[1]:</u>  a) <u>At the direction of Council or a Certified Industry Scheme;</u>  b) <u>Where a farmer transfers between Certified Industry Schemes or to a consented activity;</u>  c) <u>Where there has been a material change in on farm risk or circumstances that would require changes to the mitigation actions within the Farm Environment Plan.</u></p> <p><b>Farmer or Industry Scheme Initiated Amendments</b>  <u>Farmer initiated amendments to a Farm Environment Plan must be approved by a Certified Farm Environment Planner (“CFEP”). Any amendments shall remain consistent with the overall purpose and intent of the relevant Farm Environment Plan, and be prepared in the manner set out previously in this Schedule without the need to apply for a change to consent condition under the RMA.</u>  d) <u>Amendments to a Farm Environment Plan approved by a CFEP must be provided to Waikato Regional Council within 30 working days of the amendment being approved in writing by the CFEP. A copy of the latest approved version of a Farm Environment Plan for a farming activity shall be available from the Waikato Regional Council on-line portal at all times.</u></p> <p><b>Council Initiated reviews</b>  <u>Waikato Regional Council may every five (5) years after the date of approval of a FEP, serve notice on the Farm Environment Plan holder of its intention to review any or all of the content of the Farm Environment Plan for any of the following purposes:</u>  a. <u>To address situations where the Farm Environment Plan actions are not achieving the intended environmental outcomes envisaged by the Farm Environment Plan.</u></p>	

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			<p><u>b. To address situations where environmental or other circumstances (e.g. technology) change and as result the Most Practical Actions set out in the Farm Environment Plan require review.</u>  <u>The matters that require attention will be advised to the Farm Environment Plan holder in writing by Waikato Regional Council within 10 working days of the completion of the review. Upon receipt of such notification the Farm Environment Plan holder will engage a CFEP to prepare a new or amended Farm Environment Plan at the farmer’s cost to address matters identified in the review.</u></p> <p><b><u>Dispute Resolution</u></b>  <u>Any dispute or difference arising out of or in relating the approval of or amendments to a Farm Environment Plan may be referred to mediation, a non-binding dispute resolution process in which an independent mediator facilitates negotiation between the parties.</u>  <u>Mediation may be initiated by either party writing to the other party and identifying the dispute which is being suggested for mediation. The other party will either agree to proceed with mediation or agree to attend a preliminary meeting with the mediator to discuss whether mediation would be helpful in the circumstances.</u>  <u>The parties will agree on a suitable person to act as mediator or will ask the Arbitrators’ and Mediators’ Institute of New Zealand Inc. to appoint a mediator. The mediation will be in accordance with the Mediation Protocol of the Arbitrators’ and Mediators’ Institute of New Zealand Inc.”</u>  <u>The mediation shall be terminated by –</u>  <u>(a) The signing of a settlement agreement by the parties; or</u>  <u>(b) Notice to the parties by the mediator, after consultation with the parties, to the effect that further efforts at mediation are no longer justified; or</u>  <u>(c) Notice by one or more of the parties to the mediator to the effect that further efforts at mediation are no longer justified; or</u>  <u>(d) The expiry of sixty (60) working days from the mediator’s appointment, unless the parties expressly consent to an extension of this period.</u>  <u>If no mediation is agreed to or if the mediation should be terminated as provided in (b), (c) or (d), any dispute or difference arising out of or relating to the approval of or amendments to a Farm Environment Plan, shall be referred to and finally resolved by arbitration in New Zealand in accordance with New Zealand law and the current Arbitration Protocol of the Arbitrators' and Mediators' Institute of New Zealand Inc. The</u></p>	

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			<p><u>arbitration shall be by one arbitrator to be agreed upon by the parties and if they should fail to agree within twenty-one (21) days, then to be appointed by the President of the Arbitrators' and Mediators' Institute of New Zealand Inc.</u></p> <p><u>[1] Reference should be made to the Waikato Regional Council Farm Environment Plan Guidance Document for further information on the circumstances that may generate an amendment to a Farm Environment Plan.'</u></p> <p>OR AMEND paragraph 7(b) to adopt a reasonable, transparent and fair way of adopting Overseer version changes that maintains relativity between the NRP and the current discharge.</p>	
Schedule 2 - Certification of Industry Schemes	V1PC1-780	Support with amendments	<p>AMEND Schedule 2 Assessment Criteria 1 to read: '1. is consistent with: <del>a. the achievement of the water quality targets referred to in Objective 3;</del> <del>and</del> b. the purposes of Policy 2 or 3, <u>Policies 2A and 2B and the purpose of a Farm Environment Plan as set out in Schedule 1;</u> and c. the requirements of Rules 3.11.5.3 and 3.11.5.5.</p> <p>AND ADD a NEW paragraph (l) to Schedule 2 Assessment Criteria to read: '<u>Individual farmers retain and maintain access to information about them and their farm enterprise or property that is gathered as part of the Certified Industry Scheme.'</u></p>	<b>SUPPORT in part.</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-783	Oppose with amendments	<p>DELETE the word 'directly' from the second-to-last sentence of the paragraph under the section 'Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipā River catchments' on page 63.</p> <p>AND REMOVE the 80 year targets from Table 3.11-1 and ADD the current state for each attribute.</p> <p>AND REMOVE any identified 'spikes' in the current attribute state data.</p> <p>OR AMEND the short term targets in Table 3.11-1 to achieve realistic and reliable targets based on reasonable assumptions that address the concerns raised in this submission.</p> <p>OR AMEND the short term targets so that they are based on NOF bands rather than specific numbers.</p>	<b>SUPPORT</b>
Table 3.11-1: Short term and long term numerical water quality targets for	V1PC1-785	Oppose with amendments	<p>AMEND the explanatory note to Table 3.11-1 to read: 'The tables set out the concentrations (all attributes except clarity) or visibility distance (clarity attribute) to be achieved by actions taken in the short term <u>and provides a comparison with the current state (based on 2010-2014 monitoring data) at 80 years for rivers and tributaries, and at 80 years for</u></p>	<b>SUPPORT in part.</b>

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the Waikato and Waipa River catchments			<p><del>lakes FMUs. Where water quality is currently high (based on 2010-2014 monitoring data) the short term and 80-year targets will be the same as the current state. and there is to be no decline in quality (that is, no increase in attribute concentration or decrease in clarity). Where water quality needs to improve (based on 2010-2014 monitoring data), the values to be achieved at a site indicate a short term targets indicate that a and long term reduction in concentration or increase in clarity is required compared to the current state.</del></p> <p>For example, at Otamakokore Stream, Upper Waikato River FMU:</p> <ul style="list-style-type: none"> <li>the current state value for median nitrate is 0.740 mgNO<sub>3</sub>-N/L. The short term and 80-year targets are <u>is set at 0.740 mgNO<sub>3</sub>-N/L. It is in the A band for median nitrate and must maintain within that band.</u> to reflect that there is to be no decline in water quality</li> <li>the current state value for E.coli is 696 E.coli/100ml. The <del>80-year target is 540 E.coli/100ml and the short term target is set at 680 E.coli/100ml to recognise the improvement needed in the first 10 years. 10% of the difference between the current state value and the 80-year target.</del></li> </ul> <p>The achievement of the attribute targets in Table 3.11-1 will be determined through analysis of 5-yearly monitoring data <u>as adjusted for any anomalies e.g. one off spikes.</u> The variability in water quality (such as due to seasonal and climatic events) and the variable response times of the system to implementation of mitigations may mean that the targets are not observed for every attribute at all sites in the short term. <u>It is likely that the effect of some contaminants (particularly nitrogen) discharged from land in recent years</u> has not yet been seen in the water. This means that in addition to reducing discharges from current use and activities, further reductions <u>will may</u> be required to address the load to come that <u>will may</u> contribute to nitrogen loads in the water. There are time lags between contaminants discharged from land uses and the effect in the water <u>as well as other effects on contaminants reaching water such as attenuation.</u> For nitrogen in the Upper Waikato River particularly, this is because of the time taken for nitrogen to travel through the soil profile into groundwater and then eventually into the rivers <u>and uncertainty</u></p>	

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			<u>around how much is attenuated before it reaches the rivers.</u> This means that there is some nitrogen leached from land use change that occurred decades ago that has entered groundwater, but has not yet entered the Waikato River and for which the quantity and impact on water quality is very uncertain. In some places, water quality (in terms of nitrogen) will <u>may</u> deteriorate before it gets better....'	
Table 3.11-2: List of sub-catchments showing Priority 1, Priority 2, and Priority 3 sub-catchments	V1PC1-787	Oppose with amendments	RETAIN Table 3.11-2 but as part of the review of Chapter 3.11 (and implementation of the next generation plan in 10 years time) review whether sub-catchments were appropriately prioritised AND any implications that had for achievement of the 10 year targets and implications for drafting the next plan change. OR AMEND Table 3.11-2 to re-prioritise the sub-catchments based on distance from the 10 years targets.	<b>SUPPORT</b>
Additions to Glossary of Terms	V1PC1-792	Support	ADD a NEW definition for Catchment Profile to the Glossary of Terms to read: ' <u>Definition - Catchment Profile</u> <u>Catchment Profile: means the information about a sub-catchment or group of sub-catchments compiled and collated by Waikato Regional Council in accordance with Method 3.11.4.5A.'</u>	<b>SUPPORT</b>
Additions to Glossary of Terms	V1PC1-798	Support	ADD a NEW definition of 'farm enterprise' to the Glossary of Terms to read: ' <u>Definition – Farm enterprise</u> <u>Farm enterprise: For the purposes of Chapter 3.11, means the property upon which or enterprise within which farming activities are undertaken.'</u>	<b>SUPPORT in part, except to the extent that the decision requested may undermine Theland Tahī's position on the concept of "Enterprise".</b>
Additions to Glossary of Terms	V1PC1-802	Support	ADD to the Glossary of Terms a NEW definition of Most Practicable Action to read: ' <u>Definition - Most Practicable Action</u> <u>Most Practicable Action ("MPA"): For the purposes of a Farm Environment Plan and/or for the consideration of appropriate actions on farm to control diffuse contaminants associated with the farm enterprise, Most Practicable Action means the combination, priority and timing of actions to manage the discharge of contaminants from the farm enterprise that:</u> <u>a. recognises and provides for the characteristics of the sub-catchment within which the subject farm enterprise is located as set out in the relevant sub-catchment Management Plan and Catchment Profile produced by Waikato Regional Council; and</u> <u>b. corresponds to the scale and significance of the risk from the discharge of each contaminant from the farm enterprise to the likely achievement of the short term targets^ in Objective 3 or the progression towards the</u>	<b>SUPPORT in part.</b>



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			<u>outcomes anticipated by the Vision &amp; Strategy and values^ referred to in Objective 1; and</u> c. <u>takes account of the relative contribution of the industry sector within which the farm enterprise belongs to the likely achievement of the short term targets^ in Objective 3 or the progression towards the outcomes anticipated by the Vision &amp; Strategy and values^ referred to in Objective 1; and</u> d. <u>takes account of the resources reasonably available to the farm enterprise.'</u>	
Definition - 75th percentile nitrogen leaching value	V1PC1-790	Support with amendments	AMEND the definition of 75th percentile leaching value to ensure properties are not penalised because they are on leaky soil or have high rainfall. AND AMEND the definition to read: 'The 75th percentile value... and enterprises within each <u>River</u> Freshwater Management Unit...'	<b>SUPPORT in part.</b>
Definition - Best management practice	V1PC1-791	Oppose	DELETE the definition for Best Management Practice/s.	<b>OPPOSE</b> in part, subject to resolving question of MPA or other alternative approaches.
Definition - Cultivation	V1PC1-793	Oppose with amendments	AMEND paragraph b of the Definition of Cultivation to read: ' <del>no tillage practices</del> <u>farming practices that do not require tillage or disturbance of the ground including but not limited to haymaking and topping of pasture.</u> ' OR REPLACE with a new definition that appropriately captures and describes cultivation activities.	<b>SUPPORT</b>
Definition - Five-year rolling average	V1PC1-799	Support	RETAIN the definition of five-year rolling average.	<b>SUPPORT</b>
Definition - Good Management Practice	V1PC1-800	Support with amendments	AMEND the definition of Good Management Practice/s to read: 'For the purposes of Chapter 3.11, means industry agree and approved practices and actions undertaken on a property or enterprise that <u>manage</u> , reduce or minimise the risk of contaminants entering a water body.	<b>SUPPORT</b>
Definition - Nitrogen Reference Point	V1PC1-804	Support with amendments	AMEND the definition of Nitrogen Reference Point to read: 'The nitrogen loss number (units of kg N/ha/year) that is derived from an OVERSEER use protocol compliant OVERSEER file that describes the property or farm enterprise ( <u>or parts of the property or farm enterprise, where it is more appropriate to calculate several Nitrogen Reference Points for the property or enterprise</u> ) and farm practices ... (or another model <u>or version of approved by the Council</u> )...'	<b>SUPPORT in part.</b>

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Definition - Offset	V1PC1-806	Support with amendments	AMEND the definition of offset/s to read: 'Offset/s: For the purposes of Chapter 3.11 means for a specific contaminant/s an action that reduces residual adverse effects of that contaminant on water quality <u>or, in appropriate circumstances, achieves a greater reduction in another contaminant with the net result being an overall improvement in water quality.</u> '	<b>SUPPORT in part.</b>

# Fonterra Co-operative Group Ltd

Submitter ID: 74057

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	V1PC1-743	Support with amendments	No specific decision requested for V1 however, as noted in the submitter's previous submission to PPC1, Fonterra generally supports the direction of PPC1.	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
General	V1PC1-746	Not stated	The submitter seeks the following decision on submissions to V1: <ul style="list-style-type: none"> <li>Retention, deletion or amendment of various provisions of V1, as set out in Appendix 1 [see submission];</li> <li>To the extent that the amendments in Appendix 1 do not address the matters sought to be amended by Fonterra's original submission, the submissions made in respect of PPC1 as set out in Appendix 2; and</li> <li>Such further or other consequential relief as may be necessary to fully give effect to the relief sought in this submission.</li> </ul>	<b>OPPOSE</b>
General	V1PC1-756	Oppose with amendments	PROVIDE for the availability of a simplified tool, to be used as an alternative to the OVERSEER Model reporting, for properties meeting low to medium risk criteria. (V1)	
General	V1PC1-801	Support	ADD a NEW schedule to PPC1 to be named 'Schedule BA', and read as follows: <b><u>Schedule BA - Nitrogen Risk Scorecard Reference Grade and assessment</u></b> <u>Properties or enterprises greater than 20ha (or greater than 4.1 ha that cannot meet the conditions of Rule 3.11.5.2(3)) must comply with a nitrogen reference leaching rate determined either as the Nitrogen Reference Point (calculated in accordance with Schedule B) or a Nitrogen Risk Scorecard Reference Grade (established in accordance with Schedule BA).</u> <u>1. Where a rule of this plan allows for compliance to be measured using the Nitrogen Risk Scorecard the Nitrogen Risk Scorecard Reference Grade shall be determined as follows:</u> <u>a. The Nitrogen Risk Scorecard Reference Grade must be determined using the Nitrogen Risk Scorecard described in clause 2</u>	<b>OPPOSE.</b> Theland Tahī does not support the proposed new "Nitrogen Risk Scorecard Reference Grade and assessment" and reserves its position on the same.

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			<p><u>b. The Nitrogen Risk Scorecard Reference Grade data set out in clause 3 for the reference period set out in clause 1d, must be provided to Waikato Regional Council in the template format set out in clause 4 within the period 1 May 2020 to 30 November 2020.</u></p> <p><u>c. The provision of Nitrogen Risk Scorecard Reference Grade data must be accompanied by a statement from a Certified Farm Nutrient Advisor that the information is a true and accurate reflection of the farm inputs over the reference period and that the information to verify data supplied is available on request.</u></p> <p><u>d. The Nitrogen Risk Scorecard Reference Grade shall be the highest grade that occurred during a single year (being 12 consecutive months) within the two year reference period specified in clause d) as generated by the Nitrogen Risk Scorecard.</u></p> <p><u>e. The reference period is the two financial years covering 2014/2015 and 2015/2016.</u></p> <p><u>2. [The specific operational design of the Nitrogen Risk Scorecard is to be determined prior to the hearings on V1/PC1. However, it will include the following design features:</u></p> <ul style="list-style-type: none"> <li>• <i>It will be an online tool hosted by Waikato Regional Council</i></li> <li>• <i>It will weight the key drivers of nitrogen loss risk from a property that are within farmer control. The six key risk factors considered in the nitrogen risk scorecard are: (a) Livestock, (b) Nitrogen fertiliser, (c) Imported feed, (d) Effluent management, (e) Cropping and Cultivation, (f) Irrigation</i></li> <li>• <i>The data required for the consideration of nitrogen loss risk using the scorecard will be a subset of the data required to establish a reference number using the OVERSEER Model</i></li> <li>• <i>Each key risk factor is made up of a number of sub factors for which there is a data provision requirement (where the sub factor is relevant to a particular farm system)</i></li> <li>• <i>Each sub factor is given a weighting that drives up or down the risk grading given for the overarching key risk factor.</i></li> <li>• <i>The key risk factor (and sub factors) provide direction for the development of the appropriate tailored actions in the FEP.</i></li> <li>• <i>It will calculate numbers (grades) for the key risk factors that can be considered individually, and an overall farm level risk grade</i></li> </ul>	

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			<p><i>that acts as either the reference point for the property or: on an ongoing reporting basis, provides for an assessment of compliance with the reference point - ie identifies a property that is "steady state" for N loss risks (and the broader risks associated with intensification)</i></p> <p><u>3. Farm data required to be submitted to determine the Nitrogen Risk Scorecard Grade is as follows:</u></p> <ul style="list-style-type: none"> <li>• <u>Production data</u></li> <li>• <u>Imported feeds (tonnes imported, tonnes of feed by type - grouped according to protein content of different feeds)</u></li> <li>• <u>Nitrogen fertiliser (total kgN applied/effective ha, application timings, application rate, application decisions, fertiliser form, applications to effluent blocks)</u></li> <li>• <u>Livestock (peak stocking rate, winter management practices, calving date, animal breed, use of infrastructure)</u></li> <li>• <u>Effluent management (effluent irrigation method, effluent area, storage, effluent irrigation decisions)</u></li> <li>• <u>Cropping and Cultivation (area cultivated, cultivation practice, crop types, N fert applied, setbacks)</u></li> <li>• <u>Irrigation (method / system, scheduling approach, decisions)</u></li> </ul> <p><u>4. The template to be used for the annual provision of farm data is as provided on the Waikato Regional Council website at:</u>  <i>[url to be provided]</i>  <i>[The template aims to assist users to provide the required information in a standard format. Fonterra would expect that to be made available (in electronic form) on the Waikato Regional Council website providing the added benefit of allowing for the collation of all data fields required to carry out the scorecard assessment - and hence achieve a high level of administrative efficiency]</i></p> <p><u>5. Where a rule of this Plan allows for compliance to be measured using the Nitrogen Risk Scorecard the Nitrogen Risk Scorecard Grade shall be determined as follows:</u></p>	

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			<p><u>a. by 1 July of each year the farm data described in Clause 3 for the preceding year (1 June to 30 May) must be provided to the Waikato Regional Council in the template format described in clause 4.</u></p> <p><u>b. The landholder shall keep all relevant records supporting the reliability of the data provided to the Waikato Regional Council for the purposes of (a) above and provide this information to the Waikato Regional Council on request. This data shall include as a minimum the following:</u></p> <p><u>i. Stock numbers as recorded in annual accounts together with stock sale and purchase invoices;</u></p> <p><u>ii. Dairy production data;</u></p> <p><u>iii. Invoices for fertiliser applied to the land;</u></p> <p><u>iv. Invoices for feed supplements sold or purchased; and</u></p> <p><u>v. Water metering records.</u></p>	
Background and explanation	V1PC1-1358	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10449, to the extent it is not modified by their V1 submission:</p> <p>[RETAIN in the Background and Explanation section that part of the explanation that sets out the overall strategy for reducing contaminant losses and ensure that all provisions are consistent with that strategy AND ADD additional wording at the end of the Background and Explanation section to read: "<u>This introductory and explanatory statement may assist the interpretation of Section 3.11 of the Plan.</u>"]</p>	REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1
Water quality and National Policy Statement for Freshwater Management	V1PC1-836	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11255, to the extent it is not modified by their V1 submission:</p> <p>[AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently, differentiating clearly and consistently between; the long-term outcomes and the short-term outcomes; and the concepts of freshwater objective, attribute state and a limit or target.</p> <p>AND AMEND all references to 'short term objectives' to read: "short term <u>freshwater objectives</u>"</p> <p>AND AMEND all references to 'long term freshwater objectives' to read: "long term <u>freshwater objectives</u>"</p> <p>AND ADD to the Water Quality and National Policy Statement for Freshwater Management Section (page 14) a final sentence at the end that reads: "<u>For the avoidance of doubt, for the purpose of the National</u></p>	REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1

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			<p><u>Policy Statement for Freshwater Management, the freshwater objective of this plan is Objective 3."</u>                      AND MAKE such other changes as necessary to AMEND reference to 'water quality attribute targets' or 'water quality attribute limits' to read "water quality attribute <u>states</u>" or, where the context requires, to Objective 1 and/or Objective 3                      AND MAKE all amendments to both the English text and Māori translation.]</p>	
Full achievement of the Vision and Strategy will be intergenerational	V1PC1-837	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11256, to the extent it is not modified by their V1 submission:                      [AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently, differentiating between; the long-term desired outcomes and the short-term outcomes; and the concepts of freshwater objective, attribute state and a limit or target.                      AND AMEND all references to 'short term objectives' to read: "short term <u>freshwater objectives</u>"                      AND AMEND all references to 'long term freshwater objectives' to read: "long term <u>freshwater objectives</u>"                      AND AMEND 'Full achievement of the Vision and Strategy will be intergenerational' the last sentence of the second paragraph to read: "The staged approach also allows time for the innovation in technology and practices that will need to be developed to meet the <del>targets and limits</del> <u>long term water quality objectives</u> in subsequent regional plans to be developed."                      AND AMEND 'Full achievement of the Vision and Strategy will be intergenerational' the 6th paragraph to read:                      "Municipal and industrial point source dischargers will also be required to revise their discharges in light of the Vision and Strategy and the water quality objectives, <del>and sub-catchment limits and targets</del> that have been set."                      AND MAKE such other changes as necessary to AMEND reference to 'water quality attribute targets' or 'water quality attribute limits' to read "water quality attribute <u>states</u>" or, where the context requires, to Objective 1 and/or Objective 3.                      AND MAKE all amendments to both the English text and Māori translation.]</p>	<p><b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b></p>

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3.11.1 Values and uses for the Waikato and Waipa Rivers	V1PC1-838	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-11258, to the extent it is not modified by their V1 submission:</p> <p>[AMEND PPC1 to ensure that the definitions and terms of the National Policy Statement for Freshwater Management are applied consistently, differentiating clearly and consistently between; the long-term desired outcomes and the short-term outcomes; and the concepts of freshwater objective, attribute state and a limit or target.</p> <p>AND AMEND all references to 'short term objectives' to read: "<u>short term freshwater objectives</u>"</p> <p>AND AMEND all references to 'long term freshwater objectives' to read: "<u>long term freshwater objectives</u>"</p> <p>AND AMEND 3.11.1 Values and uses the first paragraph read: "The National Policy Statement for Freshwater Management Policy CA2 requires certain steps to be taken in the process of setting <u>limits</u> <del>limits</del> <u>freshwater objectives</u>."</p> <p>AND MAKE such other changes as necessary to AMEND reference to 'water quality attribute targets' or 'water quality attribute limits' to read "water quality attribute <u>states</u>" or, where the context requires, to Objective 1 and/or Objective 3.</p> <p>AND MAKE all amendments to both the English text and Māori translation.]</p>	<p><b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b></p>
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	V1PC1-1360	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10455, to the extent it is not modified by their V1 submission:</p> <p>[AMEND Objective 1 to read: "...By 2096, discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water result in the <u>achievement of the restoration and protection, and where necessary restoration, of the 80 year water quality to achieve the 80 year attribute targets states</u> in Table 3.11-1."]</p>	<p><b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b></p>
Objective 2: Social, economic and cultural wellbeing	V1PC1-1361	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10457, to the extent it is not modified by their V1 submission:</p> <p>[AMEND Objective 2 to read: "Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in</p>	<p><b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b></p>



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is maintained in the long term			the Waikato River catchment, <del>which</del> and the restoration and protection is undertaken in a way and at a rate that enables the people and communities to continue to provide for their social, economic and cultural well-being."]	
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	V1PC1-1362	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10459, to the extent it is not modified by their V1 submission: [AMEND Objective 3 to read: "...Actions put in place and implemented by 2026 to reduce discharges of nitrogen, phosphorus, sediment and microbial pathogens, <del>are sufficient</del> to achieve ten percent of the required change between current water quality and the <del>desired</del> 80-year water quality attribute^ <del>targets</del> ^ <del>states</del> in Table 3.11-1. A ten percent change towards the long term <del>desired</del> water quality improvements <del>states</del> is indicated by the short term water quality attribute^ <del>targets</del> ^ <del>states</del> in Table 3.11-1."]	REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1
Objective 4: People and community resilience	V1PC1-1363	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10468, to the extent it is not modified by their V1 submission: [AMEND Objective 4 to read: "...a) considering the values and uses identified in Section 3.11.1 when taking action to achieve Objectives 1 and 3 the attribute^ <del>targets</del> ^ for the Waikato and Waipā Rivers in Table 11-1; and..." ]	REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1
Reasons for adopting Objective 1	V1PC1-832	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10622, to the extent it is not modified by their V1 submission: [AMEND the reasons for adopting the Objective 1 to read: "...Objective 1 sets a long term <del>limits</del> ^ <del>goal</del> for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year <del>desired</del> water quality <del>targets</del> ^ <del>states</del> ^, which result in improvements in water quality from the current state monitored in 2010-2014. The water quality <del>states</del> ^ <del>attributes</del> ^ listed in Table 3.11-1 that will be achieved by 2096 will be used to characterise the <del>desired</del> water quality of the different Freshwater Management Units when the effectiveness of the objective is assessed. <u>Objective 1 gives effect to the Vision and Strategy.</u> "]	REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1

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Reasons for adopting Objective 2	V1PC1-833	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10623, to the extent it is not modified by their V1 submission: [AMEND the reasons for adopting Objective 2 to read: "...The full achievement of the Table 11-1 2096 <u>desired</u> water quality attribute <u>states^ targets^</u> may require a potentially significant departure from how businesses and communities currently function, ..."]	REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1
Reasons for adopting Objective 3	V1PC1-834	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10625, to the extent it is not modified by their V1 submission: [AMEND the reasons for adopting Objective 3 to read: "...at the time of consent renewal, guided by <del>the targets and limits set in Objective 1 and Objective 3.</del> <u>Objective 3 is a freshwater objective for the purposes of the National Policy Statement for Freshwater Management.</u> "]	REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	V1PC1-1364	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10469, to the extent it is not modified by their V1 submission: [AMEND Policy 1 so the policy test that applies to the enablement of low discharging activities is consistent with Policy 4, amend to read: "...a) Enabling activities with a low level of contaminant discharge to water bodies <u>consistent with Policy 4</u> <del>provided those discharges do not increase;</del> and..."]	REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-748	Oppose with amendments	AMEND Policy 2(a) to read: a. Taking a tailored, risk based approach; <u>i. to define mitigation actions on the land that will reduce diffuse discharges of <del>nitrogen</del>, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a <b>Farm Environment Plan</b> either associated with a resource consent, or in specific requirements established in a <b>Certified Industry Scheme</b>; and</u> <u>ii. to manage the diffuse discharge of nitrogen to:</u>  <ul style="list-style-type: none"> <li><u>ensure discharges do not</u></li> </ul> <p><u>- exceed the <b>Nitrogen Reference Point</b> for the property or enterprise; or</u> <u>- on properties with low to medium nitrogen leaching risk, increase as determined by a <b>Nitrogen Risk Scorecard Assessment</b>; and</u></p>	<b>OPPOSE</b> 3 year rolling average (Theland Tahī supports 5 year rolling average)  <b>OPPOSE</b> Nitrogen Risk Scorecard Assessment (as stated above).

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			<ul style="list-style-type: none"> <li>• <u>Avoid management practices that would result in significant inefficiency of nitrogen use; and</u></li> <li>• <u>reduce on any property or enterprise whose Nitrogen Reference Point is above the <b>75th percentile nitrogen leaching value</b> so that the discharge is equal to the discharge of the <b>75th percentile nitrogen leaching value</b> with the maximum <b>three year rolling average</b> to be specified in a resource consent or <b>Farm Environment Plan</b>.</u></li> </ul>	
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-755	Oppose with amendments	AMEND Policy 2(d) to read: <u>d. Requiring <b>Farm Environmental Plans</b> to identify the areas and activities representing diffuse discharge risks and the most effective way of managing those risks on the property or enterprise.</u>	<b>SUPPORT in part.</b>
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	V1PC1-1357	Oppose with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10619, to the extent it is not modified by their V1 submission:</p> <p>[AMEND Policy 3 to read: "...b. The maximum are in production for a property or enterprise <u>in any single year</u> is established and capped <u>at the largest area in production for that property or enterprise in any single year over the 10 year period ending 1 January 2016 as determined by utilising</u> commercial vegetation production data from the 10 years up to 2016; and...</p> <p>1. A 10% decrease <u>by 2026</u> in the <u>rate of</u> diffuse discharge of nitrogen <u>relative to the Nitrogen Reference Point</u> and...."</p> <p>AND DELETE Policy 3 part g. AND REPLACE with the following: "<u>...g. Requiring <b>Farm Environment Plans</b> to identify the areas and activities representing diffuse discharge risks and the most effective way of managing those risks on the particular property.</u>"]</p>	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
Policy 4: Enabling activities with lower discharges	V1PC1-1348	Oppose	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10471, to the extent it is not modified by their V1 submission:	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>

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to continue or to be established while signalling further change may be required in future			<p>[AMEND Policy 4 to read: "Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future..Manage sub-catchment wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, and enable existing and new low discharging activities to continue provided that cumulatively the achievement of Objective 3 is not compromised. Activities and uses currently defined as low dischargers may in the future need to take mitigation actions that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens in order for Objective 1 to be met.</p> <p><u>Enable existing and new farming that individually and collectively make a minor contribution to contaminant loads and/or that pose a low risk of increased contaminant discharge because the activities:</u></p> <p>a. <u>Occupy a small land area; and/or</u></p> <p>1. <u>Have a low nitrogen discharge per hectare (and/or the land is not used for an intensive farming use);</u>  <u>Provided that high risk diffuse discharge practices are avoided."</u></p> <p>AND ADD a NEW Policy 4A to read: "<u>Policy 4A: Signalling further change by lower discharging activities may be required in the future.</u>  <u>Recognise that lower discharging activities may need to take additional mitigation actions to reduce diffuse discharges or nitrogen, phosphorus, sediment and microbial pathogens after 2026 in order for Objective 1 to be met."</u></p> <p>AND ADD a NEW Policy 4AB to read: "<u>Policy 4AB: Enabling farming activities managed in accordance with industry schemes.</u>  <u>Enable existing farming activities that have a low risk of increased contaminant discharge for their farming type and/or a likelihood of diffuse discharge reductions over time because:</u></p> <p>a. <u>They are part of an industry scheme designed to manage diffuse discharge risk; and</u>                      b. <u>In accordance with that industry scheme the diffuse nitrogen discharge by those properties whose Nitrogen Reference Point is above the 75th percentile nitrogen leaching value for the relevant freshwater management unit^."</u>]</p>	

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Policy 5: Staged approach	V1PC1-1365	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10472, to the extent it is not modified by their V1 submission: [AMEND Policy 5 to read: "...Recognise that achieving the <u>desired</u> water quality attribute <del>states targets</del> set out in Table 3.11-1 will need to be staged over 80 years, to minimise <u>adverse social and economic effects</u> <del>disruption</del> and allow for innovation and new practices to develop, while <del>making a start on</del> reducing discharges of nitrogen, phosphorus, sediment and microbial pathogens, <u>to achieve Objective 3</u> and preparing for further reductions that will be required in subsequent regional plans."]	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
Policy 6: Restricting land use change	V1PC1-1349	Oppose	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10473, to the extent it is not modified by their V1 submission: [DELETE Policy 6 and REPLACE to read: "... <u>Manage the potential for increases in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens by generally only allowing land use change where it would:</u> <u>a. Not result in increased diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens; and/or</u> <u>b. Promote the implementation of Policy 16.</u> "]	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
Policy 7: Preparing for allocation in the future	V1PC1-1353	Oppose with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10474, to the extent it is not modified by their V1 submission: [REPLACE Policy 7 to read: " <u>Policy 7: Preparing for enhanced future water quality management</u> <u>Gather information (including through modelling) and undertake research about discharges and contaminant loads in the Waikato and Waipā catchments to enable future policy making that can most effectively and efficiently achieve reductions in nitrogen, phosphorus, sediment and E.coli beyond those identified in Objective 3.</u> "]	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
Policy 8: Prioritised implementation	V1PC1-1350	Oppose	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10489, to the extent it is not modified by their V1 submission: [DELETE Policy 8. AND AMEND PPC1 so that all activities with an obligation to prepare and submit a Farm Environment Plan be required to do so by 1 July 2020.]	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>

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Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	V1PC1-1366	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10490, to the extent it is not modified by their V1 submission: [ADD the following advisory note at the end of Policy 9: "Advisory note: <u>Policy 9 applies in addition to, and not as an alternative to, other policies of section 3.11.3 of this plan. It is to be given effect to through the implementation of Method 3.11.4.5.</u> "]	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
Policy 10: Provide for point source discharges of regional significance	V1PC1-1375	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10598, to the extent it is not modified by their V1 submission: [AMEND Policy 10 to read: "Policy 10: Provide for Point Source Discharge <u>from activities</u> of regional significance/... When deciding resource consent applications for Point Source Discharge of nitrogen, phosphorus, sediment and microbial pathogens to water or onto or into land, <u>subject to Policy 11 and Policy 12</u> , provide for the:..."]	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	V1PC1-1376	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10601, to the extent it is not modified by their V1 submission: [AMEND Policy 11 to read: "Policy 11: Application of Best Practicable Option <del>and mitigation or offset of effects</del> to Point Source Discharge. Require any person undertaking a point source discharge of nitrogen, phosphorus, sediment or microbial pathogens to water or onto or into land in the Waikato and Waipā River catchments to adopt the Best Practicable Option* to avoid or mitigate the adverse effects of the discharge, at the time a resource consent application is decided" AND ADD a NEW Policy 11A to read: " <u>Policy 11A: Offsetting the effects of Point Source Discharge</u> Where it is not practicable to avoid or mitigate <del>all</del> <u>any</u> adverse effects, an offset measure may be proposed in an alternative location or locations to the point source discharge, <del>for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity</del> provided that the: a. <del>The</del> <u>Primary</u> discharge does not result in any significant toxic adverse effect at the point source discharge location; and b. <del>The</del> <u>Offset</u> measure is for the same contaminant; and	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>

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			<p>c. <del>The</del> Offset measure occurs preferably within the same sub-catchment in which the primary discharge occurs and if this is not practicable, then within the same Freshwater Management Unit^ or a Freshwater Management Unit^ located upstream; <del>and</del></p> <p>d. <u>The offset measure is monitored and results in a net reduction in adverse environmental effects caused by the contaminant(s) being offset in the Point Source Discharge on the Waikato or Waipā River catchment; and</u></p> <p>e. <del>The</del> Offset measure remains in place for the duration of the consent and is secured by consent condition <u>or another legally binding mechanism."</u>]</p>	
Policy 12: Additional considerations for point source discharges in relation to water quality targets	V1PC1-1377	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10609, to the extent it is not modified by their V1 submission: [AMEND Policy 12 to read: "Policy 12: Additional considerations for point source discharges in relation to water quality targets <del>Consider</del> <u>Assess</u> the contribution made by a point source discharge to the nitrogen, phosphorus, sediment and microbial pathogen catchment loads and the impact of that contribution on the likely achievement of <del>the short term targets</del> in Objective 3 or the progression towards the <u>desired</u> 80-year <u>water quality states</u> <del>targets</del> in Objective 1, taking into account...: c. The ability to stage future mitigation actions to allow investment costs to be spread over time and <u>contribute to meeting Objectives 1 and 3</u> <del>the water quality targets</del> specified above; and..." ]</p>	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
Policy 13: Point sources consent duration	V1PC1-831	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10610, to the extent it is not modified by their V1 submission: [AMEND Policy 13 to read: "Policy 13: Point sources consent duration When determining an appropriate duration for any consent granted consider the following matters: a. A consent term exceeding 25 years, where the application demonstrates <del>the approaches set out in that</del> Policies 11, <u>11A</u> and 12 will be <del>met</del> <u>complied with</u>; and..." ]</p>	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
3.11.5 Rules	V1PC1-757	Support with	ADD a revised land use rule framework (and supporting Schedules) that simplifies the rule structure.	<b>OPPOSE</b> on the basis that the detail of the relief sought is yet to be drafted.

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		amendments		
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	V1PC1-762	Support with amendments	<p>AMEND Rule 3.11.5.1 to read:</p> <ol style="list-style-type: none"> <li>1. The property is registered with the Waikato Regional Council in conformance with Schedule A; <del>and</del></li> <li>2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; <del>and</del></li> </ol> <p><del>Either:</del></p> <ol style="list-style-type: none"> <li>3. The property area is less than or equal to 4.1 hectares; <del>and</del></li> <li>4. The farming activities do not form part of an enterprise being undertaken on more than one property; <del>or and</del></li> </ol> <p><del>Where the property area is greater than 4.1 hectares:</del></p> <ol style="list-style-type: none"> <li>5. <del>For grazed land, the stocking rate of the land is less than 6 stock units per hectare; and</del> Less than 25% of the feed consumed by livestock on the property is imported on the property.</li> <li>6. <del>No arable cropping occurs; and</del></li> <li>7. <del>The farming activities do not form part of an enterprise being undertaken on more than one property.</del></li> </ol>	<b>SUPPORT in part.</b>
3.11.5.2 Permitted Activity Rule – Other farming activities	V1PC1-765	Support with amendments	<p>AMEND Rule 3.11.5.2 as follows:</p> <p>Rule 3.11.5.2 - Permitted Activity Rule - <del>Other Farming Activities</del>Small and/or low to medium nitrogen leaching risk farming activities</p> <p>The use of land for farming activities (excluding commercial vegetable production) and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water <u>that is not permitted under Rule 3.11.5.1 where the property area is greater than 4.1 hectares, and has more than 6 stock units per hectare or is used for arable cropping,</u> is a permitted activity subject to the following conditions:</p> <ol style="list-style-type: none"> <li>1. The property is registered with the Waikato Regional Council in conformance with Schedule A; <del>and</del></li> <li>2. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C and Conditions 3<del>(e)</del><u>(c)</u> and 4<del>(e)</del><u>(f)</u> of this Rule; <del>and</del></li> <li>3. <del>Where</del>The property area is less than or equal to 20 hectares; and             <ol style="list-style-type: none"> <li>a. The farming activities do not form part of an enterprise being undertaken on more than one property; <del>and</del></li> <li>b. <u>Less than 25% of the feed consumed by any livestock on the property is imported onto the property;</u></li> </ol> </li> </ol>	<p><b>OPPOSES</b> the Nitrogen Risk Scorecard Reference Grade and reserves its position on the same; AND</p> <p><b>OPPOSE</b> the change to 3 year rolling average from 5 year rolling average.</p>



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			<p><del>b.c.</del> Where the land is:</p> <p>i. used for grazing livestock, the stocking rate of the land is no greater than the stocking rate of the land at 22 October 2016; or</p> <p>ii. not used for grazing livestock, the land use has the same or lower diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens as the land use at 22 October 2016; <del>and</del></p> <p><del>c.d.</del> Upon request, the landowner shall obtain and provide to the <u>Waikato Regional Council</u> independent verification from a Certified Farm Environment Planner that the use of land is compliant with either <del>b)c)(i)</del> or <del>b)c)(ii)</del>; above <del>and</del></p> <p><del>d.e.</del> Upon request from the <u>Waikato Regional Council</u>, a description of the current land use activities shall be provided to the Council; <del>and</del></p> <p><del>e.f.</del> Where the property or enterprise contains any of the water bodies listed in Schedule C, new fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within three metres of the bed of the water body (excluding constructed wetlands and drains); <u>or</u></p> <p>4. <del>Where</del>The property or enterprise <u>has an</u> area <del>is</del> greater than 20 hectares and:</p> <p>a. <del>A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B; and</del><u>The peak stocking rate is less than 10 stock units per hectare;</u></p> <p>b.<del>The diffuse discharge of nitrogen from the property or enterprise does not exceed either:</del></p> <p>i. <del>The Nitrogen Reference Point;</del> or</p> <p>ii. <u>15kg nitrogen/hectare/year; whichever is the lesser, over the whole property or enterprise when assessed in accordance with Schedule B; and Less than 5% of the property is cultivated in any one year;</u></p> <p><del>d.c.</del> No winter forage crops are grazed in situ.</p> <p>d. <del>No winter forage crops are grazed in situ; and</del><u>A reference level of nitrogen leaching, is provided to the Waikato Regional Council in the form of either:</u></p> <p><u>(i) An Nitrogen Reference Point calculated in accordance with Schedule B;</u></p> <p><u>or</u></p> <p><u>(ii) A Nitrogen Risk Scorecard Reference Grade determined in accordance with Schedule BA.</u></p> <p>e. <del>Where the property or enterprise contains any of the water bodies listed in Schedule C:</del></p>	

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			<p>i. <del>There shall be no cultivation within 5 metres of the bed of the water body; and</del></p> <p>ii. <del>New fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within three metres of the bed of the water body (excluding constructed wetlands and drains) and</del> <u>Nitrogen leaching from the property or enterprise does not exceed the reference level of nitrogen leaching for the property or enterprise submitted to the Waikato Regional Council in accordance with condition 4 d, as demonstrated by either:</u></p> <p><u>(i) the three-year rolling average as submitted to the Waikato Regional Council by 1 July each year; or</u></p> <p><u>(ii) an annual Nitrogen Risk Scorecard Assessment undertaken in accordance with Schedule BA and submitted to the Waikato Regional Council by 1 July each year.</u></p> <p><u>f. A Farm Environment Plan is prepared in accordance with Schedule 1, is approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council by 1 July 2023;</u></p> <p><u>g. The use of land is undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan;</u></p> <p><u>h. The Farm Environment Plan provided under Condition 4f may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan;</u></p> <p><u>i. A copy of the Farm Environment Plan amended in accordance with condition 4h shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment;</u></p> <p><u>j. Where the property or enterprise contains any of the water bodies listed in Schedule C:</u></p> <p><u>i. There shall be no cultivation within 5 metres of the bed of the water body; and</u></p> <p><u>ii. New fences installed after 22 October 2016 must be located to ensure cattle, horses, deer and pigs cannot be within three metres of the bed of the water body (excluding constructed wetlands and drains); and or</u></p> <p><del>5. For all properties greater than 4.1 hectares, from 31 March 2019 30 November 2020, in addition to the requirements of Schedule A, the following information must be provided to the Waikato Regional Council by 1 September each year:</del></p> <p><del>a. annual stock numbers; and</del></p>	

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			<p><del>b. Annual fertiliser use; and</del>  <del>e. Annual brought in animal feed.</del>  <u>The property or enterprise is used for arable cropping; and</u>  <u>a. No part of the property is used for grazing livestock</u>  <u>b. Arable cropping does not occur within 3 meters of any waterbody</u>  <u>c. No part of the property or enterprise over 15 degrees slope is cultivated</u>  <u>d. Upon request, the landowner shall obtain and provide to the Council independent verification from a Certified Farm Environment Planner that the use of land is compliant with 5 a to d above.</u>  <u>e. A reference level of nitrogen leaching and associated data, is provided to the Waikato Regional Council at the date of registration in the form of either:</u>  <u>(i) A Nitrogen Reference Point calculated in accordance with Schedule B;</u>  <u>or</u>  <u>(ii) A Nitrogen Risk Scorecard Grade determined in accordance with Schedule BA.</u>  <u>f. Nitrogen leaching from the property or enterprise does not exceed the reference level of nitrogen leaching for the property or enterprise submitted to the Waikato Regional Council in accordance with condition 4 d, as demonstrated by either:</u>  <u>(i) the three-year rolling average as calculated each year and submitted to the Waikato Regional Council; or</u>  <u>(ii) an annual Nitrogen Risk Scorecard Assessment undertaken in accordance with Schedule BA and submitted to the Waikato Regional Council by 1 July each year.</u>  <u>g. A Farm Environment Plan is prepared in accordance with Schedule 1, is approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council by 1 July 2023;</u>  <u>h. The use of land is undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan;</u>  <u>i. The Farm Environment Plan provided under Condition 4g may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan;</u>  <u>j. A copy of the Farm Environment Plan amended in accordance with condition 4h shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment;</u></p>	

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3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	V1PC1-779	Support with amendments	<p>AMEND sections of Rule 3.11.5.3 as follows:</p> <p>2. A Nitrogen Reference Point is <del>produced</del><u>calculated</u> for the property or enterprise in conformance with Schedule B <u>within the period May 2020 to 30 November 2020</u>; and</p> <p>4. The Certified Industry Scheme meets the <del>criteria</del><u>standards</u> set out in Schedule 2 <del>and has been approved by the Chief Executive Officer of Waikato Regional Council</del>; and</p> <p>5. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council <del>as follows</del>:</p> <p><del>a. By 1 July 2021, for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2 and properties or enterprises within a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value;</del></p> <p><del>b. By 1 July 2023 for properties or enterprises within Priority 2 sub-catchments listed in Table 3.11-2</del></p> <p><del>c. By 1 July 2026 for properties or enterprises within Priority 3 sub-catchments listed in Table 3.11-2; and</del></p> <p>6. <del>The use of land shall be undertaken in accordance with the actions and timeframes specified in the Farm Environment Plan; and</del><u>Where the property or farm enterprise has a Nitrogen Reference Point below the 50th percentile nitrogen leaching value, either:</u></p> <p><u>a. The three-year rolling average for the property or enterprise does not exceed the Nitrogen Reference Point from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; or</u></p> <p><u>b. The property or enterprise has an annual Nitrogen Risk Scorecard Assessment Grade the same as the Nitrogen Risk Scorecard Assessment Grade as assessed in accordance with Schedule BA; and</u></p> <p><u>c. The information required to undertake the Nitrogen Risk Scorecard Assessment as set out in Schedule BA shall be provided to the Waikato Regional Council by 1 July each year in the template prescribed in Schedule BA e; or</u></p> <p>7. <del>The Farm Environment Plan provided under Condition 5 may be amended in accordance with the procedure set out in Schedule 1 and the use of land shall thereafter be undertaken in accordance with the amended plan; and</del> <u>Where the property or farm enterprise has a Nitrogen Reference Point above the 50th percentile nitrogen leaching value but below the 75th</u></p>	<p><b>OPPOSE</b></p> <p>Nitrogen Risk Scorecard Reference concept is untested and uncertain. Theland Tahi does not support the change to the 3 year rolling average (instead of 5 year rolling average).</p>

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			<p><u>percentile nitrogen leaching value, the three-year rolling average does not exceed the Nitrogen Reference Point from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; or</u>  <u>8. A copy of the Farm Environment Plan amended in accordance with condition (7) shall be provided to the Waikato Regional Council within 30 working days of the date of its amendment.</u>  <u>Where the property or farm enterprise has a Nitrogen Reference Point above the 75th percentile nitrogen leaching value, the Farm Environment Plan for the property or enterprise will set out actions, timeframes and other measures to ensure that diffuse discharge of nitrogen is progressively reduced so that it does not exceed that 75th percentile nitrogen leaching value by 2026.</u>                      AND RETAIN conditions 1, 3, 6, 7 and 8 as notified (but renumbered as appropriate).</p>	
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	V1PC1-788	Oppose with amendments	AMEND Rule 3.11.5.4 as necessary, to provide for the Nitrogen Risk Scorecard approach [see submission points V1PC1-801, 814 and 815 as reference to this approach].	<b>OPPOSE</b> The concept of the Nitrogen Risk Scorecard and assessment is untested and uncertain.
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	V1PC1-1725	Oppose with amendments	APPLY decision/s requested in accordance with the submitter’s PPC1 submission PC1-10500: [AMEND Rule 3.11.5.4 and reorder to read: "Rule 3.11.5.42A – <del>Controlled</del> <u>Permitted</u> Activity Rule – <u>Pre-2020</u> Farming activities <del>with a Farm Environment Plan</del> not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2, <u>until January 2020</u> , the use of land for farming activities... entering water is a permitted activity <del>until:</del> " AND DELETE Points Bullets 1,2 and 3. "Subject to the following conditions: 4 <del>1</del> . The property is registered with the Waikato Regional Council in conformation with Schedule A; and	<b>REFER TO FURTHER SUBMISSION ON FONTERRA’S ORIGINAL SUBMISSION ON PPC1</b>

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			<p><del>52. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and provided to Waikato Regional Council within the period 1 September 2018 to 31 March 2019; and After the dates set out in 1), 2) and 3) above the use of land shall be a controlled activity (requiring resource consent), subject to the following standards and terms:</del></p> <p><del>a. A Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged by the dates specified in I-III below; and</del></p> <p><del>b. The property is registered with the Waikato Regional Council in conformance with Schedule A; and</del></p> <p><del>c. A Nitrogen Reference point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and</del></p> <p><del>3. The three year rolling average does not exceed the Nitrogen Reference Point calculated in accordance with condition 2 from the date on which the Nitrogen Reference Point is provided to the Waikato Regional Council; and</del></p> <p><del>4. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C."</del></p> <p>AND ADD a replacement Rule 3.11.5.4 as follows:  "Rule 3.11.5.4 – Controlled Activity Rule – From 2020 farming activities with a Farm Environment Plan not under a Certified Industry Scheme Except as provided for in Rule 3.11.5.1 and Rule 3.11.5.2, from 1 January 2020, the use of land for farming activities (excluding commercial vegetable production) where that land use is not registered to a Certified Industry Scheme, and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a controlled activity subject to the following standards and terms:  1. The property is registered with the Waikato Regional Council in conformance with Schedule A; and  2. A Nitrogen Reference Point is produced for the property or enterprise in conformance with Schedule B and is provided to the Waikato Regional Council at the time the resource consent is lodged; and</p>	

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			<p><u>3. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C; and</u></p> <p><u>4. Farm Environment Plan has been prepared in conformance with Schedule 1 and has been approved by a Certified Farm Environment Planner, and is provided to the Waikato Regional Council at the time the resource consent application is lodged; and</u></p> <p><u>5. Annual records of the nitrogen leaching value are kept and submitted to the Waikato Regional Council by 1 July each year demonstrating that the three-year rolling average nitrogen leaching value as determined using the most recent version of OVERSEER is not, over the duration of the consent, increased beyond the property or enterprise's Nitrogen Reference Point.</u></p> <p><b>Matters of Control</b>  <u>Waikato Regional Council reserves control over the following matters:</u></p> <p><u>i. The content of the Farm Environment Plan, provided that the Farm Environment Plan is no less stringent than specified in Schedule 1.</u></p> <p><u>ii. The actions and timeframes for undertaking mitigation actions that maintain or reduce the diffuse discharges of phosphorus, sediment or microbial pathogens to water or to land where they may enter water.</u></p> <p><u>iii. The three-year rolling average annual nitrogen loss rate (except that, in accordance with standard 5 no such nitrogen loss shall exceed the Nitrogen Reference Point).</u></p> <p><u>iv. Compliance with Policy 2.</u></p> <p><u>v. The duration of the consent.</u></p> <p><u>vi. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent to demonstrate and/or monitor compliance with the Farm Environment Plan.</u></p> <p><u>vii. The timeframe and circumstances under which the consent conditions may be reviewed of the Farm Environment Plan shall be amended.</u></p> <p><u>viii. Procedures for reviewing, amending and re-approving the Farm Environment Plan."</u>]</p>	
3.11.5.5 Controlled Activity Rule – Existing commercial vegetable production	V1PC1-1354	Oppose with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10505, to the extent it is not modified by their V1 submission:</p> <p>[AMEND Rule 3.11.5.5 by separating the permitted and controlled parts of Rule 3.11.5.5 into two rules with the permitted activity rule making commercial vegetable production prior to 1 January 2020 a permitted activity subject to conditions that ensure that there is no expansion of the aggregate land area devoted to that use prior to that date.</p>	REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1

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			AND within the controlled activity rule, AMEND conditions f. and g. to read: "...f. the total area of land for which consent is sought for commercial vegetable production must not exceed the maximum land area of the property or enterprise that was used for commercial vegetable production <u>in any single year</u> during the period 1 July 2006 to 20 June 2016; and g. where any <del>new</del> land is proposed to be used for commercial vegetable production <u>that has not been previously used for commercial vegetable production during the 1 July 2006 to 30 June 2026 period</u> , an equivalent area of land must be removed from commercial vegetable production in order to comply with standard and term f; and..."	
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	V1PC1-1351	Oppose	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10506, to the extent it is not modified by their V1 submission: [DELETE Rule 3.11.5.6 and REPLACE with a Rule that reads: " <u>3.11.5.6 Discretionary Activity Rule – The use of land for farming activities</u> <u>The following activities are discretionary activities (requiring resource consent):</u>  1. <u>The use of land for farming activities and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water that does not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 subject to the following standards and terms:</u>  <u>a. The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over the three-year period ending 30 June of the year preceding the year the application is made.</u>  2. <u>Any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise located in the Waikato and Waipā River catchments, where prior to 1 July 2026 the change exceeds a total of 4.1 hectares:</u>  <u>i. Woody vegetation to farming activities; or</u>	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>



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			<p><u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u> <u>iii. Arable cropping to dairy farming; or</u></p> <p>3. <u>Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u></p> <p><u>Subject to the following standards and terms:</u> <u>a. The three-year rolling average does not exceed the Nitrogen Reference Point, or where no Nitrogen Reference Point has been calculated the average nitrogen loss for the property or enterprise over:</u> <u>b. Cattle, horses, deer and pigs are excluded from water bodies in conformance with Schedule C.</u> <u>NOTE: for the purposes of this rule, 'occurring' means a land use being undertaken and this phrase does not include changes in land use for which resource consent or certificates of compliance might have been held but no increased discharges of contaminants had commenced as at 22 October 2016."</u> <u>AND AMEND other parts of PPC1 as necessary to clarify that land use change within a property or enterprise (&gt;4.1 ha) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.]</u></p>	
3.11.5.7 Non-Complying Activity Rule – Land Use Change	V1PC1-1368	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10513, to the extent it is not modified by their V1 submission: [DELETE Rule 3.11.5.7 and REPLACE with a Rule that reads: "Rule 3.11.5.7 – Non-complying Activity Rule – The use of land for farming activities and land use change The following activities are non-complying activities (requiring resource consent):</p> <ol style="list-style-type: none"> <li>1. <u>The use of land for farming activities and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water; and</u></li> <li>2. <u>Any of the following changes in the use of land from that which was occurring at 22 October 2016 within a property or enterprise location in the Waikato and Waipā catchments, where prior to 1 July 2026 the</u></li> </ol>	<p><b>OPPOSE</b> <b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b></p>

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			<p><u>change exceeds a total of 4.1 hectares:</u></p> <p><u>i. Woody vegetation to farming activities; or</u></p> <p><u>ii. Any livestock grazing other than dairy farming to dairy farming; or</u></p> <p><u>iii. Arable cropping to dairy farming; or</u></p> <p><u>iv. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5.</u></p> <p><u>That do not comply with the conditions, standards or terms of Rules 3.11.5.1 to 3.11.5.5 and is not a discretionary activity under Rule 3.11.5.6...</u>"</p> <p>AND AMEND PPC1 as necessary to clarify that land use change within a property or enterprise (&gt;4.1 ha) that does not increase the total area within that property devoted to that land use beyond 4.1 hectares is not caught by this rule.]</p>	
Schedule A - Registration with Waikato Regional Council	V1PC1-796	Support with amendments	<p>AMEND AND ADD Schedule A items 1 and 6 as follows:</p> <p>1. Registration must occur between <u>1 September 2018</u> <del>1 May 2020</del> and <u>31 March 2019</u> <del>30 November 2020</del>.</p> <p>6. <u>i.v For any property or enterprise intending to use the Nitrogen Reference Scorecard assessment for compliance purposes, the peak stocking rate as at in the reference period 2014/15 and 2015/16</u></p>	<b>OPPOSE</b> The concept of the Nitrogen Risk Scorecard and assessment is untested and uncertain.
Schedule B - Nitrogen Reference Point	V1PC1-1369	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10517, to the extent it is not modified by their V1 submission:</p> <p>[AMEND Schedule B Part c to read:</p> <p>"...c. The Nitrogen Reference Point must be calculated using the <del>current</del> <u>most recent version</u> of the OVERSEER Model (or any other model approved by the Chief Executive of the Waikato Regional Council)..."</p> <p>AND ADD a NEW Part eA of Schedule B to read:</p> <p>"...<u>eA: Once a year, following the release of a new version of Overseer (or any other model approved by the Chief Executive of the Waikato Regional Council), the Nitrogen Reference Point will be recalculated by the Waikato Regional Council (or for those registered to a Certified Industry Scheme, by the Certified Industry Scheme provider) using the latest version of that model and same data input file as was used to calculate the Nitrogen Reference Point submitted to Council in accordance with part e of this Schedule. When such a recalculation occurs, the resulting leaching rate becomes the Nitrogen Reference Point for the purposes of Rules 3.11.5.2 to 3.11.5.7...</u>"</p>	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>

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			<p>AND AMEND Table 1 setting used for 'missing data' as follows:            "In the absence of Nitrogen Referencing information being provided, the Waikato Regional Council will use appropriate default numbers for any necessary inputs to the Overseer Model. <del>Such</del> <u>Such</u> default numbers will generally be around 75% of normal FMU average values <del>for those inputs</del>. <u>for the particular farm system type but may be adjusted on the basis of farm production data which shall be provided in all cases where the complete suite of Nitrogen Referencing information is unavailable.</u>"            AND REPLACE the setting that must be used in that cell corresponding to the 'Soil Description' line of Table 1 to read:  <u>"In any Farm Management Unit that has complete coverage of S Map, obtain soil description from the Link to S Map within Overseer. In any Farm Management Unit that does not have complete coverage of S Map use soil order from LRI 1:50,000 data or a soil map of the farm."</u></p>	
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-805	Support with amendments	<p>AMEND Schedule 1, part 5 to read:            5. A description of the following:            (a) <del>Actions</del> <u>The property or enterprise's Nitrogen Reference Point timeframes and other measures to ensure that the diffuse discharge of nitrogen from the property or enterprise, as measured by that is not to be exceeded by the five three-year rolling average annual nitrogen loss as determined by the use of the current most recent version of OVERSEER, does not increase beyond the property or enterprise's Nitrogen Reference Point, unless other suitable mitigations are specified; or</u>            (b) <u>for properties or enterprises that choose to be assessed using the Nitrogen Risk Scorecard, the farm data required to establish the reference assessment grade that is not to be exceeded on an annual basis; or</u>            (b) <del>c</del> Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is <u>progressively</u> reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, except in the case of Rule 3.11.5.5.</p>	<b>OPPOSE</b> use of 3 year rolling average AND <b>OPPOSE</b> Nitrogen Risk Scorecard (refer above).
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-1370	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10559, to the extent it is not modified by their V1 submission:            [AMEND Schedule 1 paragraph 5 to read:            "This schedule applies to all farming activities, but it is acknowledged that some provisions will not be relevant to every farming activity.</p>	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>

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			<p><u>Any management plan required by a condition of any resource consent authorising industrial or other wastewater irrigation shall be deemed to be Farm Environment Plan for the purposes of this schedule, provided that the management plan addresses the relevant matters in Section A.</u></p> <p>AND ADD a NEW item 'g' to Section 2 (immediately above Section 3):  <u>"g. A description of any other wastewater irrigation or fertiliser management activities on the site including the use of fertilised replacements."</u>]</p>	
Schedule 2 - Certification of Industry Schemes	V1PC1-1355	Oppose with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10561, to the extent it is not modified by their V1 submission:</p> <p>[AMEND Schedule 2 to read:  "The purpose of this schedule is to set out the <del>criteria against which applications to approve an industry scheme will be assessed</del> <u>standards that will apply to Certified Industry Scheme and which will be used as a basis for certification.</u>  The application <u>for certification</u> shall be lodged...  <u>Assessment Criteria Standards</u>  ...f. That those registered to a Certified Industry Scheme are aware of any <u>non-compliance and, if not remedied, and non-compliance is reported to Corrective Actions will be implemented and escalated where required, including escalation to Waikato Regional Council in the approved format. If internal escalation is not successful...</u></p> <p>B. People  The application must demonstrate that:  1. Those <del>generating and auditing</del> <u>preparing Farm Environment Plans and auditing implementation of Farm Environment Plans</u> are suitably qualified and experienced.  <u>2. Auditing of Farm Environment plan requirements is independent of the Farm Environment Plan preparation and approval.</u>  <u>2. The Certified Industry Scheme has access to Certified Farm Nutrient Advisors to prepare Nitrogen Reference Points and sufficient Certified Farm Environment Planners to certify Farm Environment Plans.</u></p> <p>C. Farm Environment Plans  The application must demonstrate <del>that how</del> <u>how</u> Farm Environment Plans <del>are</del> <u>will be</u> prepared in conformance with Schedule 1.</p>	REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1

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			<u>An industry scheme will not be certified until the Chief Executive Officer of the Waikato Regional Council determines that the above standards have been met."</u>	
Additions to Glossary of Terms	V1PC1-812	Support	ADD a NEW definition to the Glossary of Terms to PPC1 called <u>50th percentile nitrogen leaching value</u> which shall read: <u>50th percentile nitrogen leaching value</u> <u>The 50th percentile value (units of kg N/ha/year) of all the Nitrogen Reference Point values for dairy farming properties and enterprises within each Freshwater Management Unit and which are received by the Waikato Regional Council by 1 November 2020, as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato Regional Council website on or before 28 February 2021.</u>	<b>OPPOSE</b>
Additions to Glossary of Terms	V1PC1-814	Support	ADD a NEW definition to the Glossary of Terms to PPC1 called <u>Nitrogen Risk Scorecard Reference Grade</u> which reads: <u>Nitrogen Risk Scorecard Reference Grade</u> <u>The nitrogen leaching grade determined in accordance with the assessment tool described in Schedule BA 1.</u>	<b>OPPOSE</b> The concept of the Nitrogen Risk Scorecard and assessment is untested and uncertain.
Additions to Glossary of Terms	V1PC1-815	Support	ADD a NEW definition to the Glossary of Terms to PPC1 called <u>Nitrogen Risk Scorecard Assessment Grade</u> which reads: <u>Nitrogen Risk Scorecard Assessment Grade</u> <u>The nitrogen leaching grade determined in accordance with the assessment tool described in Schedule BA 5.</u>	<b>OPPOSE</b> The concept of the Nitrogen Risk Scorecard and assessment is untested and uncertain.
Additions to Glossary of Terms	V1PC1-816	Support	ADD a NEW definition to the Glossary of Terms to PPC1 called <u>Peak stocking rate</u> , which reads: <u>Peak stocking rate</u> <u>The maximum number of stock units per effective hectare on a property or enterprise at any time over the period 1 June to 30 May.</u>	<b>OPPOSE.</b> Theland Tah reserves its position as the full implications of the new definition are unknown.
Additions to Glossary of Terms	V1PC1-839	Support	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10616, to the extent it is not modified by their V1 submission: [ADD to the Glossary of terms a definition of regionally significant infrastructure to read: " <u>Regionally Significant Infrastructure – means an economic activity based on the use of natural and physical resources in the region which have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits. Regionally significant industry includes:</u> a. Dairy manufacturing sites;	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>

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			<p><u>b. Meat processing plants;</u>  <u>c. Pulp and paper processing plants; and</u>  <u>d. Mineral extraction activities."</u>            AND ADD a NEW definition of 'effective hectares' to read:  <u>"Effective hectares: means the area of a property or enterprise as measured in hectares which is used for the regular grazing of animals or growing of crops or activities ancillary to those uses and which specifically excludes indigenous forest, plantation forest, closed canopy scrubland and protected wetlands."</u>            AND ADD a NEW definition of 'protected wetland' to read:  <u>"Protected wetland: for the purpose of the definition of 'effective hectares' means a wetland that is fenced to exclude stock or which is legally protected by a rule in a district or regional plan, condition of resource consent or other legally binding instrument such that it cannot be lawfully grazed, drained, cleared or otherwise modified without the consent of a local authority or third party and for which no such consent has been issued. This definition excludes any wetland constructed for the purpose of mitigating the effects of agricultural discharges on water quality."</u>]</p>	
Definition - 75th percentile nitrogen leaching value	V1PC1-1371	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10573, to the extent it is not modified by their V1 submission: [AMEND Glossary of terms definition of the 75th percentile nitrogen leaching value to read: <u>"...are received by the Waikato Regional Council by 31 March 2019, as determined by the Chief Executive of the Waikato Regional Council and published on the Waikato Regional Council website on or before 20 June 2019."</u> ]	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
Definition - Certified Industry Scheme	V1PC1-1374	Support with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10583, to the extent it is not modified by their V1 submission: [AMEND the Glossary of terms definition of Certified Industry Scheme to read: <u>"Certified Industry Scheme: is a scheme that has been certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as meeting the <del>assessment criteria and requirements</del> standards set out in Schedule 2 of Chapter 3.11."</u> ]	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>

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Definition - Five-year rolling average	V1PC1-1372	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10576, to the extent it is not modified by their V1 submission:</p> <p>[AMEND the Glossary of terms definition of five-year rolling average to read:</p> <p>"<del>Five</del> <u>Three</u>-year rolling average: means the average of modelled nitrogen leaching losses predicted by OVERSEER from the most recent <del>5</del> <u>3</u> years <u>using the most recent version of OVERSEER to model each of the three years and the same input data for each of the three years as was used to first calculate the nitrogen leaching losses for that year.</u>"</p> <p>AMEND Rules 3.11.5.2 to 3.11.5.6 as necessary to ensure data required for the calculation of the three year rolling average is collected from the date of decisions on PPC1 are issued.]</p>	<p><b>OPPOSE</b> 3 year rolling average. <b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b></p>
Definition - Nitrogen Reference Point	V1PC1-1373	Support with amendments	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10580, to the extent it is not modified by their V1 submission:</p> <p>[AMEND the Glossary of terms definition of Nitrogen Reference Point to read:</p> <p>"Nitrogen Reference Point: The nitrogen loss number (units of kg N/ha/year) that is derived <u>using the methodology specified in Schedule B, from an OVERSEER use protocol compliant OVERSEER file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm Nutrient Advisor, using the current version of the OVERSEER model (or another model approved by the Council) for the property or enterprise at the 'reference' point in time.</u>"</p>	<p><b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b></p>
Definition - Point source discharge	V1PC1-1352	Oppose	<p>APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10593, to the extent it is not modified by their V1 submission:</p> <p>[DELETE the definition of Point Source Discharge in PPC1.</p> <p>"<del>Point Source Discharge — For the purposes of Chapter 3.11, means discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems"</del></p> <p>AND AMEND the definition of Point Source Discharge in the Waikato Regional Plan as follows:</p> <p>"Point Source Discharge – means <del>discharges from a stationary or fixed facility</del> <u>a discharge from a specific and identifiable outlet onto or into land, a water body, the air or the sea.</u>"</p> <p>OR AMEND the definition of Point Source Discharge in PPC1 as follows:</p>	<p><b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b></p>

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			"Point Source Discharge: for the purposes of Chapter 3.11, <del>means discharges from a stationary or fixed facility, including the irrigation onto land from consented industrial and municipal wastewater systems. A</del> discharge from a specific and identifiable outlet onto or into land, a water body or the sea."]	
Discharges	V1PC1-887	Not stated	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-13193, to the extent it is not modified by their V1 submission: [AMEND the text of Background and Explanation as follows: Discharges <del>associate with Farming Land Use in the Waikato and Waipā River Catchments</del> Chapter 3.11 addresses the use of land for farming in the Waikato and Waipā River catchments including associated diffuse <u>discharges of nitrogen, phosphorus, sediment and microbial pathogens. Chapter 3.11 also contains objectives and policies that apply to point source discharges to land and water in the Waikato and Waipā River catchments.</u> ]	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>
Discharges	V1PC1-1356	Oppose with amendments	APPLY decision/s requested in accordance with the submitter's PPC1 submission PC1-10594, to the extent it is not modified by their V1 submission: [RETAIN one definition of Point Source Discharge in the Waikato Regional Plan by AMENDING the existing definition of Point Source Discharge in the Waikato Regional Plan as follows: "Point Source Discharge – means <del>discharges from a stationary or fixed facility</del> a discharge from a specific and identifiable outlet onto or into land, a water body, the air or the sea."]	<b>REFER TO FURTHER SUBMISSION ON FONTERRA'S ORIGINAL SUBMISSION ON PPC1</b>



## Horticulture New Zealand (HortNZ)

Submitter ID: 73801

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	V1PC1-703	Not stated	AMEND V1 to provide for a sub-catchment collective as set out in Appendix 3 of the submission.	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
General	V1PC1-704	Not stated	AMEND V1 provisions relating to plan implementation in a manner consistent with Appendix 2 of the submission that address issues around managing the provision of information across multiple properties under crop rotation. Also the current interpretation of the CIS does not provide for GAP schemes. Current requirements for data collection and reporting are onerous which raised concerns with implementation.	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
General	V1PC1-971	Not stated	AMEND PPC1 to implement a multi-contaminant approach to assessing intensification, based on the risk of Nitrogen, Phosphorus, Bacteria and Sediment discharging to water from land. AMEND PPC1 to ensure that it does not implement an allocation system based on Nitrogen only as a proxy for intensification. AND should Nitrogen be determined as a proxy for intensification and a natural capital approach be adopted. AMEND to provide for commercial vegetable production in the allocation of Nitrogen in a manner that ensures crop rotation is not compromised.	OPPOSE
General	V1PC1-984	Not stated	AMEND V1 to provide an option to convert land to commercial vegetable production, as sought in the initial submission to PPC1.	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
General	V1PC1-995	Not stated	AMEND to apply the initial PPC1 submission to the whole catchment. This includes the reinstated part of the catchment withdrawn and re-notified as V1. Note submission point PC1-9896 where the submitter has requested PC1 be withdrawn in its entirety to allow for consultation with Hauraki Iwi, and re-notify with the inclusion of the withdrawn area.	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
General	V1PC1-1594	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-9899: [AMEND PPC1 to acknowledge the effect on the grower community of water quantity decisions made in Variation 6 to the Waikato Regional Plan AND AMEND to acknowledge that Variation 6 transferred the cost of unauthorised takes and the discharges of these takes allowed; because	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1

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			<p>authorisation of these takes provided for the degradation of water quality in the lower Waikato River</p> <p>AND AMEND to acknowledge that the resulting clawback of water quantity allocation post 2030 will reduce access to key mitigation of nutrient discharges</p> <p>AND AMEND to enable commercial vegetable growers to access water at best practice application rates to manage discharges of nutrients more effectively</p> <p>AND AMEND to ensure that the costs incurred by the grower community related to clawback of authorised freshwater abstractions and removal allocation bands are factored into the section 32 analysis for PPC1</p> <p>AND AMEND to ensure key elements of the Waikato Regional Policy Statement are given effect to, including the protection of ecosystem services arising from commercial vegetable production AND provide for continuance of a viable commercial production industry in the objectives, policies and methods</p> <p>AND AMEND to ensure existing commercial vegetable production rotations can be managed according to best practice growing principles by providing for the movement of commercial vegetable production within the Waikato River catchment</p> <p>AND AMEND to ensure that statutory methods, other than the non-complying activity land use change rules, are discharge controls, not section 9 RMA land use controls</p> <p>AND AMEND the section 32 analysis to recognise the effect of the Auckland planning regime on the availability of scarce cropping land</p> <p>AND AMEND to provide opportunities for commercial vegetable production on new sites in the Waikato River catchment as a restricted discretionary activity where it can be demonstrated there is an overall reduction of contaminants AND assessment of application for a new commercial vegetable production should allow recognition for any reductions in bacterial contamination as a result of the conversion of land to commercial vegetable production AND if it can be demonstrated that the land use change results in a similar or lesser effect on the core values of the Vision and Strategy, an increase in discharges of nitrogen should be provided for.</p> <p>AND REINSTATE Objective 6.</p> <p>AND MAKE any consequential amendments.]</p>	
General	V1PC1-1695	Not stated	AMEND the dates to line up with date changes proposed in V1 to PPC1.	

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Background and explanation	V1PC1-1617	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9897: [AMEND the background and explanation to include an issue statement recognising the most significant issues and challenges facing the grower community in relation to land and freshwater management.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Co-management of the Waikato and Waipa Rivers	V1PC1-1619	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9900: [RETAIN the statement on co-management of the Waikato and Waipā Rivers AND AMEND to ensure PPC1 recognises the commitment to date of growers in improving discharges of phosphorus and sediment AND AMEND to ensure the plan provides for the establishment of an alternative method or model from the OVERSEER Model to establish a benchmark nitrogen and phosphorus discharge from commercial vegetable production systems.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Collaborative approach	V1PC1-1618	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9898: [AMEND the Collaborative approach statement to acknowledge the statements made in the submission AND AMEND to acknowledge that the plan does not adequately address all sources of contaminants that impact on values identified in the Vision and Strategy.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Full achievement of the Vision and Strategy will be intergenerational	V1PC1-1620	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9927: [AMEND the section Full achievement of the Vision and Strategy to recognise the essential aspects of the vegetable production industry in the Waikato AND AMEND to identify that existing vegetable production has a priority over any new production that is likely to have a greater contribution of discharges AND AMEND to ensure that authorised farm enterprises through a capped area controlled activity consent, allows for rotation across new and existing land parcels AND AMEND to ensure opportunities for new vegetable production are available if the proposed operation can demonstrate a decrease in discharges compared to the activity it is replacing AND AMEND to recognise permanent fruit production as a low intensity farming activity.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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3.11.1 Values and uses for the Waikato and Waipa Rivers	V1PC1-1621	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9934: [RETAIN primary production as a Mana Tangata value AND AMEND the primary production value to recognise the significant role Pukekohe and Pukekawa commercial vegetable production systems have in the national domestic food chain.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	V1PC1-1622	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9939: [AMEND Objective 1 to read: "By 2096, <u>the adverse effects from</u> discharges of nitrogen, phosphorus, sediment and microbial pathogens to land and water <u>are reduced</u> <u>resulting</u> in achievement of the <u>desired state of intrinsic freshwater values for the Waikato River, represented by the restoration and protection of</u> <del>the</del> 80-year water quality attribute targets in Table 3.11-1."]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	V1PC1-1623	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9940: [AMEND Objective 2 to read: "Waikato and Waipā communities and their economy benefit from the restoration and protection of water quality in the Waikato River catchment. <u>The restoration and protection of water quality should</u> enables the people and communities to continue to provide for their social, economic and cultural well-being."]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Objective 3: Short-term improvements in water quality in the first stage of restoration and protection of water quality for each sub-catchment and Freshwater	V1PC1-1624	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-9945: [AMEND Objective 3 to read: "... A ten percent change towards the long term water quality attribute improvements is indicated by the short term water quality attribute targets in Table 3.11-1 <u>or achievement of the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX.</u> " For the purpose of this relief the submitter has produced a 10-year Sub-catchment Load Target Table (Schedule 1C Table XX) and attached it to proposed relief as part of a new Schedule 1C. As an alternative where it is mentioned in this submission, it could be inserted as a new part of Table 3.11-1.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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Management Unit				
Objective 4: People and community resilience	V1PC1-1602	Oppose with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10005: [AMEND Objective 4 to read: "...a. considering the values and uses when taking action to achieve the attribute targets for the Waikato and Waipā Rivers in Table 3.11-1 <u>or achievement of the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX</u> ; and b. recognising that further contaminant reductions will be required by subsequent regional plans and signalling anticipated future management approaches that will be needed to meet Objective 1 <u>and</u> c. recognising that this plan change is transitional, to provide time to <u>develop the tools required to more efficiently allocate responsibility for achieving contaminant reductions targets in the long-term</u> <u>d. enabling the production of contaminant accounting frameworks that support robust measurement of progress to achieving the long-term and short-term target states for attributes and sub-catchment load limits by more accurately identifying property level responsibilities for contaminant reduction.</u> "]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Objective 5: Mana Tangata – protecting and restoring tangata whenua values	V1PC1-1605	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10009: [RETAIN Objective 5.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Reasons for adopting Objective 1	V1PC1-1625	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10012: [AMEND the Reasons for adopting Objective 1 to read: "Objective 1 sets long term limits for water quality consistent with the Vision and Strategy. Objective 1 sets aspirational 80-year water quality targets, which result in improvements in water quality from the current state monitored in 2010-2014. The water quality attributes listed in Table 3.11-1 <u>(and/or the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX)</u> that will be achieved by 2096 will be used to characterise the water quality of the different FMU's when the effectiveness of the objective is assessed. <u>There is benefit in providing flexibility to land managers seeking to achieve reductions collaboratively</u>	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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			<u>at a catchment or sub-catchment scale. Contaminant load targets are therefore set for sub-catchments to support achieving the Vision and Strategy."</u> ]	
Reasons for adopting Objective 2	V1PC1-1626	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10015: [AMEND the Reasons for adopting Objective 2 to read: "Objective 2 sets the long-term outcome for people and communities, recognising that restoration and protection of water quality will continue to support communities and the economy. The full achievement of the Table 11-1 2096 water quality attribute target may require a potentially significant departure from how businesses and communities currently function, and it is important to minimise <u>economic and</u> social disruption during this transition."]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Reasons for adopting Objective 3	V1PC1-1627	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10016: [AMEND the Reasons for adopting Objective 3 to read: "Objective 3 sets short term goals for a 10 years period, to show the first step toward full achievement of water quality consistent with the Vision and Strategy. The effort required to make the first step may not fully reflected in water quality improvements that are measurable in the water in 10 years. For this reason, the achievement of the objective will rely on measurement and monitoring of actions taken on the land to reduce pressures on water quality. <u>A range of actions will be promoted including collaborative approaches to managing discharges at a sub-catchment scale to achieve sub-catchment load limits.</u> Point source discharged are currently managed through existing resource consents, and further action required to improve the quality of these discharges will occur on a case-by-case basis at the time of consent renewal, <u>guided by giving effect to</u> the targets and limits set in Objective 1."]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Reasons for adopting Objective 4	V1PC1-1628	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10017: [AMEND the Reasons for adopting Objective 4 to read: "... Objective 4 seeks to minimise <u>economic and</u> social disruption in the short term, while encouraging preparation for possible future requirements."]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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			AND ADD the following statement: "The consenting regime will manage to discharges from activities by managing the use. The regime is, therefore, a discharge consent regime under section 15 RMA not a land use consent regime under section 9 RMA."	
Policy 1: Manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens	V1PC1-1629	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10050: [AMEND Policy 1 to achieve the intent of the following revisions: "a. Enabling activities with a low level of contaminant discharge to water bodies provided those discharges do not increase; and b. Requiring farming activities with moderate to high levels of contaminant discharge to water bodies to reduce <u>the effect of their discharges through on-farm and/or off-farm actions;</u> <u>ba. Enabling collective action at a catchment scale by groups seeking to manage discharges as a single entity; and</u> <u>bb. Providing criteria for the approval of natural resource accounting systems used to enable catchment or sub-catchment based approaches;</u> <u>bc. Providing a table of ten-year sub-catchment load targets for the four contaminants (Schedule C Table XX),</u> c. Progressively excluding cattle, horses, deer and pigs from rivers, stream, drains wetlands and lakes."]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-1630	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10051: [AMEND Policy 2 to read: "Manage and require reductions in sub-catchment-wide diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from farming activities on properties and enterprises by: a. Taking a tailored, risk based approach to define mitigation actions on the land that will reduce diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens, with the mitigation actions to be specified in a Farm or Enterprise Environment Plan either associated with a resource consent, or in specific requirements established by participation in a Certified Industry Scheme; and b. Requiring the same level of rigour in developing, monitoring and auditing of mitigation actions on the land that is set out in a Farm or Enterprise Environment Plan, whether it is established with a resource consent or through Certified Industry Schemes; and c. Establishing a Nitrogen Reference Point or proxy for <del>the a</del> property or	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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			<p>enterprise that is <u>not part of a consented catchment collective managing a range of properties as a single group</u>; and</p> <p>d. Requiring the degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens to be proportionate to the amount of current discharge (those discharging more are expected to make greater reductions) <u>when assessed across all 4 contaminants</u>, and proportionate to the scale <u>tailored to ensure reductions are targeted at actions within the sub-catchments that will improve the values of freshwater specified within this plan</u>. Of improving values water quality improvements required in the sub-catchment; and</p> <p>e. Requiring stock exclusion to be completed within 3 years following the dates by which a Farm Environment Plan must be provided to the Council, or in any case no later than 1 July 2026." ]</p>	
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	V1PC1-1595	Not stated	<p>APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-10052: [AMEND Policy 3 to read: "Manage and require reductions in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens from commercial vegetable production through a tailored, property or enterprise-specific approach to <u>consenting discharges where</u>:</p> <p>a. Flexibility is provided to undertake crop rotations on changing parcels of land for commercial vegetable production, while reducing average contaminant discharges over time; and</p> <p>b. The maximum area in production for a property or enterprise is established and capped utilising commercial vegetable production data <u>sourced</u> from the 10 years up to 2016; and</p> <p>c. Establishing a Nitrogen Reference Point for each property or enterprise; and</p> <p>d. A <u>10% decrease in the diffuse discharge of nitrogen and a tailored reduction of no more than 5%</u> through the implementation of Best or Good Management Practices in the diffuse discharge of nitrogen, phosphorus, and sediment is achieved across the sector <del>through the</del> <u>while recognising</u>:</p> <ul style="list-style-type: none"> <li>• <u>the absent or low risk of discharges of microbial pathogens from commercial vegetable production</u>;</li> <li>• <u>the need to preserve aspects of commercial vegetable production required to maintain domestic supply of vegetables</u>;</li> <li>• <u>the pressure on and scarcity of land suitable for commercial vegetable</u></li> </ul>	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>



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			<p><u>production. This pressure has recently increased as a result of greenfields expansion onto versatile land in the Auckland region.</u></p> <ul style="list-style-type: none"> <li>• <u>prior</u> implementation of Best or Good Management Practices; and</li> <li>e. Identified mitigation actions that are set out and implemented within timeframes specified in either a Farm Environment Plan and associated resource consent, or in specific requirements established by participation in a Certified Industry Scheme <u>or a collective enterprise managing discharges as a group.</u></li> <li>f. Commercial vegetable production enterprises that reduce <u>can demonstrate an overall reduction in the combined discharges of</u> nitrogen, phosphorus, sediment and microbial pathogens <u>(compared to the existing activity)</u> are enabled; and</li> <li>g. The degree of reduction in diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens is proportionate to the amount of current discharge (those discharging more are expected to make greater reductions), and the scale of water quality improvement required in the sub-catchment.</li> <li><u>h. Consent will generally be granted for a term greater than 15 years</u></li> <li><u>i. An offset measure may be proposed in an alternative location or locations to the non-point source discharge, for the purpose of ensuring positive effects on the environment to lessen any residual adverse effects of the discharge(s) that will or may result from allowing the activity provided that the:</u> <ul style="list-style-type: none"> <li><u>i. Primary discharge does not result in any significant toxic adverse effect at the non-point source discharge location; and</u></li> <li><u>ii. Offset measure provides an equivalent benefit for the values of freshwater specified in this plan; and</u></li> <li><u>iii. Offset measure occurs preferably within the same sub-catchment in which the primary discharge occurs and if this is not practicable, then within the same Freshwater Management Unit or a Freshwater Management Unit located upstream, and</u></li> <li><u>iv. Offset measure remains in place for the duration of the consent and is secured by consent condition."</u></li> </ul> </li> </ul> <p>AND if Policy 3(c) is retained, AMEND to read:  <u>"Establishing a Nitrogen Reference Point for each property or enterprise</u>  <u>Utilise proxy farm systems to approximate a Nitrogen Reference Point in recognition that OVERSEER is unlikely to identify a Nitrogen Reference</u></p>	

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			<u>Point for commercial vegetable production systems that is accurate enough for the purpose."</u>	
Policy 4: Enabling activities with lower discharges to continue or to be established while signalling further change may be required in future	V1PC1-1631	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10055: [RETAIN Policy 4 AND AMEND the definition of commercial vegetable cropping by deleting reference to asparagus.]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
Policy 5: Staged approach	V1PC1-1606	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10056: [RETAIN Policy 5 AND clarify that discharge controls are not section 9 land use rules AND MAKE consequential amendments to other policies and methods.]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
Policy 6: Restricting land use change	V1PC1-1632	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10057: [AMEND Policy 6 to read: "Except as provided for in Policy 16, <del>land use change</del> consent applications <u>under Rule 3.11.5.7</u> that demonstrate <u>on the balance</u> an increase in diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally not be granted. <del>Land use change e</del> Consent applications that demonstrate <u>on the balance</u> clear and enduring decreases in existing diffuse discharges of nitrogen, phosphorus, sediment or microbial pathogens will generally be granted."]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
Policy 7: Preparing for allocation in the future	V1PC1-1600	Oppose	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10070: [AMEND Policy 7 to read: "Any future allocation should consider the following principles: a. Land suitability which reflects the biophysical and climate properties, the risk of contaminant discharges from that land, and the sensitivity of the receiving water body, as a starting point (i.e. where the effect on the land and receiving waters will be the same, like land is treated the same for the purposes of allocation); and b. Allowance for flexibility of development of tangata whenua ancestral	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1

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			land; and e. <del>Minimise social disruption and costs in the transition to the 'land suitability' approach;</del> and d. Future allocation decisions should take advantage of new data and knowledge. <del>And;</del> e. <u>Having regard for the finite nature of High Class Soils</u> f. <u>Incorporating the principle of 'polluter pays'; meaning that when assessed across the balance of contaminant discharges to water those having the greatest effect bear a proportionally greater cost of the transition."</u> ]	
Policy 8: Prioritised implementation	V1PC1-1633	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10075: [AMEND Policy 8 to enable the management of horticultural enterprises between sub-catchments to recognise there will be a minimal overall variance in proportion of vegetable cropping across all enterprises in each sub-catchment.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Policy 9: Sub-catchment (including edge of field) mitigation planning, co-ordination and funding	V1PC1-892	Not stated	AMEND to allow for a sub-catchment approach, through the following changes to Policy 9: AMEND the opening paragraph to read: Take a prioritised and integrated approach to sub-catchment water quality management by undertaking sub-catchment planning, and use this planning to support actions including edge of field mitigation measures <u>and catchment collective responses</u> . AND ADD the following sub-clause after c.: <u>d. Enable the collaborative management of discharges at a scale greater than a single farm and provide a consenting pathway for groups that form to take responsibility for contaminant reductions by implementing a combination of catchment and paddock scale mitigations that are able to be measured and reported. Where a consent application has been approved under 3.11.5.X, the entity is allocated responsibility for a proportion of the allowable discharge limits based on the area of land covered by the consent and the load reduction targets specified for each sub-catchment in Schedule 1C Table XX.</u> AND ADD the following sub-clause: <u>e. Provide for offsetting where it can be demonstrated there will be a commensurate effect on the restoration of the health and well-being of the Waikato River.</u>	<b>SUPPORT IN PART</b> , except to the extent that the relief may be inconsistent with the reasons for submissions explained above AND subject to agreement on catchment loads identified in proposed table Schedule 1C; AND <b>OPPOSE</b> LUC/Natural capital approach.
Policy 9: Sub-catchment (including edge of	V1PC1-1634	Support with	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10078:	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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field) mitigation planning, co-ordination and funding		amendments	<p>[AMEND Policy 9 to read: "Policy 9: Sub-catchment (<del>including edge of field</del>) mitigation planning, coordination and funding/Te Kaupapa Here 9: Te whakarite mahi whakangāwari, mahi ngātahi me te pūtea mō te riu kōawāwa (tae atu ki ngā taitapa) Take a prioritised and integrated approach to sub-catchment water quality management by undertaking sub-catchment planning, and use this planning to support actions including edge of field mitigation measures <u>and catchment collective responses</u>. Support measures that efficiently and effectively contribute to water quality improvements. This approach includes:</p> <p>a. Engaging early with tangata whenua and with landowners, communities and potential funding partners in sub-catchments in line with the priority areas listed in Table 3.11-2; and</p> <p>b. Assessing the reasons for current water quality and sources of contaminant discharge, at various scales in a sub-catchment; and</p> <p>c. Encouraging cost-effective mitigations where they have the biggest effect on improving water quality; and</p> <p><u>da. Enable the collaborative management of discharges at a scale greater than a single farm and provide a consenting pathway for groups that form to take responsibility for contaminant reductions by implementing a combination of catchment and paddock scale mitigations that are able to be measured and reported.</u></p> <p>d. Allowing, where multiple farming enterprises contribute to a mitigation, for the resultant reduction in diffuse discharges to be apportioned to each enterprise in accordance with their respective contribution to the mitigation and their respective responsibility for the ongoing management of the mitigation.</p> <p><u>e. Provide for offsetting where it can be demonstrated there will be a commensurate effect on the restoration of the health and well-being of the Waikato River."</u>]</p>	
Policy 10: Provide for point source discharges of regional significance	V1PC1-1596	Not stated	<p>APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-10087: [AMEND Policy 10 to ensure that the recognition in the Regional Policy Statement for agriculture as a regionally significant industry is given equal weight when ensuring that point source discharges are to give effect to the targets of the Vision and Strategy as outlined in Table 3.11-1</p>	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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			AND MAKE any consequential amendments to the proposed changes to existing, objectives, policies and rules relating to point source discharge that are contained within Part D of PPC1 to give effect to the above relief.]	
Policy 11: Application of Best Practicable Option and mitigation or offset of effects to point source discharges	V1PC1-1635	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10088: [RETAIN Policy 11.]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
3.11.4.1 Working with others	V1PC1-1607	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10089: [RETAIN Method 3.11.4.1.]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
3.11.4.2 Certified Industry Scheme	V1PC1-1608	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10090: [RETAIN Method 3.11.4.2.]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
3.11.4.3 Farm Environment Plans	V1PC1-1609	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10091: [RETAIN Method 3.11.4.3]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
3.11.4.5 Sub-catchment scale planning	V1PC1-1636	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10108: [AMEND Method 3.11.4.5: "Waikato Regional Council will work with others to develop sub-catchment scale plans <u>and decision support tools</u> (where a catchment plan <u>or tool</u> does not already exist) where it has been shown to be required. Sub-catchment scale planning will: a. Identify the causes of current water quality decline, identify cost-effective measures to bring about reductions in contaminant discharges, and coordinate the reductions required at a property, enterprise and sub-catchment scale (including recommendations for funding where there is a public benefit identified). b. Align works and services to reduce nitrogen, phosphorus, sediment and microbial pathogen discharges including riparian management, targeted reforestation, constructed wetlands, sediment traps and sediment detention bunds. c. Assess and determine effective and efficient placement of constructed	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1

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			<p>wetlands at a sub-catchment scale to improve water quality.</p> <p>d. Support research that addresses the management of wetlands, including development of techniques to monitor ecological change and forecasting evolution of wetland characteristics resulting from existing land use in the wetland catchments.</p> <p>e. Integrate the regulatory requirements to fence waterways with the requirements for effective drainage scheme management.</p> <p>f Coordinate funding of mitigation work by those contributing to water quality degradation, in proportion to that contribution.</p> <p>g. Utilise public funds to support edge of field <u>or catchment scale</u> mitigations where those mitigations provide significant public benefit.</p> <p><u>h. In support of method 3.11.4.7, utilise (and coordinate the management of) public funds to share the cost of constructing decision support tools meeting the criteria specified in Schedule 1C Table XX."</u>]</p>	
3.11.4.6 Funding and implementation	V1PC1-1610	Support	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10109: [RETAIN Method 3.11.4.6.]</p>	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.7 Information needs to support any future allocation	V1PC1-1637	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10110: [AMEND Method 3.11.4.7 to read: "a. Implementing processes that will support the setting of property or enterprise-level diffuse discharge limits in the future. b. Researching <u>and making publicly available</u>: i. The quantum of contaminants that can be discharged at a sub-catchment and Freshwater Management Unit scale while meeting the Table 3.11-1 water quality attribute targets <u>and/or sub-catchment load targets identified Schedule 1C Table XX</u>. ii. Methods to categorise and define 'land suitability'. iii. Tools for measuring or modelling discharges from individual properties, enterprises and sub-catchments, and how this can be related to the Table 3.11-1 water quality attribute targets <u>and/or sub-catchment load targets identified Schedule 1C Table XX</u>. c. Prior to Jan 2019, by working with the Foundation of Arable Research, Horticulture New Zealand and The Pukekohe Vegetable Growers Association to develop a proxy nitrogen reference point for enterprises <u>managing multiple properties and crops using a model or method approved by the Chief Executive of Waikato Regional Council."</u>]</p>	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	V1PC1-1597	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-10111: [RETAIN Method 3.11.4.8.]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
3.11.4.9 Managing the effects of urban development	V1PC1-1598	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-10112: [AMEND Method 3.11.4.9 to read: "Waikato Regional Council will: a. Continue to work with territorial authorities to implement the Waikato Regional Policy Statement set of principles that guide future development of the built environment which anticipates and addresses cumulative effects over the long term <u>including avoiding the degradation of freshwater resources and discharge of contaminants from urban activities into the urban environment.</u> b. When undertaking sub-catchment scale planning under Method 3.11.4.5 in urban sub-catchments engage with urban communities to raise awareness of water quality issues, and to identify and implement effective solutions for the urban context. <u>c. Assess the contribution of contaminants to waterbodies from urban areas over time to ensure that urban discharges are accounted for, to allow responsibility for managing urban discharges to be allocated.</u> <u>d. In evaluating (c) above, publicly report the assessment of contributions and their assessed effect on values for freshwater identified in this plan change."</u> ]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
3.11.4.10 Accounting system and monitoring	V1PC1-1638	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10113: [AMEND Method 3.11.4.10 to read: "Waikato Regional Council will establish and operate a publicly available accounting system and monitoring in each Freshwater Management Unit, including: a. Collecting information on nitrogen, phosphorus, sediment and microbial pathogen levels in the respective fresh water bodies in each Freshwater Management Unit from:	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1

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			<p>i. Council's existing river monitoring network; and</p> <p>ii. Sub-catchments that are currently unrepresented in the existing monitoring network; and</p> <p>iii. Lake Freshwater Management Units.</p> <p>b. Using the information collected to establish the baseline data for compiling a monitoring plan and to assess progress towards achieving the Table 11-1 water quality attribute targets and</p> <p>c. Using state of the environment monitoring data including biological monitoring tools such as the Macroinvertebrate Community Index to provide the basis for identifying and reporting on long-term trends; and</p> <p><u>ca. Produce a framework model for the greater Waikato River and surrounding land using the best available data, that can be adapted to include new decision support tools at the sub-catchment level.</u></p> <p>d. An information and accounting system for the diffuse discharges from properties and enterprises that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at <del>a</del> <u>sub-catchment</u>, enterprise or property scale."]</p>	
3.11.4.11 Monitoring and evaluation of the implementation of Chapter 3.11	V1PC1-1611	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10114: [RETAIN Method 3.11.4.11]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
3.11.4.12 Support research and dissemination of best practice guidelines to reduce diffuse discharges	V1PC1-1612	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10115: [RETAIN Method 3.11.4.12]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
3.11.5 Rules	V1PC1-1614	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10162: [ADD the following rule: " <u>Rule 3.11.5.X - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective</u> <u>The management of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens onto or into land by a catchment collective in</u>	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1



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			<p><u>circumstances which may result in those contaminants entering water is a restricted discretionary activity (requiring resource consent).</u>  <u>Waikato Regional Council restricts its discretion over the following matters:</u></p> <p><u>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u>  <u>11. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u>  <u>iii. Achieving the contaminant load reduction targets specified for each for sub-catchment in Schedule 1C Table XX</u>  <u>iv. The matter set out in Schedule 1C Catchment Collectives.</u>  <u>v. The term of the resource consent. Minimum 15 years.</u>  <u>vi. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</u>  <u>vii. The timeframe and circumstances under which the consent conditions may be reviewed.</u>  <u>viii. The matters addressed by Schedules A and C and the Nitrogen Reference Point being:</u>  <u>1. In conformance with Schedule B; or</u>  <u>2. Determined through use of proxy farm systems to approximate the nitrogen reference for the catchment collective; or</u>  <u>3. Through modelling a series of collective mitigations that are estimated sufficient to meet the load limit targets, in accordance with the criteria in schedule 1C.</u>  <u>Notification:</u>  <u>Consent applications will be considered without notification, and without the need to obtain written approval of affected persons"]</u></p>	
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	V1PC1-1613	Support	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-10116: [RETAIN Rule 3.11.5.1.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ’s ORIGINAL SUBMISSION ON PPC1</b>
3.11.5.6 Restricted Discretionary Activity Rule – The use of land	V1PC1-902	Not stated	AMEND Rule 3.11.5.6 as follows: Rule 3.11.5.6 - Restricted Discretionary Activity Rule - <del>The use of land for Discharges from</del> farming activities AND ADD under the following paragraph: The use of the land for farming activities that does not comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen,	<b>OPPOSE</b> reference to “discharges” only within the introduction to the rule. If the rules are to be clearly identified as “hybrid” rules this needs to be made clear.

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for farming activities			<p>phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water is a restricted discretionary activity (requiring resource consent).</p> <p><u>Discharges related to the use of land for farming activities that either:</u></p> <p><u>a) cannot comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water; or</u></p> <p><u>b) is for new commercial vegetable cropping that can demonstrate a lesser effect from the contaminant discharge compared with the existing activity (when the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are considered together).</u></p> <p>AND ADD an additional sub-clause to read:</p> <p><u>viii. With respect to applications made under 3.11.5.6 b) the relevant clauses of Policy 3.</u></p> <p><u>Footnote: 7 All except clause b of Policy 3.</u></p> <p>AND ADD a NEW Rule:</p> <p><u>Rule 3.11.5.X - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective.</u></p> <p><u>The management of diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens onto or into land by a catchment collective in circumstances which may result in those contaminants entering water is a restricted discretionary activity (requiring resource consent).</u></p> <p><u>Waikato Regional Council restricts its discretion over the following matters:</u></p> <p><u>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</u></p> <p><u>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</u></p> <p><u>iii. Achieving the contaminant load reduction targets specified for each sub-catchment in Schedule 1C Table XX.</u></p> <p><u>iv. The matter set out in Schedule 1C Catchment Collectives.</u></p> <p><u>v. The term of the resource consent. Minimum 15 years.</u></p> <p><u>vi. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</u></p> <p><u>vii. The time frame and circumstances under which the consent conditions may be reviewed.</u></p>	

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			<p>viii. <u>The matters addressed by Schedules A and C and the Nitrogen Reference Point being:</u></p> <ol style="list-style-type: none"> <li>1. <u>In conformance with Schedule B; or</u></li> <li>2. <u>Determined through use of proxy farm systems to approximate the nitrogen reference for the catchment collective; or</u></li> <li>3. <u>Through modelling a series of collective mitigations that are estimated sufficient to meet the load limit targets, in accordance with the criteria in schedule 1C.</u></li> </ol> <p><u>Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons.</u> <u>OR if Restricted Discretionary status is not deemed appropriate,</u> <u>AMEND to provide for these activities as full Discretionary rules.</u></p>	
<p>3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities</p>	<p>V1PC1-1640</p>	<p>Support with amendments</p>	<p>APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-10149: [AMEND Rule 3.11.5.6 to read: "Rule 3.11.5.6 - Restricted Discretionary Activity Rule - <del>The use of land for</del> <u>Discharges from</u> farming activities <u>Discharges related to the use of land for farming activities that either:</u></p> <ol style="list-style-type: none"> <li><u>a. <del>does not</del>cannot comply with the conditions, standard or terms of Rules 3.11.5.1 to 3.11.5.5 and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens onto or into land in circumstances which may result in those contaminants entering water <del>is a restricted discretionary activity (requiring resource consent);</del> or</u></li> <li><u>b. is for new commercial vegetable cropping that can demonstrate a lesser effect from the contaminant discharge compared with the existing activity (when the diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens are considered together);</u> <u>Is a restricted discretionary activity (requiring resource consent).</u></li> </ol> <p>Waikato Regional Council restricts its discretion over the following matters:</p> <ol style="list-style-type: none"> <li>i. Cumulative effects on water quality of the catchment of the Waikato and Waipā Rivers.</li> <li>ii. The diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens.</li> <li>iii. The need for and the content of a Farm Environment Plan.</li> <li>iv. The term of the resource consent.</li> <li>v. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent.</li> </ol>	<p><b>REFER TO FURTHER SUBMISSION ON HortNZ’s ORIGINAL SUBMISSION ON PPC1</b></p>

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			vi. The time frame and circumstances under which the consent conditions may be reviewed. vii. The matters addressed by Schedules A, B and C. viii. <u>With respect to applications made under 3.11.5.6(b), the relevant clauses of Policy 3 (except Policy 3(b))</u> Notification: Consent applications will be considered without notification, and without the need to obtain written approval of affected persons."	
3.11.5.7 Non-Complying Activity Rule – Land Use Change	V1PC1-1603	Oppose with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10169: [AMEND Rule 3.11.5.7(4) to read: "4. Any land use to commercial vegetable production <u>that cannot be provided for through Rule 3.11.5.5, 3.11.5.6(b), or 3.11.5.X</u> <del>except as provided for under standard and term g. of Rule 3.11.5.5"</del> Or AMEND Rule 3.11.5.7 (4) to read: "4. Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5, <u>3.11.5.6 b, or 3.11.5.X"</u> ]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
Schedule B - Nitrogen Reference Point	V1PC1-1601	Oppose	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10190: [AMEND Schedule B to ensure that alternatives to the OVERSEER Model are available to calculate the Nitrogen Reference Point for the arable and commercial vegetable sector. AND AMEND to simplify the protocol for the use of Overseer in the following manner: "A. The Nitrogen Reference Point must be calculated by <u>a person who is certified as being competent to do so, with a certification being approved by the Chief Executive of the Waikato Regional Council</u> <del>Certified Farm Nutrient Advisor</del> to determine the amount of nitrogen being leached from the property or enterprise during the relevant reference period specified in clause f), except for any land use change approved under Rule 3.11.5.7 where the Nitrogen Reference Point shall be determined through the Rule 3.11.5.7 consent process. B. The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period specified in clause f), except for commercial vegetable production in which case the Nitrogen Reference Point shall be the average annual nitrogen leaching loss <u>in kilograms per hectare per year</u> during the reference period.	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1

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			<p>C. The Nitrogen Reference Point must be calculated using the current version of the OVERSEER® Model, <u>APSIM or SPASMO</u> (or any other model approved by the Chief Executive of the Waikato Regional Council).</p> <p>D. The Nitrogen Reference Point data shall comprise the electronic output file from the OVERSEER®, <u>APSIM or SPASMO</u>, or other approved model, and where the OVERSEER Model is used, it must be calculated using the OVERSEER Best Practice Data Input Standards 2016, with the exceptions and inclusions set out in Schedule B Table 1.</p> <p>...</p> <p>G. The following records (where relevant to the land use undertaken on the property or enterprise) must be retained and <del>provided</del> <u>available for inspection by the</u> Waikato Regional Council at its request:</p> <p>i. Stock numbers <del>as recorded in annual accounts</del> together with stock sale and purchase invoices;</p> <p>...</p> <p>vi. <u>The representative range of c</u>Crops grown on the land; and</p> <p>vii. Horticulture crop diaries and NZGAP records."]</p>	
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-1641	Support with amendments	<p>APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-10215:</p> <p>[ADD a NEW Schedule 1C to provide for sub-catchment scale solutions AND ADD a NEW Schedule 1C to read as follows:</p> <p><u>"Schedule 1C - Requirements for a sub-catchment scale management plan applying to Rule 3.11.5.X iv - Restricted Discretionary Activity Rule - The management of contaminants from farming activities by a catchment collective.</u></p> <p><u>A sub-catchment scale management plan (SSMP) shall be prepared in accordance with the requirements below.</u></p> <p><u>1) The (SSMP) must be approved by the Regional Council Chief Executive before an application under Rule 3.11.5.X can be granted by the Council.</u></p> <p><u>2) The SSMP must meet or exceed the expected reduction in discharges to freshwater that would be achieved through completing and implementing a farm or enterprise scale farm environment plan in accordance with Schedule 1 and Schedule 1b. The achievement in reduction of discharges must be comparable when considered over all of the properties and enterprises managed by the SSMP.</u></p> <p><u>3) The SSMP must be the responsibility of a legal entity that is accountable for achieving compliance with the conditions of a resource consent issued under Rule 3.11.5.X.</u></p>	<p><b>REFER TO FURTHER SUBMISSION ON HortNZ’s ORIGINAL SUBMISSION ON PPC1</b></p>

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			<p><u>4) The SSMP must be supported by a decision support tool that is able to be utilised as the accounting framework for the relevant sub-catchment. The decision support tool must:</u></p> <p><u>a) Calibrate discharges and hydrological flows to observed monitoring sites within the catchment. The calibration must achieve at least achieve a 'Satisfactory' criteria for a daily model with NSE - 0.6, % bias- +/- 25% and the decision support tool must be capable of continuous upgrade and improvement.</u></p> <p><u>b) Be capable of integrating with other sub-catchment, freshwater management unit and catchment scale accounting systems.</u></p> <p><u>c) Be able to measure mitigations for microbial, sediment, nitrogen and phosphorus discharges at all scales within the domain of the decision support tool to a standard approved by peer review agent approved by the Chief Executive of the Regional Council.</u></p> <p><u>d) Be made available to the Council for use in assessing compliance with the load limit targets for the relevant sub-catchment listed in Schedule 1C Table XX.</u></p> <p><u>5) The SSMP must clearly identify how any specified consent condition will be complied with.</u></p> <p><u>6) The SSMP shall contain as a minimum:</u></p> <p><u>a) The name of the legal entity registered with the Waikato Regional Council. Information provided by the Council from registration between 1 Sep 2018 and 31 March 2019.</u></p> <p><u>b) A legal description of all properties and enterprises the legal entity described in Schedule 1C 3) above have legal authority to act on behalf of.</u></p> <p><u>c) A description of the nature of enterprises, farms and properties and the domain of the SSMP.</u></p> <p><u>d) An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the activities within the SSMP domain, and the priority of those identified risks, having regard to sub-catchment load targets in Schedule 1C Table XX below.</u></p> <p><u>e) A schedule of approved mitigation actions and target completion dates."</u></p> <p><u>AND ADD Schedule 1C Table XX referred to in the submission.]</u></p>	
Schedule 1 - Requirements for Farm	V1PC1-1646	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12435: [AMEND Schedule 1 to split commercial vegetable cropping farm plans into a new Schedule 1B	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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Environment Plans			<p>AND DELETE the vegetable growing minimum standards from Schedule 1 AND ADD a NEW Schedule 1B to read as follows:  <u>"Schedule 1B - Requirements for Farm Environment Plans for commercial vegetable production enterprises</u>  <u>1. A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner (commercial vegetable production).</u>  <u>2. The construction of a farm plan does not require duplication of material within existing farm environment plans that are considered sufficient for purpose by a Certified Farm Environment Planner (commercial vegetable production).</u>  <u>3. Farm plans are not required to duplicate material provided to Waikato Regional Council for the purpose of complying with other rules in the plan.</u>  <u>4. Farm Plans will not be incorporated into consent conditions as a whole; but matters of control or discretion will include relevant actions committed to by the consent holder.</u>  <u>5. The Farm Environment Plan shall identify key risk areas for the discharge of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants where practicable.</u>  <u>The Farm Environment Plan must clearly identify how any specified consent condition will be complied with.</u>  <u>A Farm Environment Plans shall contain as a minimum:</u>  <u>1. The name of the legal entity registered with the Waikato Regional Council.</u>  <u>2. Information provided by the Council from registration between 1 Sep 2018 and 31 March 2019.</u>  <u>3. A description of the enterprise, detailing the general rotational cropping system. properties owned, leased and otherwise farmed on over time. This will include the legal description for each parcel of land.</u>  <u>4. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks, having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include:</u></p>	

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			<p><u>a. A risk assessment for nutrient discharges that is approved by a Certified Farm Environment Planner (commercial vegetable crops). The risk assessment should be equivalent to the process outlined in Section 4 of the Horticulture New Zealand Code of Practice for Nutrient Management Version 1.0 August 2014.</u></p> <p><u>b. A risk assessment for soil conservation purposes, that is approved by a Certified Farm Environment Planner (commercial vegetable crops). The risk assessment should be equivalent to the process outlined in Section 1 of the Horticulture New Zealand Erosion &amp; Sediment Control Guidelines for Vegetable Production Version 1.1 June 2014.</u></p> <p><u>c. If manures are used, undertake a microbiological discharge risk assessment.</u></p> <p><u>5. If stock are present on land managed within the enterprise, provisions of Schedule 1 relating to the farming of animals apply. If stock are present a risk assessment for stock related discharges must be undertaken .</u></p> <p><u>6. A schedule of mitigation actions and target completion dates derived from the risk assessments undertaken in 4 and 5 above.</u></p> <p><u>7. Vegetable Growing Minimum Standards Farm environment plans required under Rule 3.11.5.5, 3.11.5.6b, or 3.11.5.X shall, in addition to the matters set out above, ensure the following matters are addressed."</u></p> <p>AND INCLUDE the table for Vegetable Growing Minimum Standards as laid out in the submission.]</p>	
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-1647	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12436:</p> <p>[AMEND Schedule 1 to read:</p> <p>"A Farm Environment Plan shall be prepared in accordance with the requirements of A below. The Farm Environment Plan shall be certified as meeting the requirements of A by a Certified Farm Environment Planner.</p> <p><del>The Farm Environment Plan shall identify all sources of sediment, nitrogen, phosphorus and microbial pathogens, and identify actions, and timeframes for those actions to be completed, in order to reduce the diffuse discharges of these contaminants.</del></p> <p>The Farm Environment Plan must clearly identify how specified minimum standards will be complied with.</p> <p>The requirements set out in A apply to all Farm Environment Plans, including those prepared within a Certified Industry Scheme. <u>A separate</u></p>	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>



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			<p><u>schedule has been prepared for commercial vegetable cropping systems and plans prepared by catchment collectives.</u></p> <p>This Schedule 1 applies to all farming activities <u>other than commercial vegetable cropping systems</u>, but it is acknowledged that some provisions will not be relevant to every farming activity.</p> <p>...</p> <p>2. An assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens associated with the farming activities on the property, and the priority of those identified risks, having regard to sub-catchment targets in Table 3.11-1 and the priority of lakes within the sub-catchment. As a minimum, the risk assessment shall include (where relevant to the particular land use):</p> <p>...(b) A description of setbacks and riparian management, including:</p> <p>... (iii). The provision of minimum cultivation setbacks of 5 metres <u>and/or any other practicable measures considered necessary in an erosion and sediment control plan.</u></p> <p>(c) A description of the critical source areas from which sediment, nitrogen, phosphorus and microbial pathogens are lost, including:</p> <p>(i) the identification of intermittent waterways, overland flow paths, <u>cultivated land</u> and areas prone to flooding and ponding, and an assessment of opportunities to minimise losses from these areas through appropriate stocking policy, stock exclusion and/or measures to detain floodwaters and settle out or otherwise remove sediment, nitrogen, phosphorus and microbial pathogens (e.g. detention bunds, sediment traps, natural and constructed wetlands); and</p> <p>...</p> <p>(iii) an assessment of the risk of diffuse discharge of sediment, nitrogen, phosphorus and microbial pathogens from <u>cultivated land</u>, tracks and races and livestock crossing structures to waterways, and the identification of appropriate measures to minimise these discharges (e.g. cut-off drains, and shaping); and</p> <p>...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>(a) The boundaries of the property; and</p> <p>(b) The locations of the <del>main</del> relevant land uses <u>activities</u> that occur on the property;</p> <p>...</p> <p>5. A description of the following:</p>	

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			(b) Where the Nitrogen Reference Point exceeds the 75th percentile nitrogen leaching value, actions, timeframes and other measures to ensure the diffuse discharge of nitrogen is reduced so that it does not exceed the 75th percentile nitrogen leaching value by 1 July 2026, <del>except in the case of Rule 3.11.5.5."</del> ]	
Schedule 2 - Certification of Industry Schemes	V1PC1-893	Not stated	DELETE from Schedule 2 as follows: The application must demonstrate that the Certified Industry Scheme: <del>1. Is consistent with:</del> <del>a. the achievement of the water quality targets referred to in Objective 3;</del> <del>and</del> <del>b. the purpose of Policy 2 or 3; and</del> <del>c. the requirements of Rules 3.11.5.3 and 3.11.5.5.</del> AND ADD a new sub-clause under 3 a.) as follows: 3. Has documented systems, processes and procedures to ensure: <u>a.) Competency assessment and checks for people who generate and subsequently monitor Farm Environment Plans in line with the relevant industry qualifications as agreed with Waikato Regional Council.</u>	<b>SUPPORT in part, to the extent that the decision sought is consistent with the reasons for submission explained above..</b>
Schedule 2 - Certification of Industry Schemes	V1PC1-1599	Not stated	APPLY to V1 the decision requested in accordance with the submitter's PPC1 submission PC1-10224: [The application must demonstrate that the Certified Industry Scheme: <del>"1. Is consistent with:</del> <del>a) the achievement of the water quality targets referred to in Objective 3;</del> <del>and</del> <del>b) the purposes of Policy 2 or 3; and</del> <del>c) the requirements of Rules 3.11.5.3 and 3.11.5.5.</del> <del>21. Has an appropriate ownership structure, governance arrangements and management.</del> <del>32. Has documented systems, processes, and procedures to ensure:</del> <del>a) Competency assessment and checks for people who generate and subsequently monitor Farm Environment Plans in line with the relevant industry qualifications as agreed with Waikato Regional Council</del> <del>a) Competent and consistent performance in Farm Environment Plan preparation and audit.</del> <del>b) Effective internal monitoring of performance.</del> <del>c) Robust data management.</del> <del>d) Timely provision of suitable quality data to Waikato Regional Council.</del> <del>e) Timely and appropriate reporting.</del> <del>f) Corrective actions will be implemented and escalated where required,</del>	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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			<p>including escalation to Waikato Regional Council if internal escalation is not successful.</p> <p>gh) Internal quality control.</p> <p>hi) The responsibilities of all parties to the Certified Industry Scheme are clearly stated.</p> <p>ij) An accurate and up to date register of scheme membership is maintained.</p> <p>jk) Transparency and public accountability of Certified Industry Schemes</p> <p>kl) The articles of the scheme are available for public viewing.</p> <p><b>B. People</b></p> <p>The application must demonstrate that:</p> <ol style="list-style-type: none"> <li>1. Those generating and auditing Farm Environment Plans are suitably qualified and experienced.</li> <li>2. Auditing of Farm Environment Plan requirements is independent of the Farm Environment Plan preparation and approval.</li> </ol> <p><b>C. Farm Environment Plans</b></p> <p>The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1 or 1B." ]</p>	
Additions to Glossary of Terms	V1PC1-1642	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10227:</p> <p>[ADD a NEW definition for Catchment Collectives to read:</p> <p><u>"Definition - Catchment collective</u></p> <p><u>Catchment collective: means a group of enterprises or properties in multiple ownership, where the owners of those enterprises or properties undertake farming activities and operate as a collective for the purposes of contaminant management."</u></p> <p>AND ADD a NEW definition for Certified Farm Environment Planner (Commercial Vegetable Production) to read:</p> <p><u>"Certified Farm Environment Planner (Commercial Vegetable Production)</u></p> <p><u>Certified Farm Environment Planner (Commercial Vegetable Production): is a person or entity certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a Certified Farm Environment Planner (Commercial Vegetable Production) and has as a minimum the following qualifications and experience:</u></p> <ol style="list-style-type: none"> <li>a. <u>Tertiary qualifications in agronomy or agricultural engineering</u></li> <li>b. <u>More than 15 years' experience working with commercial vegetable cropping systems</u></li> </ol>	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

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			<u>c. A certificate of competence approved by the Waikato Regional Council relating to the relevant aspects of environmental farm plan assessment"</u> AND ADD new definition for Sub-catchment Scale Management Plans to read: "Sub-catchment Scale Management Plan (SSMP) <u>Sub-catchment Scale Management Plan (SSMP): means a sub-catchment scale plan for that sets out actions and responsibilities for a Catchment Collective (representing all or part of a sub-catchment) for the purposes of contaminant management that meets or exceeds the expected reduction in discharge to freshwater that would otherwise be achieved through a Farm Environment Plan."</u> ]	
Definition - Best management practice	V1PC1-1615	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10225: [RETAIN the definition of Best Management Practice/s.]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
Definition - Certified Farm Nutrient Advisor	V1PC1-1604	Oppose with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10235: [AMEND the definition of Certified Farm Nutrient Advisor to read: "Certified Farm Nutrient Advisor: is a person certified by the Chief Executive Officer of Waikato Regional Council and listed on the Waikato Regional Council website as a certified farm nutrient advisor and has the following <u>competencies</u> qualifications and experience: a. Has <del>completed nutrient management training to at least intermediate level, sufficient agronomic knowledge to conduct the assessment of a budget for the farm or enterprise, and</del> b. Has <del>experience in nutrient management planning the appropriate level of experience in the modelling tool utilised to develop the nutrient budget."</del> ]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
Definition - Commercial vegetable production	V1PC1-1643	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10231: [REMOVE asparagus from the definition of Commercial vegetable production.]	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1
Definition - Enterprise	V1PC1-1644	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10232: [AMEND the definition of Enterprise/s to read: "Enterprise/s: means one or more parcels of land <u>(or parts of parcels of land)</u> held in single or multiple ownership <u>to support the primary production activities undertaken</u> <del>principle land use or land which the</del>	REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1

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			<del>principle land use is reliant upon, and constitutes a single operating unit for the purposes of management. An enterprise is considered to be within a sub-catchment if more than 50% of that enterprise is within the sub-catchment."</del>	
Definition - Good Management Practice	V1PC1-1616	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10233: [RETAIN the definition of Good Management Practice/s.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>
Definition - Nitrogen Reference Point	V1PC1-1645	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10234: [RETAIN the definition of Nitrogen Reference Point that provides for the establishment of an alternative method or model to establish a benchmark nitrogen and phosphorus discharge for commercial vegetable production systems.]	<b>REFER TO FURTHER SUBMISSION ON HortNZ's ORIGINAL SUBMISSION ON PPC1</b>

# Tuwharetoa Maori Trust Board

Submitter ID: 73356

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	V1PC1-1397	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10256: [RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u> , discharges of nitrogen..."]	<b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1</b>
Policy 6: Restricting land use change	V1PC1-1400	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10297: [AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will <del>generally</del> not be granted. Land use change consent... that demonstrate <del>clear and enduring</del> <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted. <u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants.</u> "]	<b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1 [OPPOSE]</b>
Policy 7: Preparing for allocation in the future	V1PC1-1401	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10301: [AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime</u> . ... c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> <u>any new approach</u> ..." AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:..	<b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			c. the natural capacity of the landscape <u>within a sub-catchment</u> to attenuate contaminant loss; and..." ]	
3.11.4 Implementation methods	V1PC1-1416	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10466: [ADD a NEW Method to read: " <u>3.11.4.13 Decision support system</u> <u>The Waikato Regional Council working with regional stakeholders will:</u> <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u> <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a <b>sub-catchment, property and enterprise</b> level - to reducing the diffuse discharge of contaminants within the sub-catchment where <b>property</b> and/or <b>enterprise</b> is located."</u> ]	<b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.3 Farm Environment Plans	V1PC1-1408	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10392: [AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised monitoring programme</u> and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) <del>and monitoring of Farm Environment Plans</del> and a randomised method for the selection of Farm Environment Plans." ]	<b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.10 Accounting system and monitoring	V1PC1-1414	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10443: [AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each..." ]	<b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			<p>c. Using state of the... monitoring data including biological monitoring tools... Community Index and Cultural Health Index to provide the basis for...</p> <p>d. <del>An information</del> A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale..."</p>	
3.11.5.2 Permitted Activity Rule – Other farming activities	V1PC1-1418	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10485: [AMEND Rule 3.11.5.2 by ADDING the words: "<u>Note: Rule 3.11.5.2 shall be the subject of a detailed effectiveness review at 2020 and 2024.</u>"]</p>	REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	V1PC1-939	Support	<p>RETAIN the V1 amendments to Rule 3.11.5.3(5)(a) and (b).</p>	REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1
3.11.5.3 Permitted Activity Rule – Farming activities with a Farm Environment Plan under a Certified Industry Scheme	V1PC1-1419	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10487: [AMEND Rule 3.11.5.3 to read: "Except as provided for... 7. The Farm Environment Plan <del>provided</del> <u>approved</u> under Condition 5 may..." AND ADD "<u>Note: For the purpose of Rule 3.11.5.3, any property or enterprise that is deemed by the Council to be non-compliant shall be considered subject to Rule 3.11.5.6.</u>" OR AMEND Rule 3.11.5.3 to be a controlled activity with the matters of control being set out in amended Schedule 2. AND AMEND to ensure the Waikato and Waipā River Iwi are notified of all applications to Waikato Regional Council for Certified Industry Schemes.]</p>	REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1
3.11.5.7 Non-Complying Activity Rule – Land Use Change	V1PC1-1396	Support	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10511: [RETAIN Rule 3.11.5.7.]</p>	REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1 [OPPOSE]



Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
Schedule B - Nitrogen Reference Point	V1PC1-1422	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10554:</p> <p>[AMEND Schedule B to read: "A property or enterprise with a...</p> <p>b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u><del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period</del>(specified in clause f)...</p> <p>f. The reference period is <u>an average of the five years between the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1)</u><del>the two financial years covering 2014/2015 and 2015/2016</del>, except for commercial vegetable..."</p> <p>AND AMEND Table 1 to read:</p> <p>'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:</p> <ul style="list-style-type: none"> <li>(ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks on the farm by different classes of livestock.</u>"</li> </ul> <p>ADD to the third Column, the words: "<u>Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5.</u>"</p> <p>Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times.</u>"</p> <p>Third column, "<u>Accurate animal weights are difficult to obtain and prove but those operators who manage and collect verifiable weights should be able to use them.</u>"</p> <p>Soil description, second column, "<u>For dairy systems use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available.</u>"</p> <p>ADD to the third column "To ensure consistency between areas... that don't <u>for the purposes of developing the Nitrogen Reference Point 75th percentile.</u>"</p>	<p><b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1</b></p>
Schedule 1 - Requirements for Farm	V1PC1-1424	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10592:</p> <p>[AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain...</p> <p>1.c. A list of land parcels which...</p>	<p><b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1</b></p>

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Environment Plans			<p>the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) <del>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and...</del></p> <p>iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u></p> <p>2. An assessment of the risk of diffuse discharge.. farming activities on the property <u>or enterprise</u>, and the priority of...</p> <p>a. A description of where and how...</p> <p>i. the <u>location and</u> provision of fencing and livestock...</p> <p>ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative...</p> <p>c. A description of the critical source areas...</p> <p>i. the identification of intermittent waterways, <u>wetlands</u>, overland flow paths... to minimise losses <del>from</del> <u>to</u> these areas through...</p> <p>e. A description of nutrient management practices...</p> <p>i. a nutrient budget...Waikato Regional Council; <u>and</u></p> <p>ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u></p> <p>f. A description of cultivation management...</p> <p>d. <u>Establishing and</u> maintaining appropriate buffers...</p> <p>3. A spatial risk map(s) at a scale that clearly shows:</p> <p>a. The boundaries of the property <u>or enterprise</u> (if different);and...</p> <p>4. A <u>detailed</u> description of the <u>following</u>:  <u>Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u></p> <p>5. A <u>detailed</u> description of the following:  a. <u>Mitigation</u> actions, timeframes and other...</p> <p>6. <u>A programme of works that sets out:</u>  a. <u>The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u>  i. <u>Record of inspection by Waikato Regional Council staff or;</u>  ii. <u>Record of inspection by Certified Industry Scheme staff; and</u>  iii. <u>Record of audit by independent third party accredited auditor.</u></p>	

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			<p><u>7. A version control table that sets out the date of any amendment to the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u></p> <p><u>8. A declaration from the Certified Farm Environment Planner confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."</u></p>	
Schedule 2 - Certification of Industry Schemes	V1PC1-1425	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10620: [AMEND Schedule 2, Assessment Criteria to read: "A. Certified Industry Scheme System</p> <p>The application must <u>clearly demonstrate that the...</u></p> <p>a. <del>the achievement of</del>the water quality targets referred to...</p> <p>c. the requirements of Rules 3.11.5.3 and 3.11.5.5; <u>and</u></p> <p>d. <u>the magnitude of contaminant reductions that are required for the sub-catchment/s - where the Certified Industry Scheme operates - through the coordination of Farm Management plans managed by the Certified Industry Scheme.</u></p> <p>2. Has an appropriate ownership structure, governance arrangements and management <u>(including capacity and capability to undertake the coordinated management of Farm Management Plans.</u></p> <p>3. <u>Has the in-house capability to coordinate the collective mitigation measures identified in the Farm Management Plans managed by the Certified Industry Scheme and to communication with external stakeholders.</u></p> <p>4. <u>Has the appropriate resources to achieve its function and responsibilities under 1(a), including monitoring, auditing and reporting.</u></p> <p>3-5. Has documented systems, processes, and...</p> <p>a. <u>Competent and consistent performance in preparing robust Farm Environment Planspreparation, including implementation, and auditing and monitoring.</u></p> <p>b. <u>Effective internal monitoring of performance, including procedures for the review and random sampling of Farm Environment Plans to target farming operations identified as being a higher risk to water quality, or as required by the Waikato Regional Council.</u></p> <p>c. <u>Robust data management (both spatial and temporal)..</u></p> <p>d....</p> <p>e. <u>Timely and appropriate detailed reporting, including (but not limited to):</u></p>	<p><b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1</b></p>

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			<p><u>i. progress with putting in place and implementing mitigation actions from Farm Environment Plans within the Certified Industry Scheme; and</u></p> <p><u>ii. current versus modelled or expected outcomes from the Certified Industry Scheme consistent with (1)(a).</u></p> <p>f. Corrective actions will be implemented <u>where auditing reveals non-compliance with putting in place and implementing mitigation actions identified in Farm Environment Plans.</u></p> <p><u>g. Agreed process for escalating continued and deliberate inaction or non-compliance of a member of the Certified Industry Scheme to Waikato Regional Council, including (but not limited to) revocation of the member from the Certified Industry Scheme.</u></p> <p>h. Internal quality control <u>and verification.</u></p> <p>i. The responsibilities <u>and accountability</u> of all parties to the Certified Industry Scheme are clearly stated <u>and enforced...</u></p> <p>j. An accurate and up to date register of scheme membership is <u>established and maintained ...</u></p> <p>k. ...</p> <p>1. The articles of the scheme, <u>including its register of membership</u> are available for public viewing.</p> <p>B. People</p> <p>The application must demonstrate...</p> <p>1. <del>Those</del><u>The nominated parties responsible for generating and auditing Farm Environment Plans are Certified Farm Environment Planners</u><del>suitably qualified and experienced.</del></p> <p>2. <u>Auditing of Farm Environment Plans - prepared under the Certified Industry Scheme - requirements will be undertaken by the parties that are accredited auditors</u> and independent of the Farm...</p> <p>c. Farm Environment Plans</p> <p>The application must demonstrate that Farm Environment Plans are prepared in conformance with Schedule 1."</p> <p>Or</p> <p>AMEND Rule 3.11.5.3 so that farming activities with a Farm Environment Plan under a Certified Industry Scheme are a Controlled Activity subject to the assessment criteria in Schedule 2.]</p>	
Table 3.11-1: Short term and long term numerical water	V1PC1-1398	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10257:	<b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1</b>

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quality targets for the Waikato and Waipa River catchments			<p>[DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment.</p> <p>AND review the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge.</p> <p>AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments.</p> <p>AND RETAIN the 80-year numerical targets for Chlorophyll <i>a</i> for the Waikato River main stem only.</p> <p>AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem.</p> <p>AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.]</p>	
Definition - Enterprise	V1PC1-1426	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-10629:</p> <p>[AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u>, and constitutes a single..."]</p>	<p><b>REFER TO FURTHER SUBMISSION ON TUWHARETOA MAORI TRUST BOARD'S ORIGINAL SUBMISSION ON PPC1</b></p>

## Waikato and Waipā River Iwi

Submitter ID: 74035

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
General	V1PC1-696	Support	RETAIN the general direction that is articulated through PPC1 as varied by V1. AND RETAIN the increased controls on land use to 'hold the line' and prevent future land use intensification. AND RETAIN the staged approach articulated through PPC1.	REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1 [OPPOSE]
General	V1PC1-728	Not stated	No specific decision requested for V1, however the submitter notes that this submission supplements their previous submission to PPC1 and to the extent required the PPC1 submission is repeated for the purposes of V1.	REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1
General	V1PC1-1234	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-4742: [RETAIN and AMEND PPC1 as detailed in the specific submission points.]	REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1
Objective 1: Long-term restoration and protection of water quality for each sub-catchment and Freshwater Management Unit	V1PC1-1192	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3245: [RETAIN the 80-year timeframe in Objective 1. AND AMEND Objective 1 to read: "By 2096, <u>at the latest, or sooner where practicable</u> , discharges of nitrogen..."]	REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1 [OPPOSE]
Objective 2: Social, economic and cultural wellbeing is maintained in the long term	V1PC1-1193	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3248: [AMEND Objective 2 to read: "Objective 2: Social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> is maintained in the long term... Waikato and Waipā communities... enables the people and communities, <u>in particular the Waikato and Waipā River Iwi</u> , to continue to provide for their social, economic, <u>spiritual</u> and cultural well-being <u>and prosperity</u> ."] ]	REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1 [OPPOSE] Not appropriate to single out one part of the community in the objective.
Policy 6: Restricting land use change	V1PC1-1199	Support with	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3315:	REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1 [OPPOSE]

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		amendments	<p>[AMEND Policy 6 to read: "Except as provided for in... that demonstrate a <u>sustained</u> increase in the... microbial pathogens will <del>generally</del> not be granted.</p> <p>Land use change consent... that demonstrate <del>clear and enduring</del> <u>identified and sustained</u> decreases in existing... or microbial pathogens will generally be granted.</p> <p><u>For the purpose of Policy 6 'sustained' means an identified long-term decrease in the discharge of one or more of the four contaminants while allowing for low frequency, short duration and temporary fluctuations - caused by natural variability and seasonal/cyclical natural processes - in one or more of the four contaminants.</u>"]</p>	
Policy 7: Preparing for allocation in the future	V1PC1-1235	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3320:</p> <p>[AMEND Policy 7 to read: "Prepare for further diffuse discharge reductions and <del>any</del> future property or... pathogens that <del>will</del> <u>may</u> be required by... that will assist in <del>defining 'land suitability'</del> <u>preparing any new allocation or management regime.</u> ...</p> <p>c. Minimise social disruption and costs in transition to <del>the 'land suitability'</del> <u>any new approach...</u>"</p> <p>AND AMEND Footnote 5 to read: "Future mechanisms for allocation based on land suitability <del>will</del> <u>may</u> consider the following criteria:..</p> <p>c. the natural capacity of the <del>landscape</del> <u>within a sub-catchment</u> to attenuate contaminant loss; and..."</p>	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1 [SUPPORT]</b>
3.11.4 Implementation methods	V1PC1-1216	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3519:</p> <p>[ADD a NEW Method to read: "<u>3.11.4.13 Decision support system</u>  <u>The Waikato Regional Council working with regional stakeholders will:</u>  <u>a. Develop a Decision Support System (DSS) to model the effectiveness of mitigation measures that are proposed to be put in place and implemented at a sub-catchment, property and enterprise level through any proposed Farm Environment Plan.</u>  <u>For the purpose of Method 3.11.4.13, 'effectiveness' means the contribution of the proposed mitigation measures (whether individually or collectively) - that are put in place and implemented at a <b>sub-catchment, property and enterprise</b> level - to reducing the diffuse discharge of contaminants within the sub-catchment where <b>property</b> and/or <b>enterprise</b> is located.</u>"]</p>	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1 [SUPPORT]</b>

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3.11.4.3 Farm Environment Plans	V1PC1-1209	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3409: [AMEND Method 3.11.4.3 to read: "Waikato Regional Council will prepare... and microbial pathogens and specify <u>the range of relevant mitigation</u> actions to reduce those risks <del>in order</del> to bring about reductions... develop guidance for <u>undertaking</u> risk assessments,... Waikato Regional Council will... Farm Environment Plans, starting with <del>more</del> <u>standardised</u> monitoring programme and then <u>potentially</u> moving to <u>less frequent</u> monitoring based <u>on</u> risk assessment <u>and the outcome of previous monitoring results.</u> <u>Waikato Regional Council will prepare an audit schedule for undertaking</u> robust third party audit (independent of the farmer and Certified Farm Environment Planner) <u>and monitoring of Farm Environment Plans and a randomised method for the selection of Farm Environment Plans.</u> "]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.5 Sub-catchment scale planning	V1PC1-1211	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3418: [Method 3.11.4.5 the development of coordinated sub-catchment planning is supported. Coordinated planning across a spatially discrete area will motivate landowners to actively participate in Farm Environmental Planning.]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.10 Accounting system and monitoring	V1PC1-1226	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3425: [AMEND Method 3.11.4.10 to read: "3.11.4.10 <u>Freshwater</u> accounting system and monitoring <u>network</u> ... Waikato Regional Council will establish... publicly available <u>freshwater</u> accounting system and monitoring <u>network</u> in each... c. Using state of the... monitoring data including <del>biological</del> monitoring tools... Community Index <u>and Cultural Health Index</u> to provide the basis for... d. <del>An information</del> <u>A freshwater accounting system that accounts for the diffuse discharges that supports the management of nitrogen, phosphorus, sediment and microbial pathogens diffuse discharges at the enterprise or property scale...</u> "]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.11 Monitoring and evaluation of the	V1PC1-1214	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3428: [AMEND Method 3.11.4.11 to read: "3.11.4.11 <u>Plan effectiveness</u> monitoring and evaluation of the implementation..."]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1</b>



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implementation of Chapter 3.11			a. <del>Review and report</del> Report on the progress towards and achievement of the <u>10-year (Objective 3) and 80-year (Objective 1) water quality objectives of Chapter 3.11 targets in 2020 and 2024.</u> AND DELETE 3.11.4.11 b.]	
3.11.5.2 Permitted Activity Rule – Other farming activities	V1PC1-1188	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3522: [AMEND Rule 3.11.5.2 by ADDING the words: " <u>Note: Rule 3.11.5.2 shall be the subject of a detailed effectiveness review at 2020 and 2024.</u> "]	REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1
3.11.5.7 Non-Complying Activity Rule – Land Use Change	V1PC1-1190	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3526: [RETAIN Rule 3.11.5.7.]	REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1
Schedule B - Nitrogen Reference Point	V1PC1-1229	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3530: [AMEND Schedule B to read: "A property or enterprise with a... b. The Nitrogen Reference Point shall be <u>the average nitrogen leaching loss that occurred during the reference period</u> <del>highest annual nitrogen leaching loss that occurred during a single year (being 12 consecutive months) within the reference period</del> (specified in clause f)... f. The reference period is <u>an average of the five years between the five financial years spanning 2011/12 to 2015/16 (as consistent with the five year rolling average in 5(a) in Schedule 1)</u> <del>the two financial years covering 2014/2015 and 2015/2016, except for commercial vegetable...</del> " AND AMEND Table 1 to read: 'Animal distribution - relative productivity pastoral only' second column: "Use 'no differences between blocks' with the following exceptions:  <ul style="list-style-type: none"> <li>(ADD a third bullet point) <u>Where the farm has verifiable farm operational data that is capable of showing the relative use of various blocks on the farm by different classes of livestock.</u>"</li> </ul> ADD to the third Column, the words: " <u>Where verification is possible relative difference should be allowed to be used to encourage smart land use and production systems consistent with Policy 5.</u> "	REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			Animal weights, second column, "Only use OVERSEER defaults - do not enter in weights and... (national averages). <u>Except where the farm has verifiable digital data of stock weights at the appropriate times.</u> " Third column, " <u>Accurate animal weights are difficult to obtain and prove but those operators who manage and collect verifiable weights should be able to use them.</u> " Soil description, second column, " <u>For dairy systems use Soil Order - obtained from S-Map or where S-Map is unavailable from LRI 1:50,000 data or a soil map of the farm. For all other land uses use the best verifiable information available.</u> " ADD to the third column " <u>To ensure consistency between areas... that don't for the purposes of developing the Nitrogen Reference Point 75th percentile.</u> "	
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-1221	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3563: [AMEND Schedule 1 to read: "A. Farm Environment Plan shall contain... 1.c. A list of land parcels which... i. the physical street address and ownership of each parcel of land (if different from the person responsible for the property or enterprise) <del>and any relevant farm identifiers such as the dairy supply number, Agribase identification number, valuation reference; and ...</del> iii. <u>The relevant identifiers such as the rapid number, dairy supply number, Agribase identification number, valuation reference.</u> 2. An assessment of the risk of diffuse discharge.. farming activities on the property <del>or enterprise,</del> and the priority of... a. A description of where and how... i. the <u>location and</u> provision of fencing and livestock... ii. for areas with a slope... is impracticable, the <u>location and</u> provision of alternative... c. A description of the critical source areas... i. the identification of intermittent waterways, <u>wetlands</u> , overland flow paths... to minimise losses <del>from</del> <u>to</u> these areas through... e. A description of nutrient management practices... i. a nutrient budget...Waikato Regional Council; <u>and</u> ii. <u>an assessment of the assumptions used in a nutrient budget for the property and an opinion on material differences.</u> f. A description of cultivation management... d. <u>Establishing and</u> maintaining appropriate buffers...	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			3. A spatial risk map(s) at a scale that clearly shows: a. The boundaries of the property <u>or enterprise (if different)</u> ; and... 4. A <u>detailed</u> description of the <u>following</u> : <u>Mitigation actions, timeframes and other measures to reduce the diffuse discharges of phosphorus, sediment and microbial pathogens that will be undertaken in response to the risks identified in the risk assessment in 2 above (having regard to their relative priority) as well as where the mandatory time-bound actions will be undertaken, and when and to what standard they will be completed.</u> 5. A <u>detailed</u> description of the following: a. <u>Mitigation</u> actions, timeframes and other... 6. A <u>programme of works that sets out</u> : <u>a. The timeframe for putting in place and implementing the mitigation actions identified in (4) and (5) including:</u> i. <u>Record of inspection by Waikato Regional Council staff or;</u> ii. <u>Record of inspection by Certified Industry Scheme staff; and</u> iii. <u>Record of audit by independent third party accredited auditor.</u> 7. A <u>version control table that sets out the date of any amendment to the Farm Environment Plan and the content of the amendment to the Farm Environment Plan.</u> 8. A <u>declaration from the Certified Farm Environment Planner confirming the best available and most accurate information was use for the promulgation and design of mitigation actions."</u> ]	
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-1231	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3250: [DELETE from Table 3.11-1 the 80-year numerical targets for nitrate-nitrogen and ammoniacal nitrogen that are expressed in each sub-catchment AND review the 10-year numerical attribute targets for nitrate-nitrogen and ammoniacal nitrogen to fix errors and achieve greater consistency between sub-catchments so that the degree of reduction required is proportionate to the amount of current discharge AND RETAIN the 80-year numerical targets for E.coli and water clarity for the Waikato River main stem and sub-catchments AND RETAIN the 80-year numerical targets for Chlorophyll <i>a</i> for the Waikato River main stem only AND RETAIN the 10-year Total Nitrogen and Total Phosphorous targets for the Waikato River main stem	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> Oppose / Support / Reasons/ Decision requested <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
			AND AMEND the 80-year Total Nitrogen and Total Phosphorous targets to a single point at the bottom of each Freshwater Management Unit.]	
Definition - Enterprise	V1PC1-1223	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3674: [AMEND the definition of Enterprise to read: "Enterprise/s: means one or more parcels...land use is reliant upon, <u>including associated land uses</u> , and constitutes a single..."]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO AND WAIPA RIVER IWI ORIGINAL SUBMISSION ON PPC1</b>

# Waikato Regional Council

Submitter ID: 72890

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-199	Support with amendments	AMEND Policy 2 to provide further guidance for timeframes associated with identified mitigation actions.	<b>SUPPORT in part.</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-207	Support with amendments	AMEND Policy 2(d) to refer to "water quality improvement required in the sub-catchment, Freshwater Management Unit (FMU) or catchment as appropriate".	<b>SUPPORT in part.</b>
Policy 2: Tailored approach to reducing diffuse discharges from farming activities	V1PC1-1485	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-2997: [RETAIN Policy 2 AND AMEND Policy 2 to make it explicit that those dischargers who exceed the 75th percentile nitrogen leaching value, must reduce their nitrogen losses to the 75th percentile.]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1 [oppose]</b>
Policy 3: Tailored approach to reducing diffuse discharges from commercial vegetable production systems	V1PC1-202	Support with amendments	AMEND Policy 3 to provide further guidance for timeframes associated with identified mitigation actions.	<b>SUPPORT in part.</b>
Policy 3: Tailored approach to reducing diffuse discharges from commercial	V1PC1-208	Support with amendments	AMEND Policy 3(g) to refer to "water quality improvement required in the sub-catchment, Freshwater Management Unit (FMU) or catchment as appropriate".	<b>SUPPORT in part.</b>

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vegetable production systems				
Policy 6: Restricting land use change	V1PC1-1503	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3005: [AMEND Policy 6 to read: "Except as provided for in Policy 16, land use change consent applications that demonstrate an increase in the diffuse discharge of nitrogen, phosphorus, sediment or microbial pathogens <u>compared with what was occurring at 22 October 2016</u> , will generally not be granted. Land use change consent applications that demonstrate clear and enduring decreases in <del>existing</del> diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens <u>compared with what was occurring at 22 October 2016</u> , will generally be granted."]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1 [OPPOSE]</b>
Policy 7: Preparing for allocation in the future	V1PC1-1488	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3006: [RETAIN Policy 7.]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1 [OPPOSE]</b>
3.11.4 Implementation methods	V1PC1-1493	Support	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3101: [AMEND 3.11.4 the provisions related to nitrogen management so that the methods can be implemented. AND AMEND the provisions related to commercial vegetable production so that the methods can be implemented.]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>
3.11.4.5 Sub-catchment scale planning	V1PC1-1511	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3106: [AMEND Method 3.11.4.5 to read: "Waikato Regional Council will work with others to develop ... where it has been shown to be required. Sub-catchment scale planning <del>will</del> <u>may</u> ..." AND AMEND Method 3.11.4.5 (e) to read: "Integrate the regulatory requirements to fence waterways water bodies with the requirements for effective drainage scheme management." AND DELETE Method 3.11.4.5 (f) in its entirety. AND REPLACE Method 3.11.4.5 (f) with: " <u>Develop funding models for sub-catchment planning processes and mitigation actions where an individual's contribution to funding is proportional to their contribution to sub-catchment contaminant discharges.</u> "]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>

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3.11.4.8 Reviewing Chapter 3.11 and developing an allocation framework for the next Regional Plan	V1PC1-1512	Support with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-3111: [AMEND Method 3.11.4.8 (b) to read: “Use this to inform future changes... to meet the <u>water quality attribute ^ targets^</u> in <u>Table 3.11-1the Objectives</u> ”]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL’S ORIGINAL SUBMISSION ON PPC1 [OPPOSE]</b>
3.11.5.1 Permitted Activity Rule – Small and Low Intensity farming activities	V1PC1-214	Support with amendments	AMEND Rule 3.11.5.1 to specifically provide for the cutting and removing of grass for hay, silage or disposal.	<b>SUPPORT</b>
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	V1PC1-1516	Support with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-3420: [AMEND Rule 3.11.5.4 to ensure that the registration dates and Nitrogen Reference Point requirements are required 12 months after decisions are released on PPC1 AND AMEND Rule 3.11.5.4 to include a specific requirement that land users must farm such that when their farming activities are modelled in OVERSEER®, the Overseer nitrogen leaching loss does not exceed the Nitrogen Reference Point for the property AND AMEND to introduce provisions throughout PPC1 to enable the reassignment of Nitrogen Reference Point entitlements between properties when new land is incorporated into a property AND DELETE all references in PPC1 to the '5 year rolling average' (Rule 3.11.5.4 and Schedule 1) AND MAKE any consequential amendments to delete the definition in the Glossary in Part C AND AMEND to use the Nitrogen Reference Point as a yardstick to indicate the relative amount of nitrogen being lost from a property AND AMEND Rule 3.11.5.4(iii) to read: "The actions, timeframes and other...the property or enterprise’s Nitrogen Reference Point, <del>unless other suitable mitigations are specified.</del> " OR alternatively AMEND Rule 3.11.5.4(iii) and Schedule 1 to provide more clarity regarding how the discretion available in this provision, should be exercised	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL’S ORIGINAL SUBMISSION ON PPC1</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
			AND AMEND Rule 3.11.5.4(5) to require compliance with the Nitrogen Reference Point in the period during which the property owner is permitted under this rule AND AMEND to require compliance with Schedule B AND AMEND Rule 3.11.5.4 and Schedule B to delete the ability for an enterprise to hold a Nitrogen Reference Point and restrict the Nitrogen Reference Point to exist only in association with a particular parcel or property AND AMEND Rule 3.11.5.4 to provide for a more refined staging of resource consent applications over each of the three year period in each priority order but remain with the priority order in Table 3.11-2 AND AMEND Rule 3.11.5.4(5)(c) to read: "A Nitrogen Reference Point has been produced for the property <del>or enterprise in conformance to comply</del> with Schedule B and <del>is has been</del> provided to the Waikato Regional Council at the time the resource consent application is lodged..." AND AMEND Rule 3.11.5.4(4) to add a new item to read: " <u>The use of land for farming activities complies with Schedule C.</u> " AND AMEND Rule 3.11.5.4(5)(d) to read: " <u>The use of land for farming activities</u> <del>attle, horses, deer and pigs are excluded from water bodies in conformance with</del> <u>complies</u> with Schedule C." AND AMEND Rule 3.11.5.4 to re-number 4 and 5 to become a. and b. and remove the indent on the paragraph starting with 'after the dates...']	
3.11.5.6 Restricted Discretionary Activity Rule – The use of land for farming activities	V1PC1-1518	Support with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-3477: [AMEND Rule 3.11.5.6 by adding a new matter over which Council reserves its discretion to read: " <u>viii. Consistency with the Objectives and Policies of the Waikato Regional Plan or proposed regional plan.</u> "]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL’S ORIGINAL SUBMISSION ON PPC1</b>
3.11.5.7 Non-Complying Activity Rule – Land Use Change	V1PC1-1519	Support with amendments	APPLY decision requested in accordance with the submitter’s PPC1 submission PC1-3480: [AMEND Rule 3.11.5.7 to read: " <del>Notwithstanding any other rule in the Plan</del> <u>Except as authorised under rules 3.11.5.1, 3.11.5.2, 3.11.5.3 and 3.11.5.4</u> any of the following changes..." OR alternatively	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL’S ORIGINAL SUBMISSION ON PPC1 [OPPOSE]</b>



Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
			<p>AMEND Rule 3.11.5.7 to exclude from its scope, changes of land use that occur within properties or enterprises as existing at the date of notification of the Plan</p> <p>AND AMEND Rule 3.11.5.7 (4) to read: "Any land use to commercial vegetable production except as provided for under standard and term g. of Rule 3.11.5.5 <u>or a consent granted under Rule 3.11.5.6.</u>"</p> <p>AND AMEND Rule 3.11.5.7: Notification to read: "Consent applications will be considered without notification,... will be lower than that from the <del>existing land use</del> <u>land use as at 22 October 2016.</u>"</p> <p>AND AMEND Rule 3.11.5.7 to read: "Notwithstanding any other rule in this plan, any of the following changes in the <u>ongoing use... property or enterprise and the associated diffuse discharge of nitrogen, phosphorus, sediment and microbial pathogens on or into land in circumstances which may result in those contaminants entering water</u> located in the Waikato and Waipā River catchments..."</p> <p>AND AMEND Rule 3.11.5.7(2) to read: "Any <del>livestock grazing other than dairy farming</del> <u>land use, except for commercial vegetable production to dairy farming:</u>"</p> <p>AND DELETE Rule 3.11.5.7(3) in its entirety.]</p>	
Schedule B - Nitrogen Reference Point	V1PC1-1494	Support	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3553:</p> <p>[AMEND Schedule B to remove the ability for an enterprise to hold a Nitrogen Reference Point, and restrict the Nitrogen Reference Point to exist only in association with a particular parcel or property.</p> <p>AND AMEND to clarify whether it is the current, intended, or previous land use that determines the appropriate nitrogen reference period to use.</p> <p>AND AMEND clause a. to read: "The Nitrogen Reference Point must be <del>calculated</del> <u>approved</u> by a Certified Farm Nutrient Advisor..."</p> <p>AND AMEND clause b. to read: "The Nitrogen Reference Point shall be the highest annual nitrogen leaching loss that occurred during a single <u>financial year (being 12 consecutive months)</u> within the reference..."</p> <p>AND AMEND clause d. to read: "...and where the OVERSEER® Model is used, it must be calculated using the Overseer® Best Practice Data input standards <del>2016</del> <u>that relate to the version of the Overseer® model being used</u>, with the exceptions and inclusions set out in schedule B table 1."</p> <p>AND AMEND clause f. to read: "The <del>Nitrogen Reference</del> <u>Period</u> is the two... except <u>where the primary land use is</u> for commercial vegetable production in which case the reference period is 1 July 2006 to 30 June</p>	<p><b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b></p>

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			<p>2016 or such lesser, relevant period if the land was used for commercial vegetable production during only part of that period."            AND AMEND Schedule B clause g. to read: "...            i. <del>Stock numbers as recorded in annual accounts together with stock sale and purchase invoice</del>Records of stock numbers and stock classes, births and deaths, stock movement on and off the property, grazing records and transport records;            ii. Dairy production data;            iii. <del>Invoices for fertiliser applied to the land</del>Records of fertiliser type and amount, application rates and fertiliser placement records;            iv. <del>Invoices for</del>Records of feed supplements and amount sold or purchased, and records of supplements grown and fed on farm;            v. Water use records for irrigation (to be averaged over 3 years or longer) in order to determine irrigation application rates mm/ha/month per irrigated block, and proof of areas irrigated (for Overseer® block setup);            vi. <del>Records of crops grown on the land and grazed including area and yield, and including cultivation and sowing records where available; and</del>            vii. <u>A map detailing the location and area of land used for effluent irrigation;</u>            viii. <del>iii.</del> Horticulture crop diaries and NZGAP records.            ix. <u>Soil test data – including anion storage capacity</u>            x. <u>A map detailing the property boundaries, areas including block (management) areas and retired areas, and the total area of non-productive areas; and</u>            xi. <u>Certificate of title and legal description.</u>"            AND ADD an advice note to read: "<u>Advice note: For the avoidance of doubt, financial information contained within the above records may be redacted (blacked out) prior to it being provided to Waikato Regional Council.</u>"            AND AMEND Schedule B Table 1 by deleting the existing Table 1 and replace with the new Table 1 in Appendix A to the submission.            AND AMEND Schedule B clause d to read: "...with the <u>settings that must be used complying with exceptions and inclusions set out in</u> Schedule B Table 1. <u>Where another approved model is used, it will conform to the data input standards as approved by the Chief Executive of the Waikato Regional Council.</u>"]</p>	
Schedule C - Stock exclusion	V1PC1-1521	Support with	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3571:	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>

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		amendments	<p>[AMEND Schedule C to ensure that it is not inconsistent with the national regulations and to ensure that together they provide for the most efficient and effective approach to stock exclusion.</p> <p>AND ADD at the end of Schedule C an advisory note to read: "<u>A reference to a river includes a reference to a stream.</u>"</p> <p>AND AMEND Schedule C to ensure consistency with Schedule 1 stock exclusion requirements.</p> <p>AND AMEND Schedule C: Exclusions to read: "The following situations are excluded from <del>clauses 1 and 2</del><u>clause 3.</u>"</p> <p>AND AMEND Schedule C clause 5 to read: "For land use authorised... Farm Environment Plan, <u>prepared in accordance with Schedule 1</u>, which shall be within 3 years..."]</p>	
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-1522	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3575:</p> <p>[DELETE Schedule 1 references to the 5 year rolling average and instead measure compliance based on whether the proposed mitigation actions listed in a Farm Environment Plans are completed.</p> <p>AND AMEND Schedule 1 clause 2 (e) to read: "A description of nutrient management practices including... using the model OVERSEER® in accordance with the OVERSEER® <u>data input standards and Table 1: Schedule Base protocols</u>, or using any other model or method approved ...."</p> <p>AND AMEND Schedule 1: Vegetable growing minimum standards Row 5 of the table Soil/Phosphorus to read: "As a minimum by block: <del>an approved</del> <u>approved</u> erosion and sediment control plan <del>constructed</del> <u>compiled by the Certified Farm Environment Planner</u> in accordance with the Erosion and Sediment Control Guidelines for Vegetable Production June 2014"</p> <p>AND AMEND Schedule 1 clause 5(a) to read: "Actions, timeframes and other measures.... or enterprise's Nitrogen Reference Point <del>unless other suitable mitigations are specified.</del>"</p> <p>OR AMEND 3.11.5.4(iii) and Schedule 1 to provide more clarity regarding how the discretion available in this provision, should be exercised.]</p>	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>
Schedule 1 - Requirements for Farm Environment Plans	V1PC1-1537	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-12544:</p> <p>[AMEND Schedule 1 to simplify the numbering</p> <p>AND AMEND to reflect the standards/terms/conditions in the rules</p> <p>OR DELETE the references to some of the minimum standards in Schedule 1</p>	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> Oppose / Support / Reasons/ Decision requested <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
			OR AMEND to reflect the standards as 'best management practice' recommendations rather than firm requirements AND AMEND to renumber Schedule 1 clause " <del>2(f)(ii)(e)</del> " to clause " <u>2(g)</u> " AND AMEND to renumber clause " <del>2(f)(ii)(f)</del> " to clause " <u>2(h)</u> " AND AMEND Schedule 1 clause 4 to read: "A description of the actions... (having regard to their relative priority <u>and to the need for proportionality as specified in Policy 2(d) and 3(g)</u> ) as well as where the mandatory..." AND AMEND Schedule 1 clause 2(b)(ii) to read: "Where practicable the provision... for land with a slope of <del>less</del> less than 15°..."	
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-1523	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3635: [AMEND Table 3.11-1: Dune, Riverine, Volcanic and Peat Lakes freshwater Management Units on page 67, by adding two new columns to provide targets for Annual Median and Annual Maximum Ammonia as per NPSFM - Band C for 80 year target AND AMEND Table 3.11-1 by adding a footnote to read: " <u>that the annual median and annual maximum ammonia have been adjusted for pH.</u> " AND AMEND either the Methods or Table 3.11-1 Explanatory note to Table 3.11-1 to get alignment between the attribute Clarity in Table 3.11-1 and references to sediment in the Methods AND AMEND Table 3.11-1 to combine the three tables into one table, OR provide different captions and individual numbering for each table AND AMEND to place the table caption directly above the table AND AMEND Table 3.11-1 to read: "Waerenga Stm <del>SH2</del> Maramarua <u>Taniwha Rd.</u> " AND AMEND to rename Lake Opouri as Lake Ngapouri in Table 3.11-1 Dune, Riverine, Volcanic and Peat Lakes Freshwater Management Units (last section, on page 67, list the names of the lakes and their catchments, as is the case for all other entries in the table AND AMEND Table 3.11-1 to take into account the Bay of Plenty Regional Council water quality standards for those parts of the Waikato and Waipā River Catchment area that overlap with and drain into the Lake Rotorua Catchment AND AMEND to rename the Volcanic Lake category in a way that is relevant to some aspect of the character of the lakes in the category.]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>
Additions to Glossary of Terms	V1PC1-1528	Support with	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3666:	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	FURTHER SUBMISSION Oppose / Support / Reasons/ Decision requested NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.
		amendments	<p>[ADD a NEW definition to the Glossary to read "<u>Current version of OVERSEER® is the version of the Overseer® Model with the most recent release date.</u>"</p> <p>AND ADD to the Glossary a new definition for Nitrogen Reference Period to read: "<u>...is a property's or enterprise's 2014/15 and 2015/16 financial years, except for properties or enterprises where the principle land use is commercial vegetable production, in which case the nitrogen reference period is the period commencing with the property's or enterprise's 2006/7 financial year and ending with its 2015/16 financial year.</u>"</p> <p>AND ADD to the Glossary a new definition for Nitrogen Reference Period Data to read: "<u>is the set of verified OVERSEER input parameters for each of the financial years of the nitrogen reference period.</u>"</p> <p>AND ADD to the Glossary a new definition for Nitrogen Reference Point Data to read: "<u>is the verified Overseer input parameters for the single financial year of the nitrogen reference period that when modelled in the version of Overseer current at 1 April 2019 results in the highest nitrogen leaching rate.</u>"</p> <p>AND ADD to the Glossary in Chapter 3.11 a specific definition for urban properties.</p> <p>AND ADD a NEW definition to the Glossary for Wetland to read: "For the purposes of Chapter 3.11 includes permanently or intermittently wet areas, shallow water, and land water margins that support <del>a natural ecosystem of plants and animals</del> that are adapted to wet conditions."]</p>	
Definition - 75th percentile nitrogen leaching value	V1PC1-1526	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3664:</p> <p>[AMEND the Glossary definition of 75th percentile nitrogen leaching value to clarify the method for calculating the 75th percentile.</p> <p>AND AMEND to include in the definition that this calculation will be undertaken once at a single point in time.</p> <p>AND AMEND the Glossary definition of 75th percentile nitrogen leaching value to clarify that a 75th percentile nitrogen leaching value will only be established for each of the four riverine Freshwater Management Units, and will apply to any lake catchments within each riverine Freshwater Management Unit.]</p>	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>
Definition - Best management practice	V1PC1-1527	Support with amendments	<p>APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3665:</p>	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> <b>Oppose / Support / Reasons/ Decision requested</b> <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
			[AMEND the Glossary definition of best management practice to make it clear that the term includes mitigation that can also be achieved through changes to management practices.]	
Definition - Edge of field mitigation	V1PC1-1529	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3667: [AMEND the Glossary definition of Edge of field mitigation/s to clarify which actions or technologies will be considered for funding in Method 3.11.4.5(g). AND AMEND to clarify the definition of edge of field in the definition section.]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>
Definition - Enterprise	V1PC1-230	Support with amendments	AMEND the last sentence of the definition of "Enterprise" to read: "An enterprise is considered to be within a sub-catchment if the greatest proportion of that enterprise is within the sub-catchment".	<b>SUPPORT in part, to the extent that the decision sought is consistent with the reasons for submission explained above.</b>
Definition - Enterprise	V1PC1-1530	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3671: [AMEND the Glossary definition of Enterprise to clarify the scope and nature of an enterprise. AND AMEND the definition of Enterprise to read: " <u>for the purposes of Chapter 3.11, means one or more parcels...</u> " AND DELETE the words " <del>principle</del> " and replace with " <u>principal</u> ".]	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>
Definition - Nitrogen Reference Point	V1PC1-1532	Support with amendments	APPLY decision requested in accordance with the submitter's PPC1 submission PC1-3673: [AMEND the Glossary definition of Nitrogen Reference Point to read: "The nitrogen loss number (units of kg N/ha/year) that is derived from an OVERSEER use protocol compliant OVERSEER® file that describes the property or farm enterprise and farm practices in an agreed year or years developed by a Certified Farm Nutrient Advisor, using the current version of the OVERSEER® model (or another model approved by the Council) for the property or enterprise at the "reference" point in time. is: <u>1) For commercial vegetable production, the average nitrogen leaching rate (in kilograms of nitrogen per hectare per year) predicted by modelling the nitrogen reference period data in the current version of OVERSEER®.</u>  <u>2) For all other land uses, the nitrogen leaching rate (in kilograms of nitrogen per hectare per year) predicted by modelling the Nitrogen Reference Point data in the current version of Overseer®.</u> "	<b>REFER TO FURTHER SUBMISSION ON THE WAIKATO REGIONAL COUNCIL'S ORIGINAL SUBMISSION ON PPC1</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	<b>FURTHER SUBMISSION</b> Oppose / Support / Reasons/ Decision requested <b>NOTE: Reasons and decision sought (allow or disallow) are as stated above. Additional detail may be provided in this column, where considered appropriate or necessary.</b>
			AND AMEND the Glossary definition of Nitrogen Reference Point, to include changes that result from the incorporation of new land into a property and which are approved by the Council.]	

## Wairakei Pastoral Ltd

Submitter ID: 74095

Plan Section	Submission Point ID	Support or Oppose	Decision requested	Further submission Oppose / Support / Reason
General	V1PC1-701	Not stated	AMEND V1 so objectives, policies and methods (including rules) designed for managing water quality in the stretch of the Waikato River above Ohaaki-Ohakuri are focused on "maintaining" overall freshwater quality in the sub-catchment.	<b>SUPPORT</b>
General	V1PC1-998	Not stated	No decision requested for V1, however, the submitter supports a sub-catchment based approach.	<b>SUPPORT</b>
Water quality and National Policy Statement for Freshwater Management	V1PC1-999	Not stated	ADD to PPC1, that the stretch of the Waikato River catchment between the Lake Taupo control gates and Ohaaki-Ohakuri should be typified as a 'river'.	<b>SUPPORT</b>
Reasons for adopting Objective 1	V1PC1-648	Support with amendments	ADD the following words at the end of Reasons for adopting Objective 1: <u>While all objectives are potentially relevant, individual objectives will only apply where they are relevant in the context of specific resource consent applications. All six objectives will not apply in every case.</u>	<b>SUPPORT</b>
Reasons for adopting Objective 4	V1PC1-649	Oppose with amendments	ADD the following words at the end of Reasons for adopting Objective 4: <u>While adaptive management approaches will be relevant during the short-term, they will also remain equally relevant during the long-term for achieving anticipated environmental outcomes. Accordingly, Objective 4 speaks both to the current plan period and to the future beyond that, and is therefore not limited temporally by reference to a specific time period only. Effectively, the short-term should merge seamlessly with the long-term and adaptive management approaches should (where relevant) be used throughout.</u>	<b>SUPPORT</b>
3.11.5.2 Permitted Activity Rule – Other farming activities	V1PC1-672	Oppose with amendments	AMEND Rule 3.11.5.2 to read: 5. For all properties greater than 4.1 hectares, <del>from</del> <u>on or before</u> 30 November 2020, in addition to the requirements of Schedule A, the following information must be provided to the Waikato Regional Council by 1 September each year: a. Annual stock numbers; and b. Annual fertiliser use; and c. Annual brought in animal feed.	<b>SUPPORT</b>
3.11.5.3 Permitted Activity Rule – Farming activities with a	V1PC1-676	Oppose with amendments	AMEND Rule 3.11.5.3 to read: 5. A Farm Environment Plan which has been prepared in accordance with Schedule 1 and has been approved by a Certified Farm Environment Planner, is provided to the Waikato Regional Council as follows:	<b>SUPPORT</b>



Plan Section	Submission Point ID	Support or Oppose	Decision requested	Further submission Oppose / Support / Reason
Farm Environment Plan under a Certified Industry Scheme			a. <del>By On or before</del> 1 March 2022 for properties or enterprises within Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value; b. <del>By On or before</del> 1 March 2025 for properties or enterprises within Priority 2 sub-catchments listed in Table 3.11-2;	
3.11.5.4 Controlled Activity Rule – Farming activities with a Farm Environment Plan not under a Certified Industry Scheme	V1PC1-678	Oppose with amendments	AMEND Rule 3.11.5.4(1) and (2) to read: ...circumstances which my result in those contaminants entering water is a permitted activity until: 1. 1 September 2021 ( <u>or before</u> ) for properties or enterprises in Priority 1 sub-catchments listed in Table 3.11-2, and properties or enterprises with a Nitrogen Reference Point greater than the 75th percentile nitrogen leaching value; 2. 1 September 2024 ( <u>or before</u> ) for properties or enterprises in Priority 2 sub-catchments listed in Table 3.11-2; AND, as a consequence, AMEND Rule 3.11.5.4 Dates to read: I. For Priority 1 sub-catchments, and properties <u>or enterprises</u> with a Nitrogen Reference Point of greater than 75th percentile nitrogen leaching value, <del>by on or before</del> 1 March 2022 II. For Priority 2 sub-catchments, <del>by on or before</del> 1 March 2025 AND AMEND the "dates" in Rule 3.11.5.4(3) for the priority 3 sub-catchments in a similar way as a consequence.	<b>SUPPORT</b>
Schedule A - Registration with Waikato Regional Council	V1PC1-687	Oppose with amendments	AMEND Schedule A(1) to read: 1. Registration <del>must may occur between 1 May 2020 and at anytime before 30 November 2020</del> <u>but all relevant properties and enterprises must (at least) be registered by that date.</u>	<b>SUPPORT</b>
Schedule B - Nitrogen Reference Point	V1PC1-688	Oppose with amendments	AMEND Schedule B(e) to read: e. The Nitrogen Reference Point and the Nitrogen Reference Point data must <u>either</u> be provided to Waikato Regional Council within the period 1 May 2020 to 30 November 2020 <u>or in any resource consent application filed at any time before 30 November 2020.</u>	<b>SUPPORT</b>
Table 3.11-1: Short term and long term numerical water quality targets for the Waikato and Waipa River catchments	V1PC1-689	Support	RETAIN Table 3.11-1 OR AMEND by similar text.	<b>SUPPORT</b>

Plan Section	Submission Point ID	Support or Oppose	Decision requested	Further submission Oppose / Support / Reason
Definition - 75th percentile nitrogen leaching value	V1PC1-692	Support with amendments	<p>AMEND the Definition of 75th percentile nitrogen leaching value by including (inter alia) express methods for Waikato Regional Council to advise all land owners in any FMU when the 75th percentile nitrogen leaching value has been exceeded and as to what voluntary action they should all take as a result.</p> <p>AND AMEND the Definition of 75th percentile nitrogen leaching value so that this provision is only interpreted on an aggregate basis (when deciding any resource consent application) regarding the subject land area pertaining to the relevant application.</p>	<b>SUPPORT in part</b>